

Assigned for all purposes to: Spring Street Courthouse, Judicial Officer: Audra Mori

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Darrell Caldwell p/k/a Drakeo The Ruler, through his guardian ad litem Tianna Purtue

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**

15 CAIDEN CALDWELL, a minor, as
16 Successor-In-Interest to the Estate of Darrell
Caldwell p/k/a Drakeo The Ruler, through his
17 guardian ad litem Tianna Purtue,

18 Plaintiff,

19 vs.

20 LIVE NATION WORLD WIDE, INC., C3
PRESENTS, LLC, BOBBY DEE
21 PRESENTS, INC., MAJOR LEAGUE
SOCCER, LLC a/k/a LOS ANGELES
22 FOOTBALL CLUB a/k/a LAFC, JEFF
SHUMAN, and DOES 1 to 100,

23 Defendants.

15 **CASE NO. 22STCV04087**

16 **COMPLAINT FOR DAMAGES:**

- 17 1. NEGLIGENCE – WRONGFUL DEATH, CCP §377.60
- 18 2. SURVIVAL – WRONGFUL DEATH CCP §377.32;
- 19 3. PREMISES LIABILITY – WRONGFUL DEATH;

20 **DEMAND FOR JURY TRIAL**

25 Plaintiff, Caiden Caldwell, a minor, as Successor-In-Interest to the Estate of Darrell Caldwell
26 p/k/a Drakeo The Ruler (the “Decedent,” “Caldwell” or “Drakeo The Ruler”), through his guardian ad
27 litem Tianna Purtue complain of the Defendants Live Nation World Wide, Inc., C3 Presents, LLC,
28

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1 Bobby Dee Presents, Inc., Major League Soccer, LLC a/k/a Los Angeles Football Club a/k/a LAFC, Jeff
2 Shuman, Does 1 through 100, and each of them, and for a cause of action, alleges as follows:

3
4 **INTRODUCTION**

5 1. This wrongful death action arises out of the Saturday, December 18, 2021 incident that
6 occurred in the backstage transport lot area of the “Once Upon A Time in LA” music festival (“Music
7 Festival”), held at the Banc of California Stadium in Los Angeles, California, which resulted in the
8 murder of the beloved Los Angeles native, 28-year-old hip hop recording artist Darrell Caldwell p/k/a
9 Drakeo the Ruler.

10 2. Mr. Caldwell’s lynching and eventual death at the hand of a violent mob of purported
11 members of a Los Angeles based Bloods gang, while Mr. Caldwell made his way through the backstage
12 area of the Banc of California performers stage, where he was scheduled to perform just minutes
13 following the violent attack, was a result of a complete and abject failure of all Defendants to implement
14 proper safety measures in order to ensure the safety and well being of the artists whom they invited and
15 hired to their music festival.

16 3. Shortly following Mr. Caldwell’s murder, both media reports and social media accounts
17 were set ablaze with scathing criticism regarding the overwhelming gang presence and complete and
18 utter lack of security and law enforcement presence of not only the areas where festivalgoers
19 congregated, but the absolute incompetency and lack of care in securing restricted areas where
20 performers were assigned.

21 4. Defendants, and each of them, were completely knowledgeable of the potential dangers
22 posed to both their guests and the performers that they hired based upon numerous past incidents of
23 violence and death at their hip hop events, the prevalence of gang activity that would be present, not
24 only because numerous artists they hired were associated with Los Angeles gangs, but also given the
25 fact that the music festival was being held in South Central Los Angeles, one of the most dangerous
26 areas in the greater Los Angeles region. Defendants, and each of them, were also knowledgeable to the
27 fact that as a result of Mr. Caldwell having been falsely accused of being involved with the murder of a
28 member of an Inglewood Bloods gang, he was being targeted by the gang members in order to exact
revenge, based upon this false information.

1 5. Had Defendants and each of them, placed the safety and wellbeing of its guests and its
2 invited artists ahead of profits, there would have been an adequate security plan and sufficient security
3 guards and law enforcement presence to have prevented the unnecessary and untimely murder of Drakeo
4 The Ruler, at the hands of over 100 deadly gang members who inexplicably gained access to a restricted
5 area of the venue engaging in an unrelenting and unprevented attack for over 10 minutes.

6 6. Mr. Caldwell’s only son, five-year-old Caiden Caldwell, lost his father and has endured
7 great pain, anguish and loss of emotional and financial support due to this completely preventable, yet
8 recklessly permitted act violence.

9 **JURISDICTION AND VENUE**

10 7. This court has jurisdiction over this matter because the incident occurred at the Banc of
11 California Stadium, located at 3939 S Figueroa St, Los Angeles, CA 90037. Pursuant to California Code
12 of Civil Procedure §395.5, this venue is proper because the incident giving rise to liability occurred in
13 Los Angeles County, State of California.

14 **THE PARTIES**

15 8. Plaintiff, Caiden Caldwell, a minor, as Successor-In-Interest to the Estate of and through
16 his guardian ad litem Tianna Purtue, is residing in the State of California, and is the only child of the
17 decedent, Darrell Caldwell p/k/a Drakeo The Ruler, and a successor-in-interest pursuant to California
18 Civil Code § 377.60(a).

19 9. Defendant LIVE NATION WORLDWIDE. INC (hereinafter referred to as “Live
20 Nation”), is a Delaware corporation qualified to do business in California and duly existing under the
21 laws of the State of California and doing business in the County of Los Angeles, headquartered at 9348
22 Civic Center Drive, Beverly Hills, California 90210. Live Nation sub-leased the real property from
23 Defendant Major League Soccer, LLC a/k/a Los Angeles Football Club a/k/a LAFC, where the murder
24 took place, commonly referred to as Banc of California Stadium located in Los Angeles, California (the
25 “Premises” or “Banc of California Stadium”). Live Nation, along with other Defendants identified
26 herein, were responsible for organizing, promoting, selecting and hiring the artists and security
27 personnel. Live Nation had a duty to implement and execute a security plan to keep everyone attending,
28 visiting and/or doing business at the Banc of California Stadium safe. Live Nation had a further duty to

1 safeguard the Banc of California Stadium and provide adequate security to detect and prevent violent
2 incidents from taking place at the Banc of California Stadium and/or during the Music Festival.
3 Defendant Live Nation Worldwide, Inc. had an exclusive lease agreement to operate, manage, control
4 and supervise the Banc of California Stadium during the Music Festival.

5 10. Plaintiff is informed and believes, and upon such information and belief, alleges that at
6 all times herein mentioned, Defendant, BOBBY DEE PRESENTS, INC. (“Bobby Dee Presents”), is a
7 California corporation qualified to do business in California and duly existing under the laws of the State
8 of California and doing business in the County of Los Angeles, and headquartered at 9950 Bell Ranch
9 Dr Ste 104, Santa Fe Springs, CA 90670. Bobby Dee Presents, along with other Defendants identified
10 herein, were responsible for organizing, promoting, selecting and hiring the artists and security
11 personnel. Bobby Dee Presents had a duty to implement and execute a security plan to keep everyone
12 attending, visiting and/or doing business at the Banc of California Stadium safe. Bobby Dee Presents
13 had a further duty to safeguard the Banc of California Stadium and provide adequate security to detect
14 and prevent violent incidents from taking place at the Banc of California Stadium and/or during the
15 Music Festival.

16 11. Plaintiff is informed and believes, and upon such information and belief, alleges that at
17 all times herein mentioned, Defendant, C3 PRESENTS, LLC (“C3 Presents”), is a Texas limited liability
18 company qualified to do business in California and duly existing under the laws of the State of
19 California and doing business in the County of Los Angeles, and headquartered in Austin, Texas. C3
20 Presents, along with other Defendants identified herein, were responsible for organizing, promoting,
21 selecting and hiring the artists and security personnel. C3 Presents had a duty to implement and execute
22 a security plan to keep everyone attending, visiting and/or doing business at the Banc of California
23 Stadium safe. C3 Presents had a further duty to safeguard the Banc of California Stadium and provide
24 adequate security to detect and prevent violent incidents from taking place at the Banc of California
25 Stadium and/or during the Music Festival.

26 12. Plaintiff is informed and believes, and upon such information and belief, alleges that at
27 all times herein mentioned, Defendant, MAJOR LEAGUE SOCCER, LLC a/k/a LOS ANGELES
28 FOOTBALL CLUB a/k/a LAFC (“LAFC”), is a Delaware limited liability company qualified to do

1 business in California and duly existing under the laws of the State of California and doing business in
2 the County of Los Angeles. LAFC subleased the Banc of California Stadium property to Defendant Live
3 Nation, along with other Defendants identified herein. LAFC had a duty to ensure that Defendants Live
4 Nation, C3 Presents, Bobby Dee Presents, and DOES 1-100 implemented and executed a security plan
5 to keep everyone attending, visiting and/or doing business at the Banc of California Stadium safe. As
6 sub-lessor, LAFC had a further duty to safeguard the Banc of California Stadium and provide adequate
7 security to detect and prevent violent incidents from taking place at the Banc of California Stadium
8 and/or during the Music Festival.

9 13. Plaintiff is informed and believes, and upon such information and belief, alleges that at
10 all times herein mentioned, Defendant, JEFF SHUMAN (“Shuman”), is a resident of the State of
11 California. Shuman, along with other Defendants identified herein, were responsible for organizing,
12 promoting, selecting and hiring the artists and security personnel. Shuman had a duty to implement and
13 execute a security plan to keep everyone attending, visiting and/or doing business at the Banc of
14 California Stadium safe. Shuman had a further duty to safeguard the Banc of California Stadium and
15 provide adequate security to detect and prevent violent incidents from taking place at the Banc of
16 California Stadium and/or during the Music Festival.

17 14. DOES 1 through 5, inclusive, and each of them, were responsible for providing security
18 for the “Once Upon A Time In LA” music festival, and had a duty to safeguard the Banc of California
19 Stadium as well as protect and prevent artists, concertgoers, members of the general public and tour staff
20 from violence and/or harm at the Music Festival. DOES 1 through 5, had a further duty to implement
21 and execute a security plan and to provide adequate security to detect and prevent violent incidents from
22 taking place at the Banc of California Stadium premises and/or during the Music Festival.

23 15. The true names and/or capacities, whether individual, corporate, associate or otherwise of
24 defendants DOES 6 through 100 are unknown to Plaintiff at this time, who therefore sue said defendants
25 by such fictitious names. Plaintiff is informed that each of the defendants fictitiously named herein as a
26 DOE is legally responsible, in negligence or in some other actionable manner, for the events and
27 happenings referred to herein, and thereby proximately caused the injuries and damages to Plaintiff as
28 alleged herein. Plaintiff will ask leave of court to amend this Complaint to insert the true names and/or

1 capacities of such fictitiously named defendants when the same have been ascertained.

2 16. Plaintiff is informed, believes, and thereupon alleges that Defendants Live Nation, C3
3 Presents, Bobby Dee Presents, LAFC, Shuman, and each of the DOE Defendants (collectively
4 hereinafter known as “Defendants”) are in some manner responsible for the events and happenings
5 herein set forth and proximately caused injury and damages to the Decedent as herein alleged.

6 17. Each Defendant is the agent, servant and/or employee of the other Defendants, and each
7 Defendant was acting within the course and scope of his, her or its authority as an agent, servant and/or
8 employee of the other Defendants. Defendants and each of them, are individuals, corporations,
9 partnerships and other entities which engaged in, joined in and conspired with the other wrongdoers in
10 carrying out the tortious and unlawful activities described in this complaint, and Defendants, and each of
11 them, ratified the acts of the other Defendants as described in this Complaint.

12 **FACTS COMMON TO ALL COUNTS**

13 18. On December 18, 2021, Defendants Live Nation, Bobby Dee Presents, C3 Presents,
14 Shuman and DOES 5 through 100 (the “Defendant Promoters”) selected, hired and invited nearly
15 seventy Hip Hop and R&Bs artists to perform at the “Once Upon A Time In LA” Music Festival
16 (hereinafter “Music Festival”) at Exposition Park, including the Banc of California Stadium, located in
17 the City of Los Angeles, California.

18 19. The Music Festival billed some of the most iconic Hip Hop and R&B Artists to ever take
19 the stage such as Snoop Dogg, 50 Cent, The Game, YG, Ice Cube, Al Green, The Isley Brothers, The
20 Parliament Funkadelic, Too Short, E-40, DJ Quik, Warren G, Bone Thugs N-Harmony. In addition to
21 those iconic artists identified above, the Music Festival also touted the performances of Hip Hop’s next
22 generation of rising stars which included Blue Face, Dom Kennedy, OhGeesy and of course Drakeo The
23 Ruler.

24 20. As arguably one the greatest ensemble of artists gathered together to perform in a single
25 night in the greater Los Angeles region, the Music Festival was divided into three stages: (1) the Once
26 Upon a Time Stage, which included acts such as Snoop, 50 Cent and YG, and was located in the parking
27 lot area adjacent to Banc of California Stadium; (2) the Low Rider Stage, which included acts such as
28 the Isely Brothers, War and Morris Day, also located in the parking lot area adjacent to Banc of

1 California Stadium; and (3) the G-Funk Stage which featured Hip Hop’s which included Drakeo the
2 Ruler, Blue Face and Suga Free, and was located inside the Banc of California Stadium.

3 21. Plaintiff is informed and believes and thereon alleges that Defendant Promoters has
4 and/or had an exclusive sub-lease agreement from sub-lessor Defendant LAFC, to operate, manage and
5 provide security services at the Banc of California Stadium for the Music Festival. Further, on
6 information and belief, the Defendant Promoters also promoted and sold tickets to the Concert.

7 22. Plaintiff is informed and believes and thereon alleges that although LAFC was not
8 directly involved with the production and promotion of the Musical Festival, however, as sub-lessor of
9 the Premises, LAFC had a duty to ensure that the Defendant Promoters and DOES 1 through 5 had
10 developed and executed a security plan that would ensure the safety of all of the Defendant Promoters’
11 guests and artists.

12 23. Plaintiff is informed and believes that DOES 1 through 5, were responsible for providing
13 security services for the Music Festival and worked in conjunction with Defendant Promoters to design,
14 prepare and administer security services at the Music Festival.


15 24. The Banc of California Stadium is located within Exposition Park, which is situated in
16 the heart of South-Central Los Angeles. The surrounding neighborhood is considered to be one of the
17 most dangerous areas of Los Angeles, touting one of the highest murder rates in the city, and home to
18 some of the most notorious street gangs, including the Bloods, Crips, Treces, Varrio Nueva Estrada,
19 18th Street, Hoover Criminals, and MS-13.

20 25. In 2021, based upon media accounts that Los Angeles murder rate had reached a 15-year
21 high with over 400 murders. It has also been reported that along with the heartbreaking murder of mega
22 artist Nipsey Hussle in front of his Slauson store, several months prior to the Music Festival other well-
23 known L.A. based hip hop artists Nfant, Slim 400, and Earl Swavey had also been murdered.





24 26. Furthermore, Plaintiff is informed and believes and thereon alleges that several of the
25 artists set to perform at the Music Festival were either actual members or “affiliated” with some of these
26 notorious gangs, and along with the number of gangs within the surrounding area of the Premises, it was
27 highly probable that the Music Festival would attract a heavy presence of gang activity.


28 27. The heavy presence of gang presence at the Music Festival was widely reported by social
media accounts:

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 **Brian James** @VoodooHipster · Dec 19, 2021 ⋮


You are probably not gonna hear about the fact that Banc of California stadium suffered thousands \$ of damages from illiterate gang tagging last night. It was disgusting to see, it was everywhere even before the early end of the show.

 1   4 

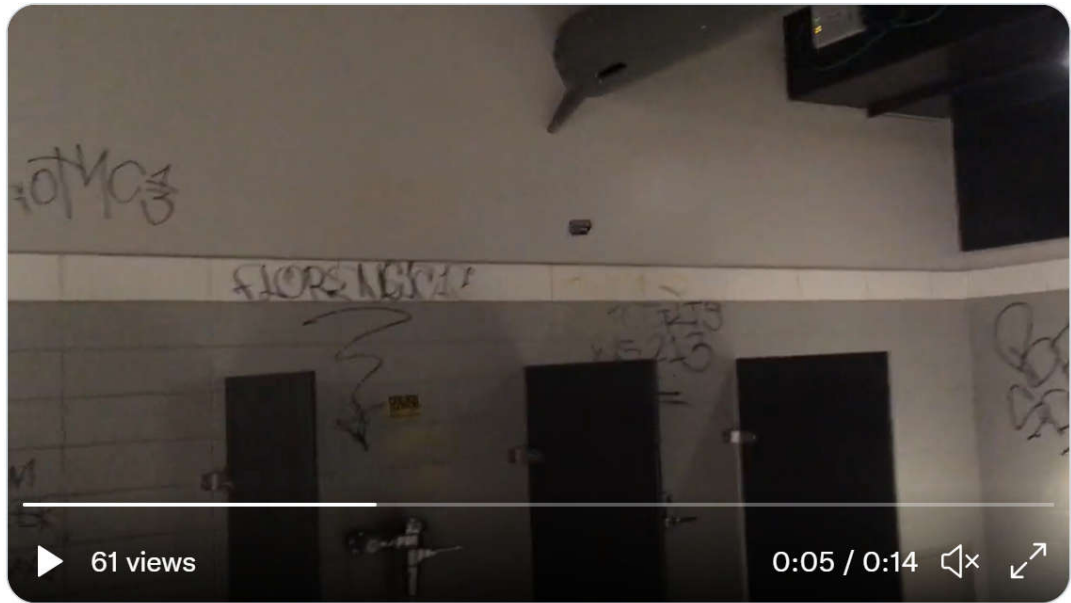
 **Bombay Beach Revival** @BombayB_Revival · Dec 19, 2021 ⋮

Pics?

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 **Brian James**
@VoodooHipster ⋮

Replying to @BombayB_Revival



9:02 AM · Dec 19, 2021 · Twitter Web App

28. Plaintiff is informed and believes and thereon alleges although Drakeo the Ruler often wore a blue bandana, he was not and never has been a member of any gang, having publicly rebuked the idea of people joining a gang during interview on the *No Jumper* podcast, stating “gangbanging was for losers.”

29. Plaintiff is informed and believes and thereon alleges that early on in his career, Decedent had engaged in music collaborations with all walks of life, including members of the bloods and crips

1 gangs, in an attempt to remain unaffiliated with any specific gang. Further, as reported by news articles,
2 because, Decedent refused to take a side, and focus solely on the development of his team of artists,
3 known as the “Stinc Team”, Decedent was constantly being challenged by various gangs for his refusal
4 to “choose” a side.

5 30. On information and belief, just a year prior to his scheduled performance at the Music
6 Festival, after having spent three years in Los Angeles County’s Men’s Central Jail on the false
7 allegation that Decedent was involved with the murder of a member of the bloods gang, Decedent was
8 acquitted of all charges.

9 31. On information and belief, despite being exonerated of having any involvement
10 whatsoever with the murder of the bloods gang member, it had been widely known to the public the
11 certain members of the bloods gang had rejected the acquittal, and sought to exact “street justice”
12 against Mr. Caldwell in order to avenge their slain member. This was evidenced by heated exchanges
13 between Mr. Caldwell and alleged members of the bloods by way of social media communications.

14 32. More specifically, Mr. Caldwell and artist and alleged member of the Bloods gang YG,
15 had an ongoing public feud. While there is no evidence to indicate that YG had anything to do with the
16 events that would lead to Mr. Caldwell’s murder on the evening of December 18, 2021, it was clear that
17 other members of the Bloods gang may take issue with him, as has been stated above, it was widely
18 known that members of the Bloods gang were actively targeting Mr. Caldwell following his acquittal.

19 33. On information and belief, although Mr. Caldwell faced the constant threat of death upon
20 his life for a murder that he did not commit, he continued to pursue his career by making meteoric gains,
21 and capturing the admiration and respect of hip hop enthusiasts across the globe dropping hits such as
22 “Flu Flamming” and “Musty Freestyle.”

23 34. Defendant Promoters and DOES 1 through 5, knew or should have known that many of
24 the hip hop artists they selected, invited, promoted and hired to perform at the Music Festival are known
25 to attract violent gang members and unruly crowds at their concerts and shows. Further, Defendants
26 knew or should have also known that the location of the Music Festival, South Central Los Angeles was
27 a haven for gang activity, and as a result, and any concert or show in the area, let alone featuring artists
28 Premises.

1 35. Based upon the very public feud between Mr. Caldwell and the Bloods gang, Defendant
2 Promoters and DOES 1 through 5 knew or should have known that Mr. Caldwell’s safety was at risk,
3 and given the fact that as a result of YG also billed to perform at the Music Festival that evening, there
4 was a high degree of likelihood that there would be a significant presence of members of the Bloods
5 gang that could potentially caused death or great bodily harm to Mr. Caldwell in the event of inadequate
6 security measures being taken in order to keep him safe.

7 36. Furthermore, Defendant Promoters, DOES 1 through 5, and more specifically Live
8 Nation, were no strangers to recognizing the need for having an adequate security plan to protect both its
9 guests and artists, and based upon media accounts that Live Nation has been connected to over 200
10 deaths and at least 750 injuries since 2006. For example, as a result of a lack of adequate security on
11 August 22, 2014, an artist was murdered backstage during the “Under the Influence” concert at the
12 Shoreline Amphitheater in Mountain View, California. Further in 2016 a concertgoer attending the
13 “HARD Festival” died of a drug overdose Live Nation had been on notice that rabid drug use was
14 common place within its crowds. Most recently, on November 5, 2022, just a month before the Music
15 Festival, ten people died at three hundred people were injured at the infamous Astroworld concert.

16 37. Upon information and belief there were two possible entrances to reach the backstage
17 artist area of the venue, as reported, there was a check point located off Martin Luther King Jr. Blvd.,
18 which was a production road and artists only parking lot, and a second entrance which was a flimsy
19 chain linked fenced, encompassed by a green fabric privacy covering, and manned by a sole unarmed
20 security guard.

21 38. That evening Mr. Caldwell was scheduled to perform on the G-Funk Stage in the Banc of
22 California Stadium at approximately 8:30 pm. Upon arriving at the venue on the evening December 18,
23 2021, Mr. Caldwell and his entourage entered the Premises through the exclusive artists’ lot off Martin
24 Luther King Jr. Blvd.

25 39. On information and belief, and as reported media, Mr. Caldwell had only been allotted
26 fifteen all-access wrist brands, which greatly reduced the typical size of his entourage who would
27 normally accompany him at such an event. In addition, Mr. Caldwell was accompanied by one personal
28 security guard.

40. On information and belief, as Mr. Caldwell began to make his way to the staging area
minutes before he was about to perform, Music Festival staff informed him that his entourage would

1 have to be split up into two separate groups, due to alleged “Covid protocols”. As such Mr. Caldwell
2 made his way to the backstage with only six members of his entourage and his lone personal security
3 guard. Prior to entering the Premises grounds, Mr. Caldwell’s personal security guard was not permitted
4 to bring in any weapons of any kind inside the venue.

5 41. Following Mr. Caldwell’s entourage now being cut in half, neither Defendant Promoters
6 nor DOES 1 through 5 did provided him with any security team managed by them, essentially leaving
7 Mr. Caldwell with his lone private security guard to provide for his protection in the event that a
8 dangerous situation materialized.

9 42. On information and belief, it was reported that as Mr. Caldwell made his way towards the
10 golf cart that was to escort him and his team to the G-Funk stage, an altercation arose between Mr.
11 Caldwell’s entourage and several unknown assailants. The altercation lasted for several minutes, and at
12 no point did security arrive to address the altercation or do anything to provide for Mr. Caldwell’s safety
13 and wellbeing. Further it was unclear who these individuals were, how they could have possibly gotten
14 in the allegedly secured backstage area, or how they knew to find Mr. Caldwell there.

15 43. Despite the fact that neither the Defendant Promoters nor DOES 1 through 5 did anything
16 to break up the physical altercation or provided Mr. Caldwell with any type of security prior to or
17 following the assault, Mr. Caldwell and his entourage continued to make his way towards the backstage
18 area of the G-Funk stage.

19 44. On information and belief, with Defendant Promoters and DOES 1 through 5 on notice
20 that Mr. Caldwell’s safety and wellbeing has now been placed in serious danger, despite the fact that Mr.
21 Caldwell as allegedly situated in a secure all-access only area of the Premises, Defendant Promoters and
22 DOES 1 through 5, did not take any action whatsoever to ensure Mr. Caldwell’s safety.

23 45. On information and belief, and as reported media, shortly after the initial altercation loud
24 cries of “wooop” and “suuu wooop” could be heard being exclaimed by unknown individuals. Suddenly,
25 scores of people, many dressed in all red and wearing ski masks most aptly described as a “sea of red”,
26 began to descend upon the entire artist transit area surrounding Mr. Caldwell, six members of his
27 entourage and his sole private security guard.

28 46. On information and belief, based upon media accounts, for at least 10 minutes following
the initial altercation, Mr. Caldwell and his entourage of a total of 7 were subjected to a vicious and
unrelenting attack of nearly 113 men, primarily dressed in red. Despite the fact that Mr. Caldwell and his

1 entourage attempted to escape this “modern day lynching” by making their way towards the flimsy
2 security chain linked fenced, allegedly monitored by a lone security guard, Mr. Caldwell’s attackers
3 blocked access to the gate by surrounding both sides of the fence in order to prevent escape.
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47. On information and belief, and based upon media accounts, one of the over 100 assailants made a loud victory cry, ripping off his mask and beating his chest, causing the lynch mob to scatter. As the sea of red subsided, the wounded Mr. Caldwell lay on the ground with what would ultimately be a fatal wound to his neck.

48. On information and belief, Mr. Caldwell began to bleed out as it took several more minutes for an emergency medical team and peace officers to arrive. As Mr. Caldwell lie on the ground continuing to lose significant amounts of blood, and with his life flashing before his eyes, it would take even longer for an ambulance to arrive, as the EMTs continued to administer life saving procedures.

49. On information and belief, and as reported in the media, at no point during either of the calculated attacks did Defendant Promoters or DOES 1 through 5 have the presence of any security guards in order to protect Mr. Caldwell's life.

50. On information and belief, Mr. Caldwell was rushed to the emergency room where he fought to hang on to life for several hours, refusing to succumb to his injuries. However, despite his

1 efforts to hold on to those last breaths of life, as a direct and proximate result of the actions or omissions
2 of the Defendants, and each of them, Mr. Caldwell died from fatal injuries inflicted by a lynch mob of
3 individuals who Defendants permitted entry on to the Premises, and in what should have been secured
4 areas.

5 51. Plaintiff is informed and believes and thereon alleges that following Mr. Caldwell’s
6 murder it was widely reported on social media that the security at the event was a total disaster having
7 failed to check for weapons and contraband, failing to adhere to state and city mandated covid protocols,
8 and exhibiting a general lack of care:



10 **Venus Urbino** ...
@Dameenchantress

11 So everyone who attended Once Upon A Time in LA, I
12 reached out to customer service to get a refund, this is
13 their response! Show ended early, Security SUCKED!
14 Everyone just walk in. Never patted anyone down,
15 didn’t check COVID test... and someone DIED!! This
16 was their response



18 **Brian James** ...
@VoodooHipster

19 I wanna add that there was no security check at Once
20 Upon A Time, no tickets were scanned when we went
21 in, no covid check.. people were handing people shit
22 through the fences, My camera did not set off metal
23 detector. It was rather unsafe so I'm disappointed but
24 not surprised.

25 7:58 AM · Dec 19, 2021 · Twitter Web App

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Erykah
@Kushmehard_

...

#onceuponatimeinLA worst concert I've ever been to. OVERPRICED FOOD I paid \$43 for two fries, CRAZY LONG LINES, so unorganized throughout the entire venue, security guards didn't give a fuck and we didn't get to see the headliners. All I know is I fucking hope Drakeo pulls thru

11:29 PM · Dec 18, 2021 · Twitter for iPhone



BABY SOLITA
@BabySolita_

...

I'm not one to complain but bro #onceuponatimeinLA is a disorganized MESS. It's barely 3PM and everything is just yikes. Be safe y'all 🙄 especially if you're at the main stage.

3:10 PM · Dec 18, 2021 · Twitter for iPhone



La Madrina
@DulceCoffeee

...

My bags weren't checked, Vaccine card wasn't checked, ticket wasn't scanned, parking wasn't marked, waited 2 hrs for trash ass food uggghhhhhh @LiveNation @onceinla you owe me money. #onceuponatimeinLA

7:53 AM · Dec 19, 2021 · Twitter for iPhone



Eric ✨
@ThatDude_Era

...

Entrance to #onceuponatimeinLA was a joke too. Just hundreds of people huddled waiting in lines that weren't lines, nothing was even searched upon entering. Might as well have gave security the day off.

11:57 PM · Dec 18, 2021 · Twitter for iPhone

1 52. Without direct implementation of adequate security measures, Defendants, and each of
2 them, exposed the Decedent, along with his friends, family and employees accompanying him that night,
3 to the aggressive and violent acts of third parties’ intent on taking Mr. Caldwell’s life. Plaintiff are
4 informed and believe, and hereon allege that the Defendants failed to take basic, reasonable steps to
5 prevent this shooting from taking place. Their negligence includes, but is not limited to:

- 6 • Failing to have an adequate security presence backstage of the Premises;
- 7 • Failing to perform thorough searches of all guests, performers, and the members of the
8 performers’ entourages;
- 9 • Failing to have security guards in the back stage area between the artist parking lot and
10 the performing stage;
- 11 • Failing to have any police officers backstage;
- 12 • Failing to maintain a list of all persons who had access to the backstage area;
- 13 • Failing to secure the backstage area from unauthorized individuals; and
- 14 • Failing to provide Mr. Caldwell with personal security throughout the venue, despite
15 having knowledge that his life was in danger amongst other failures.

16 53. Plaintiff is informed and believe, and hereon allege that there have been numerous violent
17 incidents at concerts around the country promoted and/or organized by the Defendant Promoters, which
18 put the Defendants on notice of such dangerous and unsafe conditions.

19 54. Despite several violent incidents at concerts promoted by the Defendant Promoters, they
20 failed to initiate and adhere to a policy of providing additional security measures in response to the
21 violence that has consistently occurred at concerts promoted by the Defendant Promoters.

22 55. It is inconceivable that had Defendant Promoters and DOES 1 through 5 had adequate
23 security would over 100 individuals been able to gain access to what was supposed to be a restricted and
24 secured exclusive artist area, in order to murder Mr. Caldwell in cold blood on the evening of December
25 18, 2021.

26 56. The Defendants’ failure to provide proper security measures was a substantial factor in
27 the untimely death of Decedent Darrell Caldwell.

28 57. The Defendants could have prevented the lynching and murder of Decedent by and
through reasonable security measures.

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FIRST CAUSE OF ACTION
NEGLIGENCE - WRONGFUL DEATH
(Against All Defendants)

58. Plaintiff realleges and incorporates by reference here, as though fully set forth, paragraphs 1 through 57 of this Complaint.

59. Plaintiff brings this action, as authorized by Section 377.32 (b) of the California Code of Civil Procedure, as the surviving heir of Decedent Darrell Caldwell, deceased. Plaintiff's declaration as Successor-In-Interest to Darrell Caldwell is attached to this Complaint. Plaintiff is Decedent's son and his heir at law.

60. Defendants, had a duty to use reasonable care to secure, safeguard and protect its artists whom they invited and hired to perform at the Music Festival. Defendants breached their duty of care by failing to take reasonable steps to ensure the safety of Decedent, Darrell Caldwell and prevent him from being violently attacked, stabbed and killed while making his way to the stage where he was scheduled to perform just minutes following the attack at the Banc of California on December 18, 2021.

61. Defendants had reason to know of dangerous conditions resulting from selecting, inviting and hiring, the hip hop artists to perform. Defendants had reason to know of the dangerous conditions resulting from promoting the hip hop artists in attendance and the violent and unruly crowds they attract. Defendants had reasons to know that several of the artists whom they hired to perform at the Music Festival were either actual members or "affiliated" with some of Los Angeles's most notorious gangs, and along with the number of gangs within the surrounding area of the Premises, it was highly probable that the Music Festival would attract a heavy presence of gang activity. Defendants had reason to know that failing to have an adequate number of security guards and a police presence backstage would make the occurrence of violent acts more likely. Defendants had reason to know of dangerous conditions resulting from its failure to search all persons in the venue properly. Given the multitude of violent incidents, including shootings, at their concerts around the world, Defendants knew that the Music Festival at the Banc of California Stadium on December 18, 2021 was prone to have a violent incident occur, and it was reasonably foreseeable that failure to properly search persons for weapons prior to entering the venue, failure to secure the Premises from permitting people unauthorized access to restricted backstage areas, failure to provide security escort services for artists to and from their vehicle and the staging area where they were scheduled to perform, failure to implement a security response

1 system that would immediately address any acts of violence or criminal activity that could threaten the
2 health or safety of the artists invited to perform at the Music Festival, and failure to maintain a police
3 presence backstage would result in violence.

4 62. Due to this heightened foreseeability raised by past incidents and the knowledge of a
5 heavy gang presence that would descend upon the Music Festival, along with the very public knowledge
6 that Decedent was subject to a “hit” from a Los Angeles Bloods gang, Defendants are liable for their
7 gross negligence for failing to take reasonable security precautions in order to ensure Decedent’s safety.

8 63. Defendants had a duty to take reasonable and appropriate measures to protect ALL guests
9 and invited performers from imminent violence and criminal conduct. Defendants were well aware that
10 persons entering the venue and the more restricted backstage area of the Banc of California Stadium
11 were not being searched for weapons. Defendants were also required to ensure that only authorized
12 individuals were permitted access to the exclusive artist area. Further, Defendants had a duty to ensure
13 that there was sufficient private security and law enforcement presence in order to prevent unnecessary
14 injury or even death to each person who stepped foot on the Premises.

15 64. Despite their knowledge, the Defendants neglected to make sure there was any police
16 presence backstage, failed to provide security escorts for artists to and from the stage, did not require
17 that a log be maintained to identify each person who accessed the backstage area before, during, after
18 the concert, and failed to prevent unauthorized individuals from accessing the exclusive artist areas, and
19 Defendants failed to provide safety protocols to quickly respond to an act of violence or any other
20 criminal act in a timely manner in the event such an incident were to occur. Defendants also failed to
21 have any video cameras set up to deter and/or detect criminal conduct.

22 65. As a direct and proximate result of the aforementioned acts and/or omissions by the
23 Defendants, Decedent Darrell Caldwell was stabbed in the neck and died as a result of those stabbing
24 wounds.

25 66. As a legal, direct and proximate result of the reckless and negligent conduct of
26 Defendants and DOES 1 through 100, inclusive, Plaintiff has sustained damages resulting from the loss
27 of love, affection, society, service, comfort, support, right of support, expectations of future support and
28 counseling, companionship, solace and mental support, as well as other benefits and assistance of
Decedent, all to Plaintiff’s general damages in a sum in excess \$25,000,000, which will be stated
according to proof, pursuant to Section 425.10 of the California *Code of Civil Procedure*.

1 67. As a legal, direct and proximate result of the conduct of Defendants and DOES 1 through
2 100, inclusive, Plaintiff will be deprived of the financial support and assistance of Decedent, the exact
3 amount of such losses to be stated according to proof, but in an amount of no less than \$25,000,000,
4 pursuant to Section 425.10 of the California Code of Civil Procedure.

5 **SECOND CAUSE OF ACTION**
6 **WRONGFUL DEATH - SURVIVAL**
7 **(Against All Defendants)**

8 68. Plaintiff realleges and incorporates here as though fully set forth paragraphs 1 through 67
9 of this Complaint.

10 69. Plaintiff is the Successor-In-Interest to the Estate of Ronald Anthony Mullen, pursuant to
11 California Code of Civil Procedure Sections 377.30 and 377.32.

12 70. By reason of the incident and above-described negligence of Defendants and DOES 1
13 through 100, and each of them, Decedent was compelled to, and did, employ the services of paramedics,
14 hospitals, physicians, nurses and other health care providers for medical treatment and care, and did
15 incur medical expenses prior to his death, in a sum according to proof at trial, but in an amount no less
16 than \$250,000.

17 71. As a direct and proximate result of the negligent conduct of Defendants, and each of them
18 Decedent Darrell Caldwell was severely injured and died from those injuries. Prior to his death,
19 Decedent Darrell Caldwell experienced great pain and suffering causing shock and injury to his nervous
20 system and person as he fought for survival for several hours following the brutal attack, all of said
21 injuries caused him great mental, physical and nervous, strain, pain and suffering prior to his death all to
22 their general damages in a sum in excess of \$10,000,000, pursuant to California Code of Civil Procedure
23 Section 377.34.

24 **THIRD CAUSE OF ACTION**
25 **WRONGFUL DEATH –PREMISES LIABILITY**
26 **(Against All Defendants)**

27 72. Plaintiff realleges and incorporates by reference here, as though fully set forth,
28 paragraphs 1 through 71 of this Complaint.

73. Defendants had reason to know of dangerous conditions resulting from selecting, inviting
and hiring, the hip hop artists to perform. Defendants had reason to know of the dangerous conditions
resulting from promoting the hip hop artists in attendance and the violent and unruly crowds they attract.

1 Defendants had reasons to know that several of the artists whom they hired to perform at the Music
2 Festival were either actual members or “affiliated” with some of Los Angeles’s most notorious gangs,
3 and along with the number of gangs within the surrounding area of the Premises, it was highly probable
4 that the Music Festival would attract a heavy presence of gang activity. Defendants had reason to know
5 that failing to have an adequate number of security guards and a police presence backstage would make
6 the occurrence of violent acts more likely. Defendants had reason to know of dangerous conditions
7 resulting from its failure to search all persons in the venue properly. Given the multitude of violent
8 incidents, including shootings, at their concerts around the world, Defendants knew that the Music
9 Festival at the Banc of California Stadium on December 18, 2021 was prone to have a violent incident
10 occur, and it was reasonably foreseeable that failure to properly search persons for weapons prior to
11 entering the venue, failure to secure the Premises from permitting people unauthorized access to
12 restricted backstage areas, failure to provide security escort services for artists to and from their vehicle
13 and the staging area where they were scheduled to perform, failure to implement a security response
14 system that would immediately address any acts of violence or criminal activity that could threaten the
15 health or safety of the artists invited to perform at the Music Festival, and failure to maintain a police
16 presence backstage would result in violence.

16 74. Said frequent violent criminal activities were of such nature and frequency so as to create
17 a dangerous condition upon Premises.

18 75. Defendants, and each of them, had actual and constructive notice of said dangerous
19 conditions, yet failed to make safe by providing adequate security measures and failed to warn persons,
20 such as the Decedent, of said dangerous conditions.

21 76. As a legal, direct and proximate result of the reckless and willful conduct of Defendants
22 and DOES 1 through 100, inclusive, Plaintiff has sustained damages resulting from the loss of love,
23 affection, society, service, comfort, support, right of support, expectations of future support and
24 counseling, companionship, solace and mental support, as well as other benefits and assistance of
25 Decedent, all to Plaintiff’s general damages in a sum in excess \$25,000,000, which will be stated
26 according to proof.

27 77. By reason of the incident and above-described acts of Defendants and DOES 1 through
28 100, and each of them, Decedent was compelled to, and did, employ the services of paramedics,
hospitals, physicians, nurses and other health care providers for medical treatment and care, and did

1 incur medical expenses prior to his death, in a sum according to proof at trial, but in an amount no less
2 than \$250,000.

3 78. Defendants, and each of them, were fully aware of the probable dangerous consequences
4 that resulted due to the conditions in which they willfully and deliberately failed to avoid those
5 consequences from happening. Thus, Plaintiff is entitled to recover punitive damages from Defendants
6 according to proof.

7 **JURY DEMAND**

8 Plaintiff hereby demands a jury trial in this action.

9 **PRAYER**

10 WHEREFORE, Plaintiff prays for Judgment against the Defendants, and each of them, as
11 follows:

12 1. For non-economic damages suffered by Plaintiffs, including, but not limited to, loss of
13 love, affection, care, society, service, comfort, support, right to support, companionship, solace or moral
14 support, expectations of future support and counseling, other benefits and assistance of Decedent Darrell
15 Caldwell, in an amount in excess of the jurisdictional minimum, but no less than \$25,000,000;

16 2. For economic damages suffered by Plaintiffs, related to loss of earnings and loss of
17 financial support from Decedent Darrell Caldwell, in an amount of no less than \$25,000,000;

18 3. For non-economic damages suffered by Decedent Darrell Caldwell as a result of the
19 injuries he sustained prior to and at his death, including, but not limited to pain and suffering causing
20 shock and injury to his nervous system in an amount in excess of the jurisdictional minimum, but no less
21 than \$10,000,000 pursuant to California Code of Civil Procedure Section 377.34.

22 4. For punitive and exemplary damages, according to proof.

23 5. For hospital, medical, professional and incidental expenses suffered by Decedent,
24 according to proof;

25 6. For prejudgment interest, according to proof;

26 7. For funeral and burial expenses, according to proof;

27 8. For damages for Plaintiffs' other economic losses, according to proof; and

28 9. For such other and further relief as this Court may deem just and proper.

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DATED: February 1, 2022

THE COCHRAN FIRM – CALIFORNIA

By: /s/ James A. Bryant

JAMES A. BRYANT, ESQ.
BRIAN T. DUNN, ESQ.
Attorneys for Plaintiff CAIDEN CALDWELL, a
minor, as Successor-In-Interest to the Estate of Darrell
Caldwell p/k/a Drakeo The Ruler, through his
guardian ad litem Tianna Purtue

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DECLARATION OF TIANNA PURTUE

I, Tianna Purtue, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the following facts, and if called to testify as a witness in this matter, I could and would testify to those facts, except for those facts stated upon information and belief, and, as to those facts, I believe them to be true and make this declaration pursuant to California Code of Civil Procedure §377.32.

2. Declarant is the mother and guardian ad litem to minor Caiden Caldwell (“Minor”).

3. The Decedent’s name is Darrell Caldwell.

4. Decedent’s death occurred on or about December 19, 2021, due to injuries sustained during an unprovoked attack, which took place on December 18, 2021.

5. No proceeding is now pending in California for administration of Decedent’s estate.

6. Minor is Decedent’s successor-in-interest as defined in Section 377.11 of the California Code of Civil Procedure and succeeds to Decedent’s interest in this action or proceeding.

7. Minor is Decedent’s successor-in-interest because he is Decedent’s biological son.

8. Declarant is informed and believes that Minor is Decedent’s only successor-in-interest.

9. No other person has a superior right to commence this action or proceeding or to be substituted for Decedent in this pending action or proceeding.

I declare, under penalty of perjury under the laws of the State of California that the above facts are true and correct and make this declaration pursuant to California Code of Civil Procedure §377.32.

DATED: February 1, 2022

/s/ Tianna Purtue

Tianna Purtue