

UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS,
ETHIOPIA HABTEMARIAM,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
CHALICE RECORDING STUDIOS,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

DECLARATION OF
RODNEY JONES

I, Rodney Jones, declare according to 28 U.S.C. §1746 as follows:


1. I have personal knowledge of the facts set forth herein, which I know to be true and correct, and if called upon to testify as a witness, I could and would competently testify thereto.
2. Around August 2022, I received a call from Sean Combs and his assistant/employee Frankie Santella requesting that I produce several songs on a rhythm and blues album titled "The Love Album: Off the Grid" ("Love Album").
3. Before this conversation, I was invited to Mr. Combs's house in 2021 to produce on another project.
4. From September 2022 to November 2023, I produced nine songs on Mr. Combs' Love album. I also played several instruments on a few other songs as well.
5. For two weeks in October of 2022, I worked at Combs enterprise and Combs global offices in West Hollywood training engineers.

6. I lived with Mr. Combs for months at a time, spending holidays and birthdays with him and missing major family events. He was very demanding and would often deny my requests to go home.
7. I lived at Mr. Combs' residences in Los Angeles, California, New York City, and Miami, Florida. I also spent several weeks on a yacht he rented in Saint-Barthélemy, Sint Maarten, and the Virgin Islands.
8. While living with and working for Mr. Combs, I witnessed, experienced, and endured many things that went far beyond my role as a Producer on the Love album.
9. I have hundreds of hours of audio and video recordings and photos of incidents that I detail in my first and proposed second amended complaints.
10. Mr. Combs required that I record him constantly. He did not like to repeat himself, and I quickly learned that from observing him lose his temper with his staff and family if they failed to remember something he said a day or two prior. On several occasions, Mr. Combs took my cell phone and began recording himself.
11. While creating the Love Album, I was required to work out of several studios.
12. The first studio where I produced music was Chalice Recording Studios in California. We were supposed to work out of Chalice Recording Studios for a few weeks, but that quickly turned into a few months.
13. In addition to Chalice Recording Studios, I worked out of Mr. Combs' homes located at 1550 N El Centro Ave, Los Angeles, CA 90028, 2 Star Island Dr., Miami Beach, FL 33139, 1 Star Island Dr., Miami Beach, FL 33139, and 200 South Mapleton Drive, Los Angeles, CA 90024.
14. From December 23, 2022, to January 4, 2023, I worked on the Love Album from a recording studio Mr. Combs set up on the Yacht he rented in Saint-Barthélemy, Sint Maarten, and the Virgin Islands.

23 DEC 2022 ▶ 27 DEC 2022 TRIP TO ST MAARTEN, SINT MAARTEN

PREPARED FOR
JONES/RODNEY


RESERVATION CODE HHJRNK
AIRLINE RESERVATION CODE DWBIRZ (AA)

 **DEPARTURE: FRIDAY 23 DEC** Please verify flight times prior to departure

AMERICAN AIRLINES AA 0638 Duration: 1hr(s) 52min(s) Cabin: First Status: Confirmed	ORD CHICAGO OHARE, IL	CLT CHARLOTTE, NC	Aircraft: BOEING 737-800 JET Distance (in Miles): 599
	Departing At: 7:00am Terminal: TERMINAL 3	Arriving At: 9:52am Terminal: Not Available	

Checked Baggage: Adult, 2x32kg (70lbs)
Cabin Baggage: Adult, 1 piece

Passenger Name:	Seats:	Frequent Flyer #:	eTicket Receipt(s):
» JONES/RODNEY	03A	28MXV64 / AMERICAN AIRLINES	0017877301029

 **DEPARTURE: FRIDAY 23 DEC** Please verify flight times prior to departure

AMERICAN AIRLINES AA 2478 Duration: 3hr(s) 52min(s) Cabin: Business Status: Confirmed	CLT CHARLOTTE, NC	SXM ST MAARTEN, SINT MAARTEN	Aircraft: AIRBUS INDUSTRIE A319 JET Distance (in Miles): 1611 Meals: Lunch
	Departing At: 11:20am Terminal: Not Available	Arriving At: 4:12pm Terminal: Not Available	

Checked Baggage: Adult, 2x32kg (70lbs)
Cabin Baggage: Adult, 1 piece

Passenger Name:	Seats:	Frequent Flyer #:	eTicket Receipt(s):
» JONES/RODNEY	01A	28MXV64 / AMERICAN AIRLINES	0017877301029

15. I witnessed the acquisition, use, and distribution of ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms.
16. I witnessed Mr. Combs display and distribute unregistered illegal firearms,
17. I witnessed Mr. Combs provide laced alcoholic beverages to minors and sex workers at his homes in California, New York, the Virgin Islands, and Florida.
18. I witnessed Mr. Combs' Chief of Staff, Kristina Khorram ("KK"), instruct the staff to retrieve drugs so she could provide them to Mr. Combs for his consumption.
19. I witnessed Christian Combs drug and sexually assault a stewardess while we were on the Yacht Mr. Combs rented in Saint-Barthélemy, Sint Maarten, and the Virgin Islands. The

assault began in the makeshift studio on the Yacht while I was recording Christian Combs' autotunes rapping.

20. On many mornings while on the Yacht with Mr. Combs, I worked out alongside him in the gym.
21. I have videos of Mr. Combs and me working out on the treadmill with T.D. Jakes playing on the monitor. We watched T. D. Jakes sermons every morning during our workouts. At first, I thought it was admirable that Mr. Combs listened to sermons while working out until I realized he was not studying the message, he was studying the messenger's mannerisms. During our gym sessions, he detailed how he planned to leverage his relationship with Bishop T.D. Jakes to soften the impact on his public image of Cassie Ventura's pending lawsuit.

Chalice Recording Studios:

a) The Shooting

22. On September 11, 2022, Mr. Combs held a writers and producers camp at Chalice Recording Studio at 845 Highland Ave, Los Angeles, CA 90038.
23. Over 100 producers, songwriters, and other creatives attended this camp. Many of the attendees brought plus ones with them as well. Mr. Combs, Justin Combs, and Justin's friend G were also present.
24. From my understanding, G was approximately 30 years old at the time. He is an African American male and is much taller than me.
25. While at the camp, I was required to work outside of Studio A in the lounge area. On the early morning of September 12, 2022, from approximately 3-4:00 am, during this camp, Mr. Combs, Justin Combs, and G were in a heated conversation.
26. That conversation was moved out of the studio and into a restroom adjacent to where I was sitting.
27. I was approximately 2 feet away from the bathroom when I heard gunshots. I recall hearing multiple shots.
28. I immediately went into a state of shock and feared that I would or could be shot next.
29. A crowd gathered around the restroom, and when the door finally opened, Mr. Combs and Justin Combs exited.

30. G was lying on the restroom floor in a fetal position, holding his torso and bleeding out from what I believed was somewhere near his leg/hip area.
31. Everyone stood around looking at G, and nobody was trying to help him. I was very frustrated by the lack of aid G was receiving, and I was determined not to let him die on my watch.
32. I dropped everything I was doing, ran to G, and immediately began placing pressure on G's gunshot wounds.
33. As I was applying pressure on his first wound, I realized that G was gushing blood from another area near his leg/hip, so I decided to lift G and place him on the toilet. I asked the crowd to call the ambulance. I picked G up and brought him to the front of the studio where I believed the ambulance would be. Unfortunately, when I arrived at the front of the studio, I was told the ambulance was at the end of the block and refused to come to the studio out of fear that there was an active shooting. I had to run to the ambulance and inform and convince them that it was safe for them to come to the studio.
34. At this time, Mr. Combs and Justin Combs disappeared to studio G across the parking lot from studio A.
35. Mr. Combs gave strict instructions to inform the police that he had nothing to do with the shooting. He also forced me to lie to the police by telling them that G was shot standing outside the studio by a drive-by assailant.
36. I have a video of the restroom where G was located, and it clearly shows all of the blood that G lost as a result of being shot.
37. I have several writers' camp attendees who are willing to provide the Court with a sworn statement corroborating what I witnessed and experienced at Chalice Recording Studios.



This photo was taken shortly before the shooting.

b) Sex Workers, Parties, and Excessive Drug Use

38. Mr. Combs converted the parking lot at Chalice Recording Studios into a makeshift nightclub. He had everything imaginable there, including a full-service bar, a massage spa, and hookah.
39. Every evening, Mr. Combs would host a party called "Club Love," and there would be all the attendees of the writer's camp, artists, and record label executives.
40. In addition to Club Love, Mr. Combs required everyone working on the Love Album to take laced shots of DeLeon Tequila. There was no way to tell him no. Mr. Combs felt anyone who refused to drink with him was suspicious and untrustworthy. At the time, I did not realize that he used the laced shots of alcohol to obtain and maintain control over the person consuming the alcohol.

41. Mr. Combs was not the only person who pressured everyone to take shots. His chief of Staff, Kristina Khorram (“KK”), and her direct reports, DeForrest Taylor, Frankie Santella, the A&R for Love Records, Brendan Paul, and Moy Baun, did so as well.

Drugs and Sex Trafficking:

42. Throughout the duration of my time living with Mr. Combs, I personally witnessed Mr. Combs order his staff to bring him drugs and sex workers. This was a common occurrence, and he was never told no.
43. On several occasions while in Miami, I was required to order sex workers from strip clubs in Miami, Florida. I would have to send the sex workers Ubers to Mr. Combs' property located at 2 Star Island in Miami, Florida. I am in possession of many Uber receipts.
44. On several occasions, I witnessed Brendan Paul pack cocaine, TUCI, ecstasy, and marijuana, laced candies with marijuana and other substances in his carry-on luggage whenever we had to travel internationally and to other states.

Sex Trafficking:

45. Throughout my time with Mr. Combs, I was transported from California to New York, Florida, Saint-Barthélemy, and the Virgin Islands.
46. During this time, I was forced to solicit sex workers and perform sex acts to the pleasure of Mr. Combs. Unbeknownst to me, Mr. Combs had hidden cameras and audio devices in all of the rooms of his homes. I only discovered this several months into living with him when I had to pick up my UberEATS delivery from the security office. Usually, the security would bring my food deliveries to me wherever I was in Mr. Combs' home, but at this point, I was close and familiar with the security, so they called me to their room and told me I could go in and retrieve my food myself. I saw 4 to 6 large flat-screen television monitors at that time. Each monitor had at least 20-30 little screens in them. Each screen was a view of a room in and surrounding Mr. Combs' home.
47. On the following occasions, I was forced to solicit different sex workers and bring them to 2 Star Island Drive in Miami, Florida: 11/29/22, 11/30/22, 12/1/22, 12/2/22, 12/3/22, 12/6/22, 1/26/23, 1/27/23, 1/28/23, 1/29/23, 1/30/23, 1/31/23, 2/1/23, 2/2/23, 2/4/23, 2/5/23, 2/8/23, 2/9/23, 4/1/23, 4/4/23, 5/5/23, 5/6/23, 5/7/23, 5/8/23.

48. For example, on July 2, 2023, Mr. Combs had a listening party in his California home. There were a lot of people present at this party, including Chris Brown, Justin Combs, sex workers, and some underaged girls. Justin Combs would typically bring the younger women to these parties. I have two videos of two different sex workers that Justin Combs brought with him to Chalice Recording Studios. I can provide the videos to the Court.
49. This event began at 7 pm. Mr. Combs requested female sex workers and required me to solicit them. An hour later, several sex workers appeared. In addition to sex workers, there were at least five women in the crowd who appeared to be under the age of sixteen.
50. Mr. Combs forced all the attendees to drink laced DeLeon liquor. I believe Mr. Combs laced the liquor with ecstasy. I have personally witnessed his staff members, Brendan Paul and Moy Baun, lace alcohol with ecstasy.
51. The presence of what I perceived to be underage women made me very uncomfortable. I attempted to leave, and Mr. Combs forced me to stay. I had my car keys in my book bag. I have never lost my keys, and Mr. Combs went so far as to take my car keys to prevent me from leaving.
52. After being forced to drink laced DeLeon shots, I began feeling lightheaded, and I passed out. I remember waking up at 4 am the following morning naked with a sex worker sleeping next to me.
53. On February 2, 2023, I believe Mr. Combs drugged me. I remember waking up naked, dizzy, and confused. I was in bed with two sex workers and Mr. Combs. I also recall aimlessly wandering around the house with no clothes on. I have photos of the sex workers sleeping on the bed the morning after. I can provide it to the Court if necessary.

Mr. Combs Offered Me Cocaine:

54. On Thanksgiving night of 2022, at Mr. Combs' home in Miami, Florida, he asked me and DeForrest Taylor to enter the bathroom in his studio.
55. He asked us for a hundred-dollar bill because he wanted us to do cocaine with him.
56. I was deathly afraid. Luckily, I did not have a hundred-dollar bill. Mr. Combs waited a little later to do cocaine with Yung Miami.

57. On many different occasions, Mr. Combs often required me to solicit sex workers from Booby Trap on the River, located at 3615 NW S River Dr, Miami, FL 33142. I did as he asked, and Mr. Combs forced me to engage in unsolicited sex acts with these workers.
58. Mr. Combs personally trained me how to solicit sex workers from Booby Trap on the River. I have a recording of the evening and can provide it to the Court.
59. In addition to providing me with training, Mr. Combs gave me an exclusive Bad Boy baseball cap and required me to wear it to Booby Trap on the River as a signal to any sex worker I approached that Mr. Combs was in town and had sent me to recruit them.
60. I had no desire to visit Booby Trap on the River. I had no desire to solicit sex workers from Booby Trap on the River. Mr. Combs used his power and influence to intimidate and force me into soliciting sex workers from Booby Trap on the River.
61. Unbeknownst to me, these workers were accustomed to servicing Mr. Combs and would know that he was in town by the sight of the Bad Boys baseball cap.
62. Mr. Combs promised me many things to entice me to continue engaging in his sex trafficking operation. On multiple occasions we discussed winning Grammys for the Love Album. He promised I would win the Grammy for Producer of the Year for the Love Album. He offered me \$250,000.00 to purchase all the instruments I wanted. He promised me ownership of his \$20,000,000 property, 1 Star Island, in Miami, Florida. He promised to give me access to record label executives like Lucian Charles Grainge and Ethiopia Habtemariam.
63. On multiple occasions, when Mr. Combs hosted parties at his homes in LA and Miami, many music label executives from Universal Music Group (“UMG”) and Motown Records were present.
64. Some of the other organizations represented were Apple Music and Spotify who were at Mr. Combs house in April 2023 for a listening party and a after party.

Sexually Assaulted by Yung Miami’s Cousin:

65. As previously mentioned, during the Thanksgiving gathering at Mr. Combs' home in Miami, Florida, Mr. Combs offered me cocaine. I rejected his offer and walked into the restroom, which was off to the right after you entered his home studio.

66. While using the restroom, Yung Miami's cousin burst into the bathroom and began groping me. I honestly believed that Mr. Combs sent her in there to sexually assault me as I could hear him and the other guest laughing outside the door. As she entered the bathroom, she dropped to her knees and began performing oral sex on my exposed penis. I pushed her away and exited the bathroom. Yung Miami's cousin did not accept my rejection and followed me out of the bathroom. She started undressing in front of everyone and attempted to straddle me and have sex with me in the presence of Mr. Combs and his staff. They were all laughing.
67. Despite the lack of assistance from Mr. Combs and his staff, I pushed her off. I can provide photos and videos of the room before this assault.

Mr. Combs Used My Admiration For Producer Stevie J To Groom Me Into Accepting Gay Sex:

68. I have nothing against individuals who are members of the LGBTQ+ community. I have family members and friends who are members of the community. I am a heterosexual male, and I made that point very clear to Mr. Combs.
69. Mr. Combs would always do things in covert and overt ways to see if I would be open to having sex with men. Aside from physically assaulting me by groping my groin and buttocks, Mr. Combs showed me a video of music producer Steven Aaron Jordon penetrating a Caucasian man.
70. Stevie J was part of the Bad Boy Records production team, the Hitmen, and had worked for Mr. Combs for nearly 30 years. He produced many hit songs and won a Grammy Award for his work on Mr. Combs album. This was the same Grammy that Mr. Combs promised I would win for the Love Album.
71. As a young producer, I admired Stevie J's success. Mr. Combs knew this, as we had many discussions about it. He used access to Stevie J and his knowledge of my admiration of Stevie J to groom and entice me to engage in homosexual acts.
72. Mr. Combs went so far as to share a video of who he claimed was Stevie J anally penetrating a Caucasian male without a condom. I honestly believed that Mr. Combs showed me this and attributed it to Stevie J to see my reaction and to ease my anxiety concerning sex with

men. The person in the video looked like and sounded like Stevie J. I honestly believed it was him.

73. Mr. Combs told me that "this is a normal practice in the music industry; look even Stevie J is doing it." he also shared that there are many other known artists who engage in sexual intercourse with men.
74. During my time living with Mr. Combs, I have personally witnessed these men and others visit his houses and disappear into his bedroom for hours. Several of these men own record labels and have notable catchphrases like "and another one" or "Maybach Music." I can provide those names at the Court's request.

Cuba Gooding Junior Sexually Assaulted Me:

75. I believe Mr. Combs was grooming me to pass me off to his friends, and my fear became a reality when he introduced me to Cuba Gooding Jr. while we were on his Yacht. During the introduction, he suggested that Cuba "get to know" me better. He then left me alone with him in a makeshift studio on the Yacht.
76. Cuba Gooding Jr. touched, groped, and fondled my legs, upper inner thighs near my groin, the small of my back near his buttocks, and his shoulders.
77. This made me extremely uncomfortable, and I tried to lean away from Mr. Gooding Jr. I rejected his advances, but Mr. Gooding Jr. did not stop until I forcibly pushed him away.

Drug Use and Distribution:

78. On several occasions, Mr. Combs informed me that the executives at the parties in his homes were Lucian Charles Grainge, Ethiopia Habtemariam, and other talent acquisition representatives from UMG and Motown. Mr. Combs often left the parties when these executives appeared and took them to his bedroom. They would be gone for several hours. Although I saw who Mr. Combs was referring, I never personally met with or spoke to Lucian Charles Grainge, Ethiopia Habtemariam, or any other executive who was present at these parties. I was prohibited from doing so, as meeting or being introduced to them was a privilege I would have to earn through loyalty and obedience to Mr. Combs. Mr. Combs personally informed me that these executives were present and always told me they came to scout talent.

79. In addition to the previous paragraphs, Mr. Combs often switched his approach to force me to obey and comply with his demands. On multiple occasions, he would threaten me with physical harm. Mr. Combs threatened to eat my face and informed me that he was willing to kill his mother to get what he wanted so he wouldn't think twice about harming me.
80. Mr. Combs would also make me work out of this bedroom whenever he had gang members and drug dealers visit him. I have witnessed Mr. Combs hand out guns from the hidden room in his bedroom closet. The individuals who received these guns were often dressed in black.
81. I have also seen individuals bring bags of cash to Mr. Combs' home. Mr. Combs informed me that this money came from UMG. I have witnessed known gang members at his home in LA and Miami be paid from the stacks of cash he has in the hidden room in his bedroom closet. I have seen Mr. Combs bring the cash-out and place it on his bedroom table, bed, or couch. Other than Mr. Combs, the only individual I have witnessed enter the hidden room in his bedroom closet was Mr. Combs' Chief of Staff Kristina Khorram ("KK"). She was allowed to remove cash and drugs from the hidden room in his bedroom closet.
82. During the thirteen months I lived and traveled with Mr. Combs, I witnessed KK openly order her assistants to keep Mr. Combs "high" off laced gummies and pills. I have a recording taken on a Yacht that Mr. Combs rented just before Christmas 2022 to shortly after New Year's 2023. In this recording, you will hear Mr. Combs coaching Comedian Amy Schumer how to rap, and KK is in the background instructing her staff to get Mr. Combs laced narcotic gummies.
83. KK also required all employees, from the butler and the chef to the housekeepers, to walk around with a pouch or fanny pack filled with cocaine, GHB, ecstasy, marijuana gummies (100 - 250 mg each), and Tuci (a pink drug that is a combination of ecstasy and cocaine).
84. KK ordered and distributed ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms to Mr. Combs and his celebrity guests who were present on his rented Yacht, and in his homes in LA, NYC, and Miami.
85. On multiple occasions, KK forced me to carry Mr. Combs' drug pouch against my will. I had to carry the pouch to the Booby Trap strip club in Miami.
86. Brendan Paul always carried the black pouch with him. I have videos and photos of this, and I can provide them to the Court.

87. Brendan Paul would transport the drugs through his carry-on luggage while flying with Mr. Combs. Mr. Combs informed us that TSA does not check for narcotics and other drugs in carry-on luggage. On several occasions, I witnessed Brendan Paul pack cocaine in his carry-on luggage before taking international trips with Mr. Combs.
88. As the Chief of Staff, KK was instrumental in organizing and executing Mr. Combs criminal Enterprise. KK had the following individuals execute the following tasks for the enterprise: Brendan Paul and DeForrest Taylor.
89. On the following dates, I witnessed either DeForrest Taylor, Brendan Paul, or KK procure, transport, and distribute ecstasy, cocaine, GHB, ketamine, marijuana, mushrooms, and Tuci by packing these substances in their carry-on luggage and going through TSA: 11/22/2022, 12/22/2022, 04/28/2023, and 11/4/2023. The destinations for these trips were: Los Angeles, California; Miami, Florida; Saint Barthélemy; and London, England.

Mr. Combs Advises That He Does Not Pay For Anything:

90. Throughout my time living with Mr. Combs, he made it very clear that he did not spend his money on anything. He made it clear that he had partnerships and relationships with very powerful individuals and organizations, and these individuals and organizations funded his lifestyle.
91. Mr. Combs told me that he had a long-standing relationship with UMG, Lucian Charles Grainge, and Ethiopia Habtemariam. He shared that when he was creating Love Records, he informed Ethiopia Habtemariam and other label executives, like L. A. Reid. Mr. Combs intended to partner with L. A. Reid and his label HitCo, but L. A. Reid informed him that he was negotiating the sale of the label. Mr. Combs told me that Ethiopia Habtemariam and Motown were his second option.
92. Mr. Combs informed me that he met with Lucian Charles Grainge, CEO of UMG, and Ethiopia Habtemariam, CEO of Motown Records, to negotiate the terms of the partnership.
93. Mr. Combs told me that Lucian Charles Grainge and Ethiopia Habtemariam agreed to partner with him to establish Love Records. As part of their partnership, they agreed to distribute the first and second Love Albums.
94. Mr. Combs informed me that UMG paid for Club Love, Chalice Recording Studios, and the Yacht, which he chartered from December 2022 to January 2023.

95. My counsel informed me that UMG claims that they had a distribution deal with Mr. Combs, and that they agreed to pay him for any approved invoices for the creation of the Love Album. I have to disagree with UMG's statements because Mr. Combs never paid me or several producers I know who worked on the Love Album.
96. My counsel informed me that UMG claims that they did not pay for sex workers or sponsored any of the club loves parties, or the writers camp. These claims are contradicted by the reality I saw with my own eyes. There were employees of UMG and Motown present at the writer's camp, at listening parties, and after parties. I was told by Mr. Combs they were there, and I saw them there. Mr. Combs told me they were scouting for talent. As it pertains to the sex workers, they also paid for them. I have several videos of the Chalice Recording Studio sessions, as well as in home recording sessions and there are sex workers and producers in the studio. The sex workers in these videos were the only individuals paid.
97. The following are screenshots of these recording sessions which took place in Chalice Recording Studios and in Mr. Combs home:



This Video Was Taken On January 29, 2023 Inside Sean Combs Home Located At 2 Star Island in Miami Florida



This Video Was Taken On September 30, 2022 Inside Chalice Recording Studio Justin Combs Solicited The Sex Worker In This Video



This Video Was Taken On September 15, 2022 Inside Chalice Recording Studio Justin Combs Solicited The Sex Worker In This Video

Mr. Combs Bragged About "Having Fun and Not Getting Caught"

98. In a recording I can provide the Court, and on multiple other occasions, Mr. Combs shared wild stories of his 30+ years in the music industry. He shared how he would get things by

force. This included record deals, signatures on contracts, sex acts from women and men, as well as the women of his enemies.

99. For example:

- a. Mr. Combs bragged about having Daphne Joy, the child mother of a competing rapper, on payroll as one of his sex workers. I have a video of Mr. Combs on a massage table receiving a massage from a professional masseuse while Daphne Joy is giving him a foot massage.
- b. Mr. Combs bragged about shooting a woman in the face in 1999 in NYC and getting away with it. He bragged about departed attorney Johnny Cochran's savvy legal skills and ability to pay off the witnesses through private investigators and other third parties. He bragged about having Jennifer Lopez carrying his gun into the club the night of the shooting and the fact that he had so much power and influence over her at the time. He bragged about getting Shyne to take the heat for the shooting and the fact that he paid Shyne through a record deal with his good friend L. A. Reid.
- c. Mr. Combs bragged about the power he has and the fact that he beat up record executive Steve Stoutes "ass." He laughed uncontrollably as he talked about busting him in the head with a bottle of champagne and a chair.
- d. On another occasion, Mr. Combs bragged about beating up Gerard Rechnitzer outside of a nightclub in Hollywood.
- e. Mr. Combs also informed me that only poor people pay taxes. He shared that it is a common practice in the music industry to wire money from anonymous accounts overseas. This way, if there is ever a need to take care of a problem, it would never be traced back to him. These accounts were in Germany.
- f. Mr. Combs also shared that he invests in many shell companies and provides funding for businesses like Wing Stop.

100. I could share other things, but I do not feel comfortable putting them in this document. I will be willing to discuss them with the Court under seal to preserve my Fifth Amendment rights.

I declare, under penalty of perjury under the laws of the United States of America, that the preceding is true and correct. I understand that if I intentionally lie, I would be subject to punishment.

Execution Date: Apr 8, 2024



Rodney Jones, Apr 8, 2024 21:40 EDT

RODNEY JONES