

CAUSE NO. _____

JOSE MALDONADO,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
MARCY BRYAN CROFT, ROC NATION,	§	
LLC, MJ LEGAL, P.A., JESSICA SANTIAGO,	§	
QUINN EMANUEL URQUHART &	§	
SULLIVAN, LLP,	§	
	§	
<i>Defendants.</i>	§	_____ DISTRICT COURT

**PLAINTIFF'S ORIGINAL PETITION FOR BARRATRY
AND CONSPIRACY TO COMMIT BARRATRY**

Plaintiff files this Original Petition against Defendants Marcy Bryan Croft, MJ Legal, P.A., Investigator Jessica Santiago, Roc Nation, LLC, and Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), seeking damages, and respectfully shows this Honorable Court the following:

Defendants have conspired to obstruct justice by engaging shadowy operatives to illegally seek out more than two dozen¹ current and former clients of The Buzbee Law Firm to convince those clients to bring frivolous cases against The Buzbee Law Firm. Defendant Roc Nation is financing the effort. Attorneys, Marcy Croft and Quinn Emanuel, are orchestrating the effort. In some cases, Defendants' agents pretend to work for the State of Texas and have flashed fake badges.² Soliciting clients is a crime in the State of Texas. Paying individuals to file false claims is unethical and criminal in the State of Texas. Impersonating a state official is also a crime in Texas. In at least one case, Defendants' agents offered as much as \$10,000 to a former client of

¹ Exhibit 1. Transcript between Jessica Santiago and ex-client Gerardo Garcia. "Exactly, we have like 70 people that are in this class action, and there will be more. You are on the list but we have other people too. Today I'm visiting with you, and with 3 more people who will sign up to be in the lawsuit. And it will increase daily. We have more pages with people. I don't know how many but there are many. And if there are more people in the class action, that is better for you, because that means you will collect something."

² Exhibit 1. Transcript between Jessica Santiago and Gerardo Garcia. "We are from the state."

the Buzbee Law Firm to sue the firm.³ Unfortunately for the Defendants, their agents are not very smart, or careful. Their agents were caught on audiotape, red handed. Not knowing they were being recorded, Defendant's agents admitted that Defendant Marcy Croft,⁴ a licensed Texas lawyer and member of "Team Roc," was orchestrating the effort, and in another recording those agents described the criminal conspiracy in great detail, going so far to admit that the lawsuits would be reported in the press, and that some former clients had already accepted money to join the effort.⁵

Roc Nation and Jay Z are synonymous. Jay Z is founder and Chairman of Roc Nation. At the same time the illegal conduct described herein continues, The Buzbee Law Firm is pursuing claims on behalf of at least one client against Jay Z in New York Federal Court. And, as a result of that client's claims, Jay Z sued the Buzbee Law Firm in Los Angeles state court. Defendant Quinn Emanuel, who represents Jay Z in both cases, and who also frequently represents Roc Nation, denied in open court and in the press involvement in the scheme described herein.⁶ **That denial was a bold-faced LIE.** Again, due to their own sloppiness, one of Quinn Emmanuel's own partners admitted as much in a public filing. The illegal effort described here, which Roc Nation is funding, and Defendant Croft and Defendant Quinn Emanuel are orchestrating, is intended to

³ Exhibit 2. Affidavit of Skylar Taylor; Exhibit 3. Affidavit of Shannon Champagne. The Defendants were aggressive. "These men offered me money to sign on as a client with them. Specifically, they offered me \$10,000 in exchange for signing with them as a client.". Affidavit of Shannon Champagne. Defendants' scheme has been successful in two instances thus far. Two cases have been filed to date—both utterly frivolous and patently false. Both will undoubtedly needlessly subject the former Buzbee Law Firm clients to fees and expenses, and will result in bar action against the law firms who accepted referrals of the cases from Defendant Marcy Croft. Croft, of course, will also be subject to bar complaints. Her conduct is despicable and criminal, despite being mandated by her client and self-described benefactor Roc Nation.

⁴ Defendant Roc Nation routinely employs the law firm of Quinn Emanuel. Quinn Emanuel is also the law firm representing Jay-Z in the case he filed against the Buzbee Law Firm in Los Angeles, as well as a case where Jay Z was sued by a client of the Buzbee Law Firm in New York. Defendant Marcy Croft has a long association with Quinn Emanuel and Roc Nation.

⁵ At least two cases have been filed so far as a result of this effort. The allegations in each are tailored to embarrass The Buzbee Law Firm, including absolute false and salacious allegations that have nothing to do with the underlying patently false legal claims. Each of these cases were orchestrated by the Defendants herein.

interfere with The Buzbee Law Firm's ability to represent its clients, and offer pertinent evidence to authorities.

Defendants' scheme is summarized in the following recording transcript:

What we're trying to do is, we are trying put this thing together for the company that we're working for--

We could get you paid, . . . you could get money right soon, you know?

We gave this kid 1,000 bucks to start yesterday just to get him on the right path.

At the end of the day, this is going to go through the courts, Buzbee is getting sued . . ." Exhibit 4 . Page. 6.

As part of their scheme, Defendants attempted to use the Plaintiff herein as a pawn. On behalf of Defendant Marcy Croft, two individuals attempted to call Plaintiff many times. They then went to what they believed was Plaintiff's home. They actually went to his father's home. They identified themselves as federal officers. When they realized they had the wrong house, they continued to contact Plaintiff. They were pushy. They then told him he had to talk to them, because they were with the State. They told him that they were putting together a lawsuit on behalf of Defendant Marcy Croft and the company she was working for, and that she would assign his case to someone who could get him a lot of money. Rather than go along with their illegal efforts, the Plaintiff contacted his lawyers at the Buzbee Law Firm. He now files suit for barratry, both a crime and a civil action in the State of Texas. This is just one of multiple cases to be filed by Plaintiffs who have been illegally solicited by investigators working as part of a cabal headquartered in New York City.

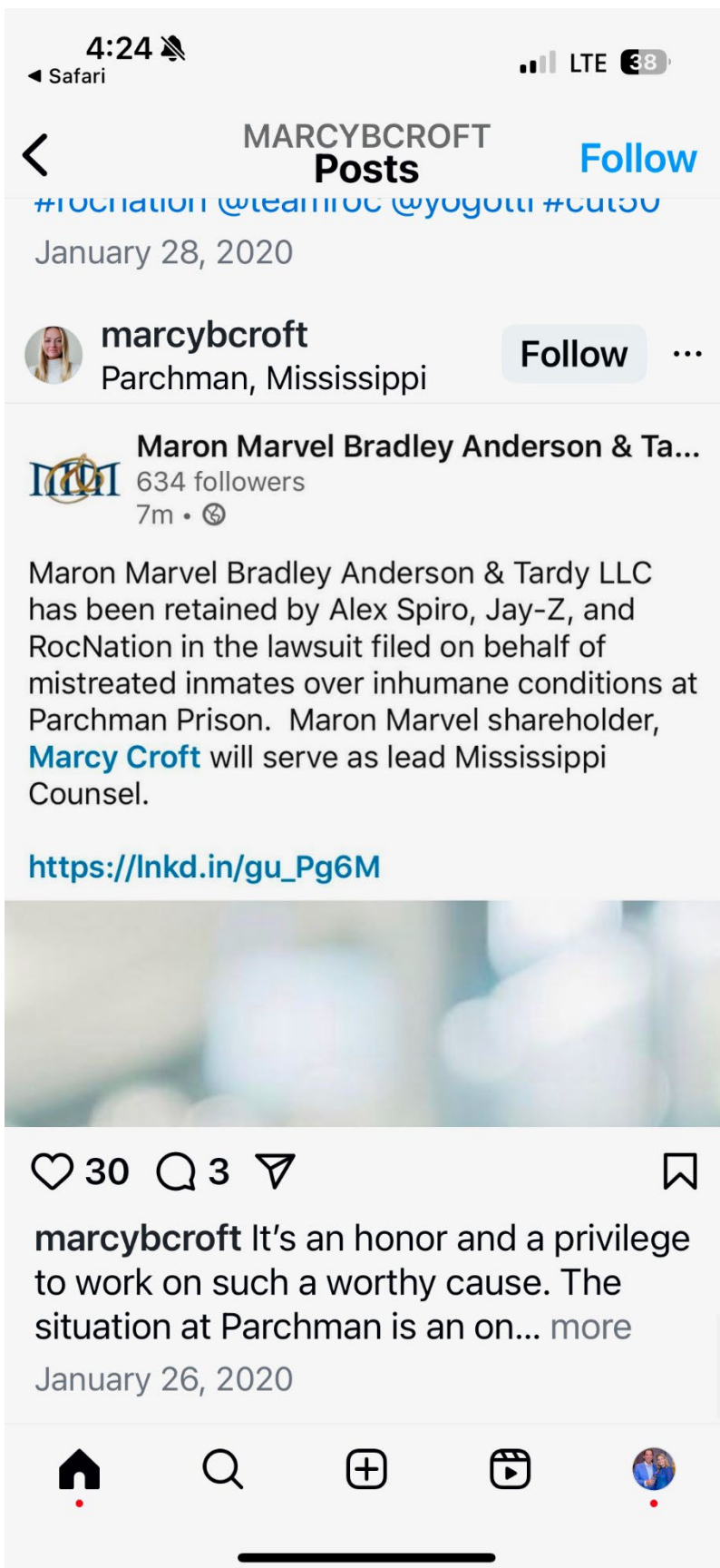
Defendants have a long history of the type of abusive and egregious conduct described herein. Because they have gotten away with it for so long, Defendants think they can come down

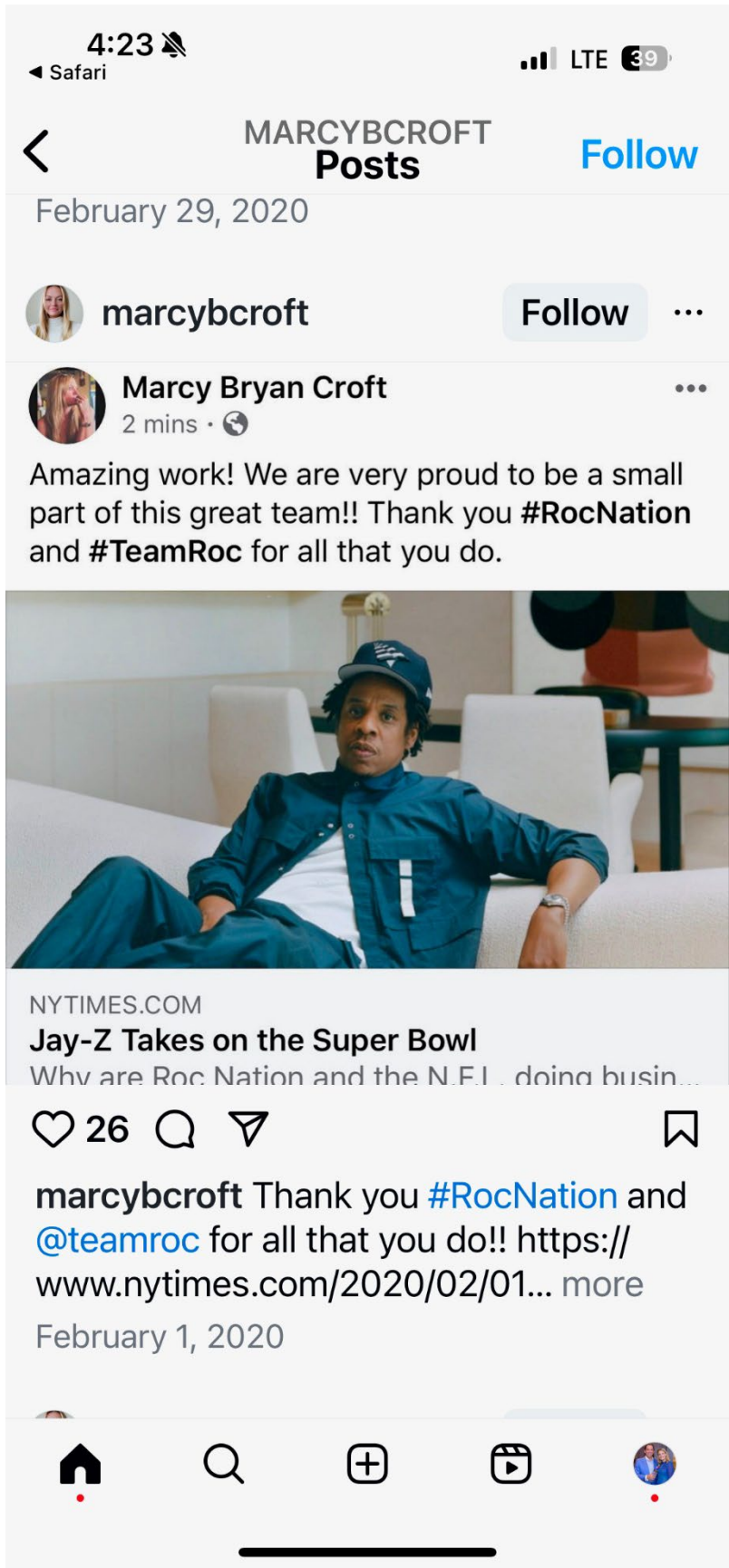
to Texas and do whatever they choose with impunity. They are wrong. Their behavior will have consequences, both civilly and criminally.

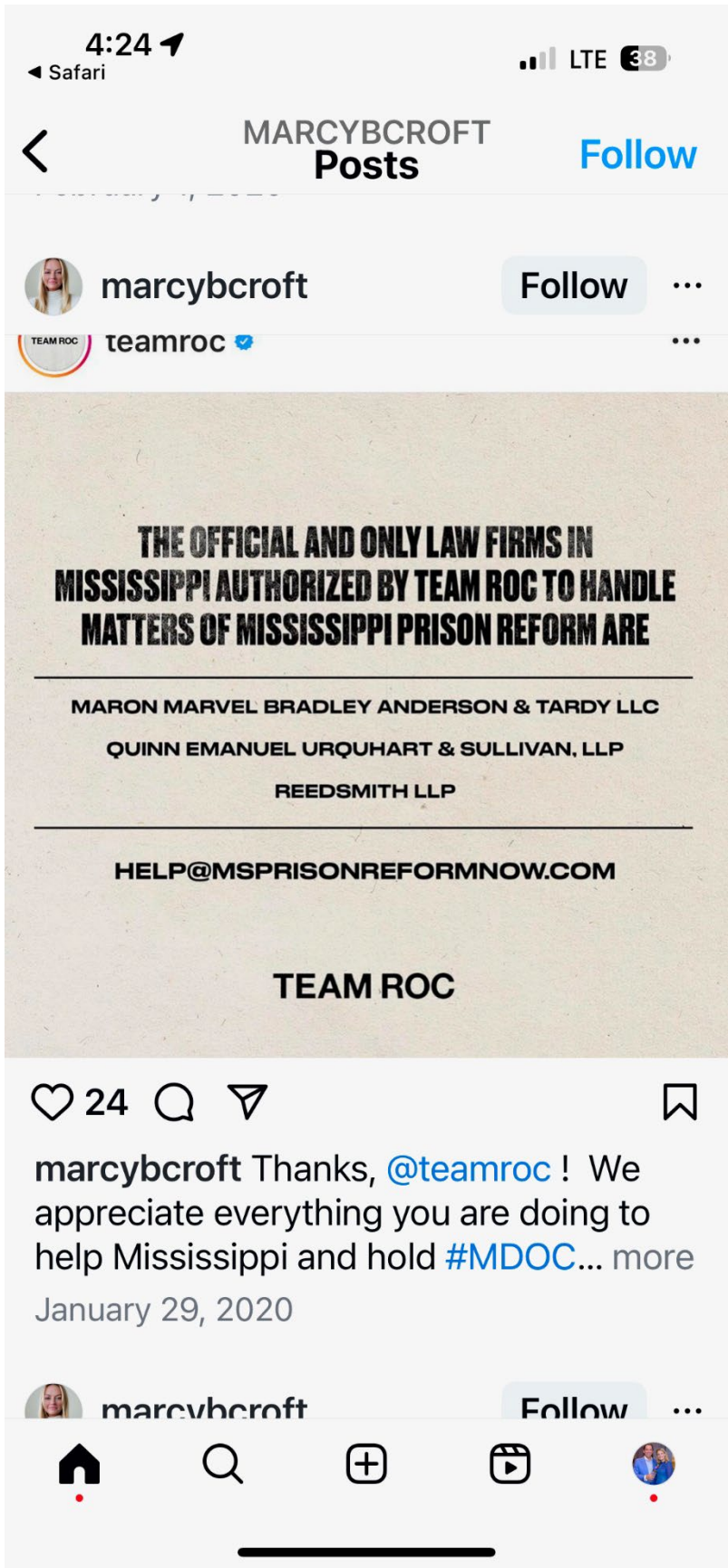
I.
PARTIES

Plaintiff is a resident of Texas and Harris County.

Defendant Marcy Bryan Croft is a Texas licensed attorney, and a self-admitted member of “Team Roc.” She can be served through the Texas Secretary of State at her office at 1501 Jacksonian Plaza 12159, Jackson, MS 39211. Marcy’s connection with Defendants Roc Nation and Quinn Emanuel is plainly demonstrated below:







Defendant MJ Legal, P.A., is a business corporation and law firm performing legal services in Texas. This Defendant can be served through the Texas Secretary of State at her office via personal service to March Bryan Croft at 1501 Jacksonian Plaza 12159, Jackson, MS 39211.

Defendant Roc Nation, LLC is a limited liability company organized in Delaware and headquartered in New York. This Defendant can be served through the Texas Secretary of State via registered agent at C/O Corporate Creations Network, Inc., 600 Mamaroneck Avenue #400, Harrison, New York 10528.

Defendant Quinn Emanuel Urquhart & Sullivan, LLP is a limited liability partnership which may be served at its Houston office located at 700 Louisiana Street, Suite 3900, Houston, Texas 77002. Quinn Emanuel frequently represents Roc Nation and currently represents Jay-Z in a lawsuit against the Buzbee Law Firm.

Defendant Jessica Santiago is a resident of Harris County, Texas, and can be served via personal service at her home address in Harris County, or wherever she may be found.

II.

VENUE AND JURISDICTION

Venue is proper in Harris County, Texas pursuant to Section 15.002(a)(1) of the Texas Civil Practices and Remedies Code because all or a substantial part of the events or omissions giving rise to the claims occurred in Harris County, Texas.

The Court has subject matter jurisdiction because the amount in controversy is within the jurisdictional limits of this Court. Moreover, all of the incidents in question occurred in Harris County.

III.

DISCOVERY CONTROL PLAN

Plaintiff intends to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4 and affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rule of Civil Procedure 169, because Plaintiff requests injunctive relief and Plaintiff seeks monetary relief over \$100,000.

IV.

FACTS

On behalf of two clients, Tony Buzbee and the Buzbee Law Firm (“Firm”) sent demand letters to Shawn “Jay Z” Carter’s attorneys in New York. The letters made no monetary demand. They only sought a confidential sit down to discuss the clients’ allegations. In response to the two letters, Defendant Quinn Emanuel filed suit against the Buzbee Law Firm on behalf of “John Doe.” That suit alleged that the Firm was trying to extort “John Doe,” who they later admitted was in fact Shawn “Jay Z” Carter.” That lawsuit was, and is, frivolous, and will be dismissed.

Several weeks later, the Buzbee Law Firm, on behalf of one of the clients who sent a demand letter, filed a lawsuit against Mr. Carter. At or around that time, Defendants’ conspiracy began. As part of that conspiracy, current and former clients of The Buzbee Law Firm began receiving solicitations from investigators aggressively encouraging current and former clients to sue the Firm. The investigators used burner phones. Many times the investigators used fake names, or flashed badges or credentials but would not let the clients actually see them. During some of the contacts, the investigators were pushy, and in at least two, they pretended to be acting on behalf of the State of Texas. One claimed to be a “federal agent.” Several of these calls or contacts were caught on either camera or tape. In each instance, the investigators were careful not to disclose on whose behalf they were working. For good reason. The Defendants in this case did not want to disclose their participation in the flagrant violation of Texas law. Indeed, these Defendants openly

and brazenly violated Texas' criminal laws dozens of times. (Defendant Quinn Emmanuel, of course, has now copped to the scheme.)

One such target of Defendant's solicitation was Plaintiff Jose Maldonado. Mr. Maldonado is a resident of Harris County. He was the Plaintiff in a Jones Act Lawsuit filed on his behalf in 2020 by The Buzbee Law Firm. His case was tried, but ended in a mistrial due to juror misconduct. His case then settled in May of 2023. He was happy with his settlement, and has no complaints with the Buzbee Law Firm. Throughout the week of December 16, 2024, Mr. Maldonado was contacted multiple times out of the blue by two "investigators." In several phone calls, and even unannounced visits to the home of Mr. Maldonado's father, these "investigators" attempted to illegally sway Mr. Maldonado. They identified themselves as federal agents. This contact was an illegal solicitation and was made on behalf of and as part of a conspiracy involving Defendants Croft, Roc Nation, and Quinn Emanuel. One of these investigators identified herself as Jessica Santiago. The other identified himself as Gregory Thomas.

After showing up to Mr. Maldonado's father's home, they started calling Mr. Maldonado directly. They asked Mr. Maldonado if he was unhappy with his representation from the Buzbee Law Firm and whether they could see his settlement documents. They were pushy. They followed this up by explaining to him that they were with the State/Feds but could connect him with a private lawyer so he could sue the Buzbee Law Firm. They told Maldonado several times that there was "money in this for you."

These investigators admitted that they were working for an attorney named Marcy Croft at the law firm MJ Legal, P.A. Defendant Marcy Croft is an attorney in Jackson, Mississippi. Defendant MJ Legal is the law firm Ms. Croft purportedly owns. Ms. Croft advertises herself as a member of "Team Roc." Moreover, Ms. Croft advertises that she has become "actively involved

with criminal justice reform and prison reform alongside Roc Nation’s philanthropic arm, Team Roc.” She further advertises herself as being involved in “numerous litigation actions pending on behalf of Team Roc, families, and hundreds of incarcerated men.” Marcy Croft has worked with Roc Nation for years, alongside Quinn Emanuel’s Alex Spiro. Spiro and Quinn Emanuel are currently opposing the Buzbee Law Firm in at least two cases.

V.
CAUSES OF ACTION

A. BARRATRY/SOLICITATION: TEXAS PENAL CODE SEC. 38.12 – ALL DEFENDANTS

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully herein.

Defendant Roc Nation, LLC in conspiracy with Quinn Emanuel orchestrated and instructed Defendants Croft and MJ Legal to send agents (private investigators) in Texas to the homes of the Firm’s clients and ex-clients who were also in Texas. One of those clients was Plaintiff Jose Maldonado. Once there, these agents/investigators solicited employment for Defendant Croft and Defendant MJ Legal. Each of these Defendants offered money to Plaintiff to hire Defendant Croft and sue the Firm. To add insult to injury, these investigators sent by Defendants acted as if they were government officials or police officers, even going so far as to brandish a badge and tell Mr. Maldonado they were federal agents.

Defendant Roc Nation is knowingly financing the commission of these criminal offenses, and is therefore guilty of same. Quinn Emanuel is assisting in the conspiracy, and has publicly lied about its involvement, and has also had its lawyers lie directly to a state court judge in Texas about its involvement.

B. CIVIL CONSPIRACY – ALL DEFENDANTS

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully herein.

Defendants make up more than two persons who sought to accomplish a goal of committing barratry and soliciting clients to sue the Firm. All Defendants had a meeting of the minds on this organized criminal conduct, and then took many unlawful acts to accomplish this criminal conduct. As a result, Plaintiff suffered damages in an amount to be proven at trial.

Because Defendants' conduct was committed with actual malice, Plaintiff seeks exemplary damages against Defendants.

C. PUNITIVE DAMAGES

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully herein.

Defendants' conduct was committed with actual malice, and, as such, Plaintiff seeks exemplary damages against Defendants.

Moreover, because this involves the violation of a criminal statute, no damage caps are applicable to Plaintiff's damages.

As a proximate result of Defendants' conduct, Plaintiff has suffered damages in an amount to be proven at trial.

VI. DAMAGES

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully herein.

As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff suffered injury. Plaintiff seeks the following damages pursuant to Texas law:

- A. Compensatory damages in an amount to be proven at trial;
- B. Consequential and special damages in an amount to be proven at trial;
- C. Exemplary damages;
- D. Interest on damages (pre- and post-judgment) in accordance with law;
- E. Costs of court;

F. Attorneys' fees; and

G. Such other and further relief to which Plaintiff is entitled.

VII.
DEMAND FOR JURY

Plaintiff respectfully demands a jury trial on those issues where appropriate.

VIII.
CONCLUSION AND PRAYER

Upon trial of this matter, Plaintiff respectfully prays for judgment as follows:

- a. The Court enter judgment in favor of Plaintiff for compensatory and punitive damages as permitted by law;
- b. Such other relief, at law or in equity, to which Plaintiff may be justly entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: /s/ Anthony G. Buzbee

Anthony G. Buzbee

State Bar No. 24001820

tbuzbee@txattorneys.com

David C. Fortney

State Bar No. 24068740

dfortney@txattorneys.com

JPMorgan Chase Tower

600 Travis Street, Suite 7500

Houston, Texas 77002

Tel: (713) 223-5393

Fax: (713) 223-5909

www.txattorneys.com

ATTORNEYS FOR PLAINTIFF