

EXHIBIT 1

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 JOHN DOE,

14 Plaintiff,

15 vs.

16 THE BUZBEE LAW FIRM, ANTHONY G.
17 BUZBEE,

18 Defendants.

CASE NO. **24SMCV05637**

**COMPLAINT FOR EXTORTION AND
INTENTIONAL INFLECTION OF
EMOTIONAL DISTRESS**

DEMAND FOR JURY TRIAL

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1 Complainant John Doe, by and through his attorneys, brings this Complaint against
2 Defendants The Buzbee Law Firm and Anthony G. Buzbee for extortion, intentional infliction of
3 emotional distress, and a civil harassment restraining order.

4 INTRODUCTION

5 1. Plaintiff John Doe is the victim of a scheme by Defendant Anthony G. Buzbee and
6 his firm, The Buzbee Law Firm (collectively, “Buzbee” or “Defendants”), who are shamelessly
7 attempting to extort exorbitant sums from him or else publicly file wildly false horrific allegations
8 against him. Defendants have threatened to unleash entirely fabricated and malicious allegations
9 of sexual assault—including multiple instances of rape of a minor, both male and female—against
10 Plaintiff if he refuses to comply with their demands. These baseless accusations are nothing more
11 than a weapon in a calculated plot to destroy Plaintiff’s high-profile reputation for profit, despite
12 the complete absence of any factual basis for such claims.

13 2. This is not the first time Defendants have been involved in an extortionate scheme
14 to extract money from high profile individuals by threatening baseless legal action. Just three
15 years ago, the Federal Bureau of Investigation (“FBI”) opened an extortion investigation in
16 connection with Defendants’ clients pursuit of football player Deshaun Watson for allegations of
17 sexual misconduct. According to Watson’s then-attorney, the FBI investigated “whether one of
18 Buzbee’s claimants against Watson had committed extortion in the way they were demanding
19 money...or what they would do if he didn’t pay up.”¹ Ultimately, the criminal cases Defendant
20 threatened to pursue against Watson were rejected by two separate grand juries and were never
21 criminally prosecuted, further evidence that the baseless sexual misconduct claims in Defendants’
22 demand letter would not have held up in civil court either. As an example of how the Defendants
23 use the media as a weapon to further exert pressure on his high-profile targets, Buzbee publicly
24 proclaimed that he would submit affidavits from the alleged victims to police, but he never did.²

26 ¹ [https://www.khou.com/article/news/local/deshaun-watson-fbi/285-3b4e5cae-7c8e-4b30-](https://www.khou.com/article/news/local/deshaun-watson-fbi/285-3b4e5cae-7c8e-4b30-bac3-cf60ab2ed00d)
27 [bac3-cf60ab2ed00d](https://www.khou.com/article/news/local/deshaun-watson-fbi/285-3b4e5cae-7c8e-4b30-bac3-cf60ab2ed00d)

28 ² [https://abc13.com/deshaun-watson-houston-texans-quarterback-lawsuits-civil-](https://abc13.com/deshaun-watson-houston-texans-quarterback-lawsuits-civil-sued/10448283/)
[sued/10448283/](https://abc13.com/deshaun-watson-houston-texans-quarterback-lawsuits-civil-sued/10448283/)

1 3. Defendants have also taken up representations against high profile individuals who
2 were targeted or set up by individuals seeking a pay day. For example, Defendants brought suit
3 against rappers Yella Beezy and Chris Brown after four men snuck back stage to provoke them
4 into an altercation.³

5 4. In addition to shaking down high-profile individuals with dubious claims he knows
6 will not stand up in court, Buzbee often employs unscrupulous litigation tactics after filing suit.

7 5. In one notable case, a federal court invalidated a referral agreement between
8 Buzbee and a known fact witness in the case, which entitled the witness to 15% of the gross
9 attorneys' fees awarded if the plaintiff was victorious. *Haywood v. Univ. of Pittsburgh*, No. 11-
10 1200, 2012 U.S. Dist. LEXIS 179045, at *2. The Court held that such agreements were "invalid as
11 a matter of public policy" and prohibited Buzbee from paying the witness any fee.

12 6. In another unscrupulous move, to get a case heard in a favorable venue, Buzbee
13 submitted "venue pleadings and [a client] affidavit" characterized as "at best, incorrect, and at
14 worst, fraudulent." *See In re Lowe's Home Ctrs., LLC*, 531 S.W.3d 861 (Tex. App. 2017). After
15 the defendant's counsel notified Buzbee's firm "that his clients misrepresented facts" that
16 "affected the trial court's venue determination," Buzbee unilaterally nonsuited the case and refiled
17 a substantially similar case in another favorable venue.

18 7. Buzbee has also allegedly used his connections when navigating the judicial
19 system, for his personal benefit, in a criminal case brought against him. Buzbee was arrested in
20 March of 2016 for driving while under the influence. But Harris County District Attorney Devon
21 Anderson personally dismissed the case after Buzbee completed pretrial intervention.

22 8. The dismissal raised significant concerns because having the District Attorney sign
23 off on the dismissal was "exceedingly rare;" the pretrial intervention program generally lasts a
24 year while Buzbee's case was dismissed after 8 months; and there did not appear to be a formal
25 contract for the DWI pretrial diversion program in Buzbee's file. Houston Mayor Sylvester Turner
26 used the controversial dismissal as part of a political attack ad in Mayor Turn's successful defense
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28 ³ <https://www.nbcdfw.com/news/local/chris-brown-dallas-rapper-yella-beezy-sued-over-alleged-assault-in-texas/3598675/>

1 against Buzbee's run for mayor in 2019, accusing lawyers from Buzbee's firm of donating to
2 District Attorney Anderson while Buzbee's DWI case was pending.

3 9. Earlier in his career, Buzbee was selected to serve as briefing attorney for United
4 States District Court Samuel B. Kent. Buzbee then gained a reputation for being on Judge Kent's
5 favored list.

6 10. In 2001, 85 of Judge Kent's cases being handled by Buzbee's firm were transferred
7 to another District Court Judge "In the interest of the improved administration of justice." Judge
8 Jerry Buchmeyer, then Chief Judge of the Northern District of Texas commented that the transfer
9 was uncommon, unusual and that he did not "think we would do that."

10 11. Buzbee represented several victims of the 2005 explosion at BP's Texas refinery.
11 On October 6, 2006, Judge Kent entered a crucial order requiring BP's CEO to be deposed in the
12 case. An anonymous source reported to the press that minutes after Judge Kent ordered the
13 deposition, Judge Kent jumped in Buzbee's Aston Martin to go to lunch. Within weeks of Judge
14 Kent's order, Buzbee settled his cases with BP.

15 12. In 2009, Judge Kent pled guilty to obstruction of justice and acknowledged that he
16 had nonconsensual sexual contact with two women. Judge Kent was sentenced to 33 months in
17 prison. Although four articles of impeachment were passed by the House of Representatives
18 against Judge Kent, Judge Kent resigned before his trial in the Senate concluded.

19 13. Defendants pursue claims they know will not stand up in a court of law, but target
20 high profile individuals who fear being tried in the court of public opinion could be worse than
21 going along with the racket. Defendants do so through a combination of sending a demand letter
22 with vague allegations of horrific conduct, and then amplify the message broadly in the press.
23 Earlier this year, Defendants targeted football player Brandon McManus, in what Mr. McManus's
24 attorney deemed an "extortionate plot," again threatening a public sexual assault lawsuit.⁴ The
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27
28 ⁴ <https://www.outkick.com/sports/attorney-commanders-kicker-brandon-mcmanus-sexual-assault-extortion>

1 claims Defendant threatened to file in court if Mr. McManus did not pay were investigated by the
2 National Football League, who found “insufficient evidence” for the claims and closed their case.⁵

3 14. Now, in a fact pattern eerily similar to what Mr. Watson, Mr. McManus, and other
4 high-profile targets were subjected to, Plaintiff is on the receiving end of another one of
5 Defendants’ extortionate plots.

6 15. Defendants have an established pattern of making threats and then using third
7 parties to contact the extortion victim, thereby acting as puppet masters, orchestrating their
8 extortion plots from behind the scenes. They follow a clear playbook: fabricate outrageous
9 allegations, send a threatening demand letter through intermediaries, and weaponize the media to
10 destroy their victims’ reputations if they do not pay. This tactic applies relentless pressure while
11 allowing Defendants to distance themselves from direct involvement, making their extortion even
12 more insidious. By pulling the strings through third parties, Defendants not only escalate the
13 intimidation but also shield their own actions from scrutiny, amplifying the harm to their victims
14 while cloaking themselves in plausible deniability. Not anymore.

15 16. In the wake of explosive allegations against Sean Combs (a/k/a “P. Diddy,” a/k/a
16 “Puff Daddy,” a/k/a “Diddy,” a/k/a “PD,” and a/k/a “Love”) in lawsuits filed by eight women and
17 one man, resulting in his indictment for racketeering, sex trafficking by force, and transportation
18 for purposes of prostitution, Defendants have managed to find some 120 plaintiffs (half male and
19 half female), including 25 minors, who claim to have been sexually assaulted by Combs and
20 others.

21 17. Much like other revelations in the #MeToo Movement, the eight women and one
22 man suing Combs sought to find justice by proceeding in their own names in a court of law.
23 Meanwhile, Defendants have created a new pocket industry that capitalizes on the bravery of those
24 victims who came forward to shakedown innocent celebrities, politicians, and businesspeople with
25 an army of masked accusers. Through use of a hotline advertised at press appearances and on a
26 website, Defendants leveraged the media attention from the Combs allegations coming to life to

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28 ⁵ https://www.espn.com/nfl/story/_/id/41535426/nfl-discipline-kicker-brandon-mcmanus-source-says

1 send the message that there is money to be made by calling the hotline, and nobody would ever
2 have to know it was you.

3 18. With Combs behind bars, and payment unlikely to be forthcoming any time soon,
4 Defendants devised a scheme to obtain payments through the use of coercive threats from anyone
5 with any ties to Combs—no matter how remote—who was of sufficient means and reputation for
6 Defendants to expect they would pay an exorbitant sum of money rather than be named.
7 Defendants specifically targeted high-profile individuals who would suffer immeasurable loss
8 from being publicly accused of committing sex crimes, including drugging and raping minors,
9 even if those allegations are false.

10 19. In order to effectuate their campaign of widespread extortion and extract the
11 maximum amount of money from as many high-profile individuals as possible, Defendants
12 concocted a narrative alleging the worst harm imaginable, including stories of alleged child
13 victims, both male and female, who were as young as nine years old at the time of their rape.

14 20. Through a series of media statements and lawsuits describing the acts of unnamed
15 individual defendants, Buzbee made his threats to his celebrity targets clear—pay exorbitant sums
16 of money to remain anonymous, or be publicly named and shamed, offered up to the FBI for
17 criminal investigation, and accused of vile acts in statements to the media.

18 21. After making the consequences for noncompliance with his shakedown clear,
19 Defendants closed in on their targets, sending demand letters to high-profile individuals, including
20 Plaintiff John Doe, accusing them of participating in Combs' crimes.

21 22. In November 2024, Defendants made demands by written correspondence
22 ("Extortion Demands") to Plaintiff containing false allegations of vile conduct by Plaintiff, who
23 Extortion Demands characterize as having been friends with Mr. Combs based on the fact that the
24 two often attended similar events frequented by celebrities.

25 23. The Extortion Demands alleged that Plaintiff raped multiple minors, both male and
26 female, who had been drugged at parties hosted by Combs.

24. In the Extortion Demands, Defendants further threatened to find an untold number of other “victims” to bring claims similar against Plaintiff, that because the specious allegations in the demands had been made, there would certainly be more.

25. Defendants put a ticking clock on the Extortion Demands, threatening to “take a different course” if Plaintiff did not commit to a “confidential mediation” to “resolve this delicate and important matter” by the deadline.

26. Defendants’ actions violate Rule 5-100(A) of the California Rules of Professional Conduct prohibiting attorneys from “threaten[ing] to present criminal, administrative, or disciplinary charges to obtain an advantage in a civil dispute.”

27. Plaintiff presently faces a gun to his head—either repeatedly pay an exorbitant sum of money to stop Defendants from the wide publication of wildly false allegations of sexual assault that would subject Plaintiff to opprobrium and irreparably harm Plaintiff’s reputation, family, career and livelihood, or else face the threat of an untold number of civil suits and financial and personal ruin. The theme of Defendants’ statements and correspondence is the immediate and extensive threat of exposure if Plaintiff fails to make a sufficient offer of money. This is textbook extortion.

28. Buzbee pretends to be speaking truth to power, but that is far from the truth. Defendants claim to be investigating the facts, but the reality is they are finding deep pockets and trying to smear all of them with the same brush. It is a cynical extortion scheme that is dressed up in vindicating victims of actual sexual abuse. Defendants corrupting this righteous cause by trying to monetize the victimization of the women who suffered at the hands of this one guy.

PARTIES

29. Plaintiff JOHN DOE is a celebrity and public figure who resides in Los Angeles, California. Plaintiff brings this action under the pseudonym “John Doe” to avoid the irreparable harm to reputation that he seeks to prevent through this action. Plaintiff will disclose his identity to the Court through a sealed, *in camera* filing or as the Court otherwise deems appropriate.

30. Defendant THE BUZBEE LAW FIRM is, on information and belief, a professional corporation with its principal place of business in the Houston, Texas.

31. Defendant ANTHONY G. BUZBEE is, on information and belief, an attorney licensed to practice in the State of Texas and the State of New York, and is the owner of THE BUZBEE LAW FIRM. THE BUZBEE LAW FIRM and ANTHONY G. BUZBEE may hereinafter be referred to collectively as “Buzbee.”

JURISDICTION AND VENUE

32. The Court has personal jurisdiction over Defendants in this action. The extortionate acts of Defendants took place in California where Plaintiff resides and was located when he received the Extortion Demands. In addition, allegations in the Extortion Demands concern events that allegedly occurred in California.

33. Venue is proper in the County of Los Angeles. The relevant activities of Defendants took place in the County of Los Angeles where Plaintiff resides and was located when he received the Extortion Demands. In addition, allegations in the Extortion Demands concern events that allegedly occurred in a residence located in the County of Los Angeles.

STATEMENT OF FACTS

A. Defendants Used Their Representation of Diddy Accusers to Kick Off a Campaign of Threats and Harassment Against Others Affiliated with Diddy

34. On September 16, 2024, Sean Combs (a/k/a “P. Diddy,” a/k/a “Puff Daddy,” a/k/a “Diddy,” a/k/a “PD,” and a/k/a “Love”) was arrested and charged with racketeering, sex trafficking by force, and transportation for purposes of prostitution.

35. On September 17, 2025, the indictment (“Combs Indictment”) charging Combs was unsealed, revealing allegations that for decades, Combs “threatened, and coerced women and others around him to fulfill his sexual desires, protect his reputation, and conceal his conduct.”

Exhibit A (Combs Indictment) ¶ 1.

36. The Combs Indictment further alleges that Combs “relied on the employees, resources, and influence of the multi-faceted business empire that he led and controlled—creating a criminal enterprise whose members and associates engaged in, and attempted to engage in, among other crimes, sex trafficking, forced labor, kidnapping, arson, bribery, and obstruction of justice.” Ex. A ¶ 2.

1 37. The Combs Indictment does not mention any sexual misconduct by other
2 “celebrities” or high profile individuals.

3 38. Still, Combs’ arrest and indictment set off a media frenzy, with coverage by all
4 major new outlets regarding speculation of what other celebrities may have been involved in the
5 parties described by the Combs Indictment.

6 39. Any association with Combs became toxic. Other members of the entertainment
7 industry were quick to make public statements condemning Combs and distancing themselves
8 from him.

9 40. Trading off the immense media coverage that came from the Combs Indictment, on
10 September 27, 2024, Buzbee posted to Instagram that The Buzbee Law Firm would be acting “as
11 Lead Counsel to pursue claims on behalf of more than fifty individuals who suffered sexual
12 assault and abuse at the hands of Sean ‘Diddy’ Combs and his cohorts.” Buzbee ominously
13 warned that “*many other individuals will be implicated.*” Exhibit B (Buzbee Instagram Post)
14 (emphasis added).

15 41. Buzbee followed up a press release on September 29, 2024 announcing that he
16 would be holding a press conference where “information will be made available for the first time
17 to the public regarding claims made by victims against Sean ‘Diddy’ Combs *and other alleged*
18 *perpetrators where rape, sexual assault, and sexual exploitation are alleged.*” The press release
19 continued, “Details provided at the conference will include information regarding *other potential*
20 *defendants.*” The press release also included the following quote attributed to Defendant Buzbee:
21 “This is an important matter that we intend to aggressively pursue. We will leave no stone
22 unturned to find all potentially liable parties, to include any individual or entity who participated
23 in or benefitted from this egregious behavior.” Exhibit C (Buzbee Press Release) (emphasis
24 added).

25 42. On October 1, 2024, Defendants held a press conference in which Buzbee warned
26 about the consequences of refusing to settle with his clients out of court.⁶ With a banner showing
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28 ⁶ <https://www.fox26houston.com/video/1525043>

1 the number to a hotline for new claimants, Buzbee made the following comments with the intent
2 to send a clear message and shakedown high profile individuals who had not yet been implicated
3 in Combs' alleged crimes:

- 4 a. "We will find the silent accomplices. We will expose the enablers who
5 enabled this conduct behind closed doors. We will pursue this matter who
6 the evidence implicates." **Exhibit D** (Oct. 1, 2024 Press Conference Tr.)
2:17-21.
- 7 b. "We now represent 120 individuals who intend to bring civil claims in civil
8 court against Sean "Diddy" Combs, as well as claims against many other
9 individuals and entities that we will name as defendants as we file these
10 individual cases. And you should know, to the extent the clients feel
11 comfortable, we also intend to make these individuals available to the
12 authorities, specifically to the FBI. Ex. D 3:9-17.
- 13 c. "Now I know this. Many of you came here thinking or hoping or perhaps
14 believing that I may start naming names. Well, that day will come, but it
15 won't be today. **The day will come when we will name names other than**
16 **Sean Combs.** And there's a lot of names. Um, it's a long list already. And
17 of course, I already know who some of these individuals are." Ex. D 11:20-
12:5.
- 18 d. "[W]hat we've been told are names that will shock you. These are
19 individual cases. There are indeed other perpetrators involved. They will
20 be revealed when that particular individual case is ready to be filed. They
21 already know who they are. And I'm talking here not just about the
22 cowardly and complicit bystanders. That is, those people we know watched
23 this behavior occur and did nothing. I'm talking about the people that
24 participated, encouraged it, egged it on. They know who they are. I call
25 them the facilitators of foul play. Willing participants in vile conduct. **As**
26 **we identify them, each will be part of this case as defendants.**" Ex. D
27 12:10-13:1.
- 28 e. "These people who know who they are should just come forward now. I
would imagine as we speak here, there are a myriad of people who are very
nervous. You can't hide skeletons in the closet forever." Ex. D 14:5-10.
- f. "We welcome the FBI or any authority who wants to come to us, and we're
going to make that available to these victims, because I think that's
important. My suspicion is based on talking with these folks is that that,
you know, the FBI is just not aware of these people. The FBI has talked to
some of these folks. And I'm going to try to make - - encourage the victims
to in fact talk to the FBI because I think they have some very important
things to say." Ex. D 31:10-19.

1 43. Notwithstanding the rhetoric, Defendants intentionally failed to identify at the press
2 conference who these amorphous “perpetrators” might be—nor have they done so since. The
3 purpose of his ominous press conference was clear: extract lucrative pre-filing settlements from
4 these perpetrators, or else he would announce names.

5 44. The next day, in an interview with Law and Crime news on October 2, 2024⁷,
6 Buzbee made clear the scope of his scheme, claiming that he would “find and ferret out all the
7 people involved, facilitated, benefitted from, profited from, and make sure that they are parties in
8 these cases as we file them. **Exhibit E** (Oct. 2, 2024 Interview Tr.) 10:5-8. Buzbee set the stage
9 to bring claims against his victims despite an absence of evidence through the use of intimidation,
10 stating “I have no doubt that there are people right now who know that they were somehow
11 involved in this who are now scrubbing their social media, who are searching their memories, who
12 are deleting their texts, probably deleting pictures and trying to distance themselves from this.
13 And we know who they are or we will find out who they are. So, you know, this is—this is not
14 something that’s going to happen overnight, but I think we’re at the tip of the iceberg here.” *Id.* at
15 10:10-19. And to those who refused to cooperate, Buzbee made the consequences crystal clear:
16 “What I’m hoping is, and I’m encouraging my clients . . . [to] make themselves available to the
17 federal authorities, to get—tell their story and I expect the indictment will grow.” *Id.* at 13:17-21.

18 45. One day later, Buzbee told Steven Smith in an interview⁸ that he intended to “make
19 sure I capture a wide net and capture everybody involved and that’s what I’m – that’s what I’m
20 trying to do. And part of the – part of the purpose of the press conference was to encourage
21 people that witnessed some of these events to come forward, and that’s happening now.” **Exhibit**
22 **F** (Oct. 3, 2024 Smith Interview Tr.) 20:5-11.

23 46. Also on October 3, 2024, in an interview with Chris Hansen⁹, Buzbee reiterated his
24 threats to targets who refused to cooperate:

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27 ⁷ <https://www.youtube.com/watch?v=aK3G5asaDhs>

28 ⁸ <https://www.youtube.com/watch?v=nAqQn7NskFc>

⁹ <https://www.youtube.com/watch?v=0gM0S-SgNnw>

- a. “I expect that some of the, the, the people that were the closest to Sean Combs, who are with him at all times, will probably talk. I think, you know, the federal government is really good, as you know, at getting people who are not the targets to talk. I expect that will happen. I expect the indictment and the charges in the indictment will grow. I expect other people will be implicated, so I think that, like I say, I think we’re only seeing the tip of the iceberg here.” **Exhibit G** (Oct. 3, 2024 Hansen Interview Tr.) 21: 16-22:3.
- b. “I call it the, you know, the the facilitators. You know, obviously the people that participated in this are terrible, terrible actions and terrible conduct and, and should be prosecuted and put underneath the jail.” Ex. G 24:3-7.
- c. “But you know what really irks me are the people that saw this happening, that enjoyed, enjoyed themselves while it was happening, that fancy themselves as upstanding people and knew this was happening and continue to go to these parties knowing this was going to happen. And they were in my view just as complicit. And - - and whether they, you know, they can be criminally charged or even civilly sued, people should know.” Ex. G 24:8-17.

47. Buzbee presented himself as a crusader for truth and justice but in reality, he is using his public platform to enable him to extract settlements from high profile individuals.

48. For example, On October 7, 2024, Buzbee told TMZ in an interview that he had sent demand letters out to “a handful of individuals, many of which you’ve heard of before, and we’ll continue to do that,” and that they would “aggressively” go after anyone who did not settle out of court—punishing those who try to defend their name and reputation, rather than making a quick payout out of fear their reputation would be tarnished. **Exhibit H** (Oct. 7, 2024 TMZ Interview Tr.). Indeed, he went so far as to claim “[a] lot of people allowed it to go on, said nothing, didn’t intervene, maybe benefited from it, profited from it. All of these individuals and entities, in my view, have exposure here.” *Id.* He goes onto say “If you were attending one of these ‘parties,’ if you will, and you attended before or you knew what was going to happen, . . . in my view, you have a problem.” *Id.* Buzbee made good on his threat and sent Plaintiff the Extortion Demands after this statement.

1 49. The same day, Buzbee also told Shaun Atwood in an interview¹⁰ that his “view is if
2 there were people present, had been at these parties in the past who knew that this was being used
3 and put it in people’s drinks or perhaps being put in oil that was rubbed, you know, people rubbing
4 it up on each other, and they allowed that to occur, participated in that, sat there and watched it,
5 didn’t intervene or kept it quiet, as far as I’m concerned, you’re just as complicit as the individual
6 who coerced and engaged in some sort of sexual exploitation.” **Exhibit I** (Oct. 7, 2024 Atwood
7 Interview Tr.) 14:8-18. Buzbee also disclosed the success of his strategy: “I will write a letter and
8 usually when I write people a letter, you know, I’ve been doing this for almost 30 years, usually I
9 get people’s attention when I write them a letter.” *Id.* at 25:5-9.

10 50. On October 14, 2024, Defendants began filing lawsuits on behalf of anonymous
11 plaintiffs, referred to as “Jane Doe” or “John Doe,” claiming to have been brutally assaulted by
12 Combs and others. Defendants described other individuals alleged to be involved in vague terms
13 with no identifying details and used language to make clear that the complaint could be amended
14 to add any individual who refused to pay Defendants as a named defendant.

15 **A. Defendants Targeted Plaintiff for a Shakedown**

16 51. Defendants sent Plaintiff multiple ostensibly “confidential” written demands
17 (“Extortion Demands”) in November 2024 alleging a litany of vile sexual misconduct committed
18 by Plaintiff.

19 52. The Extortion Demands falsely alleged that Plaintiff raped multiple two minors,
20 male and female, who had been drugged at parties hosted by Combs. The Extortion Demands
21 were the first time Plaintiff learned of these allegations, none of which has any basis in fact.

22 53. Defendants threatened in the Extortion Demands to “immediately file” a “public
23 lawsuit” against Plaintiff repeating the same fabricated allegations unless Plaintiff agreed to
24 resolve the matters through mediation for money.

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28 ¹⁰ <https://podcasts.apple.com/il/podcast/buzbee-live-texas-lawyer-for-120-diddy-alleged-victims/id1434527138?i=1000672177342>

1 54. Some of the allegations were a copy and paste of the allegations in a public
2 complaint filed by Defendants, with the obvious implication being that Defendants would amend
3 that complaint if Plaintiff refused to cooperate.

4 55. On information and belief, Defendants used identical language to put Plaintiff on
5 notice that his name would be swapped in as one of the unnamed participants if he did not comply
6 with Defendants' demands.

7 56. In the Extortion Demands, Defendants further threatened to find an untold number
8 of other "victims" to bring claims similar against Plaintiff, but did not indicate he had any basis to
9 believe such "victims" exist. This veiled threat is preceded by the following bolded sentence: **"It**
10 **has been my experience that when someone does this to a victim once, the likelihood is that**
11 **they have done the same or similar things to others."** This is the only bolded sentence
12 contained in the Extortion Demands, emphasizing its importance among all other allegations and
13 demands.

14 57. On information and belief, Defendants referenced additional "victims" to put
15 Plaintiff on notice that Defendants would "find" additional claimants to seek payments from
16 Plaintiff if Plaintiff did not pay out the two claimants referenced in the Extortion Demands,
17 meaning the amount of money Defendants was seeking would balloon.

18 58. The Extortion Demands also contained the web address of The Buzbee Law Firm
19 (www.txattorneys.com) in bolded extra-large font at the top. This website features a page
20 dedicated to the "Sean 'Diddy' Combs Litigation" that contains the video of Defendants' October
21 1, 2024 press conference as well as text touting Defendants' experience "representing victims in
22 high-stakes cases, including prominent lawsuits against various celebrities and corporations" and
23 "approach to litigation characterized by his aggressive tactics and willingness to take on powerful
24 opponents."

25 59. Defendants put a ticking clock on the Extortion Demands, threatening to "take a
26 different course" if Plaintiff did not commit to a "confidential mediation" to "resolve this delicate
27 and important matter" by the deadline, giving Plaintiff a small window of time before making
28 good on their threats.

1 60. On information and belief, Defendants intended “take a different course” to be a
2 reference to the threats he made in statements to the media, including that he would report Plaintiff
3 to the FBI, file an untold number of civil suits, and make further statements to the media accusing
4 Plaintiff of being a child rapist.

5 61. After receiving the Extortion Demands, Plaintiff contacted Defendants to better
6 understand the basis for the allegations made in the Extortion Demands and whether there was any
7 evidence—or real claimants—behind those claims. Though Defendants divulged sensitive details
8 pertaining to claimant’s accounts in the Extortion Demands and a public lawsuit, Defendants
9 refused to provide any information, including the process for validating the claims, unless Plaintiff
10 entered into confidentiality agreement. Such an agreement would protect Defendants from being
11 exposed for their own unethical and illegal conduct.

12 62. After refusing to provide information supporting the legitimacy of the claims in the
13 Extortion Demands, Defendant Buzbee appeared again on TMZ¹¹ to confirm that demand letters
14 had been sent to multiple targets and threaten that if a “dialogue” fails, “we [will] just file a
15 lawsuit.” **Exhibit J** (Nov. 14, 2024 Interview Tr.) at 3:7. Buzbee confirmed he would be bringing
16 claims against “other celebrities, politicians, businesspeople” because “these were very popular
17 parties” and “this was the venue everybody wanted to be invited to.” *Id.* at 2:11-19. He warned,
18 “if you were there and you knew somebody was being drugged because you had seen it happen in
19 a previous party or previous situation and you didn’t do anything, and you allowed it to happen,
20 and you continued to—to enjoy yourself and part and whoop and holler and have a good time, as
21 far as I’m concerned, you are just as liable as the individual who shipped the person in, who paid
22 thee persons that were there, who keep them longer than they thought they were going to be there,
23 who—who bought the drugs, who took the money out of the bank, who—who put the drugs in a
24 little shot of either a lemon shot or some sort of champagne and participated in this egregious kind
25 of—you’re just as guilty as far as I’m concerned.” *Id.* at 3:12-4:4.

26
27
28 ¹¹ <https://www.tMZ.com/2024/11/14/diddy-tony-buzbee-warns-celebrities-to-pay-lawsuits-freak-offs/>

69. Defendants' threats to publicly "accuse" Plaintiff of "a crime" or to "expose, or to impute to him . . . a deformity, disgrace, or crime" unless he acceded to Defendants' demand for an unspecified amount of money constitute extortion under Cal. Penal Code §§ 523, 524.

70. As a result of Defendants' extortion, Plaintiff has suffered, and will continue to suffer, damages in an amount to be proven at trial. Plaintiff seeks compensation for all damages and losses caused by Defendants' extortion.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

71. Plaintiff repeats and re-alleges, as if fully set forth herein, the allegations of all the preceding paragraphs.

72. Defendants' conduct, and each part of it, was outrageous and intentional and, as Defendants well knew, was likely to inflict emotional distress on Plaintiff.

73. As a direct and proximate result of Defendants' actions, Plaintiff in fact suffered emotional distress, causing him damage in an amount to be determined at trial.

74. Defendants' aforementioned conduct was willful and malicious and was intended to oppress and cause injury to Plaintiff. Accordingly, Plaintiff is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment and relief against The Buzbee Law Firm and Anthony G. Buzbee as follows:

1. An award of actual damages in an amount to be proven at trial;
2. An award of punitive damages;
3. Reasonable costs and attorneys' fees pursuant to applicable law;
4. Pre- and post-judgment interest as applicable; and
5. Any other relief the Court deems just and appropriate.

REQUEST FOR JURY TRIAL

Plaintiff hereby requests a jury trial on all issues triable thereby.

DATED: November 18, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: 

Michael T. Lifrak
Attorneys for John Doe

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SEAN COMBS,
a/k/a “Puff Daddy,”
a/k/a “P. Diddy,”
a/k/a “Diddy,”
a/k/a “PD,”
a/k/a “Love,”

Defendant.

SEALED INDICTMENT

24 Cr.

24 CRIM 542

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

Overview

1. For decades, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, abused, threatened, and coerced women and others around him to fulfill his sexual desires, protect his reputation, and conceal his conduct. To do so, COMBS relied on the employees, resources, and influence of the multi-faceted business empire that he led and controlled—creating a criminal enterprise whose members and associates engaged in, and attempted to engage in, among other crimes, sex trafficking, forced labor, kidnapping, arson, bribery, and obstruction of justice.

2. SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, operated his business, headquartered at various times in Manhattan and Los Angeles, under a variety of United States-based corporate entities, including Bad Boy

Entertainment, Combs Enterprises, and Combs Global (collectively, the “Combs Business”). Corporate entities in the Combs Business included, among other things, record labels, a recording studio, an apparel line, an alcoholic spirits business, a marketing agency, and a television network and media company.

3. At all times relevant to this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, engaged in a persistent and pervasive pattern of abuse toward women and other individuals. This abuse was, at times, verbal, emotional, physical, and sexual. As part of his pattern of abuse, COMBS manipulated women to participate in highly orchestrated performances of sexual activity with male commercial sex workers. At times, COMBS, and others acting at his direction, made arrangements for women and commercial sex workers to fly to COMBS’ location. COMBS ensured participation from the women by, among other things, obtaining and distributing narcotics to them, controlling their careers, leveraging his financial support and threatening to cut off the same, and using intimidation and violence.

4. Physical abuse by SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, was recurrent and widely known. On numerous occasions from at least in or about 2009 and continuing for years, COMBS assaulted women by, among other things, striking, punching, dragging, throwing objects at, and kicking them. These assaults were, at times, witnessed by others and included one instance at a Los Angeles hotel in or about March 2016, which was captured on video and later publicly reported, where COMBS kicked, dragged, and threw a vase at a woman as she was attempting to leave. When a member of the hotel security staff intervened, COMBS attempted to bribe the staff member to ensure silence.

COMBS' violence was also not limited to these women. It extended to his employees, witnesses to his abuse, and others.

5. SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, used the Combs Business, including certain employees, to carry out, facilitate, and cover up his abuse and commercial sex. Those employees—including security staff, household staff, personal assistants, and high-ranking supervisors—and other close associates acted as COMBS' intermediaries, and their conduct was facilitated and assisted by COMBS' control of the Combs Business.

The Combs Enterprise

6. From at least in or about 2008, through on or about the date of the filing of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and others known and unknown, were members and associates of a criminal organization (the "Combs Enterprise" or the "Enterprise"). Members and associates of the Combs Enterprise engaged in, and attempted to engage in, among other activities, sex trafficking, forced labor, interstate transportation for purposes of prostitution, coercion and enticement to engage in prostitution, narcotics offenses, kidnapping, arson, bribery, and obstruction of justice.

7. The Combs Enterprise, including its leadership, its members, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Combs Enterprise consisted of: (i) SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant; (ii) entities within the Combs Business, including but not limited to Bad

Boy Entertainment, Combs Enterprises, and Combs Global; (iii) individuals employed by and associated with the Combs Business; and (iv) others known and unknown.

8. The Combs Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Combs Enterprise. The Combs Enterprise was engaged in, and its activities affected, interstate and foreign commerce. The Combs Enterprise operated in the Southern District of New York and elsewhere.

9. At all times relevant to this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, was the leader of the Combs Enterprise.

10. SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, and others known and unknown, participated in unlawful and other activities related to the conduct of the Combs Enterprise’s affairs. These individuals included certain Combs Business employees, such as members of COMBS’ security staff, household staff, personal assistants, and high-ranking supervisors, as well as other close associates of COMBS.

Purposes of the Combs Enterprise

11. The purposes of the Combs Enterprise included the following:

a. Operating a global business in the media, entertainment, and lifestyle industries, including, among other things, record labels, a recording studio, an apparel line, an alcoholic spirits business, a marketing agency, and a television network and media company;

b. Preserving, protecting, promoting, and enhancing the power, reputation, and brand of SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, as a musician, entrepreneur, and figure in the entertainment industry;

c. Enriching members and associates of the Enterprise, including its leader, COMBS, and in particular those who demonstrated loyalty to COMBS and willingness to conceal his crimes;

d. Preserving, protecting, promoting, and enhancing the power of the Combs Enterprise, including the power of its leader, COMBS, through violence, use of firearms, threats of violence, coercion, and verbal, emotional, physical, and sexual abuse;

e. Fulfilling the personal desires of COMBS, particularly those related to COMBS' sexual gratification, including through the exploitation of women and the use of commercial sex workers;

f. Enabling COMBS and other members and associates of the Combs Enterprise to engage in unlawful acts of violence, including sexual violence; sex trafficking; forced labor; interstate transportation for purposes of prostitution; coercion and enticement to engage in prostitution; narcotics distribution; and other crimes, and concealing the commission of such acts;

g. Securing absolute loyalty from members of the Combs Enterprise, including through acts of violence and threats; and

h. Protecting the Combs Enterprise and its members and associates, including COMBS, from detection and prosecution by law enforcement authorities through acts of intimidation, manipulation, bribery, and threats of retaliation against individuals who witnessed the crimes committed by members and associates of the Enterprise.

Means and Methods of the Enterprise

12. Among the means and methods by which SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and other members and

associates of the Combs Enterprise conducted and participated in the conduct of the affairs of the Combs Enterprise included the following:

a. COMBS, and other members and associates of the Combs Enterprise, wielded the power and prestige of COMBS' role at the Combs Business to intimidate, threaten, and lure female victims into COMBS' orbit, often under the pretense of a romantic relationship. COMBS then used force, threats of force, and coercion, to cause victims to engage in extended sex acts with male commercial sex workers that COMBS referred to as, among other things, "Freak Offs." Freak Offs were elaborate and produced sex performances that COMBS arranged, directed, masturbated during, and often electronically recorded. In arranging these Freak Offs, COMBS, with the assistance of members and associates of the Combs Enterprise, transported, and caused to be transported, commercial sex workers across state lines and internationally. Freak Offs occurred regularly, sometimes lasted multiple days, and often involved multiple commercial sex workers. During Freak Offs, COMBS distributed a variety of controlled substances to victims, in part to keep the victims obedient and compliant. Sometimes unbeknownst to the victims, COMBS kept videos he filmed of victims engaging in sex acts with commercial sex workers. After Freak Offs, COMBS and the victims typically received IV fluids to recover from the physical exertion and drug use.

b. Members and associates of the Combs Enterprise, including high-ranking supervisors, security staff, household staff, personal assistants, and other Combs Business employees, facilitated the Freak Offs by, among other things, booking hotel rooms for the Freak Offs; stocking the hotel rooms in advance with the required Freak Off supplies, including controlled substances, baby oil, lubricant, extra linens, and lighting; cleaning the hotel rooms after the Freak Offs to try to mitigate room damage; arranging for travel for victims, commercial sex

workers, and COMBS to and from Freak Offs; resupplying COMBS with requested supplies; delivering large sums of cash to COMBS to pay the commercial sex workers; and scheduling the delivery of IV fluids. In or about March 2024, during searches of COMBS' residences in Miami, Florida and Los Angeles, California, law enforcement seized various Freak Off supplies, including narcotics and more than 1,000 bottles of baby oil and lubricant.

c. COMBS subjected victims to physical, emotional, and verbal abuse to cause the victims to engage in Freak Offs. COMBS maintained control over his victims through, among other things, physical violence, promises of career opportunities, granting and threatening to withhold financial support, and by other coercive means, including tracking their whereabouts, dictating the victims' appearance, monitoring their medical records, controlling their housing, and supplying them with controlled substances. During and separate from Freak Offs, COMBS, among other things, hit, kicked, threw objects at, and dragged victims, at times, by their hair. These assaults often resulted in injuries that took days or weeks to heal. COMBS also threatened victims' careers and livelihoods, including if they resisted participating in Freak Offs. Victims believed they could not refuse COMBS' demands without risking their financial or job security or without repercussions in the form of physical or emotional abuse. COMBS also used the sensitive, embarrassing, and incriminating recordings that he made during Freak Offs as collateral to ensure the continued obedience and silence of the victims.

d. Members and associates of the Combs Enterprise, including COMBS' security personnel, at times carried firearms. On more than one occasion, COMBS himself carried or brandished firearms to intimidate and threaten others, including victims of and witnesses to his abuse. In or about March 2024, during searches of COMBS' residences in Miami, Florida and

Los Angeles, California, law enforcement seized firearms and ammunition, including three AR-15s with defaced serial numbers, as well as a drum magazine.

e. Members and associates of the Combs Enterprise enabled COMBS' control over victims by following his directions regarding financial payments to victims, advancing or suppressing the victims' career opportunities, and acquiring the controlled substances COMBS used to keep the victims compliant. Members and associates of the Combs Enterprise at times witnessed COMBS' violence toward the victims, or the victims' injuries caused by Combs, without intervening. Instead, members and associates of the Combs Enterprise helped conceal the violence and abuse by, among other things, assisting COMBS in monitoring and preventing victims from leaving locations, such as hotels or COMBS' residences. These occasions included instances in which a victim was required to remain in hiding—sometimes for several days at a time—to recover from injuries COMBS inflicted, without being publicly observed. Members and associates of the Combs Enterprise also assisted COMBS in locating and contacting victims who attempted to flee his abuse.

f. When employees, witnesses to his abuse, or others threatened COMBS' authority or reputation, COMBS and members and associates of the Enterprise engaged in acts of violence, threats of violence, threats of financial and reputational harm, and verbal abuse. These acts of violence included kidnapping and arson. In addition, on multiple occasions, COMBS threw both objects and people, as well as hit, dragged, choked, and shoved others.

g. When COMBS' authority or reputation was threatened by the possibility of negative publicity or legal or law enforcement action against him, including in or about late 2023 following public allegations of COMBS' crimes, COMBS and members and associates of the Enterprise pressured witnesses and victims, including through attempted bribery, to stay silent and

not report what they experienced or knew to law enforcement. On phone calls, COMBS and other members and associates of the Enterprise, among other things, provided these victims and witnesses with a false narrative of events in an effort to conceal COMBS' crimes. COMBS caused these calls to be recorded on at least two occasions.

The Racketeering Conspiracy

13. From at least in or about 2008, through on or about the date of the filing of this Indictment, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and others known and unknown, being persons employed by and associated with the Combs Enterprise described in paragraphs 6 through 12 of this Indictment, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Combs Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. multiple acts involving kidnapping, chargeable under the following provisions of state law: California Penal Code § 207 (kidnapping), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

b. multiple acts involving arson, chargeable under the following provisions of state law: California Penal Code § 451 (arson), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

c. multiple acts involving bribery, chargeable under the following provisions of state law: California Penal Code § 137(a) (bribery of a witness), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

d. multiple acts indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant);

e. multiple acts indictable under Title 18, United States Code, Sections 1589 and 2 (relating to forced labor);

f. multiple acts indictable under Title 18, United States Code, Sections 1591 and 2 (relating to sex trafficking);

g. multiple acts indictable under Title 18, United States Code, Sections 2421, 2422, and 2 (relating to transportation and inducement to travel for purposes of prostitution and other illegal sexual activities); and

h. multiple offenses involving the possession with intent to distribute, or distribution of narcotics and controlled substances, including cocaine, oxycodone, alprazolam, 3,4-Methylenedioxymethamphetamine, 4-Bromo-2,5-dimethoxyphenethylamine, gamma hydroxybutyric acid, and ketamine, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(1)(E), (b)(2), and 846 (distribution and possession with intent to distribute and conspiracy to do the same), and Title 18, United States Code, Section 2 (aiding, abetting, and willfully causing).

14. It was a part of the conspiracy that SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, agreed that a conspirator would

commit at least two acts of racketeering activity in the conduct of the affairs of the Combs Enterprise.

Notice of Special Sentencing Factor

15. From at least in or about 2009, up to and including in or about 2018, in the Southern District of New York and elsewhere, as part of his agreement to conduct and participate in the conduct of the affairs of the Combs Enterprise through a pattern of racketeering activity, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, agreed to, in and affecting interstate and foreign commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Sex Trafficking by Force, Fraud, or Coercion)
(Victim-1)

The Grand Jury further charges:

16. From at least in or about 2009, up to and including in or about 2018, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United

States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and attempted, aided and abetted, and willfully caused the same, to wit, COMBS recruited, enticed, harbored, transported, and maintained a person (“Victim-1”), and attempted, aided and abetted, and willfully caused Victim-1, to engage in commercial sex acts, knowing and in reckless disregard of the fact that Victim-1 was engaging in commercial sex acts as a result of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a)(1), (b)(1), 1594(a), and 2.)

COUNT THREE
(Transportation to Engage in Prostitution)

The Grand Jury further charges:

17. From at least in or about 2009, up to and including in or about 2024, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, knowingly transported an individual in interstate and foreign commerce with intent that the individual engage in prostitution, and attempted, aided and abetted, and willfully caused the same, to wit, COMBS transported, aided and abetted, and willfully caused the transportation of female victims and commercial sex workers in interstate and foreign commerce on multiple occasions with the intent that they engage in prostitution.

(Title 18, United States Code, Sections 2421(a) and 2.)

FORFEITURE ALLEGATIONS

18. As a result of committing the offense alleged in Count One of this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United

States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

19. As a result of committing the offense alleged in Count Two of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offense and any and all property traceable to such property; any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and proceeds traceable to the commission of said offense.

20. As a result of committing the offense alleged in Count Three of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, shall forfeit to the United States, pursuant to (i) Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, and (ii) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any

and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

21. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 18, United States Code, Section 1594;
Title 18, United States Code, Section 1963;
Title 18, United States Code, Section 2428;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)


FOR PERSON

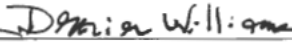


DAMIAN WILLIAMS
United States Attorney

EXHIBIT B


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PRESS RELEASE

Sean Combs Charged In Manhattan Federal Court With Sex Trafficking And Other Federal Offenses


Tuesday, September 17, 2024

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tonybuzbee The Buzbee Law Firm has been associated by the Ava Law Group to act as Lead Counsel to pursue claims on behalf of more than fifty individuals who suffered sexual assault and abuse at the hands of Sean "Diddy" Combs and his cohorts. This group of brave individuals include both men and women; many were minors when the abuse occurred. Some of these brave individuals reported the incidents to the police, others did not. Each individual story is gut wrenching and



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PRESS RELEASE

Sean Combs Charged In Manhattan Federal Court With Sex Trafficking And Other Federal Offenses

Tuesday, September 17, 2024

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powerful people against minors and the weak. I expect the group seeking redress will grow as this case progresses. I expect many other individuals will be implicated. We expect to have a press conference early next week where some of these stories can be told as the nation learns more and grapples with the potential scope of this scandal. Our firm has always been at the forefront of the most important cases in the United States. We are proud to represent this group of brave souls and pray for justice on their behalf.



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**FOR IMMEDIATE RELEASE:*****The Buzbee Law Firm and AVA Law Group to Release Information Regarding Pending Lawsuits***

The Buzbee Law Firm and the AVA Law Group will hold a press conference on Tuesday, at 1 pm, CST, at The Buzbee Law Firm Houston Office, 75th Floor, JP Morgan Chase Tower, 600 Travis, Houston, Texas 77002. At the press conference information will be made available for the first time to the public regarding claims made by victims against Sean "Diddy" Combs and other alleged perpetrators where rape, sexual assault, and sexual exploitation are alleged.

At the conference Lead Counsel Tony Buzbee will release pertinent details regarding cases that will be filed on behalf of what is now well over 100 alleged victims. Details provided at the conference will include information regarding other potential defendants, information about the claimants themselves, where the alleged activity occurred, and what allegedly occurred. Mr. Buzbee also intends to share specific compelling stories of victims and take questions.

Also at the conference Mr. Buzbee will discuss the various state laws that apply, the venues where the cases will be filed, and expected next steps. Further, at the conference, Andrew Van Arsdale, co-counsel and attorney with the AVA Law Group, will publish the **Sexual Assault Hotline, 1-800-200-7474** and explain the process when witnesses or victims call that number.


 1,522  842


tonybuzbee A press conference setting out the claims alleged against Sean "Diddy" Combs and others will be at 1pm, Tuesday, on the 75th floor of Chase Tower. Access is restricted to those with press credentials only. The Buzbee Law Firm and the AVA Law Group represent well over 100 individuals at this point.

If you've been victimized or have witnessed such, call the Sexual Abuse Hotline at 1-800-200-7474. Be brave!!

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September 29



4:42


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 JPMorgan Chase Tower


According to Buzbee: "This is an important matter that we intend to aggressively pursue. We will leave no stone unturned to find all potentially liable parties, to include any individual or entity who participated in or benefitted from this egregious behavior. As we do this important work, we ask that the public understand it is very difficult and takes an incredible amount of courage for victims to come forward. I ask that we treat these brave individuals with the dignity and compassion that they deserve as they go through this trying time. Further, I'm also asking that if you have been victimized, or are a witness to the alleged behavior, please come forward. Your identify will remain confidential at this time."

Details of conference: *Those without press credentials will not be admitted. Uniformed police personnel will be present. The 75th Floor of Chase Tower has a maximum capacity of 100 persons; it is encouraged that members of the press arrive early to gain admission.*

---Attorney **Tony Buzbee** is with The Buzbee Law Firm, headquartered in Houston, Texas and can be found on the web at www.txattorneys.com. **Inquiries:** tbuzbee@txattorneys.com; 713-223-5393.

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tonybuzbee A press conference setting out the claims alleged against Sean "Diddy" Combs and others will be at 1pm, Tuesday, on the 75th floor of Chase Tower. Access is restricted to those with press credentials only. The Buzbee Law Firm and the AVA Law Group represent well over 100 individuals at this point.

If you've been victimized or have witnessed such, call the Sexual Abuse Hotline at 1-800-200-7474. Be brave!!

www.txattorneys.com

September 29



EXHIBIT D

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TRANSCRIPT OF VIDEO-RECORDED

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PRESS CONFERENCE

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"DIDDY LAWSUITS. LAWYER FOR MORE THAN 100 ALLEGED

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VICTIMS SPEAKS"

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<https://www.fox26houston.com/video/1525043>

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Job No.: 561200

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Pages: 1 - 33

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Transcribed by: Christian Naaden

1 P R O C E E D I N G S

2

3 TONY BUZBEE: Hello everyone. My name is Tony
4 Buzbee. I'm a lawyer here in Houston. I'm licensed in
5 Texas and in New York. And I'll introduce other members
6 of our team as they speak.

7 As many of you know, our law firm has been at
8 the forefront of some of the most important litigation
9 in the United States. We like the tough cases. We
10 thrive in the complicated cases. We've handled over the
11 last 25 years some very big and very important cases. I
12 believe that this first may surpass them all. There are
13 many facets to this.

14 The conduct we will describe today occurred
15 over more than 20 years. There are many people and many
16 entities involved, and we're going to follow this
17 evidence wherever it takes us. We will find the silent
18 accomplices.

19 We will expose the enablers who enabled this
20 conduct behind closed doors. We will pursue this matter
21 no matter who the evidence implicates. These brave
22 victims who have stepped forward deserve nothing less.

1 The biggest secret in the entertainment
2 industry that really wasn't a secret at all has finally
3 been revealed to the world. The wall of silence has now
4 been broken and victims are coming forward.

5 Our team has had at this point, more than 3000
6 and 285 individuals contact us, with people claiming
7 people claiming to have been victimized by Sean Combs
8 after vetting.

9 We now represent 120 individuals who intend to
10 bring civil claims in civil court against Sean "Diddy"
11 Combs, as well as claims against many other individuals
12 and entities that we will name as defendants as we file
13 these individual cases.

14 TONY BUZBEE: And you should know to the
15 extent the clients feel comfortable, we also intend to
16 make these individuals available to the authorities,
17 specifically to the FBI.

18 And you should also know a few of them have
19 already been spoken to by the FBI. Now, before we
20 discuss the nature of the claims and claimants
21 themselves, let me comment on the large volume of calls
22 we have received since our first announcement.

1 Even before the indictment of Sean Combs, we
2 had received a small volume of calls and had screened a
3 handful of cases after the indictment of Sean Combs and
4 the announcement that we were pursuing these claims,
5 the floodgates opened.

6 People who wouldn't otherwise, for a variety
7 of reasons, are now stepping forward to make their
8 voices heard and to pursue justice. But no, most of
9 these people are scared. They fear backlash in their
10 communities.

11 They fear backlash in their own families. They
12 are afraid of retaliation from the perpetrators and
13 their associates. They are rightly afraid for their own
14 personal safety. I expect that through this process,
15 many powerful people will be exposed. Many dirty
16 secrets will be revealed.

17 We know what we are potentially up against.
18 And as is always the case in situations like this, when
19 a celebrity is involved, people can be downright mean
20 and nasty.

21 You would be shocked at the length fans will
22 go, no matter the evidence to the contrary, to defend

1 celebrities they love. I mean, there's a reason for
2 this word "fans."

3 They're fanatics. I've personally already been
4 threatened multiple times on social media, and when I
5 agreed to pursue this, I expected as much. This isn't
6 my first rodeo, but victims who step forward to have
7 their voices heard should not be subjected to that kind
8 of conduct.

9 They should not be targeted. I want to say
10 this, and I want to be clear about it. Although we are
11 vetting each call as stringently as we can, I always
12 start with a mindset that I believe victims. I believe
13 victims because I understand the tremendous courage it
14 takes to step forward.

15 So if you're watching this, please hear me. If
16 you're out there and you have been victimized, you are
17 not alone. There is a great strength in numbers. You
18 can seek redress. You can obtain justice. We can help
19 you, and we will help you.

20 That being said, as stated, we are vetting
21 every call that we receive. We have had to turn away
22 some for each. We ask for corroboration for each. We

1 ask for the identity of witnesses. We also have
2 collected pictures, videos, texts. We check venues. We
3 check dates.

4 We want to corroborate that the claims being
5 made have legitimacy and merit. We have on staff now a
6 former detective from the major offenders Unit of
7 Houston Police Department who is helping us vet each
8 claim.

9 We're using our common sense. We're being
10 stringent because, as I said, these are not easy cases.
11 They're very tough. The process is hard, and in some
12 cases the process is very lengthy.

13 TONY BUZBEE: These cases are hard to prove.
14 Many times it's the victim's word against the alleged
15 perpetrator.

16 Each of these victims will no doubt be
17 publicly attacked by the alleged perpetrators and in
18 some cases, the general public. The feckless and
19 cowardly keyboard warriors love to attack. We know what
20 we're up against.

21 We did not enter this fray blindly. I wish it
22 was my last such foray. I wish this type of behavior

1 wasn't so pervasive. But it is what it is. So we will
2 press on. As I said, our law firms have been retained
3 by 120 individuals at this point to pursue cases in
4 civil court against Sean "Diddy" Combs.

5 You should know in this group it is evenly
6 divided between males and females. There are 60 males
7 and 60 females who have joined us to pursue these
8 claims as plaintiffs in this group. 62 percent identify
9 as African American, 30 percent are white and the
10 remainder are Hispanic or Asian.

11 The victims are from more than 25 states. The
12 majority are from California, New York, Georgia and
13 Florida. And I want to focus on the ages of these
14 victims.

15 When we talk about the ages of the victims,
16 when the conduct occurred, it's shocking. Our youngest
17 victim at the time of the occurrence was nine years
18 old. We have an individual who was 14 years old.

19 We have one who is 15. 25 of the 120
20 individuals who are plaintiffs in these cases were
21 minors at the time of the acts complained of.

22 The time frame of the acts complained of is

1 very wide. The conduct at issue spans from the years
2 1991 all the way to this year 2024. If you wonder why
3 there are so many alleged victims, that's your answer.

4 We're talking about more than 25 years of this
5 type of conduct. Now, although most of the victims who
6 have stepped forward were victimized after 2015, this
7 has been going on for a very long time now.

8 When you think about the fact that some of
9 this conduct occurred 25 years ago, and you wonder, why
10 would it take somebody so long to step forward?

11 I want to remind you that that many states in
12 the United States have recognized that it's very
13 difficult for a victim to step forward and to make
14 these types of allegations when something very terrible
15 has happened to them. I'll use New York, the state of
16 New York, as an example.

17 The state of New York has specific statutes in
18 place that revive claims that are even claims that
19 would typically be not able to be brought, that revive
20 such claims, and they can be brought even 25 to 30
21 years later, because there's a recognition there in New
22 York and California and other states that that it's

1 very difficult for a victim to come forward.

2 And I would -- I would respectfully suggest
3 the only reason many of these people are coming forward
4 because they see other victims coming forward, and it
5 gives them some comfort that, hey, I won't be the only
6 one and I expect more victims will come forward.

7 TONY BUZBEE: You know, there's an old saying
8 that says a lie has great speed, but truth has
9 endurance.

10 The acts complained of in these cases that
11 we're going to file occurred primarily in New York,
12 either Manhattan or the Hamptons, or occurred in
13 California, primarily in Los Angeles or in Florida,
14 primarily in Miami.

15 Most of these events and incidents occurred at
16 parties, typically after parties or album release
17 parties; New Year's Eve parties; 4th of July parties,
18 something they called a puppy party, the All White
19 Party.

20 Although several of these events occurred at
21 auditions Many times, especially young people, people
22 wanting to break into the industry were were coerced

1 into this type of conduct in the promise of being made
2 a star or in the promise of of having Sean Combs listen
3 to their tape or even let them read for Sean Combs.

4 You should know that some of this behavior
5 occurred at well-known venues in New York City. Some of
6 this behavior occurred at private residences of people
7 that we all know.

8 Some of this behavior occurred at hotels that
9 we're all familiar with. You should know that more than
10 55 percent of the victims filed reports, reported this
11 conduct to either the authorities, that is, the police
12 or to hospitals.

13 We are in the process of collecting, with our
14 team assistance, medical records reports that were made
15 to the authorities. And I've already said that some of
16 the individuals in this group did, in fact, talk to the
17 FBI.

18 TONY BUZBEE: You should know that that
19 several of the individuals and when I say several, I
20 mean many who did in fact seek medical treatment were
21 drug tested.

22 And drugs were found in their system. Weird

1 drugs. Drugs that you probably never heard of. One in
2 particular that continues to pop up is a drug called
3 xylazine or tranq, which, based on our research, is
4 known as a horse tranquilizer.

5 Now, there's been a lot of reports that we're
6 filing a class action. This is not a class action.
7 Class action is when 1 or 2 people file a case on
8 behalf of a group of people. That's not this. These
9 cases will be individual cases.

10 Each case will live and die on its own merit.
11 These cases will be filed individually. One plaintiff
12 against whoever the defendants were involved in the
13 case. Each case may be filed in one venue, like
14 California.

15 Another case may be filed in New York. One
16 case may sue just Sean Combs, but multiple other
17 people. One case may sue a range of people. I would
18 expect most, though, to be filed, as I said, in New
19 York and Los Angeles.

20 Now I know this. Many of you came here
21 thinking or hoping or perhaps believing that I may
22 start naming names. Well, that day will come, but it

1 won't be today.

2 The day will come when we will name names
3 other than Sean Combs. And there's a lot of names. Um,
4 it's a long list already. And of course, I already know
5 who some of these individuals are.

6 But because of the nature of this case, we're
7 going to make damn sure. Damn sure that we're right
8 before we do that. But the names that we're going to
9 name, assuming that our investigators confirm and
10 corroborate what we've been told our names that will
11 shock you.

12 These are individual cases. There are indeed
13 other perpetrators involved. They will be revealed when
14 that particular individual case is ready to be filed.
15 They already know who they are. And I'm talking here
16 about not just the cowardly but complicit bystanders.

17 That is, those people that we know watched
18 this behavior occur and did nothing. I'm talking about
19 the people that participated, encouraged it, egged it
20 on. They know who they are. I call them the
21 facilitators of foul play. Willing participants in vile
22 conduct as we identify them.

1 Each will be part of this case as defendants.
2 These defendants will not only include individuals, but
3 would also include corporate entities who ultimately
4 profited off of this culture and behavior. I'm looking
5 at banks, pharmaceutical companies, hotels. We know
6 that many of these individuals were paid cash.

7 We know that that many of these individuals
8 involved, whether they were the ones being assaulted
9 and abused or they're witnessing other people being
10 assaulted and abused and then paid and threatened and
11 told to leave, typically paid ten grand in cash and
12 told to leave and then threatened as they were leaving.

13 So in addition to Sean Combs, you should know
14 the defendants in these cases were going to file will
15 include anyone, of course, who engaged in the assault
16 or exploitation.

17 TONY BUZBEE: Anyone who participated in such
18 in any way. Anyone who encouraged or facilitated this
19 conduct.

20 Anyone who was in the room and watched it
21 happen but made no effort to stop it. Any venue or
22 venue owner who was aware of what was going on, but

1 failed to stop it.

2 Any individual or entity who knew about the
3 conduct and benefited from it, but did nothing to
4 report it or stop it. And any individual or entity who
5 covered it up or helped cover it up. These people who
6 know who they are should just come forward now. I would
7 imagine as we speak here, there are a myriad of people
8 who are very nervous.

9 You can't hide skeletons in the closet
10 forever. I would expect there are many people out there
11 right now who are who are desperately searching their
12 memories as they delete their texts and data. Now,
13 although these are in fact individual cases, there is a
14 common theme, an MOT, if you will.

15 Typically, the victim is lured into a
16 situation where he or she is given a drink. Typically,
17 that drink reported by these victims is apparently
18 laced with something. Once that drink takes effect, the
19 perpetrators perform all kinds of sexual acts on the
20 victims.

21 Many times passing him or her around as other
22 people watch and enjoy the show and then leave the

1 victim ashamed, confused, injured, and wondering what
2 happened. When the victim reaches out, he or she is
3 told not to say anything.

4 TONY BUZBEE: Sometimes there are threats of
5 physical violence or financial repercussions or bodily
6 harm. The claims we intend to bring will include the
7 following.

8 Violent sexual assault or rape. Sexual abuse.
9 Facilitated sex with a controlled substance. False
10 imprisonment. Compelling prostitution. Sexual
11 misconduct. Dissemination of video recordings. False
12 imprisonment. Sexual abuse of minors.

13 Given the large volume of cases, and given our
14 other docket obligations, and given the fact that we
15 want to be sure when we file these cases that they are
16 fully vetted, I expect we'll start filing these cases
17 against Sean Combs and other perpetrators within the
18 next 30 days.

19 Now it's rare, you know, sexual abuse, sexual
20 exploitation, these types of this type of activity is
21 pervasive in our society, and it's rare we get a chance
22 where we can really focus on this as a country and

1 really focus on this, about how pervasive this is and
2 what we as collectively can do about it.

3 So I thought I'd take this opportunity before
4 I go into some of the individual cases and talk about
5 some of the individual claims being made and some of
6 the. So you'll get a get a sense of what this 120 20
7 people group looks like individually. I want to bring
8 forward Carrie Paul.

9 She is a national victim advocate who helps
10 victims who have been victimized by this type of
11 conduct. And she has some important words and I hope
12 you'll you'll pay close attention. I think it's
13 important that you hear from her.

14 Carrie Paul: Hello, I'm Carrie Paul with the
15 National Victim Advocate. It's not easy for any
16 survivor to come forward. Our culture doesn't believe
17 survivors.

18 It blames and questions them. Instead of
19 showing support, many choose to enable abusers. The
20 media runs stories asking why it took so long for
21 survivors to come forward Instead of asking what
22 barriers exist.

1 We also don't equip law enforcement with the
2 ability to handle sexual assault crimes. Lack of
3 funding translates to lack of training. We have
4 officers in the field that don't know what to say to a
5 rape victim, and also an alarming amount of backlogged,
6 untested rape kits.

7 Prosecutors are focused on what they can prove
8 in a case, and if so, how to do that at time of trial,
9 advocates and staff are stretched thin with growing
10 caseloads in the criminal justice system. Most people
11 don't know how the criminal justice works in general.

12 There isn't enough staff or resources to
13 adequately explain the entire process to every victim
14 and survivor. Our culture works against victims and
15 survivors every day, and abusers know this.

16 Abusers work themselves into positions of
17 power, building a public image that is trusted and
18 financially large enough to make people look away.
19 Abusers are unfortunately very skilled at power and
20 control. The foundation of abuse. They seek victims who
21 are vulnerable, such as children, their employees and
22 their intimate partners.

1 All who see a different version than the
2 public does. All who rely on the abuser in some way.
3 And for those that do come forward and aren't believed
4 face questions like, are you sure it happened that way?
5 Were you drinking? What were you wearing?

6 All of this creates an environment that
7 enables abusers to continue abusing them and future
8 victims to the survivors that have come forward,
9 despite not being believed at some point in time. Your
10 courage is like nothing we have seen before.

11 We thank you for coming forward for yourself
12 and all survivors. And lastly, I want all survivors
13 that are watching this to know we believe you and we
14 support you. Thank you.

15 TONY BUZBEE: I want you now to hear from my
16 co-counsel, Andrew Van Arsdale. Um, you know, we've
17 we've created a sexual abuse hotline, and I want him to
18 visit with us just a few moments about how that works
19 and the kind of volume of calls we've received.

20 ANDREW VAN ARSDALE: Thank you. Tony. Um, like
21 Tony said, my name is Andrew Van Arsdale. I'm the
22 managing partner of AVA Law Group. We have offices in

1 California, Montana and North Carolina.

2 To build off of what you just so well said,
3 it's very hard to come forward. And given what we've
4 experienced the past ten days, is really unprecedented
5 in in my career at least.

6 We represent thousands of survivors of abuse
7 and never, ever in a ten day period have we seen over
8 3000 people come forward where we've confirmed and
9 decided to investigate and represent 120 people. While
10 we're continuing to work through another 100 plus cases
11 to prove them up, to validate what has happened here
12 and to hold those that are responsible, accountable.

13 And so, like Tony said, we've set this up.
14 It's 1-800-200-7474. I have a team of people standing
15 by, literally, if you know that this happened to
16 someone and you have information about it, please
17 contact us.

18 If this happened to you, come forward. There's
19 attorney-client privilege here. What you tell us is in
20 confidence. Yes. We'll have to go out and build your
21 case, but we will protect you. And the other thing that
22 I want to say is the pattern and practice of this,

1 again, is unprecedented.

2 Over 30-plus years of the same sort of events
3 happening. People thrust into the circle, reportedly,
4 and horrible things happening to them as a result.

5 And from talking to these people that have
6 come forward these past ten days, I can tell you
7 unequivocally that because the federal government did
8 what it needed to do and indicted this man, that they
9 put him in jail and a judge kept him in jail. They tell
10 me directly this validates my feelings. For so long, I
11 thought it was my fault.

12 What is it about me that put myself in that
13 scenario? What was I wearing at the time? What did I do
14 to be subjected to such horrific treatment at these
15 people that I was trying to trust? Well, we know now it
16 was not your fault.

17 You were victimized by a group of powerful
18 people that operated for 30-plus years, taking
19 advantage of their wealth and the power that they held
20 within the music industry.

21 So again, thank you to every single person
22 that has come forward and contacted our office over the

1 past ten days. If you or someone you know suffered the
2 same sort of treatment, please contact us at the number
3 behind me and we will help you. Thank you.

4 TONY BUZBEE: I think it speaks to how
5 important this issue is in the United States and
6 frankly, internationally, that we have reputable people
7 here that want to provide the kind of information that
8 I think victims need to hear, witnesses need to hear,
9 the public needs to hear.

10 Let me introduce to you now, Olivia Rivers
11 from the Texas Association Against Sexual Assault, and
12 let her visit with you a few moments about these types
13 of cases.

14 Q. OLIVIA RIVERS: Thank you. Good afternoon
15 everyone. My name is Olivia Rivers. I am just served my
16 sixth year as the board chair for the Texas Association
17 against sexual assault.

18 I'm also the CEO for The Bridge Over Troubled
19 Waters, which is a local rape crisis center here in the
20 Houston area. So thank you for being here as we address
21 these heinous crimes. Sexual assault is not just a
22 crime of violence against the body.

1 It's an assault on the very essence of human
2 dignity and safety. It shatters lives. It destroys
3 confidence. And all too often, it leaves survivors
4 feeling like they are voiceless, isolated and
5 vulnerable.

6 The reality for many survivors is that coming
7 forward to report their assault is one of the most
8 difficult and daunting tasks that they will ever have
9 to do. And for some, it may take days, months, or even
10 years to speak up if they ever do.

11 The reasons for this have been mentioned, but
12 include the fear of being disbelieved, being blamed or
13 judged, and of course, retaliation.

14 The trauma of the assault itself being
15 compounded by the trauma of the criminal justice
16 process, where survivors must relive their experience
17 in order to seek justice, and these feelings and fears
18 are further exacerbated when the allegations are
19 against prominent figures in the entertainment industry
20 or Hollywood.

21 Cases involving powerful figures often attract
22 significant media attention, which can deter victims

1 from coming forward due to fear of public exposure or
2 scrutiny.

3 The intense focus on these high profile cases
4 can make survivors feel that their personal lives are
5 being put under a microscope, causing further emotional
6 distress.

7 These allegations mentioned here today, as
8 reported, reflect deeply troubling claims that deserve
9 thorough investigation. And no individual, regardless
10 of their stature, is above the law or public
11 accountability.

12 Sadly, the statistics paint a very disturbing
13 picture. According to the National Sexual Violence
14 Resource Center, one in three women and one in six men
15 will experience some form of sexual violence in their
16 lifetime.

17 In the US alone, there are approximately
18 163,000 victims of rape or sexual assault every year,
19 and these numbers barely scratch the surface as sexual
20 violence remains one of the most underreported crimes.
21 But the numbers that follow tell an even more troubling
22 story.

1 Only about 23 percent of sexual assaults are
2 reported to law enforcement. Of those, just 5 percent
3 lead to an arrest and even fewer. Less than 1 percent
4 of reported cases ever result in a conviction, which is
5 a devastating gap between the crime and the justice
6 that survivors deserve.

7 I want to briefly focus on our state here in
8 Texas. According to the Texas Association Against
9 Sexual Assault, 6.3 million Texans men and women will
10 experience some form of violence. That's every two
11 minutes someone is sexually assaulted.

12 Q. Olivia Rivers: Meaning, during the course
13 of this press conference, around 60 individuals will
14 forever be changed by this violence. And those are just
15 a few of the victims. Obviously this is unacceptable.

16 We cannot allow this cycle of silence and
17 inaction to continue. We have to create an environment
18 where survivors feel empowered to come forward, where
19 they are met with empathy and respect and support, not
20 skepticism and blame.

21 We have to ensure that our legal system is
22 equipped to handle these cases with the seriousness

1 they deserve, and that survivors have access to the
2 resources that they need beyond the legal courtroom.

3 We have to address the root causes of this
4 epidemic prevention, awareness and fostering
5 environments where respect, consent, and safety are
6 non-negotiable values. Additionally, support for
7 survivors has to be holistic.

8 They have to have access to counseling,
9 medical services, legal advocacy, and of course,
10 community support, regardless of whether they choose to
11 report or not.

12 To every survivor who has come forward, your
13 bravery is an inspiration to those who are still
14 grappling with their decision. Know that you are not
15 alone and that your voice matters.

16 Your story matters. We see you. We believe
17 you. And we are committed to fighting for a future
18 where sexual violence is no longer tolerated and where
19 justice is not the exception, but the standard. Thank
20 you.

21 TONY BUZBEE: I want to visit with you real
22 quickly before we close here about some specific

Transcript of Press Conference

26

1 instances without disclosing the victim's name. You
2 probably know that depending on the age of the victim
3 you can file these cases, these individual cases under
4 Jane Doe or John Doe.

5 Each state is different in that respect.
6 Typically, there is a balancing test, like the public's
7 right to know the name of the of the victim and
8 plaintiff versus versus the confidentiality and the
9 safety of the plaintiff.

10 So we'll have to struggle with that with each
11 one of these cases. Our intention, of course, is to,
12 like we always do, file these cases under a pseudonym
13 until the court tells us otherwise. But let me let me
14 share with you a few.

15 A few just kind of give you a sense of the
16 kind of cases and the kind of instances that people are
17 calling and reporting that we are trying to corroborate
18 that. And these are the ones that we've already
19 corroborated, vetted and collected evidence on.

20 One individual who was 22 years at the time.
21 She was assaulted, said that the typical M.O. at one of
22 these parties that have been widely discussed in the

Transcript of Press Conference

27

1 press was that when when you were handed a drink.

2 And now we know that the drink is laced with
3 something. If you refuse to drink it, you were kicked
4 out of the party.

5 Now, let that sink in for a minute. I mean,
6 the admission to this party was that you had to drink
7 the chosen drink that was handed to you.

8 And now we know that that in most cases, I
9 would say 90 percent of the cases. These individuals
10 were drugged with some sort of drug. That was kind of
11 the M.O.

12 Another instance, this individual who was nine
13 years old at the time, was taken to an audition in New
14 York City with Bad Boy Records. Uh, other boys were
15 there to audition as well. All of them were trying to
16 land a record deal. All of them were minors.

17 This individual was sexually abused, allegedly
18 by Sean Combs and several other people at the studio in
19 the promise to both his parents and to him himself of
20 getting a record deal.

21 Another instance, another minor told allegedly
22 by Sean Combs that he would make him a star, but he

Transcript of Press Conference

28

1 needed to visit with him in private about it away from
2 his parents once they were in a private area.

3 Allegedly, Mr. Combs made the victim perform oral sex
4 upon him.

5 Another incident, an individual 15 years old
6 at the time flown to New York City to attend a party,
7 was drugged and then taken into a private room,
8 allegedly in the presence of Mr. Combs, where this
9 female individual minor was raped and then other
10 individuals took turns raping her.

11 Another individual, 26 at the time of the
12 occurrence, was picked up by allegedly by Mr. Combs and
13 several other people in a black SUV from the airport;
14 was given one drink in the SUV and then literally woke
15 up the next day not knowing what had happened, but with
16 pain and damage to both her vagina and her anus where
17 she was then.

18 She then went to the hospital. She was missing
19 her underwear and her shoes. Another instance, an
20 individual, this time not a minor, was attending a
21 group dinner, allegedly with Sean Combs in Miami. She
22 wasn't drinking because she was pregnant, but she.

Transcript of Press Conference

29

1 Whatever she drank at the table, apparently, at least
2 according to her, was laced with something.

3 She blacked out and she woke up in the same
4 bed again, allegedly with Mr. Combs in his mansion in
5 Miami. Her vagina and her anus were torn and sore.

6 And I could go on. I mean, literally, you're
7 you're sensing a theme here. It's the same theme and it
8 all involves some sort of drug. One instance, an
9 individual who was 20 years old at the time was asked
10 to attend, just saw her on the street, asked to attend
11 a party in a hotel.

12 She was flattered, went to the party, was
13 given one drink and doesn't remember anything else.
14 Ultimately was so messed up. Was went to the hospital
15 where they found cocaine and this horse tranquilizer in
16 her blood system.

17 I want to give you a quote from a very young
18 man who told us over the phone about his experience and
19 all the things that happened to him.

20 He says, allegedly at the hands of Sean
21 "Diddy" Combs and his friends in the effort to try to
22 sign a record deal. This was kind of what he was told

Transcript of Press Conference

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1 he would have to do.

2 His quote is had he not been in power, I feel
3 like I could have been something great. I quit. I quit
4 the industry because of what Sean Combs did to me. And
5 that's really what it comes down to.

6 We are pursuing this, asking you to support
7 this effort, to encourage witnesses and victims to come
8 forward and bring your evidence so we can continue to
9 break down this wall of silence, and we can continue to
10 have these stories heard.

11 This is the beginning of what I hope to be a
12 national dialog. This type of sexual assault, sexual
13 abuse and sexual exploitation should never happen in
14 the United States, United States, or anywhere else.

15 This should have never been allowed to go on
16 for so long. This conduct has created a mass of
17 individuals who are injured, scared and scarred. If you
18 are one of those individuals, we ask you to reach out.
19 If not to us, to someone you trust.

20 If you are someone who witnessed any of these
21 events, we ask you to reach out. Your name can remain
22 confidential. With that, I'll take a few questions. Not

Transcript of Press Conference

31

1 many, maybe two. But if you have a question, I'll be
2 pleased to try to answer it.

3 AUDIENCE: Perfect. How many minors are making
4 accusation accusations in total? And are the feds aware
5 of the allegations of minors.

6 TONY BUZBEE: In the case? I don't know what
7 the feds are aware of, but I do know it's 25 out of
8 this 120.

9 And Tony, I will I will say this to that
10 point. We welcome the FBI or any authority who wants to
11 come to us, and we're going to make that available to
12 these victims, because I think that's important.

13 My suspicion is based on talking with these
14 folks is that that, you know, the FBI is just not aware
15 of these people. The FBI has talked to some of these
16 folks.

17 And I'm going to try to encourage the victims
18 to, in fact, talk to the FBI because I think they have
19 some very important things to say.

20 AUDIENCE: Tony, were all of the children
21 auditioning because they were musicians, or were any of
22 them kids of employees or anything like that?

Transcript of Press Conference

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1 TONY BUZBEE: All all seeking either TV or
2 some sort of music career with promises of, you know,
3 we're going to make you a star. Instead, basically did
4 things to them such that they don't want to have
5 anything to do with the entertainment industry ever
6 again.

7 All right, guys, thank you very much for your
8 attention. We're going to go now. Thank you.

9 AUDIENCE: Tony, do you anticipate any Houston
10 cases, any filed here locally?

11 TONY BUZBEE: Yeah, there's a few plaintiffs
12 here, but I don't anticipate filing here, probably in
13 New York City. Thank you.

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Transcript of Press Conference

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CERTIFICATE OF TRANSCRIBER

I, Chris Naaden, a transcriber, hereby declare under penalty of perjury that to the best of my ability from the audio recordings and supporting information; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome, the above 32 pages contain a full, true and correct transcription of the tape-recording that I received regarding the event listed on the caption on page 1.

I further declare that I have no interest in the event of the action.



November 11, 2024

Chris Naaden

(561200, Diddy lawsuits-Lawyer for more than 100 alleged victims speaks)

EXHIBIT E

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THE STEPHEN A. SMITH SHOW

12

INTERVIEW WITH TONY BUZBEE

13

Tuesday, October 3, 2024

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20 Job No.: 561873

21 Pages 1 - 22

22 Transcribed By: Jennifer Candela-Alvarez

1 STEPHEN SMITH: Joining me now is the
2 man who is representing the more than 100 men and
3 women who plan to file civil suits against Sean
4 Diddy Combs. Tony Buzbee, who's representing about
5 120 people, held a press conference yesterday at
6 his firm in Houston, Texas. Some of the cases they
7 intend to file will center around allegations of
8 sexual assault, rape, facilitating sex with a
9 controlled substance, dissemination of video
10 recordings, and sexual abuse of minors, just to
11 name a few.

12 Please welcome to the show Mr. Tony
13 Buzbee. Good afternoon, Tony. How are you?

14 TONY BUZBEE: Good. How are you?

15 STEPHEN SMITH: Thank you for your time.
16 So let's get right into it. How long have you been
17 working on these potential suits against P. Diddy
18 Combs?

19 TONY BUZBEE: My co-counsel, who sent me
20 the cases, has been working on this for about six
21 months. He got me involved about two weeks ago
22 actually. And so I started talking to some of

1 these victims and deciding whether I wanted to
2 become involved in this case. Some of the things
3 that I was told by these folks are very compelling,
4 some of which I shared with the public yesterday.

5 So, for me, it's been about two weeks.
6 When I announced about ten days ago that I was
7 going to join these cases and serve as lead
8 counsel, the call volume went up to about 3200
9 calls. And so far, as you as you've laid out, we
10 have 120 clients that are prepared to file suit.

11 STEPHEN SMITH: Mm-hmm. What made you
12 ultimately decide you wanted to get involved in it?
13 You said it just came to your attention a couple of
14 weeks ago. What was the deciding factor that made
15 you want to get involved?

16 TONY BUZBEE: Talking to these folks
17 and, you know, reviewing the indictment, and it was
18 very clear that the conduct that these people were
19 talking about was very consistent with what the
20 indictment lays out; and then, you know, just
21 hearing their voices and seeing their faces.

22 And I have to do a credibility check

1 myself and decide if this is something that I want
2 to be involved in. And, you know, this is -- you
3 know, I see this really as God's work. And I think
4 -- you know, obviously, Sean Combs is arrested,
5 indicted, and his bail has been denied, but there's
6 more to it than that. This is conduct that's went
7 on for more than 25 years. These people who we
8 represent are from more than 25 states. These are
9 people whose ages range from as young as nine years
10 old up to people in their 30s.

11 As you -- as you said, these are women
12 and men. You know, it -- the scope of this is
13 really -- it's unfathomable that this could go on
14 for so long. And, you know, I said yesterday "This
15 is -- this is the secret in the entertainment
16 industry that really wasn't a secret." And I think
17 people are shocked to learn that this went on for
18 so long and some of the things that people say
19 happened to them. And I think because of the
20 indictment, because the federal government got
21 involved, I think because of the arrest and because
22 of the denial of bail, it really gave people -- you

1 know, really emboldened people to step forward and
2 be counted and tell their stories.

3 STEPHEN SMITH: It's interesting because
4 I -- before I get to additional questions, you
5 talked about vetting them yourself or what have
6 you. One will ask -- the suspicious minds would
7 ask. Two weeks -- is that enough vetting that
8 could have possibly -- is that enough time to have
9 vetted all of these people to the point where you
10 feel comfortable and secure in representing them?
11 What do you say as a response to cynics with such
12 questions?

13 TONY BUZBEE: Yeah. There's -- you know
14 better than me there's always cynics and there's
15 always people that like to sit back and criticize.
16 And, you know, that's just the nature of the
17 business. And, you know, I've been in this
18 business for almost 30 years.

19 STEPHEN SMITH: Right.

20 TONY BUZBEE: I would say that we have
21 more than 90 people who did the initial screening
22 and vetting. Then we have --

1 STEPHEN SMITH: Got it.

2 TONY BUZBEE: -- Houston Police
3 Department personnel who also are part of the
4 vetting process. Then we have a team of lawyers
5 that are also a part of that. And then, you know,
6 I've personally spoken to many of these folks
7 myself. And then, ultimately, as we start to file
8 the case, I will talk to each one of these people
9 just to make sure one -- because, you know, it's a
10 high-profile case.

11 It's just like, you know, other cases
12 I've been involved in. If I put my brand on it,
13 I'm going to make sure that it's something that I
14 feel comfortable with and that I'm fully behind
15 because, you know, these cases are tough enough
16 themselves. You know, typically it comes down to
17 circumstantial evidence, corroborating evidence
18 from witnesses that saw this or that, and then it
19 comes down to the word of the victim versus the
20 words of the various perpetrators.

21 STEPHEN SMITH: What impact did the
22 federal indictment have on the volume of suits

1 you're now intending to file?

2 TONY BUZBEE: I think it had a big
3 impact. I think the original impact probably was
4 the Cassie situation and the video that was
5 released. I think it was -- it was known that
6 there was a federal investigation going forward.
7 There had been several lawsuits, and there's been
8 more. I think there's been as many as seven so far
9 against Sean Combs and other people. And then the
10 indictment, the arrest, and then the denial of bail
11 and then, of course, us announcing that -- look.
12 There's -- there are a lot of people that intend to
13 pursue these cases. Please come forward. If
14 you're a witness, please come forward. If you have
15 evidence, please come forward. I think -- I think
16 that was instrumental in what we're seeing now.

17 Ever since -- I mean, in 24 hours, we've
18 received 12,000 calls if you can believe that. Now
19 I don't know what -- if that's going to --

20 STEPHEN SMITH: Twelve thousand calls?

21 TONY BUZBEE: Yes, sir.

22 STEPHEN SMITH: You said 12,000 calls?

1 You received 12,000 calls?

2 TONY BUZBEE: Now that doesn't mean
3 12,000 people who claim to be victimized. It just
4 means 12,000 people have called this line that we
5 published yesterday. Obviously, as you know,
6 there's going to be people --

7 STEPHEN SMITH: Right.

8 TONY BUZBEE: -- the crank calls and
9 people with foolishness and people with --

10 STEPHEN SMITH: Understood.

11 TONY BUZBEE: -- you know, malcontent,
12 but we are sifting through that and trying to, you
13 know, make sure that we identify and vet people
14 that have real claims, legitimate, credible claims.
15 Right now, you know, we're talking about 120 people
16 from 25 different states for conduct that occurred
17 over 25 years.

18 STEPHEN SMITH: Twenty-five different --
19 25 different states? Is that what you -- not
20 cities. You said 25 different states?

21 TONY BUZBEE: Yeah. Yeah. Yeah.
22 Because, you know, a lot of these parties obviously

1 took place in Los Angeles; New York, Manhattan or
2 the Hamptons; and Miami. And a lot of these people
3 --

4 STEPHEN SMITH: Right.

5 TONY BUZBEE: -- were flown in. These
6 -- and this wasn't a secret. I mean, it was known
7 that people were being flown in for these parties.
8 People were being paid cash to attend these
9 parties. People were being identified at clubs or
10 at concerts or on the street even and invited to
11 these parties. You have that group of people that
12 are involved, and then you have another group. And
13 maybe this is a more sinister situation where, you
14 know, young people with stars in their eyes wanting
15 to break into the entertainment industry with
16 promises of stardom who are taken advantage of in
17 some cases, allegedly, drugged and abused and
18 basically just left behind, you know -- you know,
19 with shame and guilt.

20 You know, it's -- what I'm looking at --
21 obviously, you know, you have an individual who has
22 been indicted and arrested and whose bail has been

1 denied, and obviously that's -- he's obviously a
2 target of this, but I'm looking more in addition to
3 that, of course. Who else was involved? What
4 venues were involved?

5 STEPHEN SMITH: Right.

6 TONY BUZBEE: What -- who sponsored some
7 of this conduct? Who benefited from this? Who
8 profited from this? Who was there in the room?
9 Who encouraged this, facilitated this, didn't say a
10 word about it, kept it, kept it hush-hush. I mean,
11 you can only imagine the number of entities --

12 STEPHEN SMITH: Well --

13 TONY BUZBEE: -- and individuals that
14 could potentially be complicit in all this.

15 STEPHEN SMITH: Mr. Buzbee -- and I'm
16 getting there. I was going right there because you
17 talk about the complicitness of those others that
18 may have been involved. I want to know if the
19 survivors, the accusers, whatever word is
20 appropriate -- do they talk about and have they
21 talked about Diddy Combs? Or have they named names
22 and provided names of other, dare I say,

1 co-conspirators in all of this? What kind of --
2 what can you tell us on that front?

3 TONY BUZBEE: We have a long list of
4 names, and obviously this is a very sensitive
5 situation. The worst thing we could do is name
6 somebody who was involved or allegedly involved and
7 not have our ducks in a row. I'm not going to do
8 that. I'm not going to be involved --

9 STEPHEN SMITH: Right.

10 TONY BUZBEE: -- in ruining someone's
11 reputation --

12 STEPHEN SMITH: Understood.

13 TONY BUZBEE: -- by making a mistake.
14 You know, obviously, a lot of this is hard to
15 corroborate. I mean, you're talking about a
16 situation where somebody is -- you know, who thinks
17 that all their dreams are about to come true.
18 They're with somebody who's a megastar and other
19 stars in the room, and they think all kinds of good
20 things are going to happen to them, and probably
21 the worst thing that could happen to them happens.
22 But, yes, there are people who owned

1 private homes, people who owned private venues,
2 people that were in the room, people that I'm going
3 to allege knew what was going on and either
4 participated in it encouraged it, egged it on, if
5 you will, or somehow benefited from it; and that's
6 going to be different for every case. I mean,
7 these --

8 STEPHEN SMITH: Right.

9 TONY BUZBEE: -- are individual cases at
10 different points in time with different people
11 involved, and there will be different defendants in
12 each case.

13 STEPHEN SMITH: Without naming names --
14 because certainly I appreciate you being
15 responsible enough and, dare I say, I would have
16 been responsible enough to say I'm not -- I'm not
17 going to even get into names of allegations. I
18 wouldn't put that out there. But may I ask you,
19 from a general perspective or a generic
20 perspective, are these alleged co-conspirators --
21 are they public figures? Are they well-known
22 people in Hollywood in the music industry? Are

1 they people who worked for P. Diddy Combs? Could
2 you be specific in that regard?

3 TONY BUZBEE: I would say yes to all of
4 the above. Yeah. People that --

5 STEPHEN SMITH: Yes to all of the above?

6 TONY BUZBEE: All the above. People
7 that -- names that you would know. Some people's
8 names you wouldn't know but are people that are in
9 management or executive positions, people that were
10 benefiting from this culture that was created,
11 people that were there knowing that this was going
12 to happen, people that actually participated,
13 venues that knew it was going on.

14 I mean, just think about it. Just one
15 aspect of this. You know, typically when an
16 entertainer of the stature that P. Diddy was at one
17 point, when he rents out a hotel, he typically
18 would rent out the entire floor and just a
19 revolving door of people showing up at the front
20 desk, whose names weren't being taken down, who
21 were just escorted right up to the floor, and
22 things are happening up there.

1 I mean, it's hard to turn a blind eye.
2 You know, if you have any common sense whatsoever,
3 you know what's going on. People that aren't from,
4 for instance, New York City that are being flown in
5 from Los Angeles, you know, five, ten, 15 at a time
6 were being paid in cash to attend these various
7 events that are occurring; people that are -- that
8 are identified in the crowd of a show and asked to
9 come backstage, and then they're whisked off to
10 some other party and they find themselves in the
11 morning, you know, not knowing what had happened
12 because they've been drugged and they're injured
13 and they're feeling shameful and, you know, blaming
14 themselves. I mean, you can only imagine the
15 various individual scenarios.

16 But the common theme throughout this, at
17 least from what I've gathered, is there's always
18 some sort of drug involved. There's always some
19 sort of drink that that I believe we'll be able to
20 show was spiked in some way with some kind of drug
21 that caused these individuals not to really be able
22 to fight back perhaps as much as they might have.

1 And then they wake up not knowing what had happened
2 to them other than they know that they're injured
3 in their private areas.

4 And so many of them went to seek medical
5 treatment. Some of them were drug tested when they
6 did so. I mean, there's several of these
7 individuals who their drug tests came back with
8 some weird -- and I haven't even heard of this --
9 you know, I own a farm, and I guess maybe my ranch
10 manager knows what this is -- but a horse
11 tranquilizer. You know, it's called tranq. I'd
12 never heard of this before.

13 STEPHEN SMITH: A horse -- a horse
14 tranquilizer?

15 TONY BUZBEE: A horse tranquilizer. I
16 mean, it's just ridiculous. It's just outrageous
17 when you think about it, but, you know, how did
18 this get into these people's bloodstream? How did
19 -- how was -- you know, it's just -- I think -- I
20 think we're just now scratching the surface of
21 this. You know, obviously all of this -- these are
22 allegations. You know, even the indictment --

1 those are allegations that the government must
2 prove, but you have -- you have a lot of people
3 coming forward saying the same thing. All of it is
4 very similar. And, you know, you have -- one of
5 the things I've said, and I think it's true, you
6 have a lot of people right now out there who are
7 watching this happen, who are probably scrubbing
8 their social media, who are probably searching
9 their memories, who are probably deleting texts and
10 data from their phones and are probably very
11 nervous right now, and I would -- I would think
12 they should be.

13 STEPHEN SMITH: I'm not going to get in
14 too much to the nine-year-old because that's a
15 child. There's no explanation for that. Zero.
16 Okay? But when you talk about some of these
17 survivors, you hear about half of them are men,
18 half are women. Twenty-five were minors at the
19 time of the alleged incidents.

20 Number one, is that true? And, number
21 two, when strictly speaking about the adults, what
22 about those who would say what are we talking about

1 here? If they were flown in, they were, quote/
2 unquote, sex workers, they knew what they were
3 getting into. It was complicit. It might be
4 reprehensible in some people's eyes, but as Diddy's
5 lawyer said on television weeks ago, "It's one
6 thing to be unethical. It's another thing to be
7 illegal." And it wasn't illegal because they were
8 given the impression that it was adult consent
9 involved. What does Mr. Tony Buzbee say to that?

10 TONY BUZBEE: I think every case stands
11 on its own merit. I think -- I think -- you know,
12 I could -- I could imagine a scenario where
13 somebody was either through a broker or maybe a
14 staff member who went and collected individuals,
15 promised them payment to come and be -- you know,
16 you all have heard of atmosphere girls or people to
17 attend parties for the atmosphere, and then those
18 people could be taken advantage of and not being
19 allowed to leave and being coerced to do things
20 that perhaps they didn't expect they would have to
21 do. I don't think that's outside the bounds of
22 imagination.

1 But I will say that, with regard to a
2 minor, when that's involved, it doesn't matter
3 whether there's payment and consent or attempted
4 consent. Obviously, under the law, you cannot
5 consent to that kind of -- kind of conduct when
6 you're a minor. And I'm not suggesting that the
7 120 people here are people that were flown in. I'm
8 just suggesting that that's what they report.

9 Most of the people that I represent are
10 not those people that were recruited and flown in.
11 Most of them are people who were either trying to
12 break into the business or who were identified --
13 you know, were not, you know, part of some group
14 that would typically be flown in anywhere. They
15 were just people that were invited to parties
16 because they were either on the street, in a club,
17 at a bar at a hotel lobby. I mean, you name it,
18 every scenario you can think of probably fits the
19 bill with these 120-some-odd people.

20 STEPHEN SMITH: When do you expect to
21 start filing these suits?

22 TONY BUZBEE: I'm hoping to file -- I

1 wanted to do it in a week, but to be -- to be
2 realistic, I said 30 days, but I expect within 30
3 days we'll start filing individual cases, and we'll
4 continue to file individual cases. And, you know,
5 we'll pursue them aggressively. And obviously it's
6 a herculean task when you're -- when you're dealing
7 with a lot of different individuals with -- each of
8 them has a different case, different evidence,
9 different defendants, different venue, different
10 law that applies. So it's a -- it's a tough task,
11 but, you know, it's an important task because I
12 look forward to it.

13 STEPHEN SMITH: Your thoughts or your
14 words to people who would say, well, you had a
15 press conference yesterday, and it was very, very
16 dramatic. There's over 120 cases that you're going
17 to aim in the direction of P. Diddy Combs, and
18 you're still searching for additional evidence, et
19 cetera, et cetera. So the argument will be made
20 that you don't really have a lock-solid case
21 against this man at this -- at this particular
22 moment in time. They would say why have the press

1 conference at all at this particular juncture as
2 you did yesterday. To that, you say what, sir?

3 TONY BUZBEE: To that I say, you know,
4 could I file the cases against Sean Combs right
5 now? Absolutely. Yeah. But I want to make sure I
6 capture a wide net and capture everybody involved,
7 and that's what I'm -- that's what I'm trying to
8 do. And part of the -- part of the purpose of the
9 press conference was to encourage people that
10 witnessed some of these events to come forward, and
11 that's happening now.

12 Because I want to make sure, when we
13 file the case, that we don't just -- you know, I
14 want to say it like this. You know, Sean Combs,
15 you know, obviously has a lot of trouble on his
16 plate right now, and, you know, he ain't going
17 anywhere. I want to make sure that anyone that
18 facilitated this, egged it on, participated,
19 benefited from, profited from, they're involved too
20 because that's really -- that's really what needs
21 to happen here. It happens -- it happens in other
22 cases like that. You want to make sure that you

1 include everyone, especially those that enabled and
2 were complicit.

3 STEPHEN SMITH: So, Tony Buzbee, to
4 close this interview, you're saying -- and I want
5 to make sure I'm quoting you accurately --
6 Sean Diddy Combs is not the only person you're
7 after? You're after anyone who was involved,
8 anyone who was complicit -- public figure, private
9 figure, business folks, industries, et cetera. You
10 don't give a damn who it is. You want them all.
11 That's what you're here to do; is that correct?

12 TONY BUZBEE: I think you summed it up
13 perfectly. Yes. That's true.

14 STEPHEN SMITH: Tony Buzbee with the
15 Buzbee Law Firm based out of Houston, Texas, right
16 here on the Stephen A. Smith show over the digital
17 airwaves of YouTube and, of course, iHeartRadio.
18 Tony Buzbee, thank you so much for your time and
19 your expertise. Really, really appreciate it, and
20 thank you so much.

21 TONY BUZBEE: Thank you, sir.

22 (End of recording.)

Transcript of Steven A. Smith Interview with Tony Buzbee
Conducted on October 1, 2024

22

CERTIFICATE OF TRANSCRIBER

I, Jennifer Candela-Alvarez, do
hereby certify that this transcript was prepared
from the digital audio recording of the foregoing
proceeding; that said transcript is a true and
accurate record of the proceedings to the best of
my knowledge, skills, and ability; and that I am
neither counsel for, related to, nor employed by
any of the parties to the case and have no
interest, financial or otherwise, in its outcome.



JENNIFER CANDELA-ALVAREZ

NOVEMBER 15, 2024

EXHIBIT F

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3

LAW & CRIMES NEWS

4

Interview of TONY BUZBEE

5

By SIERRA GILLESPIE

6

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Wednesday, October 2, 2024

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20 Job: 561873

21 Pages: 1 - 24

22 Transcribed by: Steph Mistele

1 PROCEEDINGS

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3 SIERRA GILLESPIE: Tony, thank you so much for
4 coming on with us today.

5 TONY BUZBEE: Thank you for having me.

6 SIERRA GILLESPIE: So, let's start with the big
7 question, why now? I mean, Diddy was indicted last
8 month, but these allegations came out almost a year
9 ago, starting in November of last year with Cassandra
10 Ventura, so why now are these plaintiffs planning to
11 file suit?

12 TONY BUZBEE: I think it's because the
13 indictment and then the denial of bail. You know, we
14 had several cases before the indictment and we were
15 just kind of waiting to see what the federal
16 government was going to do. We knew there was an
17 investigation ongoing.

18 Then when the indictment came about and then
19 when the arrest occurred and then when bail was
20 denied, I think those events led to more and more
21 calls. And then my co-counsel-- who then called me
22 and associated me with the case and thought that this

1 would probably be the kind of case that I should
2 handle.

3 When I made an announcement that I was going to
4 pursue these cases, the floodgates really opened. We-
5 - in about a 10-day period, we got 3200 calls. And
6 then from the press conference we had yesterday,
7 we've had 12,000 calls since, I guess, in about what,
8 24 hours?

9 And so, our Herculean task is to try to sift
10 through every one of these calls and make sure that
11 we are identifying those who are victims and those
12 who are witnesses and collect evidence. I mean, it's-
13 - we have about-- almost 100 people working on this
14 task.

15 The 120 that we announced yesterday, those are
16 claims that we could file right now against Sean
17 Combs, but we're trying to make sure that when we
18 file the cases - and they're going to be filed on an
19 individual basis - that we include every potentially
20 liable party. And by those-- by that I mean any
21 entities or other individuals that either were
22 involved, participated, facilitated, egged it on,

1 provided the venue, benefited from it, profited from
2 it, that sort of thing.

3 So, that's where we are now. We have 120 cases
4 that we are preparing to file and we're trying to
5 sift through another 12,000 phone calls and contacts
6 that we received in the last 24 hours. So, you know,
7 the volume of calls has been overwhelming and it's
8 been, you know, kind of shocking.

9 But when you put it in context that we re
10 talking about behavior-- alleged behavior that
11 occurred over 25 years with individuals that had
12 parties, I mean, you can only imagine the amount of
13 different types of parties that occurred. We're
14 talking about album release parties. We're talking
15 about the white parties you've heard about, after
16 parties after shows. Just, you know, impromptu
17 parties at hotels and clubs.

18 You know, I think the indictment and the arrest
19 kind of gave people a little bit more comfort that
20 they have more safety and support to step forward.
21 And I think announcing that there were 50 people that
22 were preparing to file suit kind of made people that

1 were on the fence, that were still scared to step
2 forward.

3 Now anytime you have a situation like this, you
4 know, the real task is to make sure that every single
5 person that you sign on to represent has a legitimate
6 claim and that's the difficulty because one bad, you
7 know, apple spoils the barrel, as they say.

8 So, you're kind of-- it's kind of a balancing
9 test, really. On the one hand, you want to
10 absolutely, we believe victims. If you've been
11 victimized, please step forward. This is a safe space
12 for you. We can help you. We will help you. On the
13 other hand, we have to make sure that we fully vet
14 the case and we have to make sure that it's a
15 legitimate case. So, that's the process that we're
16 going through now.

17 You know, yesterday I announced that our team
18 intended to start filing cases within 30 days. It may
19 be sooner than that. But, you know, I was not
20 expecting the high volume of contact that we've
21 gotten in the last 24 hours.

22 SIERRA GILLESPIE: I mean, the sheer number of

1 lawsuits that you're talking about as of yesterday,
2 120. To me, I'm like, wow, that is a giant number.
3 But now you're talking about over 1000 people that
4 came forward just overwhelming as you're discussing
5 that, but let's move onto another aspect of this.

6 A lot of people are talking about names that
7 could come up in these lawsuits. You referenced that
8 some of these names are pretty high profile and could
9 shock us. What can you tell me about those names? Are
10 there a lot of people that could be implicated in
11 future crimes? Is it possible that the things that
12 will be listed in these future lawsuits could be
13 prosecuted? What can you tell me?

14 TONY BUZBEE: Well, I'm very careful to talk
15 about whether someone did or did not commit a crime.
16 You know, the civil system is very different than the
17 criminal system. The criminal authorities are very
18 particular about which claims that they pursue
19 because they're-- the standard of proof is beyond a
20 reasonable doubt. In the civil system, the standard
21 of proof is more likely than not or preponderance of
22 the evidence. So, it's a lot lower standard in the

1 civil system.

2 So-- but to answer your question as far as
3 crimes, I won't comment on that. But as far as
4 whether there will be additional individuals, people
5 that we all know, joined in some of these suits,
6 there's no doubt that will be the case. There's no
7 doubt that some of these events and these assaults
8 occurred at particular people's homes, some venues,
9 some hotels, some clubs. We know that there were
10 people in the room when some of these things
11 occurred.

12 It's my view that if you participated in it, if
13 you benefited from it, if you encouraged it, if you
14 watched it go on and were somehow involved, whether
15 it be even peripherally involved and did not try to
16 stop it, especially with regard to minors, then it's
17 my view that you have liability on the civil side.

18 So, that's what we're looking at and obviously
19 we want to be very careful about who we name because,
20 you know, I don't want, you know, an error in that
21 respect. It's not good for anyone. And I'm not going
22 to be the person that starts naming names of

1 potential people and smearing people for no reason
2 because the case is about credibility.

3 So, I have made sure that each of these people
4 that we represent currently are people that I'm proud
5 to represent and that I believe in and I believe in
6 their case, but I want to make sure that we make sure
7 we include every potential liable party when we file
8 the case.

9 SIERRA GILLESPIE: These names that will be
10 included, the ones that you are willing to include in
11 these suits, why will they surprise us so much? Is it
12 because they're beloved people in the Hollywood
13 universe?

14 TONY BUZBEE: I've gotten this question so many
15 times and I know-- and you're doing your job,
16 obviously. You want to know who they are, some kind
17 of facts so you can kind of figure out who they are.

18 I think I'll just leave it at this, I mean, you
19 know, it was a secret that everyone knew about what
20 was going on with regard to these parties and some of
21 the things that happened at these so-called after
22 parties. There's a pattern and practice, custom of

1 behavior that went on for many, many years. The M-O
2 of how it went down was pretty much the same for
3 many, many years.

4 It typically included, you know, people
5 identified and specifically invited to certain venues
6 and parties. When they showed up, they were given a
7 specific drink. They were made to drink it. If they
8 didn't drink it, they would many times be kicked out
9 of the party. And a lot of these folks would drink
10 this drink that was provided to them and literally
11 could not remember hardly anything that happened
12 thereafter. And then next morning, woke up
13 disheveled, injured, confused, scared, ashamed, full
14 of guilt and wondering what in the heck happened to
15 them. Some of them of course have clear memory about
16 what happened, but could-- just literally could not
17 stop it from happening.

18 It's really-- it's incredibly egregious,
19 especially with regard to those that were minors at
20 the time this happened. And it's my view that if you
21 were around and you were there and you were watching
22 this and in some way participated in this, you know,

1 you're complicit. You know, it's one thing to--
2 obviously anybody that was directly participating in
3 this, in my view, should be under the jail, but I'm--
4 that's not my decision to make. That's the
5 authorities. My job is to find and ferret out all the
6 people involved, facilitated, benefited from,
7 profited from, and make sure that they are parties in
8 these cases as we file them.

9 And there is a long list of people. You know,
10 I've said and I'll say it again, I have no doubt that
11 there are people right now who know that they were
12 somehow involved in this who are now scrubbing their
13 social media, who are searching their memories, who
14 are deleting their texts, probably deleting pictures
15 and trying to distance themselves from this. And we
16 know who they are or we will find out who they are.
17 So, you know, this is-- this is not something that's
18 going to happen overnight, but I think we're at the
19 tip of the iceberg here.

20 SIERRA GILLESPIE: You brought up the disturbing
21 pattern that we're hearing over and over again in the
22 civil suits that have already been filed and the

1 indictment that Diddy would allegedly drug these
2 people, oftentimes against their will, and then
3 sexually assault them. And then the word that we're
4 hearing a lot is "Freak Offs", when these incidents
5 would oftentimes be recorded. Is this something that
6 you've seen from your clients that potentially they
7 have recordings?

8 TONY BUZBEE: The client-- some of the clients
9 have recordings. What-- the reason the press
10 conference was held yesterday is obviously we can
11 collect evidence from our own clients and we can
12 check their phones and we can-- you know, some of
13 this stuff happened years back, so some of that is
14 hard to do.

15 But what we really are interested in, not only
16 victims coming forward, but people that witnessed
17 these events coming forward. I have had so many
18 people send me unsolicited information that they
19 think might help. I was here. I saw this. Here's-- I
20 can corroborate this, that kind of thing, and that's
21 so important with a case like this.

22 You know, I don't know what the federal

1 government has in its possession based on the raids
2 of Sean Combs' homes. So, I am doing what I can.
3 Obviously I've cast a very wide net and I put the
4 word out that, look, if you have evidence, please
5 come forward. Please provide us what you have. It may
6 be helpful. It may not.

7 You know, I've gotten a lot of videos and
8 pictures and it's hard to sort through that and
9 figure out, okay, let me try to put this in context,
10 you know, and figure out how this might help a claim
11 and how it might not.

12 But what we've seen is, you know, if you look
13 at the indictment-- of the three-count indictment
14 against Sean Combs, it describes a pattern of
15 activity that is very consistent with what we're
16 hearing from people that are calling us.

17 SIERRA GILLESPIE: You spoke of an eerie part of
18 this pattern, even more disturbing than the rest of
19 it that minors are involved. And this is something
20 you referenced in the press conference, someone as
21 young as 9 years old. You also listed a 14-year-old,
22 a 15-year-old. Obviously all these people are

1 underage. They're minors at the time. So, are you
2 surprised that in the indictment there weren't any
3 charges to that effect?

4 TONY BUZBEE: I think that the government--
5 obviously, typically when you deal with the
6 government, you know, they do not bring an indictment
7 unless they can absolutely prove it beyond a
8 reasonable doubt. I mean, that's-- anytime you deal
9 with the feds, they're very thorough, but they will
10 not put something in an indictment that they do not
11 think they can slam dunk prove.

12 So, it's my suspicion-- I haven't talked to
13 them, but it's my suspicion that they certainly had
14 information that suggested the very kind of thing I
15 talked about yesterday, but maybe they don't have the
16 evidence to put it in an indictment and to prove it.

17 What I'm hoping is, and I'm encouraging my
18 clients, to those that-- to the extent that they are
19 willing to do so, to, you know, make themselves
20 available to the federal authorities, to get-- tell
21 their story and I expect the indictment will grow. I
22 expect there will be more counts.

1 So, but again, that's not-- that's not my
2 bailiwick. My bailiwick is to pursue justice in a
3 civil system on behalf of the clients that I vetted
4 and I think their cases can win in court.

5 SIERRA GILLESPIE: That's interesting that you
6 said you think the indictment will grow, maybe more
7 charges could be filed against Diddy based on what
8 we're going to hear in these more than 100 lawsuits.

9 So, let's talk about those allegations for
10 second. Again, we're just seeing this pattern over
11 and over about sexual assault, false imprisonment,
12 drugging. Can you tell me a bit more about the
13 allegations that your clients are bringing?

14 TONY BUZBEE: I'll just talk generally about
15 them. It's-- I kind of put them in two different
16 buckets, if you will. The first bucket is
17 individuals, young people, trying to break into the
18 entertainment industry, whether it be acting,
19 singing, dancing, that sort of thing. People who are
20 recruited by affiliates of Sean Combs or others in
21 his group who-- one individual I'm thinking about in
22 particular who went to a studio to audition and ended

1 up being allegedly sexually assaulted. That's one
2 bucket.

3 The larger bucket is just people who are
4 identified perhaps in a crowd, on the street, at a
5 club, recruited to come to parties and get to the
6 party and are drugged and then are assaulted. That's
7 the second bucket. That's the larger bucket.

8 And so, that's kind of-- the M-O's the same,
9 but, you know, the group of people is a little bit
10 different. You have some aspiring singers and
11 aspiring dancers and actors, that group, and then you
12 have people that just were flattered to be invited to
13 a party by somebody of Sean Combs' stature and
14 celebrity. So, you know, it's-- all of it's sad. All
15 of it's egregious, but each case is different.

16 SIERRA GILLESPIE: This next part is really--
17 just sad to even talk about. You mentioned that over
18 50%, half of these people who are filing suit
19 actually had already reported this, whether it be to
20 the police or to hospitals, maybe in the way of a
21 rape kit or something like that following a sexual
22 assault. So, this had already been on record. How do

1 you feel about that? Do you think that charges
2 should've been filed when those things were reported?

3 TONY BUZBEE: You know, I'm still delving into
4 that, you know. The-- many of these folks who woke up
5 the next morning scared, ashamed, in some cases can't
6 find their shoes. The only thing they remember is
7 being forced to take a drink. You know, end up at the
8 hospital, drug tested and find drugs in their system
9 when they're not people that typically do drugs.

10 In several cases where they found what was
11 described as a horse tranquilizer in their system,
12 you know, obviously those people who went to the
13 hospital and reported that, you know, what happened
14 after that? Why wasn't it pursued?

15 You know, there's as many different reasons for
16 that as there are different clients. So, you know,
17 I'm not casting dispersions at the authorities or
18 casting dispersions at the hospital. It just is what
19 it is. And you should know, and I think you probably
20 do know is that any time someone is victimized in
21 this way, it takes a heck of a lot of courage to come
22 forward. The authorities know that these are

1 incredibly hard cases to prove.

2 I think we released yesterday some statistics
3 about sexual abuse and assault and exploitation in
4 the United States. About the small percentage of
5 people that actually report it and the much, much,
6 much smaller percentage of cases that are ever
7 actually taken. And then the much, much smaller
8 percentage of prosecutions that ever actually occur.
9 It's just a nationwide pervasive issue.

10 And if you don't report it immediately, it
11 becomes that much harder to report because, you know,
12 the first thing we're going to hear, and I think
13 we've already heard from Mr. Combs' team is that if
14 something had happened, why didn't they report it
15 immediately? That's kind of the knee jerk reaction of
16 most people.

17 People who don't understand the scenario here
18 and how things actually work in the real world
19 because it's hard to prove these cases. Even if you
20 reported it on the spot, it's hard to prove these
21 cases. It makes it much harder, especially when
22 you're worried about ramifications from your family

1 even, from your job, from your community. And also,
2 you're dealing with a celebrity who's, you know,
3 celebrated.

4 You know, and, you know, the word fanatic is--
5 the short for that is fan and fans can be quite
6 nasty. You know, I've already gotten a lot of threats
7 on social media just because I'm the lawyer
8 representing these folks. You know, there's a real
9 fear there.

10 And, you know, I think the fact that the
11 federal government took action, the fact that there
12 was an arrest and an indictment, the fact that bail
13 was denied I think now three times, gives people some
14 courage to step forward. And then when they see that
15 other people are stepping forward, I think it's a
16 good thing.

17 And to have a dialogue and a discussion about
18 the difficulty of these cases and how pervasive this
19 kind of conduct is, is good for everybody. And, you
20 know, so I'm glad that-- and proud these people are
21 stepping forward, of their courage and I'm going to
22 do my best to pursue their claims in aggressive

1 fashion and make sure that, you know, the-- you know,
2 obviously one of the defendants will be Sean Combs,
3 but I think they'll be many more.

4 SIERRA GILLESPIE: You used the word courage and
5 I really want to highlight that because you're right,
6 this is such strength for these people to come
7 forward at maybe the darkest moment of their life and
8 reveal it to the world. But the strength there is
9 really important to highlight. And I'm wondering as
10 things move forward, if federal prosecutors do reach
11 out to any of your plaintiffs, do you think that
12 they'd be willing to testify and tell their story in
13 that way?

14 TONY BUZBEE: I'm certainly going to encourage
15 them to do so. Absolutely going to encourage them to
16 do so. You know, that's, of course, another level of
17 courage to do that. You know, one of the things that
18 each plaintiff has been told is that at some point
19 your name will be revealed. When we file the case,
20 obviously we're going to reveal your name to the
21 people that we sue and the entities that we sue.
22 We're going to file your case as John Doe or Jane

1 Doe, but it's up to the court, ultimately, whether we
2 will have to reveal your name publicly. And I've
3 tried to make it clear that ultimately the court may
4 say, you must reveal your name. And so, I've tried to
5 make that clear on the front end.

6 Now that's even a step further when you talk
7 about, are you going to be a witness in a federal
8 prosecution? That's a big deal. You can't hide-- you
9 can't hide your name and your identity when you serve
10 as a witness in a case, especially a case against
11 somebody like Sean Combs. It's going to be very high
12 profile and, you know, every-- and you-- in these
13 cases, I think you probably, you know, common sense
14 tells you that the first defense is always going to
15 be to attack the victim. That's the first defense.
16 It's been that way since I've been handling these
17 cases for 20-some odd years.

18 And you got to make it clear on the front end
19 that, look, you're going to be put under a
20 microscope. Everything you've done and said in your
21 entire life is going to be examined. Anything you've
22 ever posted on the internet or social media is going

1 to be examined. Every job you ever had, every
2 employer you've ever had, they're going to talk to
3 them. You know, they're going to do a deep, deep dive
4 into your background. And be prepared for that.

5 But ultimately, none of that has anything to do
6 with what happened in the room at the time that
7 individual was assaulted. So, you know, you have to
8 prepare people for that and that's one of the reasons
9 that people are very reluctant to come forward.
10 Laying aside the guilt and the shame and the self-
11 blame that people have, like, how did I put myself in
12 this position? That sort of thing.

13 You know, when I was representing the women who
14 were assaulted or allegedly assaulted by DeShaun
15 Watson, the football player, you know, we-- I-- at
16 the beginning I encouraged them to speak to the NFL.
17 And, you know, and the NFL investigators, former
18 federal prosecutors, these were very professional,
19 very sophisticated people who were leading the
20 investigation on behalf of the NFL. One of the first
21 questions they asked these women was, "What were you
22 wearing?" Which is indicative of what these folks

1 face, which is, you know, even the people who are
2 supposedly trying to help you, who are trying to
3 gather information, their first thought is, somehow
4 you re to blame for the conduct of someone else.

5 And so, it's very hard to-- for the general
6 public to understand that because the general public
7 typically is going to look, well, if something
8 happened, you would've reported it. Well, if
9 something happened, what was your role in this? You
10 know, why did you take that drink?

11 You know, instead of looking at it from the
12 perspective of, I was sought out. I was flattered. I
13 thought, wow, this is something I can tell my
14 friends. I was invited to an after party with this
15 celebrity and other celebrities. And the next thing I
16 know I wake up confused and injured, you know,
17 through no fault of my own, but it's the natural
18 human tendency to want to blame yourself and
19 certainly the tendency of the general public to blame
20 the victim.

21 SIERRA GILLESPIE: This is a major update in the
22 widespread allegations against P. Diddy, so obviously

1 we're going to continue to follow this one, but Tony,
2 thank you so much for coming on today and giving us
3 some insight into these future lawsuits.

4 TONY BUZBEE: Thank you very much.

5 SIERRA GILLESPIE: Following the news of these
6 impending civil lawsuits, Diddy's team released a new
7 statement saying quote, "As Mr. Combs' legal team has
8 emphasized, he cannot address every meritless
9 allegation in what has become a reckless media
10 circus. That said, Mr. Combs emphatically and
11 categorically denies as false and defamatory any
12 claim that he sexually abused anyone, including
13 minors."

14 Diddy has pleaded not guilty to the federal
15 charges, saying he plans to tell his side of the
16 story when it comes time for trial. Reporting for Law
17 & Crime, I'm Sierra Gillespie.

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20 (The recording was concluded.)

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Transcript of Interview Of Tony Buzbee

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CERTIFICATE OF TRANSCRIBER

I, Steph Mistele, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding; that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; and that I am neither counsel for, related to, nor employed by any of the parties to the case and have no interest, financial or otherwise, in its outcome.



STEPH MISTELE

November 15, 2024

EXHIBIT G

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TRANSCRIPT OF VIDEO-RECORDED

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INTERVIEW

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"INSIDE DIDDY'S FREAK OFFS WITH LAWYER TONY BUZBEE .

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THE CHRIS HANSEN SHOW . EP 1"

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<https://www.youtube.com/watch?v=0gM0S-SgNnw>

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Pages: 1 - 26

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Transcribed by: Christian Naaden

1 P R O C E E D I N G S

2

3 CHRIS HANSEN: Coming up, an interview with
4 the lawyer representing more than 100 victims of Sean
5 "Diddy" Combs, some of whom were underage. It seems not
6 a moment goes by without another very disturbing
7 allegation against the music impresario Sean "Diddy"
8 Combs, now being accused by Homeland Security and
9 federal prosecutors of operating a major human
10 trafficking and sex exploitation ring.

11 And Tony Buzbee, who is a lawyer based in
12 Houston, Texas, represents now more than 100 survivors,
13 victims, allegedly of Diddy. And Mr. Buzbee joins me
14 now from Houston, sir. Thank you for being with us
15 today.

16 TONY BUZBEE: Glad to be here. Chris, how are
17 you?

18 CHRIS HANSEN: I'm great. Thank you. Disturbed
19 by all this, though? We've been investigating predators
20 for for decades now.

21 And I'm at a loss to describe an alleged case
22 this big, this violent and this disturbing. How do you

1 get your arms around representing more than 100 alleged
2 victims, survivors of one man?

3 TONY BUZBEE: It's difficult. It's obviously
4 very administrative intensive. You know, you have to
5 treat each one of these cases on its own merit. Um,
6 we've received at this point 3500 calls of people who
7 either claim to be victimized by Sean Combs or have
8 information they want to share about him, some sort of
9 interaction they had with him and things that they saw.
10 Um, so it's very tough.

11 You know, we have about 90 people who are
12 attempting to vet these claims on the on the front end.
13 And then we have retired Houston police officers,
14 including people that were in the Major Crimes Unit
15 here who are assisting us in running down witnesses,
16 collecting texts, pictures, video, that sort of thing.

17 We want to make sure, you know, because it's
18 such a high profile case, because there's a lot of
19 media attention. We want to make sure that that it's
20 done by the numbers and done correctly. So, you know,
21 we've been working on this probably for six months.

22 Uh, obviously after the indictment and

1 specifically after Sean Combs bail was denied for the
2 second time, I think, you know, that kind of opened the
3 floodgates. I think people are very, very fearful of of
4 Sean Combs and his his entourage.

5 You know, he's perceived to be you know,
6 connected with some sort of criminal element on the one
7 hand, but also very friendly with people in power and
8 also with other celebrities. So he's -- he's very
9 quick.

10 These victims will tell you that that when
11 they would cry out or complain about certain things, he
12 would be very quick to to make these either explicit
13 threats or, or implicit threats about, you know, them
14 speaking to anyone about the conduct that they had seen
15 or been involved in. So, you know, the floodgates.

16 CHRIS HANSEN: You raise a critical point
17 here, Mr. Busby, in that one of the reasons his bail
18 was denied was because of this allegation of violent
19 witness tampering.

20 And now that he's clearly going to be held
21 without bail, based upon what we've seen in the courts
22 in New York, it would seem that a lot of these victims

1 would feel safe coming forward. But it speaks to the
2 violence alleged in these allegations.

3 TONY BUZBEE: Yeah. I mean, there's there's
4 some of these victims that were on the receiving end of
5 some very, you know, not not implicit, but very direct
6 violence against them.

7 But, you know, there's an M.O here when you,
8 when you, when you look at the range of these cases and
9 what what has been alleged. You kind of see an
10 overwhelming theme, which is, you know, he identifies
11 somebody that that he wants to either have sexual
12 contact with or he wants his cohorts to have sexual
13 contact with.

14 They are ultimately drugged in some way,
15 typically through a drink, and then they end up, you
16 know, being murky, not understanding what's going on
17 and wake up the next morning, in some cases without
18 their clothes or shoes, confused, injured, and not
19 knowing what to do.

20 That is a reoccurring theme. And so how this
21 was able to go on for so long. It's -- it's -- it's
22 hard to fathom because we know that, that a lot of this

1 conduct occurred at -- at, you know, venues, whether it
2 be hotels, clubs after parties, famous people's homes,
3 you know, publicized parties that that are all over the
4 internet, we can see that the clips from them.

5 And if you look at interviews that people that
6 attended the party, when they get to the point of
7 asking about certain things that would kind of get
8 close to some of the conduct we're talking about, you
9 know, they go quiet.

10 TONY BUZBEE: So this was a secret in the
11 industry that everyone knew about. And I'm just very
12 proud that that, you know, that the chips have started
13 to fall.

14 You know, the Cassie case, I think was was
15 kind of the beginning of this and then the the
16 investigation and then the the indictment and then the
17 arrest and then the bail being denied. And now people
18 are coming forward.

19 In fact, we published a phone number for abuse
20 Hotline yesterday and it literally crashed. We had so
21 many calls. So we have a great task in front of us of
22 trying to sift through whether these folks who are

1 calling are victims or have information or just, you
2 know, you obviously, you know that in these types of
3 situations, there's people that just call for, you
4 know, and crank and that sort of thing.

5 We have to sift through that and we're going
6 to do that. But I expect we'll start filing cases in
7 New York federal court in the next two weeks to 30
8 days.

9 And I expect we're going to be joining
10 defendants in these cases that are going to raise some
11 eyebrows. And I look forward to, you know, following
12 this evidence wherever it goes and whoever.

13 CHRIS HANSEN: Begs the question, Mr. Buzbee,
14 and you bring up one of the points that intrigues me
15 and a lot of other people so much is that other people
16 in the music industry had to know, perhaps even cover
17 up and, as you may allege in the future, have taken a
18 role in allowing Combs to do this.

19 AD: Hey everyone, Chris Hansen here. We have
20 almost 100 new episodes on my streaming crime network.
21 Watch true blue.com. Use the code YouTube 24 for half
22 off your first month or YouTube year for \$20 off a full

1 year. We'll see you soon on True Blue.

2 TONY BUZBEE: It's my view that if you were in
3 the room, a miner is in the room being abused, and you
4 allow it to happen, you have liability. It's my view
5 that if you that if you facilitated or egged that on in
6 some way, you have liability.

7 It's my view that you -- if you provided the
8 venue knowing how he was and the things that he was
9 doing along with the people that he was, that he was
10 with, you have liability.

11 It's my view that if that -- if that -- if you
12 knew as a hotel owner that he was renting out an entire
13 floor and there were people appearing, multiple people,
14 young women and young men who were appearing at the
15 front desk, and you were not taking down their name and
16 you were sending them directly to his floor, you have
17 liability.

18 It's my view that if you're a bank and you
19 knew that he was withdrawing hundreds of thousands of
20 dollars in cash that was being used to pay for people
21 to be shipped from all across the country, as in
22 trafficked, you have liability.

1 I mean, I think the the facets of this and,
2 you know, everybody's really tuned into, you know, who
3 are the celebrities that might be named. But in my
4 view, the more sinister, the more sinister element of
5 this is all the corporations that benefited from this
6 and the venues that benefited from this, and the people
7 that profited from this culture that he created.

8 And I look forward to peeling back every layer
9 of that onion so we can all see what was going on here.

10 CHRIS HANSEN: And there is precedent for
11 this. Jp Morgan Chase was held liable in the Epstein
12 case, as I'm sure you know, and in human trafficking
13 cases around the country, hotel chains, major companies
14 have been held responsible for allowing this sort of
15 human trafficking activity to occur on their
16 properties.

17 TONY BUZBEE: Yeah, we know we know from the
18 victims that that, you know, that it was routine for
19 for the so-called atmosphere.

20 They had what they called atmosphere. Girls
21 who would be shipped in paid \$10,000 per person to be
22 there and then coerced and bullied, and in some cases

1 forced to do certain things that they didn't anticipate
2 that they were supposed to be doing and then held.
3 They're not allowed to leave.

4 I mean, this is the kind of thing that was
5 going on and was going on at the same time that a lot
6 of people, they were taking pictures. It's going on
7 like literally, right, you know, right next to them.

8 And some of the same pictures that you see on
9 Instagram and other social media platforms. I think
10 this is going to be, you know, even bigger than people
11 can imagine. Um, give me.

12 CHRIS HANSEN: A sense of the volume of
13 videotape and photographic evidence and recordings you
14 have.

15 TONY BUZBEE: We are still sifting through
16 hundreds of pictures and video. You know, some of it,
17 it's without context. It's hard to even know what this
18 even means or what's, you know, how does this fit into
19 the picture?

20 We've been -- I've been sent just unsolicited
21 via email and direct message on social media, videos
22 and pictures and stuff. So we're trying to sift through

1 all that. So I couldn't even give you an estimate.

2 You know, yesterday there was there was an
3 individual who, of course, did not want to reveal who
4 she was, but was texting me just video after video
5 after video from some of these so-called freak offs.
6 And I'm just looking at this stuff like, man, I wish
7 this weren't on my phone. Number one. And number two,
8 she was.

9 CHRIS HANSEN: Texting you on your personal
10 phone. Yeah. Videos of these freak-offs.

11 TONY BUZBEE: Yeah, yeah.

12 CHRIS HANSEN: And what does that say to you?
13 That somebody unsolicited feels so strongly about
14 what's happened to her and others that she would send
15 this material to you?

16 TONY BUZBEE: Yeah, and I'm trying to. And
17 here I am trying to figure out, first off, you know, I,
18 I don't want this stuff on my phone, but.

19 CHRIS HANSEN: No, of course.

20 TONY BUZBEE: Not. I'm trying to figure out
21 the context. Like who, who is who are these people
22 doing these things that you would, you know, you would

1 typically wouldn't -- wouldn't see. And obviously you
2 couldn't -- couldn't show it to anybody in public. It's
3 pretty -- pretty graphic.

4 But -- but you know, I've had -- you know, we
5 have this large team of people trying to field all
6 these calls and all these media or this internet
7 contact and you know, trying to sift through that and
8 screen that and get people to the next level to start
9 talking to lawyers.

10 And the difficulty, as you might expect, is
11 what you want to do is you want to you want to make
12 sure that people believe you are believed. Okay. We
13 believe victims. We're not going to we're not going to
14 we're not here to cross-examine you at this point.
15 We're not here to -- to -- to, you know, to to be
16 skeptical.

17 But at some point we have to be because, as
18 you know, these are very difficult cases. These are
19 these these are difficult cases going against a
20 powerful group of people. So at some point, you know,
21 when they get to the third level, hard questions have
22 to be asked.

1 And so we're -- we're -- there's a balance we
2 have to cut here. We have to on the one hand, make sure
3 that people understand that we believe you. We want to
4 hear what you have to say. We want to hear your story.
5 We want to represent you and help you if we can. On the
6 other hand, you need to understand that this is this is
7 not going to be a cakewalk.

8 TONY BUZBEE: You know, this is this is going
9 to be there's going to be a lot of attention on this.
10 And they're going to fight -- fight us tooth and nail.

11 And the first defense is going to be we never
12 don't know who you are. And you're just here to try to
13 get money. And the second defense is, well, if you've
14 proven that we were in the same room together, but we
15 didn't do anything to you and the entire defense is
16 going to be we're going to attack your character and
17 your lawyer's character, and we're going to attack, you
18 know, from the very beginning.

19 So this is -- I've been down this road before.
20 It's a -- it's a difficult road, but the fact that we
21 have 120 people who are willing to step forward, who
22 have been vetted now and are and are ready and willing

1 and able to file their case, we're going to file them
2 under the Jane Doe or the John Doe pseudonym.

3 But we understand that eventually their names
4 will be made public. I'm encouraging them to talk to
5 the Homeland Security and the FBI. Um, I'm encouraging
6 them to allow me to share their names and their
7 information with the authorities.

8 I'm encouraging them that at some point, let's
9 let's step in front of a camera and let's tell your
10 story, because there's probably many, many other people
11 out there who, if they see you on the camera and they
12 hear what you have to say and it happened to them,
13 they'll step forward too. So that's kind of where we
14 are in this. And, you know, we're at the tip of the
15 iceberg.

16 CHRIS HANSEN: How many of your victims? Mr.
17 Busby were underage, were minors at the time of the
18 offenses?

19 TONY BUZBEE: Twenty-five of the 120.

20 CHRIS HANSEN: Twenty-five.

21 TONY BUZBEE: Twenty-five we're talking about.
22 And you would think that we're talking about females,

1 but we're you would be. I was surprised because I just
2 expected this was all these were all females.

3 But -- but of the 120 people, half are males.
4 And of the minors, about half are males as well. We
5 have a young man who was nine years old at the time
6 this occurred.

7 CHRIS HANSEN: Nine years old, Mr. Busby. Nine
8 years.

9 TONY BUZBEE: Old. 13 years old. 14 years old.
10 A 15 year old. All of these are, with one exception,
11 young men who were trying to break into the industry.

12 The nine year old young man was was was
13 essentially his parents responded to some sort of
14 advertisements. Somebody was recruiting young people to
15 break into the industry, and he he made the various
16 screening mechanisms they had.

17 And him, along with four other boys, went and
18 were able to meet Sean Combs and his his parents
19 essentially handed him off to Sean Combs. And they they
20 alleged that they handed him off.

21 And Sean Combs had had his way with this child
22 by coercing him and pressuring him and promising him

1 things. And, you know, to the point now that that, you
2 know, just devastated this, this young man's life, who,
3 you know, he doesn't want to have anything to do with
4 music.

5 I mean, it was his dream to be a musician. He
6 doesn't want to have anything to do with music. Of
7 course, his parents are have shame and guilt because
8 they helped facilitate that.

9 And that's kind of a typical story of what
10 we're talking about here. And I think I think it goes
11 without saying that, and it shouldn't be this way, but
12 it is this way that that it's even more difficult for a
13 for a young man to come forward when this happens to
14 him, you know, because there is a stigma involved in
15 that. So this is what we're dealing with.

16 And at the same time trying to be sensitive
17 you know, you've got to be aggressive and pursue the
18 case and make sure we leave no stone unturned, and we
19 gather all the evidence and we ask the hard questions
20 of the clients.

21 But at the other hand, on the other hand, we
22 have to be sensitive because this is tough stuff. And

1 this -- this young man's been living with this for a
2 long time.

3 CHRIS HANSEN: I can't imagine the shame, the
4 degradation, the absolute destruction of a child's life
5 being exposed to this at the age of nine.

6 TONY BUZBEE: You think about, you know, this
7 at the time this happened, this allegedly happened.
8 Sean Combs was the top of the top of the music
9 industry.

10 It was well known that if he if he liked you,
11 he could make you a star. And that's what the parents
12 were excited about. Obviously, the young man was
13 excited about. And then this -- this happens.

14 And, you know, it's like he's just on the
15 scrap heap of history, if you will. You know, just
16 devastates. I don't want to be too pessimistic because
17 my my hope is that the young man has a long, productive
18 life. But -- but boy, it's hard when something like
19 this happens to you.

20 CHRIS HANSEN: In terms of predatory behavior.
21 You've investigated victims whom you've represented.
22 Where does this case rank? Mr. Busby?

1 TONY BUZBEE: A lot of the cases that I've
2 had, the conduct has been secret, private. There were
3 some suspicions, but it was private, and it was usually
4 one person on one person.

5 And of course, you know, when you have this
6 predilection like this, it happens over and over. You
7 know, it doesn't just happen once. Typically when
8 something like this happens, you can you can bet that
9 it's probably happened more than once.

10 What's -- what's different about this case, in
11 my view, is that is that this was not a secret. I mean,
12 some of this behavior was happening in the presence.

13 And I'm not just talking about in the presence
14 because Sean Combs never went anywhere without
15 bodyguards, never went anywhere, never traveled
16 anywhere without some sort of entourage or posse, if
17 you will. And certainly those people knew what he was
18 up to and knew what his, his inclinations were.

19 But what's what's more disturbing about this
20 is, is that at some of these, these after parties
21 weren't just four or five people, these after-parties
22 were people that knew that about 1:00, you know, there

1 was going to be a shift in this party and things were
2 going to be different.

3 You know, this was not going to be, you know,
4 the party that you see on the -- on Instagram and so
5 forth.

6 TONY BUZBEE: I mean, some of the conduct
7 occurred during the main party, but the most sinister
8 conduct occurred in the so-called after parties, and
9 those were not small affairs.

10 And so you wonder, you have people of note,
11 people who are known, who attended some of these and
12 knew about some of some of this behavior going on. I
13 mean, there was no secret that people were being flown
14 in.

15 I mean, there's no way you could you could not
16 know that unless you were just there's just no way you
17 could not know that.

18 And the things that were going on in the
19 presence of people, that of names that we've all heard
20 and venues that we all know and people's homes that we
21 all know, and how it went on for, for 25 or more years
22 without anybody saying anything.

1 You know, you've heard some celebrities say,
2 hey, I would never go to a Diddy party. There's --
3 there's a -- there's a group of celebrities out there
4 who are making that more and more well known because
5 obviously, what's going on.

6 But how did this go on for so long without
7 anyone saying, you know, enough is enough of this? I'm
8 going to speak out about this.

9 TONY BUZBEE: You know, I know he's a powerful
10 person. I know he's connected with with some powerful
11 people. I know that, you know, politically, he's even
12 connected.

13 And maybe there's an element of some sort of
14 criminal element here that could be a danger. But I'm
15 going to say something because what I'm seeing is not
16 correct. It's not right. And I don't want to be a part
17 of it, and I don't want to be associated with it.

18 But you never heard that, you know, you heard
19 people like Katt Williams who have said some things
20 years back, you know, 50 Cent has said some things
21 about, about that, you know, you've heard interviews
22 here and there about when people ask about Sean Combs

1 parties, you know, they grow silent and they kind of
2 it's kind of hush-hush.

3 I can't talk about that. But why didn't they
4 ever say something, you know, why did they allow this
5 to happen and continue to happen?

6 It's my view that if you continue to attend
7 those parties knowing what was going on and not saying
8 anything. How are you not. How are you not complicit in
9 some way?

10 CHRIS HANSEN: Do you have witnesses, insiders
11 who are willing to cooperate in this case?

12 TONY BUZBEE: I think so. I also think that
13 certainly have witnesses who saw this, who weren't
14 involved but are willing, who have nothing to gain, who
15 are willing to talk.

16 I expect that some of the, the, the people
17 that were the closest to Sean Combs, who were with him
18 at all times, will probably talk. I think, you know,
19 the federal government is really good, as you know, at
20 getting people who are not the targets to talk. I
21 expect that will happen.

22 I expect the indictment and the charges in the

1 indictment will grow. I expect that other people will
2 be implicated. So I think that, like I say, I think
3 we're only seeing the tip of the iceberg here.

4 And, you know, I -- I'm what I'm most
5 interested in is, is every single person who is
6 victimized come forward and come forward now. You know,
7 there's a reason that that that New York State and
8 California have very long statutes of limitation for
9 these types of crimes because people are very, very --
10 you know, they don't cry out immediately.

11 Then it gets harder and harder as time passes
12 for them to come forward, because they're going to be
13 the first thing people say is, why didn't you come out
14 immediately? Because a lot of people don't understand
15 how hard it is to say, hey, this person did this to me
16 because it's a they don't.

17 TONY BUZBEE: There may be financial
18 repercussions, safety concerns, family repercussions,
19 backlash from their community. You know, people can be
20 you know, there's a reason for this. You know, this
21 word "fan" is short for fanatics. And people are can be
22 really mean and nasty.

1 And when you're dealing with a, you know,
2 alleged criminal element, you know, people should feel
3 that. Yeah, there's blowback. And, you know, even for
4 me, you know, I've been -- you know, you can only
5 imagine, I'm sure, for you two, the kind of the kind of
6 messages you get on social media are people that are
7 going to do this to you, and they're going to do that
8 or to your wife.

9 And, you know, I've had my wife told me last
10 night, you know, we're going to have to get because I
11 have security at my house, but we're going to have to
12 you're going to have to have 24-hour security. I'm
13 thinking, come on, you know, you know, that's just a
14 bunch of foolishness. But but who knows? I mean.

15 CHRIS HANSEN: It's real. I, I've seen it
16 personally, you know, and you're out there trying to do
17 the right thing and expose evil actors. And, you know,
18 there can be blowback from those people and their
19 associates.

20 There's no question. What? Before I let you
21 go, Mr. Buzbee, and I know you're a busy fellow. One
22 last question. What does this say about this particular

1 segment of the music industry that, as you have said
2 and has been proved, look the other way on this.

3 TONY BUZBEE: I call it the, you know, the the
4 facilitators. You know, obviously the people that
5 participated in this are terrible, terrible actions and
6 terrible conduct and, and should be prosecuted and put
7 underneath the jail.

8 But you know, what really irks me are the
9 people that that saw this happening, that enjoyed,
10 enjoyed themselves while it was happening, that fancy
11 themselves as upstanding people and knew this was
12 happening and continue to go to these parties knowing
13 this was going to happen. And there were, in my view,
14 are just as complicit.

15 And -- and whether they, you know, they can be
16 criminally charged or even civilly sued, people should
17 know, know that they knew and they didn't do anything
18 about it.

19 CHRIS HANSEN: Tony Buzbee from Houston, thank
20 you very much for spending all this time and taking us
21 inside this investigation.

22 I promise you we will stay in touch and we

1 will continue our work on our end as well. Thank you,
2 sir.

3 TONY BUZBEE: Thank you Chris.
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Transcript of Interview - The Chris Hansen Show

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1 CERTIFICATE OF TRANSCRIBER

2 I, Chris Naaden, a transcriber, hereby declare
3 under penalty of perjury that to the best of my ability
4 from the audio recordings and supporting information;
5 and that I am neither counsel for, related to, nor
6 employed by any of the parties to this case and have no
7 interest, financial or otherwise, in its outcome, the
8 above 25 pages contain a full, true and correct
9 transcription of the tape-recording that I received
10 regarding the event listed on the caption on page 1.

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12 I further declare that I have no interest in
13 the event of the action.

14 
15

16 November 11, 2024

17 Chris Naaden
18

19 (561200, Inside Diddy's FREAK OFFS with Lawyer Tony
20 Buzbee, The Chris Hansen Show, EP 1)
21
22

EXHIBIT H

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TRANSCRIPT OF VIDEO-RECORDED
INTERVIEW

"LAWYER TONY BUZBEE SAYS MORE CELEBRITIES WILL BE SUED
WITH DIDDY, DEMAND LETTERS SENT"

https://www.tiktok.com/@unbotheredbabez/video/7423099457639697707?_r=1&_t=8rHk8WIXxbq

Job No.: 561200

Pages: 1 - 7

Transcribed by: Christian Naaden

1 P R O C E E D I N G S

2

3 HARVEY LEVIN: Tony, you said last week at the
4 news conference that you would begin filing lawsuits as
5 early as this week. Um, do you have plans to do so? Um,
6 and do they involve celebrities? Do they involve just
7 Diddy people beyond Diddy?

8 TONY BUZBEE: I think I let the lawsuits speak
9 for themselves. I don't expect there to be anything.
10 You know, everyone's focused on what what other
11 celebrities were involved.

12 HARVEY LEVIN: Um, you know who's going to be
13 named? Who's going to be outed?

14 TONY BUZBEE: I don't expect that to happen
15 this week. I'm hoping to file some lawsuits this week.
16 Will they, of course, will include Mr. Combs and some
17 corporate entities. Uh, but we want to make sure that
18 that, you know, if we name individuals beyond Mr.
19 Combs, that that we make sure that we've done our
20 homework because it's going to create a firestorm. We
21 understand that. So we're going to make sure that we
22 dot our I's and cross our T's.

1 CHARLES LATIBEAUDIERE: Tony, you said
2 something interesting there. You said I don't expect
3 that to happen this week. So that sounds like there
4 could be other people named other famous people named
5 down the road. I know you said this is going to be a
6 process over the next 30 days of filing these lawsuits.
7 So are you saying not this week, but maybe in the weeks
8 coming after this one?

9 TONY BUZBEE: I would expect so. I really
10 don't want to get in into a situation where people are,
11 you know, if I don't file a lawsuit next week, then,
12 you know, there's a that creates a media frenzy that
13 the truth is, I want to be clear about something.

14 Um, if you were attending one of these
15 parties, if you will, and you attended, attended before
16 or you knew what was going to happen, that is, um, you
17 knew that a particular drug was being used in drinks
18 that was causing people, uh, to be coerced and taken
19 advantage of, and you were there in the room or you
20 participated, or you watched it happen and didn't say
21 anything, or you helped cover it up, in my view, you
22 have a problem.

1 And as we file each one of these cases, we're
2 going to make an effort to resolve them on the front
3 end. But failing that, we're going to file public
4 lawsuits and pursue these cases aggressively.

5 HARVEY LEVIN: So who will be named when they
6 will be named?

7 TONY BUZBEE: All that will come out in due
8 course. But the bottom line is, you know, I want to be
9 clear about the scope of this. A lot of people attended
10 these parties. A lot of people saw this activity going
11 on.

12 A lot of people allowed it to go on, said
13 nothing, didn't intervene, maybe benefited from it,
14 profited from it. All of these individuals and
15 entities, in my view, have exposure here.

16 HARVEY LEVIN: Are we talking about
17 celebrities on the level of Diddy?

18 TONY BUZBEE: I would expect so. Yes.

19 HARVEY LEVIN: Have you sent any demand
20 letters out to anybody other than Diddy saying, um,
21 here's what you've done, we want to settle with you or
22 we're going to file a lawsuit. Have you sent any to say

1 other celebrities beyond Diddy?

2 TONY BUZBEE: We have. And I want to I want to
3 explain that process because it's important, you know,
4 in every single case, especially cases like this, we
5 collect our data, collect our evidence, do our due
6 diligence, spend time with the victim.

7 And then because it's in the best interest of
8 the victim, we attempt to resolve these matters without
9 the filing of a public lawsuit. And we have done that
10 already. We've done that.

11 I would say, you know, with a handful of
12 individuals, many of which you've heard of before and
13 will continue to do that. That's just the standard
14 process that every lawyer in the United States who
15 handles these types of cases uses, because it's it's
16 it's the right way to do it.

17 HARVEY LEVIN: But there are also people who
18 want to jump on the gravy train and want to make money,
19 and that's got to be a big slice of what you're
20 getting. I mean, it's not just automatically believing
21 somebody because they say it.

22 TONY BUZBEE: No, I think, Harvey, I think

1 you're right. You know, I was born at night, but I
2 wasn't born last night.

3 Um, you know, you get 3200 calls and that
4 turns into 100-some-odd clients. I think you see the
5 process that we're involved in.

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Transcript of Interview - Demand Letters Sent

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November 11, 2024

Chris Naaden

(561200, Lawyer Tony Buzbee says more celebrities will be sue wuth Diddy, Demand letters sent)

EXHIBIT I

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Atwood Unleashed

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BUZBEE LIVE

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Interview with Shaun Attwood and Tony Buzbee

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October 7, 2024

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Job No.: 561873

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Pages 1 - 72

22

Transcribed by: Jackie Scheer

1 P R O C E E D I N G S

2 MR. ATTWOOD: Hello. Shaun Attwood, true
3 crime YouTube here in the UK. I'm here with
4 Tony Buzbee. I was just saying to him he must
5 be one of the busiest guys in the world right
6 now after the press conference. And I am
7 honored that he's come here and we are live and
8 he's able to answer your questions.

9 So first off, huge thank you for coming
10 on.

11 Huge thanks for coming on, Tony.

12 MR. BUZBEE: Oh, you're welcome. Thank
13 you. I didn't hear you. Go ahead.

14 MR. ATTWOOD: Yeah, no worries. I think
15 one of the most -- when you speak to Chris
16 Hansen, one of the parts that stood out to us
17 the most was the fact that your wife was asking
18 you to beef up security, get it 24 hours.
19 We've been investigating the Franklin scandal
20 on this channel. We've had Nick Bryant on.
21 The chief investigator in that case ended up
22 mysteriously going down in a plane crash.

1 What are you thinking right now about your
2 safety considerations? Because called out the
3 banks, you've called out big pharma, you're
4 calling out hotel XX. I mean, whoo, you've
5 called out a lot of people. You've got huge
6 cojones as far as I'm concerned.

7 MR. BUZBEE: Well, you know, I typically
8 have security at my house. She -- she -- you
9 know, I've had so many unsolicited advice being
10 provided to me and the -- the overwhelming
11 theme is, Tony, you better get more security in
12 light of some of the allegations that are being
13 made against some of the individuals being
14 made. I, you know, I try not to, you know, be
15 lax about it. I don't want to, you know, make
16 a joke of it, but, you know, I was in the
17 Marines. You know, I was a recon officer in
18 the Marines and served in Somalia and Desert
19 Storm and so, you know, I don't typically walk
20 around being scared.

21 That being said, you know, there's a
22 reason for the, you know, fan is short for

1 fanatic and, you know, there are going to be
2 some people named in these cases that are going
3 to raise some eyebrows and I've already made it
4 clear that -- that, you know, if you were a
5 bank and you were somehow facilitating this by
6 allowing, you know, hundreds and hundreds of
7 thousands of dollars of cash to be withdrawn to
8 be used for various things, or you were some
9 sort of pharmacy that ordered large volumes of
10 particular drugs were being purchased or maybe
11 you were a hotel or a club or this type of
12 activity was taking place, you're going to be
13 named. And, you know, I guess, you know, a lot
14 of people have told me get more security, you
15 know, you need to be, you know, keep your head
16 on a swivel, which is kind of what my old
17 football coach used to tell me. You know, and
18 we're going to do that. But I'm not going to
19 go around being scared. But I'm going to be
20 responsible.

21 MR. ATTWOOD: You're not going to buy
22 yourself a thank. All right. So we got a

1 question from Michael and I'll just add a bit
2 to this because, you know, you had I think it
3 was 3,280 calls initially and then you
4 distilled that down to 120, but you were still
5 processing people. You put the hotline number
6 out, it crashed. I can only imagine the amount
7 of allegations and cases coming in, potential
8 cases coming in now has gone up exponentially
9 since you did the press conference. What is
10 the present status of the amount of alleged
11 victims coming forward to your office?

12 MR. BUZBEE: Well, let me -- let me kind
13 of go back in time a little bit. So there's a
14 lawyer friend of mine who I did some work with
15 on the Boy Scout sexual assault cases. He took
16 a very active role in those. He knew of course
17 I handled the Deshaun Watson allegations.
18 Those went on for several years, they were very
19 high profile, and then there's been a few other
20 high profile individuals who we've had cases
21 against. So he's been kind of following this
22 and as it was very clear there was an

1 investigation going forward, and so he began to
2 field calls from people who -- who claim that
3 they were victimized by Sean Combs or at a Sean
4 Combs party or by Sean Combs cohorts or friends
5 or attendees. And so he had -- he had vetted
6 about 55 cases and called me and said, Tony,
7 you know, I have these cases and I'm looking
8 for somebody who has the -- the fire power to
9 handle them and the -- and the manpower to
10 handle them. And so I said, you know, I'm
11 never one to shy away from -- from a case if
12 it's a good case.

13 So I did -- did my due diligence. I had
14 the people here look at them and once I decided
15 to sign on and see if I could help these
16 people, I made one social media posting that we
17 were, you know, I would -- I had signed on to
18 these and I was going to pursue these. Well,
19 you know, then his -- his number that he had
20 been using just started ringing off the hook.
21 I think 3,285 calls, and of those calls, and I
22 think that includes probably the previous calls

1 as well, but it was certainly nowhere in that
2 range. You know, we were able to sift through
3 and vet and -- and come up with 120 cases that
4 we were willing to pursue. And that's not to
5 say that there weren't other cases of people
6 that we did not believe. That's not to say
7 that there were not legitimate cases that we
8 turned away because we obviously turned away a
9 lot of people. And -- and you can only imagine
10 that -- that in situations like this, sometimes
11 people just call the number to see who will
12 answer. Sometimes people call and do a prank
13 call. There's people that, you know, call
14 and -- and, you know, feed you a line of
15 baloney and then, you know, laugh and hang up.
16 And then there's -- there's also people who
17 call and want to just tell you, hey, we support
18 you, we're on your team, you know, God's with
19 you, you know, we're -- we're behind you,
20 things like that which are kind and very nice
21 to hear. And then, you know, there are people
22 that call that -- that have what they think is

1 evidence or they -- they -- they want to send
2 you a YouTube link, you know, that's of course
3 publicly available and I probably already have.
4 They want to send you a social media post and
5 that, you know, of course I've already seen.
6 But -- but, you know, I'm not going to
7 criticize them for that, they're trying to
8 help.

9 Then there's people who -- who send you
10 information that you've never seen before.
11 Videos that were taken at a particular party.
12 Pictures that were taken at a white party in
13 the Hamptons. Things like that that you -- you
14 kind of put in a folder and say, okay, this
15 is -- this is information that we could use, we
16 just have to put it in context. There's people
17 that call and say, hey, I witnessed this or I
18 saw this or I was at this party and here's how
19 it went or you should talk to this person.
20 Hey, this person has information, you should
21 find them and contact them. There's that --
22 that group of people. And then of course

1 there -- there are people that say I was a
2 victim of conduct that should have never
3 happened and I'm coming forward.

4 And so, you know, we have about a hundred
5 people who are -- who, you know, all hours of
6 the day who are sifting through this, returning
7 calls, talking to people, asking for
8 information to try to -- to try to figure out,
9 you know, how -- how large is the scope of
10 this. And then of course we did the press
11 conference. We received about 12,000 calls, so
12 much so that -- that the system, it's a
13 computerized call system, crashed. But the
14 good news is is that the way it's set up is
15 that even if the call wasn't answered, the call
16 number was logged so they could be -- the call
17 could be returned. And so we're sifting
18 through those. And of course the goal is -- is
19 to only pursue the cases that are legitimate.
20 The -- only -- only pursue the cases that, you
21 know, that we can -- that we can corroborate,
22 with the understanding that, you know, I look

1 through this from the prism of if you're a
2 victim and you have the courage to come forward
3 and after I've read -- read you The Riot Act,
4 which I always do, which is, hey, you need to
5 understand these are difficult, you need to
6 understand this is not a cake walk, it's not a
7 walk in the park. You need to understand
8 that -- that when we -- ultimately, you know,
9 first thing we're going to do is we're going to
10 send a letter with your identity involved in it
11 that lays out the allegations. I'm going to
12 send that to the other side and we're going
13 to -- we're going to try to resolve your case
14 on the front end. If that doesn't happen,
15 that's public. Every court in the United
16 States is a public system. So people can log
17 on and they can see who's filing what. We're
18 going to file the case under a pseudonym but --
19 but the -- what the -- it's my full belief that
20 at some point, the other side, the alleged
21 perpetrators are going to try to force us to
22 disclose your name publicly, so you need to be

1 prepared for that.

2 At some point as this process goes
3 forward, you're going to have to sit in a room
4 with an army of lawyers who have went into, you
5 know, done a deep dive into your past. They're
6 going to go all the way back to your high
7 school. They're going to look at everything
8 you did or failed to do. They're going to look
9 at every social media post that -- that you've
10 done. They're going to want to have a download
11 of your cell phone. They're -- they're going
12 to look -- they're going to talk to everybody
13 that -- that knows you or has known you and
14 they're going to attack you and attack you and
15 attack you, because defense number one in cases
16 like this is attack the credibility of the
17 victim. And they're going to deny, deny, deny.

18 They're going to deny that they ever were
19 in a room with you, they never heard of you,
20 they don't know you, they didn't do anything to
21 you. And when we show that, you know what, we
22 can prove that you guys were in the same room

1 at this point in time and we can prove that
2 there were illicit drugs there that were being
3 given to people without their knowledge, then
4 they're going to say all that might be true but
5 we still didn't do anything to you and you
6 can't prove it. And, you know, then it's going
7 to come down to the word of the victim versus
8 the word of the alleged perpetrator, and we're
9 going to have to test the credibility of each
10 and ultimately the -- a jury will make that
11 decision. And that's an arduous process. It's
12 very difficult. The court system doesn't make
13 it easy and, frankly, it shouldn't be easy,
14 because these types of allegations are very,
15 very serious and very egregious. And so that's
16 the process that we're going through and it's
17 a -- for us it's a herculean task. It's --
18 it's a lot of labor, a lot of administrative
19 work.

20 And so at this point we have 120 cases
21 that are, you know, I hope to start filing
22 cases in the coming weeks. A lot of people are

1 focused, you know, laser focused on, okay,
2 Tony, who are you going to name and, you know,
3 who are the celebs that you're -- that you're
4 going to out and all that and I'm not so
5 focused on that. I'm more focused on making
6 sure that on each case that we -- that we
7 capture every entity and every individual who
8 was complicit.

9 And -- and let me be clear, and I've said
10 this a few times, because I think there's some
11 confusion. The, you know, our allegation is
12 that -- that the situation that allowed these
13 types of things to occur was orchestrated by
14 Sean Combs. We -- I believe that -- that any
15 individual who was present who knew what was
16 happening, that is, you know, we've heard
17 that -- the talk about the thousand bottles of
18 baby oil. There's been some suggestion that
19 that baby oil was laced with -- with what's
20 called Liquid G. You know, Liquid G is --
21 is -- is commonly referred to as the date rape
22 drug. Typically it's put clandestinely into

1 someone's drink. It's odorless, it's
2 tasteless. It -- it essentially removes your
3 inhibitions. It essentially -- it's a libido
4 enhancer as well and it also for the most part
5 wipes your memory. It makes you very, very
6 subjective -- or subject to coercion and to
7 persuasion and that's why it's called the date
8 rape drug. And my view is if there were people
9 present, had been at these parties in the past
10 who knew that this was being used and put in
11 people's drinks or perhaps being put in oil
12 that was being rubbed, you know, people rubbing
13 it up on each other, and they allowed that to
14 occur, participated in that, sat there and
15 watched it, didn't intervene or kept it quiet,
16 as far as I'm concerned, you're just as
17 complicit as the individual who coerced and
18 engaged in some sort of sexual exploitation.

19 And, frankly, if you are some sort of
20 pharmacy or some sort of vendor that was
21 selling this particular drug or selling some --
22 some mixture of this particular drug or if

1 you're a club owner who knew this was happening
2 and it was common practice, because the
3 allegation is it was a common practice, and you
4 were profiting from this or benefiting from
5 this so called, you know, party culture. Or
6 you're a hotel where the entire floor was being
7 rented out and you had -- there was basically a
8 revolving door at the front desk of people who
9 are not registered that were just showing up
10 and coming up to say -- let's say the ninth
11 floor and then you would see people leaving the
12 hotel just completely discombobulated and
13 disoriented and you did nothing about it and it
14 happened over and over. Or maybe you're a bank
15 that -- that knew that hundreds of thousands of
16 dollars was being withdrawn with no -- with no
17 explanation as to, okay, why do you need all of
18 this cash. And -- and we believe and we think
19 we'll be able to prove that cash was being used
20 to fly in individuals from all over the
21 country, specifically from Los Angeles and
22 various entities that we've identified in Los

1 Angeles of people flown in that were drugged
2 that were kept longer than they should have
3 been kept, that -- that were coerced to do
4 things that they never expected would happen,
5 and then basically left disoriented and -- and,
6 you know, some -- in some cases without --
7 without a way to go home.

8 So I think the scope of this is much
9 larger than not -- any of us can fathom. And
10 I'm not so laser focused on, you know, who's
11 going to be outed like everyone else is. You
12 know, obviously there's a line of -- a long
13 line of people who -- whose names keep coming
14 up in some of these -- these incidents. But,
15 you know, I'm more interested in the -- the
16 entities, corporations, banks, hotels, that
17 profited from this that should not be able to
18 escape liability.

19 MR. ATTWOOD: Wow, okay. So just going
20 back to what you said earlier about the vetting
21 of the people who are calling your office.
22 What do you do to back up their claims? Is it,

1 like, cell phone records, text messages,
2 hospital records, police reports?

3 MR. BUZBEE: All of the above. Obviously
4 I want -- if that exists, if anything, any
5 documentation exists, I want it. You know,
6 sometimes it's a, you know, somebody went to a
7 party with their friend and their friend
8 supports what happened. Sometimes it's a --
9 there's a plane ticket. Sometimes there's --
10 there's a bank record that shows that a certain
11 amount of money went into someone's account.
12 Sometimes it's, you know, some cases, you know,
13 a lot of these individuals that attended these
14 parties, you know, they're super excited
15 about -- about being -- they're flattered to be
16 invited.

17 I'm thinking about one case where -- where
18 a 16-year-old young man who was at a concert
19 and was -- was -- was singled out and was
20 invited back and then -- then was told, hey,
21 why don't you come to the Hamptons. We're
22 having a party in the Hamptons and so when he

1 got to the Hamptons he, you know, he took a --
2 took a, you know, a selfie with he and Sean
3 Combs. And so he provided that to me and then,
4 you know, described to me what happened to him
5 thereafter. You know, you're -- there's not
6 going to be a smoking gun. I mean, we all wish
7 there was going to be, you know, like on TV,
8 there's some video that shows somebody, you
9 know, putting a -- a tab in a drink and then
10 somebody drinking it and then something very
11 terrible happening. That's -- that's rarely,
12 rarely ever happens, especially in situations
13 like these.

14 What you have to do instead is the -- I've
15 always said that no matter what type of case it
16 is, whether it's a -- a case where you're
17 alleging fraud or a case where you're alleging
18 a personal injury or even a car wreck or -- or
19 a case like a sexual abuse case, the first --
20 the first and most important piece of evidence
21 is the plaintiff herself or the plaintiff
22 himself. I have to believe them. I have to

1 look them dead in the eye. You know, I'm -- I
2 didn't just -- I didn't, you know, I was born
3 at night but I wasn't born last night. And so
4 I, you know, I'm pretty good about looking
5 someone in the eye and asking them very hard
6 questions and making sure that they pass the
7 common sense test with me. Which sometimes
8 it's unpleasant for them. You know, I have to
9 ask hard questions because if they think the
10 questions I'm going to ask them are hard, it's
11 going to get a lot harder.

12 And, you know, so first is, you know, I
13 want to see, okay, tell me about your
14 background, tell me about what you've done
15 since and what you did before. What do you do
16 with yourself now. You know, tell me what kind
17 of -- what kind of family you come from, tell
18 me what kind of job you have. All those kinds
19 of things. Because most people, unless they're
20 just complete nuts, would not willingly put
21 themselves through this. Unless something
22 happened. And now, I'm not suggesting that

1 there aren't people like that, that would do
2 that. But for the most part, somebody who's --
3 who has a comfortable life and they're doing,
4 you know, their everyday life, you know,
5 life -- for instance, I'm thinking about this
6 particular individual just because I just
7 recently had contact with him who, you know,
8 has a wife and four kids and a nice home and a
9 nice job. You know, they're -- he has no
10 reason whatever to come forward and make up
11 some baloney.

12 So I start with that and then, you know, I
13 want to -- I want evidence that -- I want
14 evidence. You know, what are the dates, what
15 are the locations, who was there, who will
16 support that, who will corroborate. Where's
17 your -- if you flew there, if you drove there,
18 if you, you know, I'm -- I'm -- I want to
19 get -- if there's texts back and forth about
20 your going there, all of that.

21 Now, you need to understand -- your
22 viewers need to understand that a lot of this

1 conduct occurred many years ago. And a lot of
2 these people, you know, until just recently
3 were -- were -- didn't want to think about
4 this. This was a bad chapter in their life
5 they were very happy to get past. But, you
6 know, one of the reasons for having that press
7 conference was to get -- let people know that,
8 you know, you should come forward. If this
9 happened to you, come forward. Other people
10 have come forward. It won't just be you. It
11 just won't, you know, there's other witnesses
12 that have come forward. There's a lot of
13 people that have called in support that have
14 come forward and we want to hear from you. And
15 a lot of times, you know, when -- when the dam
16 finally breaks, the wall of silence, if you
17 will, breaks, you'll -- you -- you get people
18 that will come forward.

19 I'm thinking about as an example -- I
20 don't want to get off track too much but, you
21 know, in the Deshaun Watson case that some of
22 your viewers have -- may remember. You know,

1 this was a -- a star quarterback who was the --
2 I think he was the first round draft pick for
3 the Houston Texans, was given -- he was traded
4 to the Cleveland Browns, was given a contract
5 of \$230 million guaranteed. There was one
6 individual who was involved. He came into her
7 salon for a massage and some activity occurred
8 that was just way out of bounds. And she was a
9 licensed massage therapist, nothing like this
10 had ever happened with her. She didn't say
11 anything, but it just continued every time she
12 would go in to give a massage to anyone,
13 especially another male or a male, she would --
14 she would just have panic attacks, and finally
15 she called my office. And, you know, she
16 talked to some of the -- the young associates
17 here and, you know, I -- typically the way it's
18 screened, you know, it goes through a several
19 person process and it finally makes its way to
20 me. And, you know, I said I don't want to -- I
21 don't want to, you know, I -- I feel bad for
22 the -- for her but I don't want to pursue that.

1 I don't want to -- I don't want to do that, you
2 know, she's -- it's a -- he's a star
3 quarterback, you know. She -- there's no --
4 there's no, quote, evidence. Obviously it's
5 not on video. It's going to be a -- when it
6 comes down to it, her word against his, but she
7 was persistent. She might have -- I think she
8 called back three times and finally one of my
9 young lawyers said, Tony, you at least should
10 speak to her and hear what she has to say from
11 her own mouth.

12 So, you know, I -- I brought her in and
13 she told me and I was, like, I, you know, this
14 is the reason I got a law license, you know.
15 It wasn't just to ride around in a Rolls-Royce
16 and fly private jets, you know. This is the
17 reason that -- that I signed on to do this, you
18 know. I -- I -- I, you know, I have that kind
19 of fighting spirit. You know, I could have
20 been a pilot and, you know, flown in the Marine
21 Corps. I chose to be an infantry officer and
22 then chose to be a -- a reconnaissance officer,

1 you know. I could have avoided service in
2 Somalia. I chose to go to Somalia. You know,
3 it's just kind of in my DNA. And so, you know,
4 I was thinking I don't know what a jury would
5 give this young woman. You know, the
6 allegation was -- is that, you know, she asked
7 him to get under the draping and she left the
8 room and she came back and he was completely
9 nude standing there and wanted her to do things
10 that -- that, you know, you shouldn't ask a
11 masseuse to do. And then, you know, touched
12 her with his -- with his genitals was the
13 allegation. And, you know, I listened to her
14 and, you know, of course I asked the question,
15 you know, what -- what evidence do you have.
16 Well, she had a -- she had an appointment book
17 that showed that he made an appointment. That
18 was her evidence other than what she told me.

19 Now, you know, some people would say,
20 well, that's not enough evidence to pursue a
21 case, Tony. You know, that's a -- how can you
22 win that case? Well, ultimately it comes down

1 to what she says and what he says. And -- and
2 a lot of these cases may be the same way. But
3 that woman, you know, I -- just like I'm doing
4 on these cases, I said, you know what, I will
5 commit to a letter on your behalf. I will
6 write a letter and usually when I write people
7 a letter, you know, I've been doing this for
8 almost 30 years, usually I get people's
9 attention when I write them a letter. And then
10 I usually get a pretty prompt response and I
11 got a prompt response from some agent slash
12 lawyer from Los Angeles who was probably in
13 his, you know, fancy office and -- and thought,
14 oh, this is a lot of foolishness. And I ended
15 up talking to him on the phone and I told him.
16 I said, look, man, I, you know, this woman
17 wants to resolve this confidentially. You
18 know, ultimately she wants him just to
19 apologize and not do this anymore, ultimately.
20 And, you know, I got the typical response which
21 I'm expecting the same response from the Sean
22 Combs team. And which I'm prepared for.

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

26

1 And so I filed the first case and that
2 first case, when it was filed, it got picked up
3 by the local press and then ultimately by the
4 national press. And it just so happens that
5 Watson was in negotiations with the Cleveland
6 Browns on his -- on his large contract. It
7 became a national thing and -- and it -- and it
8 encouraged a lot of other people to come
9 forward. 20, 25, 20, 30 different women. And
10 you -- and there were others that I turned away
11 because I just -- like, no, I -- I -- I don't
12 want to put you through this because I don't
13 think your case is strong enough, but I
14 believed them. And that was just, you know,
15 conduct that occurred over an 18 month period,
16 and it was very specific in the
17 massage/masseuse context.

18 This is a lot different. This is conduct
19 alleged against Sean Combs himself but also
20 against the people that surrounded him. But
21 also his group of friends that would attend
22 these parties that watched what's going on.

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

27

1 And it happened the allegation is over 25 to 30
2 years. And, you know, and I had the same
3 reaction as a lot of people, which is, well,
4 why did they wait. Why didn't they come
5 forward. But I've seen this time and time
6 again where victims, if they don't go -- if
7 they don't immediately go to the authorities,
8 which in many cases they're treated like the --
9 the -- the perpetrator when in fact they're the
10 victim, there's a lot of -- a lot of your
11 police departments -- I would say Houston
12 Police Department is set up and does a very
13 good job with people that are -- who allege
14 sexual abuse or assault or exploitation, but a
15 lot of places, they're very quick to dismiss it
16 and say what is your evidence. And, you know,
17 it's, like, well, my evidence is what I'm
18 telling you is my evidence. And, you know,
19 they -- a lot of them don't understand that,
20 you know, a person saying this happened to me,
21 that's your best piece of evidence right there.
22 But, you know, when you -- when you don't do

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

28

1 that immediately, every day that goes by it's
2 harder and harder to step forward. And I think
3 most of the states in the United States
4 recognize that. I mean, the common -- the
5 common sense is, you know, we should make the
6 time period for that allows people to come
7 forward as long as possible as we can do. Like
8 the State of New York, they have statutes in
9 place that make it to where you can bring these
10 types of allegations even if they occurred 20,
11 25 to 30 years ago, because -- because they --
12 they recognize how difficult it is to step
13 forward. But when one person steps forward and
14 two people step forward and five people step
15 forward, a lot of other people take note and
16 say, you know what, okay, that happened to me,
17 too. I would never step forward alone but
18 there's other people that are stepping forward.
19 I'm going to -- I'm going to step forward and
20 be heard. I'm going to -- I'm going to, you
21 know, I'm going to be brave and be heard.
22 And then you have other people who saw

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

29

1 things occur or know things perhaps were --
2 were somewhat involved but knew it was wrong
3 when it was happening, they began to step
4 forward and I think that's what you're seeing
5 here.

6 MR. ATTWOOD: Yeah, we saw it with the
7 Epstein case and we've interviewed some of the
8 survivors of that case and many other survivors
9 and you're right. It's absolutely horrific
10 what they go through, and the results when they
11 do go through the full court process, quite
12 often their reputations get destroyed. And --
13 and in the Franklin case, again, the only
14 people who ended up going to prison were some
15 of the survivors.

16 But anyway, going back to what you said
17 about -- on Chris Hansen's channel. You said
18 that a woman had sent you videos of freak off
19 party activity that you -- you said you would
20 rather -- you hadn't seen, you said it wasn't
21 on your file. What is the protocol for that?
22 Do you have to inform the feds that you've got

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

30

1 this evidence?

2 MR. BUZBEE: No. You know, obviously I --
3 I encourage every client to talk to the feds.
4 I encourage that and obviously if the feds
5 contact me and ask for information, I will
6 willingly provide it to them. You -- we have
7 to remember that we're dealing with two
8 separate systems with two different standards
9 of proof. In the criminal system, the standard
10 of proof in the United States in every court is
11 beyond a reasonable doubt, which is very
12 difficult standard to prove. That's why the
13 feds and most of your prosecutors across the
14 U.S. rarely will bring a case unless it is slam
15 dunk. They have all their proof long before
16 they ever seek an indictment. Specifically the
17 Federal Government. I mean, they're very
18 particular in my experience of making sure they
19 have all of their ducks in line and all of
20 their evidence before they ever go in front of
21 a federal grand jury and ask for an indictment.
22 Typically they have -- they have their case in

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

31

1 the bag before they ever even bring the case.

2 That's a lot different than a civil case.

3 In a civil case in the United States, the
4 standard of proof is preponderance of the
5 evidence, which I describe it when I'm trying
6 cases -- and I've tried many cases -- I
7 describe it to the jury as kind of a scale,
8 more likely than not. Which means basically,
9 you know, you stack all the evidence on the --
10 each side of the scale for and against, and if
11 the scale tips ever so slightly in favor of the
12 victim, you must find in favor of the victim.

13 So it's a completely different standard.
14 And so, you know, when I'm reviewing evidence,
15 that's the way I look at it, where as perhaps
16 when the U.S. attorney is reviewing evidence,
17 he or she is looking at it from -- from their
18 prism. And I don't want to be -- and I'm --
19 and I'm fairly certain, because having done
20 this type of case before when there was
21 other -- other activities going forward, for
22 instance, local authorities or the federal

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

32

1 authorities were pursuing things -- as an
2 example, in the Deshaun Watson case I
3 referenced, there were two different grand
4 juries that were impaneled to -- to review the
5 evidence there. The -- typically the
6 authorities do not want to be seen as working
7 with a civil lawyer or -- or a, you know,
8 coordinating. So they're very reluctant to --
9 to seek me out or to -- or to ask me for
10 evidence. But -- but I have said publicly, you
11 know, to the extent I have evidence that will
12 be helpful to them, I will willingly and gladly
13 provide it.

14 In the Deshaun Watson case, I did in
15 fact -- I did in fact sit with and speak with
16 FBI agents about evidence that I had and did
17 make available to not only the local police
18 departments but also the FBI agents. Some of
19 my clients, you know, I basically said
20 here's -- here's the clients I have. Here's
21 what they -- what they say happened, here's
22 what they know, and they could pick and choose

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

33

1 the ones that they wanted to speak to and I
2 helped facilitate that. But -- but certainly,
3 you know, the Federal Government is going to do
4 its own thing. The U.S. attorney has very
5 competent, very, very smart people that work
6 there that -- that -- that understand the --
7 the notoriety involved, the celebrity involved,
8 the -- all the eyes on them.

9 You know, I think it was the same U.S.
10 attorney that recently indicted the Mayor of
11 New York. I mean, these -- these are -- in the
12 United States, these are very high profile
13 cases. My -- my belief is they probably don't
14 want to be seen or even suggested that they're
15 working or coordinating with me. But I'll say
16 it again like I've said when this question has
17 been asked. I will willingly and gladly
18 provide them whatever I have.

19 And let me -- let me visit with you a
20 little bit -- on video, I may have said this.
21 But, you know, when you get sent video,
22 sometimes on social media, sometimes you get

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

34

1 sent -- it's texted to you, somehow they get
2 your cell phone and text it to you, it's
3 e-mailed to you, pictures, that sort of thing.
4 You know, that type of evidence is, you know,
5 obviously it's helpful but without the witness
6 and without the victim herself or himself, it's
7 really -- it certainly doesn't -- doesn't
8 answer the questions that have to be answered.

9 MR. ATTWOOD: So in terms of the 120
10 filed, based on the volume of calls that are
11 coming in, what do you think that could rise
12 to? And since your previous announcements,
13 have more allegations involving minors come in?

14 MR. BUZBEE: Yeah, it's been -- percentage
15 has been about the same. You know, the
16 first -- the group that I announced last week
17 on Tuesday I believe it was, so, you know,
18 3,200 calls. Of that, 120 clients that I
19 believe have cases that -- that are supportable
20 and should be pursued. And then of that 120,
21 about 25 were minors at the point in time that
22 the -- that the conduct alleged occurred. I

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

35

1 would expect, you know, considering that we
2 received so many calls after that press
3 conference, 12,000 was the number that -- just
4 in a 24 hour period, but obviously there's been
5 many more since then. You know, we're sifting
6 through probably another hundred cases that we
7 potentially will pursue. But, you know, it's
8 just hard to get your head around, you know,
9 how pervasive this type of conduct was.

10 And I want to -- I want to be clear again.
11 I know I've said this once but I want to be
12 clear. You know, we're talking about a long
13 period of time. We're talking about a culture
14 that many of us really are -- are not even on
15 the outside looking in. Many of us are
16 completely un-aware of. The -- the party
17 culture which is, you know, you have people in
18 the entertainment industry who go from venue to
19 venue, party before and party after, and then
20 there's even an after party after that. At
21 places all over the United States, but
22 primarily Miami, Los Angeles, New York,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

36

1 Manhattan and the Hamptons, and also Georgia
2 was another place. Atlanta, Georgia is a
3 pretty hot spot for this type of activity.
4 And, you know, a lot of different people
5 involved. A lot of -- a lot of drug activity.
6 And I think, you know, when you -- when you
7 consider it from that context, it's not
8 surprising that you have 120 people who -- who
9 stepped forward once the -- once the culture of
10 silence is broken and say, you know what, I was
11 taken advantage of. I was drugged. I was -- I
12 woke up not knowing where I was. I didn't -- I
13 drank one drink. I drank a -- a lemon drop.
14 You know, I didn't have any idea that that, you
15 know, this was 0this was supposed to be the
16 most -- the coolest thing I'd ever been invited
17 to. There was no way I was going to get so
18 hammered that I didn't remember what was going
19 to happen. I drank one drink and everything
20 after that is a blur and, you know, I -- I
21 wake -- they wake up disoriented, bewildered,
22 and injured in many cases. So, you know,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

37

1 it's -- it's hard to get your head around but
2 that's -- that's what we're dealing with.

3 MR. ATTWOOD: Yeah. You gave me
4 flashbacks of the horrific scenes in this movie
5 that's just come out, Don't Blink Twice.

6 So you talked about going after the
7 facilitators of the foul deeds, the enablers.
8 There was a legal quagmire for the prosecutors
9 in the Epstein case because he set up a pyramid
10 scheme whereby women who came in, teenagers who
11 come in, if they didn't go all the way with
12 what he wanted them to do, he would try and get
13 some of those girls groomed into recruiting.
14 He had a scheme at a high school in Florida.
15 He was sending flowers in, some were getting
16 finders fees to send the girls over. So in
17 this case, do you think you will have those
18 difficulties when it comes to classifying
19 people who are survivors who have also
20 facilitated these foul deeds?

21 MR. BUZBEE: Yeah. I think -- I think so.
22 I think that sounds -- sounds familiar. Sounds

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

38

1 similar to what -- what we're talking about
2 here. You had people that were recruiters.
3 You know, nothing more that -- the way I would
4 describe them when we get to court proceeding
5 is pimps who -- who went and collected
6 individuals and brought them to these places
7 and -- and, you know, that -- under the --
8 under the pretense of, hey, you know, we're
9 going to do a music video or this may be used
10 in a music video. And then when they get to
11 the venue, you know, in some cases paid, some
12 cases not, they get to the venue, you know, the
13 next thing they know they're drugged. Next
14 thing they know in some cases they're not
15 allowed to leave. In some cases they're not
16 even -- their way, you know, their way back was
17 not paid for.

18 You know, there were -- with regard to
19 some of these younger individuals, there were
20 ads that were placed or -- or, you know, things
21 that were placed on the internet about, you
22 know, we're recruiting for -- for this -- this

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

39

1 video, recruiting for, you know, you have a
2 chance to -- to audition for Bad Boy, you know,
3 you may even meet Sean Combs. And, you know,
4 these kids come forward with stars in their
5 eyes thinking that they're going to be the next
6 Justin Bieber. And, you know, things happen
7 and go very south and such that they don't want
8 to have anything to do with the music industry
9 ever again, and their parents are feeling guilt
10 and shame for having put them in that position.

11 So, you know, it pretty much ends --
12 every -- every scenario that you can think of
13 is involved here, whether it be a situation
14 where a female is picked out of a crowd at a
15 concert and, you know, you have people that --
16 that go through the crowd and either are
17 pointed out by the performers or they -- they
18 know what the criteria is and they -- they hand
19 backstage passes to people. And then they come
20 backstage and -- and either stuff happens
21 backstage or the party, you know, reconvenes at
22 a hotel and then the next thing they know,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

40

1 they're drugged and taken advantage of, not by
2 just one person but multiple people. Some
3 cases it's videoed or, you know, they're
4 invited. Maybe they're -- they're spotted at a
5 hotel lobby or they're spotted even on the
6 street and they're saying, hey, you should --
7 you should come to this party we're having and
8 you might be able to meet this person or that
9 person, and so they go to this party and, you
10 know, everything seems normal and they're
11 taking selfies and they're excited and happy.
12 And then the after party begins and the next
13 thing you know, they're -- they can't control
14 themselves because they've been drugged and
15 then bad things happen to them. And they leave
16 there in shame and -- and not knowing what
17 happened.

18 You know, so you can imagine, I could go
19 on and on about the very scenarios because
20 there's -- every story's a little bit
21 different. But -- but at the -- at the end of
22 the day, it all typically involves some sort of

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

41

1 drug and it all involves taking advantage of
2 somebody, and with people around who benefited,
3 participated in or profited from it.

4 MR. ATTWOOD: It seems the priority of the
5 feds is always the big fish. I mean, there's
6 cartel hitmen walking around free because they
7 cooperated against their superiors. In this
8 case, do you think the facilitators of the foul
9 deeds will get passes if they cooperate against
10 Diddy?

11 MR. BUZBEE: I don't know. You know, I
12 know that there's been allegations against
13 bodyguards. There's been allegations against
14 certain executives or people that were -- kind
15 of surrounded Sean Combs. Obviously those
16 people are -- are -- I'm assuming the feds are
17 looking very carefully at -- at those folks,
18 and I would expect some of those folks to
19 cooperate with the government. I'm -- I'm --
20 I'm looking at it in a broader scope. You
21 know, obviously I'm looking at those folks and
22 looking at Mr. Combs, but I'm also looking

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

42

1 at -- at the corporate entities who -- who knew
2 this culture was being created, who had -- who
3 had executives there at these parties that knew
4 what was going on. You'd have to be blind not
5 to know that -- that, you know, they had a
6 thousand bottles of -- of oil, you know, what
7 was the purpose, what is a legitimate purpose
8 of that. And when people are -- are just
9 openly, you know, having sex in front of
10 everyone and you can tell that they're
11 disoriented and they're conducting or engaging
12 in behavior like that and then people are being
13 passed around. I mean, it's not illegal to
14 have sex at a party. It's not illegal to
15 have -- to have sex in public. It's not --
16 none of that's illegal. But it becomes more
17 sinister when people are being drugged and
18 people being kept there against their will and
19 being -- are being coerced and people are being
20 given -- given a drink that's laced with
21 something and not being told that. That
22 becomes -- that becomes, you know, you've

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

43

1 crossed a line there, whether you've crossed a
2 line -- the legal line of criminal conduct or
3 you crossed a line, certainly you've crossed
4 the civil liability line as far as I'm
5 concerned.

6 MR. ATTWOOD: So Diageo PLC here in the
7 UK, the drink company, have stated that they've
8 transferred Diddy a billion dollars since their
9 relationship began in 2007. You think that is
10 one of the companies that will end up in a
11 legal mess over this?

12 MR. BUZBEE: I'm certainly looking in that
13 direction. You know, you know, it's easy, you
14 know, Sean Combs is -- is obviously -- he's
15 indicted on three counts. He's been arrested.
16 He's sought bail three times and been denied
17 each time. And he's, you know, I know a lot of
18 people are looking at him and he's purportedly
19 the only target of the feds. I don't think
20 that's the case. Certainly not the case for me
21 and not the case with my clients. You know,
22 I'm looking at -- at -- any time something like

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

44

1 this is allowed to happen and to go on for so
2 long, there have to be entities and individuals
3 who are facilitating this that are looking the
4 other way. And usually when people are looking
5 the other way and ignoring this and not
6 intervening, it's usually because they're
7 profiting from this. It's usually because
8 they're -- they're getting some sort of benefit
9 from this type of conduct. Or whether it be
10 from just the culture itself that's been
11 created or whether it be, you know, maybe
12 you're a -- an alcohol company or maybe you're
13 a bank or maybe you're a hotel or a venue and,
14 you know, when -- when Sean Diddy Combs shows
15 up, you know, it raises your stature in some
16 way or -- or increases people to that -- attend
17 your concert or your venue. You know, I'm
18 looking at all -- all of those individuals and
19 entities because, you know, it's -- it's Sean
20 Combs. Of course there's many allegations
21 against him now and there will be more I
22 expect, but I expect there will be others

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

45

1 involved.

2 MR. ATTWOOD: You mentioned holding execs
3 of big pharma responsible. Who role could they
4 have played?

5 MR. BUZBEE: Well, I just wonder how do
6 you get this -- this much Liquid G. How do you
7 get that much. How do you get the -- the
8 various drugs that have been alleged by these
9 victims to be involved. It makes you really
10 wonder how do you -- how do you get that volume
11 of drugs. And so we're looking into that
12 and -- and, you know, I don't know the answer
13 to that but I -- I certainly -- it's worth, you
14 know, a very hard look.

15 MR. ATTWOOD: People are asking if you
16 could hypothesize why he got away with it for
17 so long and it's all just coming out presently.

18 MR. BUZBEE: Yeah, I think -- I think --
19 just like we described, you mentioned it in the
20 Epstein -- the Epstein situation. We talked
21 about the allegations against Deshaun Watson.
22 There's allegations against, you know, this is

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

46

1 not the first time this has happened in the
2 United States and otherwise where, you know,
3 Harvey Weinstein, you know, let's not forget
4 that situation where it was kind of a -- a
5 secret that everyone knew, you know. Everybody
6 knew about the Weinstein casting couch. You
7 know, this was something but nobody wanted to
8 talk about it. And especially when, you know,
9 the individual that -- that was allegedly
10 involved in this conduct is -- has enough power
11 to keep you in or out of a movie that might win
12 an Oscar or keep you in and out of an industry
13 where you could become famous and perhaps
14 wealthy. So part of it -- part of it is that.

15 The other part of it is -- is, you know,
16 the perception, at least from these victims'
17 points of view is Sean Combs was the -- at one
18 point in time, was the number one producer,
19 music producer in the U.S. I mean, he could
20 make you a star. He could also make sure that
21 you were never a star. And then, you know,
22 you -- you're invited to these -- these parties

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

47

1 and you're picked out of a crowd and you're
2 incredibly flattered and you -- you think this
3 is going to be the time of your life and then
4 something, you know, the most terrible thing
5 that you can imagine happens to you. And
6 you're shame -- you're ashamed and you feel
7 guilty and the natural reaction of most people
8 that -- that are victimized like this is to
9 first blame themselves. How did I put myself
10 in this position. Oh, I shouldn't have done
11 this, I shouldn't have done that, instead of
12 focusing on, you know, you were drugged. You
13 know, you were coerced. You came -- there's
14 nothing wrong with a famous celebrity picking
15 you out of a crowd and saying, hey, come to our
16 party. And you go to the party and have a nice
17 time just like any other party and you go home
18 and that's the end of it. That's not what
19 happened in many cases. And so, you know, the
20 first inclination of these folks is to blame
21 themselves, and that's why a lot of, you know,
22 I think with our press conference we -- we had

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

48

1 some professionals who -- who, you know, have
2 made -- devoted their entire lives to helping
3 victims of sexual assault and exploitation who
4 went through some statistics about this, and
5 how few of these types of -- this activities
6 ever reported. And then how few are ever
7 investigated and then ultimately how -- how few
8 of that, you know, it's a fraction of a
9 fraction of a fraction are ever -- ever
10 prosecuted or a guilty verdict is obtained. So
11 there's a reason for that and we have to --
12 part of it is people don't talk about these
13 things. And -- and it -- it seems to me that
14 this culture that was created, this party
15 culture, you know, it kept getting more and
16 more extreme and it became -- it was
17 normalized.

18 And, you know, at some point obviously
19 enough people cried out about it to get the
20 attention, and I'm assuming that the -- the
21 Cassie video probably, you know, was very
22 important in some of this. But, you know,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

49

1 enough -- enough people came forward and said
2 enough things and said, you know, this just
3 isn't -- you know, the emperor has no clothes
4 here. This ain't right. They got the
5 attention of the U.S. attorney and, you know,
6 now here we are. And people continue to come
7 forward and -- and, you know, anybody watching
8 this, I encourage you, be brave. We, you know,
9 we believe you. If you have a legitimate and
10 credible claim, we will pursue it. It's a
11 tough -- it's a tough nut to crack but -- but,
12 you know, we're -- we're good at that. And
13 we'll try to help you as much as we can.

14 MR. ATTWOOD: One of the most harrowing
15 stories you told was that of the nine-year-old.
16 Is that person okay now?

17 MR. BUZBEE: Well, I mean, as okay as you
18 as you can be when something like that happens
19 to you at that age. You know, this person now
20 is -- is obviously not a minor anymore and
21 going about his life, you know. Still when
22 talking about this, you know, cries these many

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

50

1 years later. You know, you think about
2 children at that age are innocent and they're,
3 you know, you want to be -- you, you know,
4 you've been identified as somebody with talent.
5 Your parents are super charged up because, you
6 know, my son is super talented, he's going to
7 be a star. You get a chance to go to an
8 audition at Bad Boy and you go there and, you
9 know, the parents essentially hand you off
10 because it's going to be a several day thing
11 where they're screening -- screening young men.
12 Two different groups, in fact. It was an
13 older group and a younger group and, you know,
14 there was a track record there, you know, Sean
15 Combs and Bad Boy records made people stars.
16 People are still stars from -- from, you know,
17 he made them stars. And, you know, and I'm
18 sure the parents are home thinking, oh,
19 goodness, you know, this is, you know, God
20 smiled at us and I don't know why but, you
21 know, he touched us and this is my son's big
22 break, his dream is going to come true. And

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

51

1 then something a lot, you know, unimaginable
2 happens, and -- and not only did his dream not
3 come true but his worst nightmare came true.
4 And young man has no interest whatsoever in the
5 entertainment industry, none at all. You know,
6 his dream ended, was just extinguished. And
7 then, you know, as the years past, just dealing
8 with -- with the guilt and shame of that.

9 And like I say, every day that passes when
10 you don't, you know, the catharticism of
11 getting -- just saying this happened to me, I
12 think most therapists will tell you is -- is
13 good for you. Whether anything happens after
14 that or not, that's -- that, you know, that
15 remains to be seen. But -- but him doing that
16 and coming forward I think is, you know, it's a
17 right -- the right step forward for him.

18 MR. ATTWOOD: Yeah, he's a brave person.

19 Question from Michelle. Because Diddy is
20 so powerful, will the claimants, any of the
21 claimants, have to go into witness protection?

22 MR. BUZBEE: I wouldn't expect so. I

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

52

1 would not expect that. That would be
2 unprecedented, I would think.

3 MR. ATTWOOD: So question from Taleetha.
4 Are your clients getting help emotionally, are
5 they protected?

6 MR. BUZBEE: Yeah. That's, as you might
7 imagine, super important to me. And the good
8 news in that respect is a lot of the calls
9 we've received are people volunteering their
10 services. Not because they're trying to make
11 money but because they're, like, look, I know
12 you have a large group of people. This is a --
13 a real step that they've taken, you know, that
14 they -- they want their voice to be heard. You
15 know, we're here to help, you know, this is
16 a -- I've been locally and nationally offered
17 help for any -- any victim who is -- who would
18 take advance of that sort of thing. And the
19 good news is in most cases, you know, these
20 people are, like, look, this is
21 (incomprehensible). You know, any -- would you
22 please make -- make, you know, us as one of the

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

53

1 potential entities that would be willing to
2 offer counseling and that sort of thing to
3 anybody that's willing to take advantage of
4 that, and I absolutely am going to make that
5 and have made that available.

6 MR. ATTWOOD: Okay. The speculation that
7 the death of Kim Porter could be
8 reinvestigated, the shooting involving J Lo in
9 1999 in a nightclub could be relooked at. Do
10 you have any thoughts on those types of
11 scenarios?

12 MR. BUZBEE: No, I'm not going to wade
13 into that. I mean, obviously that's -- that's
14 something that, you know, the -- the first
15 question I always get is, you know, who --
16 who -- who's involved, what big name
17 celebrity's involved. And, you know, I rebuff
18 that. And then I'm asked about the J Lo and,
19 you know, the shooting that you're referencing
20 or even the shooting of Tupac, and I have no
21 comments on any of that. I don't know anything
22 about that other than what everyone else knows.

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

54

1 MR. ATTWOOD: All right. Question from
2 Marie about the banks. So in the Epstein case
3 we saw huge settlements, I think it was JP
4 Morgan, hundreds of millions. Do you see
5 parallels in this case with the banks? Is
6 that -- is that the way it's going to play out?

7 MR. BUZBEE: The -- I do. I really do,
8 because whether, you know, there's a lot of
9 cash exchanging hands. And, you know, the
10 nature of the banking business is not that
11 you -- you go down and take out a half a
12 million dollars in cash without some
13 understanding as why. You know, and I'm not
14 suggesting that -- that the person taking the
15 cash out is required to tell you that. But if
16 it, you know, over and over or if there's wire
17 transfers being made, \$10,000 a pop to various
18 people, you know, there's -- there's -- there's
19 all kinds of way to transfer money. Primarily
20 what I've seen is mostly cash, which means
21 somebody had to go and take the cash out of the
22 bank.

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

55

1 But I do believe and that's obviously one
2 of the avenues that I'm very interested in is
3 that where did all this money come from,
4 because clearly this entire house of cards was
5 supported by a lot of cash.

6 MR. ATTWOOD: Do you see any other
7 parallels with the Epstein case?

8 MR. BUZBEE: I do. I do. I do see a lot
9 of parallels here. I think the -- the play
10 book on how those cases were being pursued
11 and -- and, you know, everybody wanted to know
12 the -- the -- who flew on Epstein's plane and
13 who went to his island, right. I get the --
14 it's very similar to the question I get all the
15 time, is who are the celebrities that you're
16 going to sue, you know. You'll find that out
17 in due course but I don't -- it's not like I
18 have a list that I'm going to waive around and
19 publish, you know, like, Joe McCarthy or
20 something.

21 But -- but in -- in that Epstein case just
22 like in this case, and perhaps even more so in

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

56

1 this case, there are a lot of entities and
2 individuals that had to be looking the other
3 way or benefiting from this or facilitating
4 this for this to go on for so long.

5 MR. ATTWOOD: Question from a viewer here.
6 When can we expect court proceedings re the
7 class act to start?

8 MR. BUZBEE: Let me -- let me visit with
9 you on that a minute. So this won't be a class
10 action. This will be -- these will be
11 individual cases. A class action in the United
12 States is an action where two or three people
13 who are considered to be class representatives
14 that are similarly situated with everybody else
15 in this class that you're trying to -- that
16 you're trying to represent, so two or three
17 people file a case on behalf of hundreds if not
18 thousands of people. That's not this. This
19 will be hundreds of people who file individual
20 cases, one case, one person. As I say, I like
21 to say one horse, one rider. And so that case
22 will live and die on its own merits.

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

57

1 In -- in that case, I think in every one
2 of the cases Mr. Combs will be one of the
3 defendants. But every case may have different
4 defendants. If it occurred at a particular
5 residence, I would expect that the individual
6 or entity that owned that residence would be a
7 defendant. If there were other people involved
8 and engaged in the behavior, I would expect
9 that they would be defendants in that
10 individual case. If there were a bank that was
11 involved and, you know, cash that was used for
12 that -- to hand out money to certain
13 individuals at that particular party, I expect
14 the bank might be in that case. And so it's
15 going to be -- every case is going to be
16 different. That's the challenge here is
17 that -- that, you know, it's not like we're
18 talking about one event that occurred that
19 injured a hundred people. We're talking about
20 a hundred different individual events that have
21 different defendants, different evidence,
22 different proof, different witnesses, on and

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

58

1 on.

2 MR. ATTWOOD: In terms of the compensation
3 fund then, where would the money come from?
4 Would it be Diddy's assets, would it be future
5 royalties getting seized? How does it work?

6 MR. BUZBEE: That -- that, you know,
7 typically you -- you -- typically you don't
8 even go into, you know, what assets do -- does
9 a defendant have until after you have a
10 judgment, until after you've actually won the
11 case. Now, you know, you're suing Sean Combs,
12 Bad Boy Records, perhaps you're suing the --
13 the companies that he was -- that were
14 sponsors, perhaps the venue where this
15 occurred. Perhaps somebody sponsored the
16 particular party, somebody, you know, typically
17 at a -- parties like this you got multiple
18 sponsors. Somebody, you know, is sponsoring
19 the liquor, somebody is sponsoring the party
20 itself, somebody, you know, that's -- that's
21 how it typically occurs at these types of
22 parties. So, you know, you can see that there

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

59

1 would be a lot of potential parties that would
2 have liability, and then, you know, on top of
3 that, then you have the individuals involved,
4 and then as I've -- I think I've said as
5 clearly as I can, anybody that knew this was
6 going to occur, that had seen it occur or was
7 watching it occur that didn't intervene and
8 kept it quiet either -- either explicitly, you
9 know, said it didn't happen or tacitly, you
10 know, let it happen without saying anything, as
11 far as I'm concerned, they have liability, too.

12 MR. ATTWOOD: Could Diddy try and weasel
13 out through creative accounting?

14 MR. BUZBEE: It's always a concern but --
15 but given -- given the fact that the -- the
16 Federal Government's involved, that's probably
17 less likely here.

18 MR. ATTWOOD: Question from Kimberly. Do
19 you have a limit on how many clients you can
20 represent?

21 MR. BUZBEE: No, other than -- other than,
22 you know, every lawyer -- I'm licensed in the

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

60

1 State of New York and the State of Texas and,
2 you know, you have to -- you can't take on more
3 clients than you can -- than you can represent.
4 In other words, I have to be able to give my
5 full attention to every client and pursue their
6 case with -- with vigor, every case. The good
7 news is here we have 25 lawyers here on -- on
8 this floor where I'm sitting right now on the
9 75th floor of Chase Tower in Houston, Texas,
10 but I also have a cocounsel who has many
11 lawyers, and as need, you know, you can
12 associate as many lawyers as you want from
13 other firms. And I would expect there will be
14 other firms that, given the notoriety of this
15 case, will probably come forward with their own
16 clients, and eventually the courts will have to
17 coordinate these cases. Because, you know,
18 there's a -- there's a problem with
19 overwhelming the courts.

20 I remember when we -- when -- with BP
21 Horizon explosion, this was a -- a large
22 drilling vessel that exploded and burned and

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

61

1 sank off the coast of Louisiana. The -- our
2 firm handled 14,000 clients. Those were people
3 that were entities impacted by the oil spill.
4 And then I think we had -- there were 119 rig
5 workers on board that rig and I think we
6 represented about 30 of them. But there were
7 other lawyers that had their own cases from all
8 over the country. And so what -- when this
9 happens, what the court system does is it -- it
10 forces the lawyers to form a committee, develop
11 a leadership structure, develop, you know, how
12 to collect evidence, how to take depositions,
13 how to -- how to file motions so it doesn't
14 overwhelm the court system. And typically all
15 the cases are consolidated into one case and
16 assigned one judge to oversee the litigation.
17 So I would expect that even though, you know,
18 we're the first firm with the great majority of
19 the cases right now, I think there have been
20 seven cases filed before we stepped forward
21 with over a hundred, I would expect there are
22 other law firms that -- I know I've been called

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

62

1 by several lawyers that have, you know, a
2 couple of cases here and there trying to send
3 me the cases or -- or, you know, want me to
4 help them on their cases.

5 But so it's not just the lawyers, whether
6 the lawyers have the -- the bandwidth to handle
7 this many cases, but it's also the court
8 service and making sure that -- that these are
9 coordinated in such a way that -- that the
10 plaintiffs get their day in court, the
11 defendant and defendants, you know, are not
12 sitting for, you know, a hundred different
13 depositions over a hundred days. You know,
14 typically the coordination allows where you,
15 you know, we're going to -- we're going to
16 handle these 10 cases at once. We're going to
17 do all the discovery and figure out what
18 happened with these 10 and then we're going to
19 do the next 10 and then we're going to do, you
20 know, it's -- so this could be a very long long
21 process. It's very expensive.

22 Just -- if you think about just collecting

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

63

1 data and collecting evidence and the one on one
2 interviews and sending out subpoenas or -- or
3 document requests to third parties when you're
4 trying to corroborate somebody's presence at a
5 particular point in time. So, you know, the
6 lawyers that do step up and have cases, you
7 know, are making not only a substantial time
8 commitment to this but also a substantial
9 financial commitment.

10 MR. ATTWOOD: Tony, we're almost at the
11 hour, mate. This is the final question. Do
12 you think the criminal case will go to plea
13 bargain or trial?

14 MR. BUZBEE: Well, you know, I've -- I've
15 handled -- I've handled criminal cases in my
16 life and I know -- I never, you know, you
17 have -- you have to give certain statements to
18 the press because ultimately your case will be
19 decided by somebody who might read an article
20 or see an interview. But, you know, so far
21 Mr. Combs' criminal lawyers have been very
22 defiant and, you know, claim that they're --

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

64

1 they're -- demand their trial and claim that,
2 you know, that my case are for -- as an
3 example, are, you know, defamatory and, you
4 know, and -- and Combs is going to testify and
5 he's going to spill the beans and, you know,
6 you've heard all this stuff. And at one point
7 Mr. Combs' lawyer was literally on the street
8 corner being interviewed, you know, it seemed
9 like every hour. But that's -- that's the
10 public. That's the public persona, if you
11 will. That's -- that's what they're telling
12 the public. If I'm sitting there and I'm being
13 accused of at this point only three counts,
14 and, you know, at this point, knowing that
15 there is an army of victims out there who have
16 had the bravery to step forward and tell their
17 story and that the likelihood is -- is that
18 there are going to be more people like me, Tony
19 Buzbee, step forward who, you know, with a
20 track record of aggressively pursuing these
21 things and leaving no stone unturned and
22 pulling every layer of the onion off, you know,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

65

1 the point of view might be a little different.

2 You know, does he -- does he want to
3 testify, how is he -- explain the thousand
4 bottles of baby oil that allegedly is laced
5 with Liquid G. You know, at some point, you
6 know, the -- the bravado goes away and you have
7 to look very carefully about, you know, how the
8 rest of your life looks. So I don't think that
9 there's going to be a criminal trial because I
10 think any time the Federal Government gets
11 involved and the U.S. attorney's office gets
12 involved and lawyers -- credible lawyers who
13 are handling that matter in Brooklyn, I think
14 they have the goods on Sean Combs and there
15 ain't a whole lot you can do when the Federal
16 Government has the goods other than try and cut
17 a deal.

18 MR. ATTWOOD: So Tony's link is in the
19 description box below this video. Do you want
20 to remind the survivors what they can do, they
21 can contact you and what the number is, please?

22 MR. BUZBEE: Yeah. I need to find that

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

66

1 number, I'm sorry, I don't have it. But -- but
2 I'm easy to find on the web. Tony Buzbee.
3 It's justwin.com. That's -- that's kind of
4 the -- the e-mail and the website that I use.
5 We also have a -- the 1-800 number. Let me see
6 if I can find it.

7 MR. ATTWOOD: 1-800-200-7474.

8 MR. BUZBEE: There you go. That -- that
9 number's being handled by my cocounsel in -- in
10 Los Angeles and San Diego. There are 90 people
11 standing by to take those calls and talk to
12 you, whether you were -- were victimized,
13 whether you saw something that you want to
14 share, whether you have a piece of evidence
15 that you would like to share. You know, of
16 course, you know, the -- the -- the support
17 that you provide, the kind words, that's
18 appreciated as well, but -- but we're primarily
19 interested in if you've been victimized or have
20 evidence.

21 MR. ATTWOOD: We salute your work and
22 thank you for being so generous with your time,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

67

1 Tony. I'm going to close the show and let you
2 go, so thanks.

3 MR. BUZBEE: Thanks, Shaun. See you
4 later.

5 MR. ATTWOOD: Take care, cheers.

6 Wow, what an amazing guest. Thank you for
7 all the questions, guys. Look, I know there
8 was a lot of questions in there about celebs
9 and stuff, but when I asked him about, you
10 know, the reopening of the J Lo, the shooting
11 at the club and the death of Kim Porter, he --
12 he indicated that he didn't want to go down
13 that road with any big names. So I was not
14 going to put anything like that on him. He's a
15 very serious guy, he's on a mission. I can't
16 imagine the stress and pressure he is under
17 right now from the dark forces that are out
18 there going -- going after big pharma execs
19 like you just heard today. He's going over the
20 bank centers as well as the facilitators of the
21 foul deeds.

22 So, you know, these people are worth huge

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

68

1 amounts of money, and, like I said about the --
2 if you've investigated the Franklin scandal and
3 we got Nick Bryant on, who did publish the
4 Epstein client list, he was the first guy to do
5 it, we've got him coming on on Wednesday at
6 9:30 to talk about the Diddy case. He's doing
7 a lot. The guy who was investigating it went
8 down in a plane, mysteriously crashed with his
9 son, both died, and the only people who went to
10 prison in that case were some of the survivors.
11 All the higher ups were protected. So there's
12 a wall of money and power, political power,
13 bank power. It goes right to the top of the
14 pyramid and, you know, I can't imagine the
15 forces that are mounted against him right now.
16 You'd think when you're going after these
17 preds, these people who prey on the kids of the
18 world, the whole world would rally around you,
19 but as we know from the Jeffrey case, the
20 things that happened to me personally, the
21 channel -- I lost the channel twice, the hell I
22 went through, I ended up getting criminalized,

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

69

1 called into a cop shop, and they've restricted
2 my reporting on survivors now. If I don't ask
3 survivors certain things when they come on, I
4 can go to prison.

5 When you start to expose people who are in
6 this class, and you know the class that I'm
7 talking about, in the Epstein class in
8 particular, once you go after people who are in
9 that class, they come for you. And we don't
10 know the names that he's naming. I know a lot
11 of people are putting the questions who are the
12 names, bla, bla, bla. We -- we -- we can't
13 press this professional lawyer for that kind of
14 information. There was no way he was going to
15 volunteer any of that. But thank you for all
16 of the professional questions that did come in.
17 That kept it going and if you watch Lionel
18 Nation, he's been outspoken on the Diddy story
19 and he's becoming out with one of us this
20 evening. I believe Ron is doing an after chat
21 very soon on the channel, so join us for that.
22 He's going to be analyzing in close detail what

Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

70

1 Buzbee just told us, and then I will be back
2 tomorrow with the news update and Lionel. And
3 these podcasts are we're helped by --
4 -- I've been hearing that a lot lately.
5 That's what I hear when we make another sale on
6 Shopify. The all in one commerce platform to
7 start, run, and grow your business. Shopify is
8 the commerce platform revolutionizing millions
9 of businesses worldwide. Whether you're
10 selling Pokemon cards or hoodies, Shopify
11 simplifies selling online and in person so you
12 can successfully grow your business. Covering
13 all your sales channels from a shop front ready
14 POS system so its all in one e-commerce
15 platform, Shopify even gets you selling across
16 social media marketplaces like Facebook,
17 Instagram, and Tiktok. Full of the industry
18 leading tools ready to ignite your growth,
19 Shopify gives you complete control of your
20 business and your brand without learning new
21 skills and design or coding, and thanks to
22 award winning help and with an extensive

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Conducted on October 7, 2024

71

1 business cost library, Shopify is ready to
2 support your success every step of the way.

3 What's lovely about Shopify is that no
4 matter how big you want to grow, Shopify will
5 be there to empower you with the confidence and
6 control to take your business to the next
7 level. It's time to get serious about selling
8 and get Shopify today. This is possibility
9 powered by Shopify. Sign up for a one pound
10 per month trial period at [Shopify.co.UK/shaun,](https://Shopify.co.UK/shaun,s-h-a-u-n)
11 [s-h-a-u-n](https://Shopify.co.UK/shaun,s-h-a-u-n), all lower case. Go to
12 Shopify.co.UK/shaun to take your business to
13 the next level today. Shopify.co.UK/shaun.
14 Link in description box if you're watching this
15 on YouTube. Thanks for supporting our sponsor.
16 Back to the podcast. Cheers.

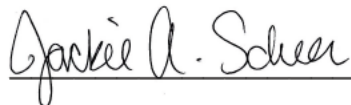
17 (The recording was concluded.)
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Transcript of Interview with Shaun Attwood and Tony Buzbee
Conducted on October 7, 2024

72

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I, Jackie A. Scheer, do hereby certify
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ability; and that I am neither counsel for, related
to, nor employed by any of the parties to the case
and have no interest, financial or otherwise, in its
outcome.

A handwritten signature in cursive script that reads "Jackie A. Scheer". The signature is written in dark ink and is positioned above a horizontal line.

JACKIE A. SCHEER

NOVEMBER 15, 2024

EXHIBIT J

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November 14, 2024

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TMZ VIDEO

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20 Job No.: 561803

21 Pages: 1 - 5

22 Transcribed by: Lauren Bishop

1 TANEA WALLACE: I was at one of P. Diddy's
2 freak offs.

3 HARVEY LEVIN: You saw celebrities there
4 that you recognized.

5 TANEA WALLACE: It was a rapper that we all
6 know.

7 MALE SPEAKER 1: Straight up porn directed
8 by Diddy.

9 TANEA WALLACE: I'm just grateful to have
10 made it out.

11 HARVEY LEVIN: You said that there were
12 other powerful people that you were looking at who
13 you allege were involved in some of these assaults.
14 Are we talking about cases involving other
15 celebrities? Politicians? Business people?

16 MR. BUZBEE: I think all the above. These
17 were very popular parties. This was the venue
18 everybody wanted to be invited to. So a lot of people
19 participated that would raise people's eyebrows.

20 HARVEY LEVIN: Have you been in touch with
21 any of them to say, we're looking at you. You did
22 something wrong. Have you had any contact beyond the

1 Diddy people?

2 MR. BUZBEE: I'm gonna -- I'm gonna just
3 not speak on that. I will say that -- that, you know,
4 the typical practice is to send a demand to layout
5 here's what we believe the situation was. Here's how
6 we think you were involved and try to start a
7 dialogue. Failing that, we just file a lawsuit.

8 HARVEY LEVIN: Safe to say, you've sent
9 some demand letters already?

10 MR. BUZBEE: That's true.

11 HARVEY LEVIN: Beyond Diddy?

12 MR. BUZBEE: True. In my view, if you were
13 there and you knew somebody was being drugged because
14 you had seen it happen in a previous party or
15 previous situation and you didn't do anything, and
16 you allowed it to happen, and you continued to -- to
17 enjoy yourself and party and whoop and holler and
18 have a good time, as far as I'm concerned, you are
19 just as liable as the individual who shipped the
20 person in, who paid the persons that were there, who
21 kept them longer than they thought they were going to
22 be there, who -- who bought the drugs, who took the

1 money out of the bank, who -- who put the drugs in a
2 little shot of either a lemon shot or some sort of
3 champagne and participated in this egregious kind of
4 -- you're just as guilty as far as I'm concerned.

5 (The recording was concluded.)

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Transcript of TMZ Video

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I, Lauren Bishop, do hereby certify that the foregoing transcript is a true and correct record of the recorded proceedings; that said proceedings were transcribed to the best of my ability from the audio recording and supporting information; and that I am neither counsel for, related to, nor employed by and of the parties to this case and have no interest, financial or otherwise, in its outcome.

Lauren Bishop

LAUREN BISHOP
PLANET DEPOS, LLC.
NOVEMBER 14, 2024