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10 Attorneys for Plaintiff, **GRACE O’MARCAIGH**

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF LOS ANGELES**

13 GRACE O’MARCAIGH, an individual, ) CASE NO.: **24STCV08571**

14 )  
15 *Plaintiff,* )

**COMPLAINT FOR DAMAGES**

16 )  
17 vs. )

- 1. Assault
- 2. Battery
- 3. Sexual Assault
- 4. Premises Liability
- 5. Aiding and Abetting
- 6. Intentional Infliction of Emotional Distress
- 7. Negligent Infliction of Emotional Distress

18 )  
19 CHRISTIAN COMBS, an individual, )  
SEAN COMBS, an individual, and JOHN )  
20 and JANE DOES 1-10 and )  
ABC CORPORATIONS. 1-10. )

21 )  
22 *Defendants.* )

**DEMAND FOR JURY TRIAL**

23  
24 Plaintiff GRACE O’MARCAIGH (“PLAINTIFF”), by and through her attorney of  
25 record, allege as follows:

26 **PARTIES**

27 1. Plaintiff GRACE O’MARCAIGH (hereinafter “PLAINTIFF”) is a European  
28 Caucasian female who worked as a Stewardess in the Yachting Industry since 2018.

1           2.       PLAINTIFF’s love of yachting started at an early age and was the foundation on  
2 which she had built her career.

3           3.       Through yachting, PLAINTIFF has traveled the world, met many new friends and  
4 colleagues, and enjoyed a very successful career.

5           4.       Throughout her career, PLAINTIFF has always worked well in teams and received  
6 high praises and great feedback from her managers and colleagues.

7           5.       PLAINTIFF also consistently received exemplary reviews from her clients for her  
8 excellent customer service as well as glowing references over the past few years.

9           6.       PLAINTIFF has consistently received promotions and has never been rejected for  
10 any position she has applied for.

11          7.       Prior to being sexually assaulted by Defendant Christian Combs (hereinafter  
12 “DEFENDANT C. COMBS”), PLAINTIFF planned to work the entirety of her career in  
13 hospitality and the yachting industry. Unfortunately, those plans have been derailed due to the  
14 trauma PLAINTIFF continues to have as a result of the assault.



Christian “King” Combs

1 8. DEFENDANT C. COMBS is a twenty-five-year-old autotuned and heavily edited  
2 rapper.

3 9. Unfortunately, as the saying has it, the apple does not fall far from the tree.

4 10. Defendant Sean Combs (“DEFENDANT S. COMBS”), who has also been accused  
5 of several acts of sexual assault, rape, sexual violence, and drugging, among other deplorable  
6 conduct, is the father of DEFENDANT C. COMBS, who has seemingly taken after his father and  
7 the family business of reckless partying, drugging others, sexual violence, and other illegal  
8 conduct.

9 11. Specifically, DEFENDANT C. COMBS is the second child of billionaire  
10 DEFENDANT S. COMBS and his late ex-partner, Kim Porter.

11 12. Upon information and belief, DEFENDANT C. COMBS resides in the city of  
12 Beverly Hills, California in Los Angeles County, California.



Sean Combs

25 13. Defendant Sean Combs (hereinafter “DEFENDANT S. COMBS”) is a rapper and  
26 record executive popularly known by his stage names Puff Daddy, Puffy, P. Diddy, Diddy, Brother  
27 Love, or Love.  
28



1 great customer service skills.

2 22. In or about September 2022, PLAINTIFF had been part of a dedicated team at the  
3 Monaco Boat Show tasked with selling charters for Victorious to high-net-worth clients such as  
4 C. COMBS and S. COMBS.

5 23. In December 2022, PLAINTIFF and her team were advised that the yacht had been  
6 successfully chartered for the 2022 holiday period.

7 24. PLAINTIFF changed her personal holiday family plans to accommodate the charter  
8 service and flew to St. Martin to prepare the yacht for service.

9 25. PLAINTIFF soon learned the client who chartered the yacht was DEFENDANT S.  
10 COMBS and his family.

11 26. DEFENDANT S. COMBS leased the yacht, and had full control of the staff and  
12 premises of the yacht.

13 27. Although PLAINTIFF was used to working in discreet and VIP environments, this  
14 was one of her first times working with an “A-list celebrity.” Because of this, PLAINTIFF and the  
15 rest of the team assigned to the yacht were determined to make the holidays special for  
16 DEFENDANT S. COMBS and his family.

17 28. For the duration of the trip, PLAINTIFF was assigned the 6:00 p.m. to 6:00 a.m.  
18 shift along with one other crew member. This shift, commonly known as the “late shift,” was very  
19 busy.

20 29. Late shift duties included dinner and drink service for the clients for the entire 12-  
21 hour period. Dinner and drink service had to be carried out with minimum staff support or backup  
22 during the night shift since only two individuals were assigned.

23 30. Although DEFENDANT S. COMBS was always typically on the yacht, his sons,  
24 DEFENDANT C. COMBS and Justin Combs, were staying in a luxury villa nearby but joined  
25 their father aboard the yacht most evenings.

26 31. During the second week of the charter service, there was a significant amount of  
27 partying and drug use, which caused the guests to stay up throughout the night.

28 32. The make-up of the yacht quickly evolved from just DEFENDANT S. COMBS and  
his family to include a constant rotation of suspected sex workers and other A-List celebrities such

1 as French Montana and actor Cuba Gooding, Jr.

2 33. DEFENDANT S. COMBS turned what was sold as a wholesome family excursion  
3 into a hedonistic environment.

4 34. According to PLAINTIFF, it resulted in an unexpected increase in workload for her  
5 and her colleagues as well as unwanted exposure to unlawful drug use, sex work, and general  
6 chaos.

7 35. It also created an extremely hazardous environment; for example, guests often  
8 demanded drink service until 6:00 a.m., staff was often treated with disrespect, suspected sex  
9 workers were sprawled out unconscious about the yacht, and it was difficult to distinguish which  
10 bottles of alcohol were laced with drugs and which bottles were not.

11 36. It is important to note that as a bartender, PLAINTIFF understands the impact of  
12 alcohol and the likelihood that a person would not generally become intoxicated following one  
13 mixed drink. Because of this, PLAINTIFF found it very suspicious that after one shot of DeLeon  
14 tequila or one mixed drink, various women on the yacht would be falling over themselves,  
15 panicking, or passing out. This led PLAINTIFF to reasonably believe that the alcohol given to  
16 these women was likely laced with drugs.

17 37. PLAINTIFF was aware that Rodney Jones (“Mr. Jones”), a producer who was  
18 employed to work on the Love Album: Off the Grid, was required to be on standby for musical  
19 recordings often late into the night.

20 38. The Love Album: Off the Grid is the fifth studio album by American rapper and  
21 record producer Sean "Diddy" Combs, released on September 15, 2023.

22 39. Mr. Jones was accepted as an extended member of the service staff and spent time  
23 with PLAINTIFF at the service bar and piano room, where he played the piano.

24 40. On or about the early morning of December 28, 2022, the evening shift started as  
25 normal. At about 5:00 a.m., PLAINTIFF was messaged on the on-duty phone that DEFENDANT  
26 C. COMBS would be joining the yacht by tender, a smaller craft that runs back and forth from a  
27 larger yacht and used for servicing and providing support and entertainment to a private or charter  
28 yacht. DEFENDANT C. COMBS wanted to be brought over to Victorious to record in the yacht’s  
makeshift recording studio with Mr. Jones.

1           41.     Although it was not unheard of for DEFENDANT C. COMBS to come aboard at  
2 such a late hour, he usually stayed at his dwelling offshore overnight, particularly when there was  
3 no party on board on any given night.

4           42.     DEFENDANT C. COMBS arrived in the tender and was heavily intoxicated.  
5 PLAINTIFF suspects DEFENDANT C. COMBS was intoxicated from a mixture of narcotics and  
6 alcohol.

7           43.     Upon entering the recording studio, DEFENDANT C. COMBS immediately  
8 started ordering that tequila shots be poured from a bottle of alcohol he may have brought onto the  
9 yacht.

10          44.     Ironically, DEFENDANT C. COMBS was playing Cassie's "Me and U" was  
11 playing in the background. Cassie was an artist under S. COMBS and was his former love interest  
12 who also accused S. COMBS of serious sexual and mental abuse.

13          45.     In the studio, DEFENDANT C. COMBS asked that PLAINTIFF bring the shots to  
14 the recording studio/sundeck, and PLAINTIFF obliged as she was the only serving steward at the  
15 time.

16          46.     PLAINTIFF noticed immediately that he was particularly attentive with her, which  
17 she considered very inappropriate.

18          47.     However, PLAINTIFF began to become concerned when he insisted that she take  
19 shots of the tequila he may have brought on board the yacht.

20          48.     Under pressure and wanting to be polite, PLAINTIFF obliged. Prior to this, the  
21 Plaintiff witnessed DEFENDANT S. COMBS create a "Black Santa Video," which showed him  
22 demanding the Captain, various head of departments, and crew take a shot of Tequila with him.

23          49.     As this was a pattern established by the Captain of the yacht and DEFENDANT S.  
24 COMBS, Plaintiff felt comfortable knowing that Mr. Jones was present and didn't think anything  
25 more of it. She felt that she would take one shot, and he would let her return to the pantry.

26          50.     According to PLAINTIFF, at this point, the mood changed, and things became  
27 sinister. DEFENDANT C. COMBS insisted that PLAINTIFF stay chatting and that she sit beside  
28 him.

          51.     PLAINTIFF resisted and remained polite, asking to leave. DEFENDANT C.

1 COMBS became aggressive and insisted that PLAINTIFF take a further shot and sit beside him.

2 52. At this point, DEFENDANT C. COMBS violently grabbed PLAINTIFF's arm and  
3 began hurting her. He pulled PLAINTIFF to the seat beside him and prevented her from getting  
4 up.

5 53. PLAINTIFF insisted that she had to return to the pantry, but her pleas fell on deaf  
6 ears. Angered, DEFENDANT C. COMBS forced PLAINTIFF to take another shot.

7 54. PLAINTIFF was quite scared and realized she was in a very dangerous situation.  
8 PLAINTIFF was also feeling the effect of the tequila shots and quickly suspected that the Tequila  
9 was spiked.

10 55. At this point, the situation escalated, and PLAINTIFF started to be physically  
11 assaulted by DEFENDANT S. COMBS. He touched PLAINTIFF's legs, breasts, anus, and vagina.  
12 He also tried to kiss her and proceeded to kiss her neck, face, and hands.

13 56. The timeline at this point is very blurry and vague to PLAINTIFF, as she does not  
14 recall exactly what happened to her due to the effects of the spiked Tequila shots.

15 57. Luckily for PLAINTIFF, due to DEFENDANT S. COMBS' insistence on Mr.  
16 Jones recording everything, Mr. Jones has an audio recording of DEFENDANT C. COMBS  
17 drugging and sexually assaulting PLAINTIFF.

18 58. Below is the transcript of DEFENDANT C. COMBS forcing PLAINTIFF to  
19 consume the suspected laced shots of DeLeon tequila:

20 Audio 1

21 **DEFENDANT C. COMBS:** Yo, it's shot o'clock.

22 **PLAINTIFF:** No, I'm not doing shots. Christian?

23 **DEFENDANT C. COMBS:** Everybody, we got to take a shot.

24 Audio 2

25 **PLAINTIFF:** I'll just put the ledge.

26 **DEFENDANT C. COMBS:** No, no, no. Take the whole thing.

27 **PLAINTIFF:** No, you will take it as well.

28 **DEFENDANT C. COMBS:** Take the whole shot.



1 **PLAINTIFF:** I'm only doing it as long as you take it as well.

2 **DEFENDANT C. COMBS:** I ain't going to lie, I'm not taking nothing. Please, please, take  
3 the shot.

4 **PLAINTIFF:** You are drugging me?

5 **DEFENDANT C. COMBS:** Take the shot. Hey, yo, play another beat one time because  
6 now--

7 59. Below is the transcript of DEFENDANT C. COMBS' sexual assault of  
8 PLAINTIFF:

9 [Cassie *Me & U* featuring P. Diddy and Young Joc song playing in the background]

10 **PLAINTIFF:** This is not an offer.

11 **DEFENDANT C. COMBS:** You said what?

12 **PLAINTIFF:** I can't. I'm swapping out. I can't do it. I'm sorry, darling.

13 **DEFENDANT C. COMBS:** Nah, we need you.

14 **PLAINTIFF:** I'm going to stop. Stop. I have to go. I have to go. Honestly, I'm like already  
15 losing sleep. I have to go now.

16 **DEFENDANT C. COMBS:** You're the best one on this ship, though.

17 **PLAINTIFF:** What do you mean?

18 **DEFENDANT C. COMBS:** Who's going to replace you?

19 **PLAINTIFF:** Who's going to replace me?

20 **DEFENDANT C. COMBS:** Fuck that. That's going to be trash, though. You feel me?

21 **PLAINTIFF:** Excuse me, you don't touch my legs like that. I'll move my legs where I  
22 want to.

23 **PLAINTIFF:** If I want to do this, then I will. You don't touch my legs like that.

24 **DEFENDANT C. COMBS:** Listen, you and everybody in the crew, it's great.

25 **PLAINTIFF:** I can't. I have to go down. I have to go down.

26 **DEFENDANT C. COMBS:** No. Yo, tell me, listen.

27 **PLAINTIFF:** What?

28 **DEFENDANT C. COMBS:** Like say you're just vibing with me the whole time.

**PLAINTIFF:** I can't. I promise you, I wish I could, but I can't. Unless I say that you guys

1 requested me.

2 **DEFENDANT C. COMBS:** Yes, who can I talk to right now? Who can I talk to? I'm  
3 going to say I requested you right now.

4 **PLAINTIFF:** Well, you can take your hand off my ass for the first thing.

5 60. According to the PLAINTIFF, she said she would have to be requested because she  
6 knew anyone of authority who would approve the request was asleep. Defendant C. Combs would  
7 not have been able to contact them, and PLAINTIFF could then leave.

8 61. After being assaulted in the recording studio, PLAINTIFF attempted to resume her  
9 duties that night.

10 62. She made her way to the pantry, where she met another steward who was assigned  
11 to take over the shift. Her colleague recognized that PLAINTIFF was visibly intoxicated, in shock,  
12 and trying to finish the shift.

13 63. Shortly after returning to the pantry, DEFENDANT C. COMBS called for  
14 PLAINTIFF. He went looking for her and demanded that she find him a place to sleep on the  
15 yacht.

16 64. At such a late hour of the night, there were no spare cabins for DEFENDANT C.  
17 COMBS to stay in. Despite this, he refused to go back to shore. The most acceptable place for him  
18 to sleep that night was in the cinema.

19 65. PLAINTIFF directed him to the cinema, which was commonly used as an extra  
20 sleeping area. The cinema has one door to exit and enter. PLAINTIFF entered the room, and  
21 DEFENDANT C. COMBS blocked her from exiting.

22 66. PLAINTIFF retreated to a corner of the room, and DEFENDANT C. COMBS  
23 became physical and extremely aggressive. He cornered PLAINTIFF and started to grope her.  
24 PLAINTIFF pushed him back constantly.

25 67. DEFENDANT C. COMBS then took off all of his clothes. His penis was erect,  
26 and he grabbed her arms and was trying to force PLAINTIFF to perform oral copulation on him.

27 68. The PLAINTIFF began fighting DEFENDANT C. COMBS, and not long after, her  
28 partner on board entered the cinema. This startled DEFENDANT C. COMBS, and the PLAINTIFF  
was finally able to leave.

1           69.     The PLAINTIFF'S partner became concerned and went looking for the PLAINTIFF  
2 after she had not returned to her room after her shift had ended.

3           70.     The morning after, PLAINTIFF complained to the yacht's captain, Captain Petar  
4 Milkov.

5           71.     Captain Milkov berated the PLAINTIFF. He lacked compassion or concern, failed  
6 to investigate, and insisted that the PLAINTIFF was probably voluntarily partying with the guests.  
7 She was not.

8           72.     Captain Milkov added insult to injury by assigning PLAINTIFF to work in front of  
9 the house, which required personally serving DEFENDANT C. COMBS while they were on the  
10 yacht. PLAINTIFF was not provided an option to be isolated or not have to serve DEFENDANT  
11 C. COMBS.

12           73.     PLAINTIFF was twenty-five years old at the time of the attack.

13           74.     Based on information and belief, DEFENDANT S. COMBS' employees, including  
14 his drug mule Brendan Paul, his Chief of Staff Kristina Khorram, and his second in line Frankie  
15 Santella, learned of what occurred and informed DEFENDANT S. COMBS.

16           75.     Shortly after, Captain Milkov received a generous tip from DEFENDANT S.  
17 COMBS in order to keep Captain Milkov quiet and keep him from protecting PLAINTIFF or  
18 taking action on her behalf.

19           76.     Only a few members of the ship's staff were required to write statements.  
20 PLAINTIFF and her partner were the only two staff members not interviewed and not asked to  
21 write a statement.

22                   **AS A RESULT OF DEFENDANT C. COMBS' SEXUAL ASSAULT**  
23                   **PLAINTIFF HAS SUFFERED**

24           77.     Below are images of PLAINTIFF's bruises because of DEFENDANT C. COMBS  
25 violently grabbing her and attempting to force her to perform oral copulation:  
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1 78. According to PLAINTIFF, the past year (2023) has been the most deeply  
2 traumatizing time of her life.

3 79. After DEFENDANT C. COMBS' sexual assault and the subsequent coverup  
4 orchestrated by DEFENDANT S. COMBS and his staff, PLAINTIFF was isolated and retaliated  
5 against on the Yacht.

6 80. This isolation and retaliation finally resulted in PLAINTIFF's termination by  
7 Captain Petar Milkov on or around May 10, 2023.

8 81. In addition to losing her employment, PLAINTIFF also lost her longtime partner,  
9 with whom she had planned a future. PLAINTIFF'S partner was never the same after seeing  
10 PLAINTIFF's bruises on her body because of DEFENDANT C. COMBS' sexual assault and  
11 having to deal with the mental and emotional ramifications, so they separated.

12 82. PLAINTIFF's mental health deteriorated to the point that she was medicated and  
13 required intensive therapy. Additionally, she fell into a deep depression and was unable to fully  
14 carry out her maid of honor duties at the wedding of her only sister in June 2023, which she had  
15 been looking forward to doing for over eighteen months.

16 83. PLAINTIFF's anxiety and panic attacks prevented her from securing another  
17 permanent position in the Yachting industry in 2023.

18 84. PLAINTIFF also developed a severe eating disorder as a result of the attack due to  
19 the shame and mental warfare she was experiencing that affected her body image and appetite.

20 85. On several occasions, the effects of DEFENDANT C. COMBS' sexual assault led  
21 PLAINTIFF to have severe suicidal ideations.

22 86. In addition to PLAINTIFF's psychological trauma, her physical health began to  
23 deteriorate. PLAINTIFF had several epileptic seizures. These seizures resulted in PLAINTIFF  
24 losing her ability to privately do things she was accustomed to doing alone. PLAINTIFF now  
25 requires supervision to do basic activities like swimming and bathing and is not required to inform  
26 people in public places that she is epileptic and requires supervision.

27 **PREMISES LIABILITY AND**  
**AIDING AND ABETTING FOR DEFENDANT S. COMBS**

28 87. According to the PLAINTIFF, DEFENDANT S. COMBS chartered the Yacht and

1 assumed responsibility for the actions of himself, his guests, and his family. Upon information  
2 and belief, DEFENDANT S. COMBS fostered and encouraged an environment of debauchery.  
3 There was always a party atmosphere filled with suspected sex workers, suspected laced alcohol,  
4 violence, and sheer disrespect of women and the Yachts crew.

5 88. Upon information and belief, DEFENDANT S. COMBS did not have any  
6 safeguards in place to ensure there was no excessive drug use, no excessive drinking, and no  
7 importation of purported sex workers.

8 89. DEFENDANT S. COMBS' apparent failure to ensure there was a safe environment  
9 on the Yacht was intentional. On one occasion, Kristina Khorram, DEFENDANT S. COMBS'  
10 chief of staff, instructed Plaintiff to ensure that the entire bar area was stocked with DeLeon  
11 Tequila and Ciroq Vodka. It was important for DEFENDANT S. COMBS to be surrounded by  
12 these bottles. On this occasion, DEFENDANT S. COMBS was visibly intoxicated.

13 90. PLAINTIFF is unsure if he was high from drugs, alcohol, or both. Out of nowhere,  
14 Kristina Khorram quickly approached PLAINTIFF and ordered her to remove all the Ciroq and  
15 DeLeon bottles. She was informed that (REDACTED 1)<sup>1</sup> and (REDACTED 2)<sup>2</sup> were boarding  
16 the Yacht. At that point, DEFENDANT S. COMBS exited the room, (REDACTED 1) and  
17 (REDACTED 2) entered the room, and DEFENDANT S. COMBS returned, sober, holding his  
18 newborn daughter. This all occurred within less than an hour.

19 91. This incident led PLAINTIFF to believe that DEFENDANT S. COMBS knew right  
20 from wrong and had the ability and wherewithal to determine that the environment on the Yacht  
21 was safe. He intentionally created an unsafe environment that gave license to DEFENDANT C.  
22 COMBS to believe that he was free to sexually assault PLAINTIFF.

23 92. DEFENDANT S. COMBS allowed DEFENDANT C. COMBS and his friends to  
24 behave carelessly, as they observed and mimicked his actions.

25 93. According to PLAINTIFF, on many occasions, she witnessed young girls visiting  
26 the boat, stay for less than 30 minutes in a cabin with a guest and leave. This led PLAINTIFF to  
27 believe these girls were sex workers.

28 <sup>1</sup> A famous female Comedian.

<sup>2</sup> Wife of a famous comedian and founder of a New York-based charity.



1           94.     According to PLAINTIFF, DEFENDANT S. COMBS routinely engaged in and  
2 encouraged open illegal drug use while on the yacht.

3           95.     On several occasions, PLAINTIFF witnessed DEFENDANT S. COMBS smoking  
4 marijuana while receiving services from the Yachts crewmembers. He would not allow them to  
5 leave as he smoked, and as a result, several crew members had a contact high.

6           96.     According to PLAINTIFF, in another incident, DEFENDANT S. COMBS had  
7 several women whom Plaintiff suspected of being sex workers on the yacht. In one incident, a girl  
8 was extremely upset and ran to the lower deck, locked herself in the massage room, and was  
9 hysterically crying. She said she did not feel safe and wanted to leave. The crew was alerted of  
10 this. At this time, Sarah Chapman, one of S. COMBS' children's mother, was due to have a  
11 massage, so PLAINTIFF had to attempt to remove this young woman from the massage room, but  
12 she was very reluctant as she felt unsafe. Eventually, she left.

13           97.     According to PLAINTIFF, on another occasion, DEFENDANT C. COMBS lost a  
14 large bag of marijuana and required the crew to search the yacht for it.

15           98.     According to PLAINTIFF, on another occasion, while Hulu was filming,  
16 DEFENDANT S. COMBS and his friends, including Yung Miami, were playing a game called  
17 "Careesha Please." DEFENDANT S. COMBS was dared to expose himself. At that point,  
18 DEFENDANT S. COMBS stood up, pulled down his pants, and exposed his penis. PLAINTIFF  
19 was standing beside the table and heard the commotion. DEFENDANT S. COMBS' mother was  
20 sitting beside him. Plaintiff then returned to the pantry and refused to stand by outside of the  
21 pantry for the duration of that service period.

22           99.     According to PLAINTIFF, on another occasion during New Year's Eve,  
23 DEFENDANT S. COMBS had guests who stayed until late afternoon the next day. A fight broke  
24 out between Justin Combs' friends. They physically assaulted each other and walked around the  
25 boat topless, screaming. PLAINTIFF and the crew felt very uneasy in this environment. At one  
26 point, one of DEFENDANT S. COMBS' guests shoved Plaintiff's chief steward on the stairs and  
27 threw an object across the bar.

28           100.    According to PLAINTIFF, on another occasion, she witnessed an argument  
between a woman and a man. The man was upset and proceeded to physically assault her.



1 alcohol which she now believes was laced with drugs.

2 109. DEFENDANT C. COMBS also exposed himself to PLAINTIFF, baring his naked,  
3 erect penis, trying to physically force PLAINTIFF to perform oral copulation.

4 110. PLAINTIFF was seriously bruised as a result of the attack.

5 111. Plaintiff did not consent to any of the sexual assault or misconduct and was  
6 drugged/intoxicated by DEFENDANT C. COMBS.

7 112. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or  
8 offensive contact with an intimate part of PLAINTIFF's body as defined by California Civil Code  
9 § 1708.5.

10 113. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or  
11 offensive contact between an intimate part of Defendant's body and PLAINTIFF's body as defined  
12 by California *Civil Code* § 1708.5.

13 114. Through the aforementioned acts, DEFENDANT C. COMBS caused PLAINTIFF  
14 an imminent apprehension of harmful or offensive contact with an intimate part of Plaintiff's body,  
15 and sexually offensive contact with Plaintiff resulted.

16 115. As a result of DEFENDANT C. COMBS' conduct, PLAINTIFF has suffered  
17 economic injury, all to PLAINTIFF's general, special, and consequential damage in an amount to  
18 be proven at trial, but in no event is less than the minimum jurisdictional amount of this Court.

19 116. As a result of DEFENDANT C. COMBS' above-described conduct, PLAINTIFF  
20 has suffered and continues to suffer great emotional distress and was prevented and will continue  
21 to be prevented from performing daily activities and obtaining the full enjoyment of life.

22 117. As described in this Complaint, DEFENDANT C. COMBS' conduct was done with  
23 oppression, fraud, and/or malice, warranting significant damages, including punitive damages.

24 **SECOND CAUSE OF ACTION**  
**BATTERY**  
**(Against Defendant C. Combs)**

25 118. The plaintiff realleges and incorporates by reference, as though set forth fully at  
26 this point, each and every allegation contained herein.

27 119. On or around December 28, 2022, DEFENDANT C. COMBS sexually battered  
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1 PLAINTIFF by violently grabbing her, groping her legs, breasts, anus, and vagina.

2 120. He also tried to kiss her and proceeded to kiss her neck, face, and hands.

3 121. Prior to the assault, DEFENDANT C. COMBS also forced PLAINTIFF to drink  
4 alcohol, which she now believes was laced with drugs.

5 122. DEFENDANT C. COMBS also exposed himself to PLAINTIFF, baring his  
6 naked, erect penis, trying to physically force PLAINTIFF to perform oral copulation.

7 123. PLAINTIFF was seriously bruised as a result of the attack.

8 124. Plaintiff did not consent to any of the sexual assault or misconduct and was  
9 drugged/intoxicated by DEFENDANT C. COMBS.

10 125. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or  
11 offensive contact with an intimate part of PLAINTIFF's body as defined by California Civil Code  
12 § 1708.5.

13 126. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or  
14 offensive contact between an intimate part of Defendant's body and PLAINTIFF's body as defined  
15 by California *Civil Code* § 1708.5.

16 127. Through the aforementioned acts, DEFENDANT C. COMBS caused PLAINTIFF  
17 an imminent apprehension of harmful or offensive contact with an intimate part of Plaintiff's body,  
18 and sexually offensive contact with Plaintiff resulted.

19 128. As a result of DEFENDANT C. COMBS' conduct, PLAINTIFF has suffered  
20 economic injury, all to PLAINTIFF's general, special, and consequential damage in an amount to  
21 be proven at trial, but in no event is less than the minimum jurisdictional amount of this Court.

22 129. As a result of DEFENDANT C. COMBS' above-described conduct, PLAINTIFF  
23 has suffered and continues to suffer great emotional distress and was prevented and will continue  
24 to be prevented from performing daily activities and obtaining the full enjoyment of life.

25 130. As described in this Complaint, DEFENDANT C. COMBS' conduct was done with  
26 oppression, fraud, and/or malice warranting significant damages, including punitive damages.

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28 ///

**THIRD CAUSE OF ACTION**  
**SEXUAL ASSAULT**  
**(Against Defendant C. Combs)**

131. The PLAINTIFF realleges and incorporates by reference as though set forth fully at this point, each and every allegation contained herein.

132. The plaintiff realleges and incorporates by reference, as though set forth fully at this point, each and every allegation contained herein.

133. On or around December 28, 2022, DEFENDANT C. COMBS sexually battered PLAINTIFF by violently grabbing her, groping her legs, breasts, anus, and vagina.

134. He also tried to kiss her and proceeded to kiss her neck, face, and hands.

135. Prior to the assault, DEFENDANT C. COMBS also forced PLAINTIFF to drink alcohol which she now believes was laced with drugs.

136. DEFENDANT C. COMBS also exposed himself to PLAINTIFF, baring his naked, erect penis, trying to physically force PLAINTIFF to perform oral copulation.

137. PLAINTIFF was seriously bruised as a result of the attack.

138. Plaintiff did not consent to any of the sexual assault or misconduct and was drugged/intoxicated by DEFENDANT C. COMBS.

139. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or offensive contact with an intimate part of PLAINTIFF's body as defined by California Civil Code § 1708.5.

140. Through the aforementioned acts, DEFENDANT C. COMBS caused harmful or offensive contact between an intimate part of Defendant's body and PLAINTIFF's body as defined by California *Civil Code* § 1708.5.

141. Through the aforementioned acts, DEFENDANT C. COMBS caused PLAINTIFF an imminent apprehension of harmful or offensive contact with an intimate part of Plaintiff's body, and sexually offensive contact with Plaintiff resulted.

142. As a result of DEFENDANT C. COMBS' conduct, PLAINTIFF has suffered economic injury, all to PLAINTIFF's general, special, and consequential damage in an amount to be proven at trial, but in no event is less than the minimum jurisdictional amount of this Court.

143. As a result of DEFENDANT C. COMBS' above-described conduct, PLAINTIFF

1 has suffered and continues to suffer great emotional distress and was prevented and will continue  
2 to be prevented from performing daily activities and obtaining the full enjoyment of life.

3 144. As described in this Complaint, DEFENDANT C. COMBS' conduct was done with  
4 oppression, fraud, and/or malice warranting significant damages, including punitive damages.

5 **FOURTH CAUSE OF ACTION**  
6 **PREMISES LIABILITY**  
7 **(Against Defendant S. Combs)**

8 145. The PLAINTIFF realleges and incorporates by reference, as though set forth fully  
9 at this point, each and every allegation contained herein.

10 146. DEFENDANT S. COMBS leased, occupied and/or controlled the yacht on which  
11 PLAINTIFF was sexually assaulted and battered on the date and time PLAINTIFF was sexually  
12 assaulted and battered.

13 147. DEFENDANT S. COMBS had control over the staff and the happenings aboard  
14 the yacht.

15 148. DEFENDANT S. COMBS completely controlled the premises of the yacht,  
16 allowing who he wanted on, throwing parties, having sex workers come to service his guests,  
17 allowing fights to occur, and nonstop illegal drug use and alcohol use.

18 149. DEFENDANT S. COMBS had a valid lease giving him control of the yacht for the  
19 entire holiday season and occupied the yacht in order to throw lawless parties and allow illegal  
20 activities to occur.

21 150. Over the 2022 holiday season, DEFENDANT S. COMBS used the yacht that he  
22 leased and had control over as a location for mayhem, including illegal prostitution, drug use, and  
23 reckless partying.

24 151. DEFENDANT S. COMBS was negligent in the use or maintenance of the yacht.

25 152. DEFENDANT S. COMBS allowed and encouraged the people aboard his yacht,  
26 including his son C. COMBS to engage in the drugs and reckless behavior while aboard the yacht.

27 153. PLAINTIFF was sexually assaulted and battered by DEFENDANT S. COMBS'  
28 son, C. COMBS when he forced her to drink a likely laced drink, violently grabbed her, groped  
her, exposed his erect penis to her, and tried to force her to perform oral copulation on him all

1 while on the premises of the yacht in question.

2 154. DEFENDANT C. COMBS also tried to kiss her and proceeded to kiss her neck,  
3 face, and hands.

4 155. PLAINTIFF was severely mentally, emotionally, and physically harmed while on  
5 the yacht.

6 156. DEFENDANT S. COMBS' negligence was a substantial factor in causing  
7 PLAINTIFF's harm because of failing to properly use and secure the yacht and for fostering an  
8 environment for drug use and assault to occur without ramifications.

9 157. Through the aforementioned acts, DEFENDANT S. COMBS caused Plaintiff an  
10 imminent apprehension of harmful or offensive contact with an intimate part of PLAINTIFF's  
11 body, and sexually offensive contact with PLAINTIFF resulted.

12 158. As a result of DEFENDANT S. COMBS' conduct, PLAINTIFF has suffered  
13 economic injury, all to PLAINTIFF's general, special, and consequential damage in an amount to  
14 be proven at trial, but in no event is less than the minimum jurisdictional amount of this Court.

15 159. As a result of DEFENDANT S. COMBS' above-described conduct, PLAINTIFF  
16 has suffered and continues to suffer great emotional distress and was prevented and will continue  
17 to be prevented from performing daily activities and obtaining the full enjoyment of life.

18 160. As described in this Complaint, the DEFENDANT S. COMBS' conduct was done  
19 with oppression, fraud, and/or malice warranting significant damages, including punitive damages.

20 **FIFTH CAUSE OF ACTION**  
21 **AIDING AND ABETTING**  
22 **(Against Defendant S. Combs)**

23 161. The PLAINTIFF realleges and incorporates by reference, as though set forth fully  
24 at this point, each and every allegation contained herein.

25 162. DEFENDANT S. COMBS knew that an assault/battery/sexually assault was being  
26 committed and was and going to be committed against PLAINTIFF because he encouraged and  
27 fostered an environment and culture to his son and his employees to do whatever they want with  
28 PLAINTIFF and the other yacht staff.

163. S. COMBS provided drugs and alcohol to be used to take advantage of many

1 women on the yacht, including PLAINTIFF.

2 164. S. COMBS knew PLAINTIFF had been assaulted because he “paid off” the yacht  
3 Captain after hearing of PLAINTIFF’s complaint relating to his son DEFENDANT C. COMBS’  
4 assault/battery/sexual assault against PLAINTIFF.

5 165. DEFENDANT S. COMBS’ conduct was a substantial factor in causing harm to  
6 PLAINTIFF’s harm.

7 166. Through the aforementioned acts, DEFENDANT S. COMBS caused PLAINTIFF  
8 an imminent apprehension of harmful or offensive contact with an intimate part of PLAINTIFF’s  
9 body, and sexually offensive contact with PLAINTIFF resulted.

10 167. As a result of DEFENDANT S. COMBS’ conduct, PLAINTIFF has suffered  
11 economic injury, all to PLAINTIFF’s general, special, and consequential damage in an amount to  
12 be proven at trial, but in no event is less than the minimum jurisdictional amount of this Court.

13 168. As a result of DEFENDANT S. COMBS’ above-described conduct, PLAINTIFF  
14 has suffered and continues to suffer great emotional distress and was prevented and will continue  
15 to be prevented from performing daily activities and obtaining the full enjoyment of life.

16 169. As described in this Complaint, the DEFENDANT S. COMBS’ conduct was done  
17 with oppression, fraud, and/or malice warranting significant damages, including punitive damages.

18 **SIXTH CAUSE OF ACTION**  
19 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
20 **(Against Defendant C. Combs)**

21 170. The PLAINTIFF realleges and incorporates by reference, as though set forth fully  
22 at this point, each and every allegation contained herein.

23 171. On or around December 28, 2022, DEFENDANT C. COMBS assaulted  
24 PLAINTIFF by violently grabbing her, groping her legs, breasts, anus, and vagina.

25 172. Prior to the assault, DEFENDANT C. COMBS also forced PLAINTIFF to drink  
26 alcohol which she now believes was laced with drugs.

27 173. DEFENDANT C. COMBS also exposed himself to PLAINTIFF, baring his naked,  
28 erect penis, trying to physically force PLAINTIFF to perform oral copulation.

174. He also tried to kiss her and proceeded to kiss her neck, face, and hands.



1 175. PLAINTIFF was seriously bruised as a result of the attack.

2 176. Defendants' extreme and outrageous conduct alleged in this Complaint, including  
3 but not limited to assault, sexual assault, and battery upon Plaintiff, were done in wanton and  
4 reckless disregard of such consequences to Plaintiff.

5 177. PLAINTIFF now experienced seizures and has to constantly be helped by others  
6 for tasks that she could previously do independently.

7 178. PLAINTIFF has also been unable to secure another job in the industry she knows  
8 and loves, the yachting industry, since she was wrongfully terminated from her position with the  
9 Fraser.

10 179. PLAINTIFF's relationship with her significant other prematurely ended because her  
11 significant other could not bear to deal with the physical and emotional ramifications of the assault  
12 by C. COMBS.

13 180. DEFENDANT C. COMBS' actions were extreme and outrageous.

14 181. As a direct and proximate result of said extreme and outrageous conduct by  
15 DEFENDANT C. COMBS, PLAINTIFF did suffer humiliation, mental anguish, and emotional  
16 and physical distress and has been hurt and injured in her health, strength, and activity, sustaining  
17 an injury to her nervous system and person, all of which have caused, continue to cause and will  
18 continue to cause Plaintiff great mental, physical and nervous pain and suffering.

19 182. As a result of such severe emotional distress, PLAINTIFF has been generally,  
20 specially, and consequentially damaged in an amount to be established according to evidence.

21 183. DEFENDANT C. COMBS committed the aforementioned infliction of emotional  
22 distress willfully and intentionally and by means of oppression, fraud, and malice and in conscious  
23 disregard of PLAINTIFF's rights. Therefore, PLAINTIFF is entitled to an award of exemplary or  
24 punitive damages in an amount to be established at trial to meaningfully punish DEFENDANT C.  
COMBS, thereby deterring similar conduct in the future.

25 **SEVENTH CAUSE OF ACTION**  
26 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
27 **(Against Defendant C. Combs)**

28 184. The plaintiff realleges and incorporates by reference, as though set forth fully at

1 this point, each and every allegation contained herein.

2 185. The plaintiff realleges and incorporates by reference, as though set forth fully at  
3 this point, each and every allegation contained herein.

4 186. On or around December 28, 2022, DEFENDANT C. COMBS assaulted  
5 PLAINTIFF by violently grabbing her, groping her legs, breasts, anus, and vagina.

6 187. Prior to the assault, DEFENDANT C. COMBS also forced PLAINTIFF to drink  
7 alcohol which she now believes was laced with drugs.

8 188. DEFENDANT C. COMBS also exposed himself to PLAINTIFF, baring his naked,  
9 erect penis, trying to physically force PLAINTIFF to perform oral copulation.

10 189. He also tried to kiss her and proceeded to kiss her neck, face, and hands.

11 190. PLAINTIFF was seriously bruised as a result of the attack.

12 191. Defendant's extreme and outrageous conduct alleged in this Complaint, including  
13 but not limited to assault, sexual assault, and battery, were negligent.

14 192. PLAINTIFF now experienced seizures and has to constantly be helped by others  
15 for tasks that she could previously do independently.

16 193. PLAINTIFF has also been unable to secure another job in the industry she knows  
17 and loves, the yachting industry, since she was wrongfully terminated from her position with the  
18 Fraser.

19 194. PLAINTIFF was also abandoned by her significant other who could not bear to  
20 deal with the physical and emotional ramifications of the assault by DEFENDANT C. COMBS.

21 195. As a direct and proximate result of said extreme and outrageous conduct by  
22 DEFENDANT C. COMBS, PLAINTIFF did suffer serious emotional distress including  
23 humiliation, mental anguish, and emotional and physical distress and has been hurt and injured in  
24 her health, strength, and activity, sustaining an injury to her nervous system and person, all of  
25 which have caused, continue to cause and will continue to cause PLAINTIFF great mental,  
26 physical and nervous pain and suffering.

27 196. As a result of such severe emotional distress, PLAINTIFF has been generally,  
28 specially, and consequentially damaged in an amount to be established according to evidence.

197. DEFENDANT C. COMBS committed the aforementioned infliction of emotional

1 distress willfully and intentionally and by means of oppression, fraud, and malice and in conscious  
2 disregard of PLAINTIFF's rights. Therefore, PLAINTIFF is entitled to an award of exemplary or  
3 punitive damages in an amount to be established at trial to meaningfully punish DEFENDANT C.  
4 COMBS, thereby deterring similar conduct in the future.


5 **PRAYER**

6 WHEREFORE, PLAINTIFF GRACE O'MARCAIGH prays for judgment against all  
7 DEFENDANTS, jointly and severally, as follows:

- 8 1. For compensatory, special, and general damages according to proof;
- 9 2. For punitive and exemplary damages;
- 10 3. For costs of suit, pre-judgment, and post-judgment interest; and
- 11 4. Such other and further relief as the Court may deem necessary or appropriate

12 Dated: April 4, 2024

13 **IVIE McNEILL WYATT PURCELL & DIGGS**

14 By:   
15 **RODNEY S. DIGGS, ESQ.**  
16 Attorneys for Plaintiff,  
17 **GRACE O'MARCAIGH**

1 **DEMAND FOR JURY TRIAL**

2 Plaintiff GRACE O’MARCAIGH hereby demands a jury trial.

3  
4 Dated: April 4, 2024

**IVIE McNEILL WYATT PURCELL & DIGGS**

5 By: *Rodney S. Diggs*  
6 **RODNEY S. DIGGS, ESQ.**  
7 Attorneys for Plaintiff,  
8 **GRACE O’MARCAIGH**

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2 **PRESERVATION NOTICE**

3 The term “you,” “your,” or “yours” as used herein shall refer to you (the recipient of this letter),  
4 as well as to the respondents and any individuals responsible for the custody and control of the  
5 below information, including, but not limited to, those individuals’ administrative assistants,  
6 secretaries, agents, employees, information technology personnel and third-party vendors. From  
7 this point forward, you are directed to prevent “spoliation,” defined as altering, changing, updating,  
8 destroying (even if periodically), editing, or deleting any information set forth hereafter.

9 If you cause any such alteration, destruction, or change, direct it, or allow it to occur, you may be  
10 charged with discovery rule violations for which sanctions may be imposed. Further, your failure  
11 to abide by this request could result in severe penalties against you and form the basis of legal  
12 claims for spoliation.

13 **Electronically Stored Information:**

14 In terms of electronically stored information, you are directed to prevent any destructive,  
15 alternative or other change to any web pages, virtual profiles or identical (including, but not limited  
16 to, Facebook, Instagram, Pinterest, Twitter, Tumblr, LinkedIn, Snapchat, Google Plus+, Flickr,  
17 Vine, About.me, ask.fm etc., or any other social media-based web profile or networking site  
18 account), emails, voice messages, text messages, instant messages or messaging systems,  
19 recordings, digital recordings, media images and videos, temporary memory, memory sticks,  
20 portable memory devices, laptops or computers, CDs, DVDs, USB devices, databases, computer  
21 activity logs, internet browsing history (including cookies), network access and server activity  
22 logs, word processing files and file fragments, backup and archival files, imaging and facsimile  
23 files, electronic calendar and scheduling program files and file fragments as well as any other  
24 contact and relationship management data (e.g., Outlook), electronic spreadsheet files and file  
25 fragments, pertaining in any way to this controversy of the parties or any potential witnesses. This  
26 includes a request that such information not be modified, altered, or deleted due to data  
27 compression or disk fragmentation (or other optimization procedures), which processes you are  
28 hereby directed to suspend until that data can be preserved, copied, and produced.

1 You are directed not to modify, alter, or delete or allow modifications, alterations, or deletions to  
2 be made to any electronically stored information. You are further directed to preserve all, and not  
3 to destroy any, passwords, decryption productions (including, if necessary, the software to decrypt  
4 the files), network access codes, manuals, tutorials, written instructions, decompression or  
5 reconstruction software, and any other information and things necessary to access, view and (if  
6 necessary) reconstruct the electronic data we will request through discovery.  
7

8 Paper Information:

9 Regarding the paper information, you are directed to preserve any emails, videos, texts, memos,  
10 reports, documents, notes, correspondence, photographs, investigative information, or other  
11 documents about the controversy, parties, or witnesses. We expect to obtain several documents  
12 and other data from you through discovery, including text messages, emails, photographs, and  
13 other information stored on computers, electronic devices, and telephones.  
14

15 Although we may bring a motion with a court for order-preserving documents and other data from  
16 destruction or alteration, your obligation to preserve documents and other data for discovery, in  
17 this case, arises independently from any order on such motion. Electronic documents and the  
18 storage media, including but not limited to telephones on which they reside, contain relevant,  
19 discoverable information beyond what may be found in printed documents. Therefore, even where  
20 a paper copy exists, we will likely seek all documents in their original, electronic form, along with  
21 metadata or information about those documents on the media. We will seek paper printouts of  
22 only those documents that contain unique information created after they were printed (e.g., paper  
23 documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting,  
24 and redactions) and any paper documents for which no corresponding electronic files exist.

25 The laws and rules prohibiting the destruction of evidence apply to electronically stored  
26 information in the same manner they apply to other evidence. Due to its format, electronic  
27 information is quickly deleted, modified, or corrupted. Accordingly, the demand is made that you  
28 take every reasonable step to preserve this information until the final resolution of this matter.

1 This may include, but would not be limited to, an obligation to discontinue all data destruction and  
2 backup tape recycling policies.

3  
4 Concerning electronic data created after this Complaint's delivery date, relevant evidence should  
5 not be destroyed. You must take the steps necessary to avoid the destruction of such evidence.

6  
7 Dated: April 4, 2024

**IVIE McNEILL WYATT PURCELL & DIGGS**

8 By: *Rodney S. Diggs*  
9 **RODNEY S. DIGGS ESQ.**  
10 Attorneys for Plaintiff,  
11 **GRACE O'MARCAIGH**

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