

FILED
10/9/2024 9:11 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2024L011220
Calendar, A
29706949

**IN THE CIRCUIT COURT OF COOK COUNTY,
ILLINOIS COUNTY DEPARTMENT, LAW DIVISION**

LASHEENA WEEKLY as Independent)
Administrator of the Estate of Carlton Weekly)
deceased, DAVON BRINSON,)
CASHAE WILLIAMS)

Plaintiffs,)

ONLY THE FAMILY ENTERTAINMENT INC.)
a/k/a "OTF",)
DURK DERRICK BANKS, a/k/a "Lil Durk")
Individually and as agent of Only The Family)
Entertainment Inc., DAYVON BENNETT a/k/a)
"King Von" as an agent of Only The)
Family Entertainment, Natasha Bennett and)
Hometown Bank as Co-Independent)
Administrators of the ESTATE OF DAYVON)
BENNETT deceased, ALAMO RECORDS,)
SONY MUSIC ENTERTAINMENT INC.,)
EMPIRE DISTRIBUTION INC.,)
UNIVERSAL MUSIC GROUP RECORDINGS)
INC. d/b/a INTERSCOPE RECORDS,)
FOREVER AND A DAY LLC,)
DOLCE & GABBANA USA INC,)
PICORE BERISTAIN INITIATIVE INC.)
d/b/a PICORE INTERNTIONAL INC.)
individually and as agents)
Of DOLCE & GABBANA USA INC,)
TOP TIER SAFETY INC. individually and as)
Agents of PICORE BERISTAIN INITIATIVE INC.)
And/or DOLCE & GABBANA USA INC.)
CHARLES LIGGINS, a/k/a "C Murda")
KENNETH ROBERSON a/k/a "Kenny Mac")
TACARLOS OFFERD a/k/a "Los")
CHRISTOPHER THOMAS a/k/a "C Thang")
MARCUS SMART a/k/a "OTF Muwop")
Individually and/or as agent of Only The Family)
Entertainment, RALPH TURPIN a/k/a "Tall" or)
"Teezy" and)
THE CITY OF CHICAGO, a Municipal)
Corporation)

Defendants.)

Case Number:

2024L011220

JURY TRIAL DEMANDED

For updated information about your case, including hearings, subsequent case information, please visit our Online Case Search and search for your case: <https://casesearch.cookcountyclerkofcourt.org>

FILED DATE: 10/9/2024 9:11 AM 2024L011220



¹PHOTO 1 – Referenced and incorporated in paragraphs 16 and 17 of the PARTIES section of Plaintiffs’ Complaint.

¹ The image is an organizational chart titled "LIL DURK FAMILY OVER EVERYTHING," which visually represents the hierarchy of the Only the Family (OTF) gang. Lil Durk is depicted at the top center as the "Boss," encircled in red. Below him are two "Underbosses," including King Von, and one "Consigliere." Further down are individuals identified as "Capos." The photo includes annotations such as "Armed and Dangerous Do Not Approach" and "CLASSIFIED" stamps, suggesting a structured organization. This image was featured in connection with *Family Over Everything*, a compilation album by OTF and its leader, Lil Durk. The album was released by the label OTF alongside Alamo Records/Sony Music and Interscope Records on December 11, 2019. The chart's portrayal reinforces the organized and hierarchical nature of OTF and its members, with Lil Durk positioned as the leader.

COMPLAINT AT LAW

Plaintiffs LASHEENA WEEKLY as Independent Administrator of the Estate of Calton Weekly deceased, DAVON BRINSON and CASHAE WILLIAMS, by and through their attorneys, ALLEN FIRM LLC and DINIZULU LAW GROUP, complaining of Defendants, ONLY THE FAMILY ENTERTAINMENT INC. (hereinafter OTF), DURK DERRICK BANKS (hereinafter Lil Durk), DAYVON BENNETT (hereinafter King Von) as agent of OTF, Natasha Bennett and Hometown Bank as Co-Independent Administrators of the ESTATE OF DAYVON BENNETT deceased (hereinafter Estate of King Von), ALAMO RECORDS (hereinafter SONY/ALAMO), SONY MUSIC ENTERTAINMENT INC. (hereinafter SONY/ALAMO), UNIVERSAL MUSIC GROUP RECORDING INC., d/b/a INTERSCOPE RECORDS (hereinafter UMG/INTERSCOPE) EMPIRE DISTRIBUTION INC., (hereinafter Empire), FOREVER AND A DAY LLC (hereinafter Forever And A Day), DOLCE & GABBANA USA INC. (hereinafter Dolce & Gabbana) PICORE BERISTAIN INITIATIVE INC. (hereinafter PICORE), TOP TIER SAFETY INC., (hereinafter Top Tier) CHARLES LIGGINS (hereinafter “C-MURDA”), KENNETH ROBERSON hereinafter (KENNY “MAC”), TACARLOS OFFERD (hereinafter “LOS”), CHRISTOPHER THOMAS (hereinafter “C-THANG”), MARCUS SMART (hereinafter “OTF MUWOP”), DURK DERRICK BANKS (hereinafter “LIL DURK”), RALPH TURPIN (hereinafter “Tall” or “Teezy”), CITY OF CHICAGO and states as follows:

PARTIES

1. Plaintiff, DAVON BRINSON, is, and at all times herein mentioned was an individual residing in the County of Cook, State of Illinois and an invitee of DOLCE & GABBANA.

2. Plaintiff, LASHEENA WEEKLY, is, and all times mentioned herein was an individual residing in County of Cook, State of IL. Lasheena Weekly was appointed as Independent Administrator of the Estate of Carlton Weekly on October 7, 2022. Carlton Weekly died on August 4, 2020.

3. Plaintiff, CASHAE WILLIAMS, at all times mentioned herein was, an individual residing in the County of Cook, State of Illinois.

4. Defendant DOLCE & GABBANA is an Italian multinational luxury clothing company, and at all relevant times mentioned herein was, a corporation authorized to do business in the County of Cook, State of Illinois and was doing so at 68 East Oak Street, Chicago, Illinois.

5. Defendant PICORE is at all times mentioned herein, a corporation who provided security services to DOLCE & GABBANA, at 68 East Oak Street, Chicago, IL, and is a corporation authorized to do business in the County of Cook, State of Illinois.

6. Defendant TOP TIER is at all relevant times mentioned herein, a corporation who provided security services to DOLCE & GABBANA at 68 East Oak Street, Chicago, Illinois, and is a corporation authorized to do business in the County of Cook, State of Illinois.

7. Defendant SONY MUSIC is a music, media, and entertainment company, which includes the record label Alamo Records. On information and belief, SONY purchased ALAMO RECORDS in June 2021.

8. ALAMO RECORDS at all relevant times was a music media and entertainment company and was purchased by Sony Music Entertainment, a subsidiary of Sony Corporation of America. At all times mentioned herein Alamo was contracted with OTF to release, market, distribute, promote, produce music for OTF and its artists. Alamo records did substantial business in the State of Illinois through various entertainment/music platforms and availed itself of personal jurisdiction of the Illinois courts.

9. Defendant UNIVERSAL MUSIC GROUP RECORDING INC., d/b/a INTERSCOPE is a music, media, and entertainment company. INTERSCOPE is a division of UMG RECORDINGS INC. On information and belief prior to June 2021, Lil Durk, ALAMO, OTF were contracted with UMG/INTERSCOPE to release, market, distribute, promote, produce various title tracks for Lil Durk, OTF and its artists. UMG/INTERSCOPE does substantial business in the State of Illinois through various entertainment/music platforms and availed itself of personal jurisdiction of the Illinois courts.

10. EMPIRE at all relevant times mentioned herein, was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, marketed music for various artists. Empire was contracted with OTF and/or King Von to promote, distribute, release, market various title tracks at all times mentioned herein and past his death. EMPIRE does substantial business in the State of Illinois through various entertainment/music platforms and availed itself of personal jurisdiction of the Illinois courts

11. CHARLES LIGGINS, a/k/a "C Murda" is a resident of the County of Cook, State of Illinois, and is an agent, affiliate and/or associate of OTF and an affiliate, member of the O-Block street gang a criminal organization whose members and associates engaged in acts of

violence, including but not limited to acts involving murder, battery and assault, and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

12. KENNETH ROBERSON, a/k/a “Kenny Mac” is a resident of the County of Cook, State of Illinois, and is an agent, affiliate and/or associate of OTF and an affiliate, member of the O-Block street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery and assault, and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

13. TACARLOS OFFERD, a/k/a “Los,” is a resident of the County of Cook, State of Illinois, and is an agent, affiliate and/or associate of OTF a music collective and an affiliate, member of the O-Block street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery and assault, and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

14. CHRISTOPHER THOMAS, a/k/a “C Thang,” is a resident of the County of Cook, State of Illinois, and is an agent, affiliate and/or associate of OTF a music collective and an affiliate, member of the O-Block street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder and assault, and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

15. MARCUS SMART, a/k/a "OTF Muwop" is a resident of the County of Cook, State of Illinois, and is an employee, agent, affiliate and/or associate of OTF and an affiliate, member of the O-Block street gang a criminal organization whose members and associates engaged in acts of

violence, including but not limited to acts involving murder, battery and assault, and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

16. DURK BANKS, a/k/a “Lil Durk” is a resident of the County of Cook, State of Illinois, and is the Founder/Owner, Chief Executive Officer, Boss, of OTF and is an affiliate and/or member of the O-Block street gang and criminal organization, also a member, associate of the Black Disciples street gang whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery and assault, robbery and which operated on the South Side of Chicago, in the County of Cook, State of Illinois, and elsewhere. *(See Photo 1 referenced and incorporated herein).*

17. ONLY THE FAMILY ENTERTAINMENT, INC., a/k/a “OTF” an Illinois corporation and music label that serves as a hub for the O-Block criminal enterprise and street gang. OTF is the media outpost of the O-Block criminal organization, street gang. OTF operated to achieve the objectives of the O-block criminal enterprise through the promotion of music and social media influence with a significant emphasis of content that utilizes and promotes use of threats, intimidation, and violence, including, but not limited to, murder and other acts of violence. *(See Photo 1 referenced and incorporated herein).*

18. DAYVON BENNETT was a resident of the State of Illinois, at the time of his death and all times material to this complaint. King Von was signed to OTF and Empire records to produce, create, market, sale music. King Von was the Under Boss of OTF and was a high-ranking member of the O-Block criminal organization and Black Disciples street gang whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery and assault, robbery and which operated on the south side of Chicago, in the County of Cook, State of Illinois, and elsewhere.

19. Estate of Dayvon Bennett (2021 P 00279) was opened on March 23, 2021, as a result of the death of Dayvon Bennett. Dayvon Bennet's place of residence at the time of his death on November 6, 2020, was New Lenox, Illinois. Natasha Bennett and Hometown Bank were appointed as Co-Independent Administrators of the Estate of Dayvon Bennett by the Circuit Court of the Twelfth Judicial Circuit Will County Probate Court. Hometown Bank was appointed as Co-Independent Administrator on June 23, 2022.

20. Forever and a Day LLC is an Illinois limited liability company established on April 8, 2021. The assets held in the LLC are the music catalog and royalties of King Von. The Estate of Dayvon Bennett has a 100% membership interest in Forever and a Day LLC.

21. The O-Block enterprise constituted an on-going criminal organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise and was adjudicated a criminal enterprise in the United States District Court for the Northern District of Illinois, Eastern Division on January 17, 2024.

The purposes of the enterprise included, but were not limited to, the following:

- a) Acquiring, preserving, and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder and other acts of violence.
 - b) Promoting and enhancing the enterprise and its members' and associates' activities, including by publicly claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members.
 - c) Increasing the status of the enterprise through the use of social media platforms and music.
22. At all times mentioned herein, THE CITY OF CHICAGO was a municipal corporation within the State of Illinois.
23. At all times mentioned herein, all duly appointed firefighters, medical personnel, Chicago Police officers, was acting within the scope of their employment with the City of Chicago.

FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTIONS

24. On or about August 4, 2020, Defendant DOLCE & GABBANA owned, operated, maintained, possessed and/or controlled the premises located at or near 68 East Oak Street in Chicago, County of Cook, State of Illinois.

25. On or about August 4, 2020, Defendant DOLCE & GABBANA assumed control of the sidewalk abutting the property, undertook a duty to maintain the sidewalk for its own purposes and to further its business interests. They utilized and roped off the sidewalk for its business interests and directed its customers to stand and wait in a line directly outside its entrance to enter its premises. They also stationed an armed security guard on the sidewalk to direct invitees when to enter the store.

26. On or about August 4, 2020, Defendant PICORE was contracted to provide security services and protection of life and property for DOLCE & GABBANA at or at or near 68 East Oak Street in Chicago, County of Cook, State of Illinois.

27. On or about August 4, 2020, Defendant TOP TIER was contracted to provide security services and protection of life and property for DOLCE & GABBANA at or near 68 East Oak Street in Chicago, County of Cook, State of Illinois.

28. On information and belief on or before August 4, 2020, Defendant, DOLCE & GABBANA, individually and by and through their known and unknown agents and employees, knew or should have known of the increase in violent crimes, consisting of armed robberies, armed smash and grabs, and armed violent acts against citizens in the retail area, lootings, violent destruction of property that devastated the luxury retail area and high-end retail areas in Chicago.

29. On information and belief DOLCE & GABBANA was notified and knew about the increase in armed violent attacks against citizens in the retail area and held staff meetings to

address the increase in armed violence against citizens and the overall increase in violence in the area.

30. On information and belief as a result of this armed violence against citizens in this high-end retail area, the Chicago Police Department stationed police officers walking the streets in the high-end retail area and stationed patrol cars in the area to address the armed violence against citizens. DOLCE & GABBANA was notified and knew of the Chicago Police Department's presence because of the increase in armed violence against citizens in the high-end retail area.

31. On information and belief as a result of the increase in armed violence against citizens in the high-end retail area DOLCE & GABBANA hired and contracted with security companies to provide security services for the purpose of preventing and deterring armed violence against its customers and for the protection of life and property of its customers and/or invitees.

32. On or about August 4, 2020, or prior, Defendant, DOLCE & GABBANA individually and/or through its agents placed an armed security guard on its premises and sidewalk abutting the property directing its invitees to stand in a line and when to enter the store.

33. On information and belief approximately 20-30 minutes prior to DAVON BRINSON AND CARLTON WEEKLY being directed to stand in a roped off line at the DOLCE & GABBANA store, an unknown man was chased by another unknown man who was armed with a gun down Oak Street directly in front of the DOLCE & GABBANA store. The unknown man being chased with the gun was screaming for help and trying to get into stores along Oak Street inclusive of DOLCE & GABBANA.

34. On information and belief DOLCE & GABBANA through its employees, contractors, agents, witnessed this incident, and knew that an unknown man with a gun was chasing

another man down the street threatening to shoot him. This conduct was a danger to its patrons that they continued to direct to wait in line in front of its store.

35. That on or before August 4, 2020, DOLCE & GABBANA implemented a directive, policy, protocol, to direct its business customers, invitees to wait in line on the sidewalk outside the retail establishment. This directive, policy, protocol was carried out by its agents, contractors, and/or employees. On August 4, 2020, this directive, policy, protocol was a danger to its invitees and customers seeking to shop at its retail establishment.

36. On or about August 4, 2020, at all relevant times, DAVON BRINSON was a business invitee and was lawfully on the premises awaiting entry into the retail establishment. He was directed by DOLCE & GABBANA'S employees, contractors, agents, to stand in line on the sidewalk which was roped off at the entrance of the retail establishment.

37. On or about August 4, 2020, Carlton Weekly a/k/a FBG DUCK a musical artist, and rival musician to OTF and O-Block was out shopping for his son's birthday in the high-end retail area on oak street. FBG Duck was a business invitee on August 4, 2020, and was lawfully on the premises awaiting entry into the retail establishment DOLCE & GABBANA. He was directed by DOLCE & GABBANA'S employees, contractors, agents, to stand in line on the sidewalk, which was roped off, and awaiting entry into the retail establishment.

38. In December 2017, FBG Duck, as an independent artist released his single "Slide" that launched his music career to become a nationally recognizable artist. In January 2018 he released a video to "Slide" which garnered over 77 million views on YouTube and became one of Chicago's most recognizable drill rap anthems. The single was certified Gold by RIAA on January 17, 2023, by selling over 500,000 units.

39. At all relevant times, “Lil Durk,” an artist and Founder/Owner, Chief Executive Officer, Boss of OTF Entertainment, was an affiliate and/or member of the O-Block street gang and criminal organization. He was also a member and associate of the Black Disciples street gang, specifically under the subset known as the “Lamron” street gang (based around 64th Street and Normal Boulevard), also referred to as the 300 set of the Black Disciples. The members and associates of these gangs engaged in acts of violence, including, but not limited to, murder, battery, assault, and robbery, operating on the south side of Chicago, in Cook County, Illinois, and elsewhere.

40. On information and belief “Lil Durk” rose to prominence on the drill music scene in Chicago on or about 2013 as a result of the success of his mixtape entitled “Signed to the Streets.”

41. Prior to OTF being incorporated as a music label it was a collective of gangs which consisted of O-Block, 600, Lamron, THF, and other subsets of the Black Disciples street gang whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery, assault, robbery and which operated on the south side of Chicago, in the County of Cook, State of Illinois, and elsewhere. OTF music label acted as the conglomerate to these street gangs and was the hub for their activity.

42. OTF music label signed gang members of O-Block, 600, THF, Black Disciples and other subsets of Black Disciples and knew or should have known that they were engaged in acts of violence, and criminal activity, including but not limited to acts involving murder, battery, assault, robbery. The signing of these gang members as artists furthered the criminal activity of the gangs, allowed OTF to gain international notoriety and influence through social media platforms. It increased the profits they could generate from social media platforms, YouTube, and

other streaming services. OTF attempted to exert control over the Drill rap music genre in Chicago through intimidation, threats, and the selling of reality rap music ie. their criminal conduct.

43. At all times relevant Dontay Banks aka D-Thang was the brother of Lil Durk, who was a member of the Black Disciples street gang and held several executive positions within OTF inclusive of Chief Executive Officer of OTF.

44. In 2018 OTF signed King Von as an artist to its music label knowing that King Von was a high-ranking member of the O-Block criminal organization and/or street gang and the Black Disciple's street gang. Within OTF, King Von was a high ranking official and used the OTF platform to further the criminal enterprise of O-Block.

45. Lil Durk and OTF knew of King Von's murders, batteries, assaults, robberies and criminal conduct prior to signing King Von to OTF. Lil Durk and OTF knew King Von intended to use OTF to commit robberies and/or murders of other musical artists and to further the activities of O-Block and the Black Disciple's street gang. During the time King Von was signed to OTF Lil Durk participated with and was present for robberies, assaults and batteries committed by King Von.

46. Once signed as an artist to OTF; King Von, OTF, Empire, Sony/Alamo, UMG/Interscope, utilized social media and music to torment, taunt, and threaten the life of FBG Duck via posts on X formerly known as twitter and via streaming services through lyrics written by King Von, approved, marketed, promoted by OTF, Empire, Sony/Alamo, and UMG/Interscope.

47. Sony/Alamo, OTF, Empire, UMG/Interscope, released, promoted and marketed King Von's music to build the brand of King Von, O-Block and OTF for profit.

48. King Von had a history of utilizing social media prior to signing to OTF and during the time he was signed to OTF to disclose facts concerning the acts of violence he committed, was committing and would commit in the future. Inclusive of murders he participated or carried out.

49. Once signed as an artist to OTF, King Von continued to glorify the acts of violence he committed, was committing and would commit inclusive of murder, through social media platforms and through his lyrics of his songs, approved, distributed and marketed by Sony/Alamo, OTF, Empire, UMG/Interscope for profit.

50. King Von and other members of O-Block and OTF utilized social media and the public release of music through streaming platforms and YouTube to announce their allegiance, commitment and loyalty to O-Block the criminal enterprise.

51. Sony/Alamo, Empire, UMG/Interscope, and OTF knew of or should have known of this allegiance to O-Block, a criminal enterprise and that their decisions assisted, participated in the branding, development of King Von and O-Block to further the O-Block criminal enterprise.

52. Lil Durk, OTF, King Von began to directly taunt, threaten and intimidate FBG Duck through social media posts and music released in a concerted effort to grow, develop a brand for O-Block and expand the brand of Lil Durk and OTF all in an effort to further the O-Block criminal enterprise.

53. After the death of FBG Duck; Lil Durk, OTF and King Von glorified the killing of FBG Duck using social media and music streaming platforms for profit. The killing of FBG Duck was used to expand the developing brand of Lil Durk, OTF, and O-Block and to further the criminal enterprise of O-Block.

54. As a result, Lil Durk, O-Block, OTF became international brands through social media and music streaming platforms and profited through podcasts, social media and music streaming. In essence they monetized the killing of FBG Duck.

55. Lil Durk and OTF signed OTF MUWOP as an artist to its music label knowing that OTF MUWOP was a member of the O-Block criminal organization and/or street gang and the Black Disciple's street gang and was a close affiliate, companion to King Von.

56. During the criminal trial in Northern District Court of Illinois, case number 1:21-cr-00618, which lasted from October 2023-January 2024, it was discovered that King Von placed a One Hundred-thousand-dollar (\$100,000 USD) bounty to any member of OTF, O-Block and/or Black Disciples street gang that killed FBG Duck.

57. This was discovered through a 2-year investigation by the Chicago Police Department and Federal Bureau of Investigation. Davon Brinson and Cashae Williams had no actual knowledge of this bounty or hit placed on the life of FBG Duck by King Von, Lil Durk, OTF nor did they have any presumptive knowledge of this hit put out by King Von and Lil Durk. Due to the investigatory privilege held by law enforcement it was absolutely no way Davon Brinson or Cashae Williams could have discovered or confirmed this information prior to the testimony in the criminal trial or prior to the expiration of the statutory limitations period.

58. On information and belief Lil Durk and D-Thang as corporate officers of OTF knew King Von placed a \$100,000.00 bounty to kill FBG Duck and actively participated to have FBG Duck killed and/or to cover up the killing of FBG Duck.

59. On information and belief D-Thang knew about, participated in and facilitated the events of August 4, 2020, the execution of FBG Duck.

60. On or about August 4, 2020, while DAVON BRINSON AND CARLTON WEEKLY were lawfully on the premises awaiting entry into the retail establishment DOLCE & GABANA, Defendants C-Murda, Kenny Mac, Los, C Thang, and OTF Muwop, all wearing masks and all members, affiliates, associates, artists of OTF and O-Block carried out the orders of King Von and Lil Durk to kill FBG Duck. They knowingly used, carried, brandished, and discharged multiple firearms approximately thirty-two times at Carlton Weekly, killing him and in the process shooting DAVON BRINSON and CASHAE WILLIAMS several times with multiple rounds of ammunition causing severe life threatening and permanent injuries.

61. On August 4, 2020, during the shooting and killing of FBG Duck, an agent of defendants Top Tier, Picore and Dolce & Gabbana., contracted to protect FBG Duck and Davon Brinson, while waiting in line to enter the retail establishment, fled the scene, abandoned his post and left FBG Duck and Davon Brinson defenseless.

62. On or about January 17, 2024, Defendants, C-Murda, Kenny Mac, Los, C-Thang, and OTF Muwop were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. “Los” and “OTF Muwop” were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. “C-Murda”, “Kenny Mac” were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams. Ralph Turpin was found guilty of murder in aid of racketeering and conspiracy to commit murder in aid of racketeering activity.

63. Since the breakout success of Chief Keef and drill rap in early 2013 in Chicago, record labels have flocked to the south side of Chicago neighborhoods to prey upon young black men who are prone to and engage in a life of violence due to their environments.

64. The signing of Chief Keef by Interscope, a major record label at the time, and the internet becoming the primary source for young teens and adults to consume music, codified the ability to profit from rapping about violence in the black community in Chicago. Interscope provided a blueprint for major labels to capitalize from the violence, death and destruction young black men were engaged, via the newfound principles of global influencing.

65. As drill music became more and more profitable for major labels a desire to maintain and control the third largest music market, Chicago, became ground zero for signing young black drill rappers.

66. As the profits grew, and the popularity of drill rap music grew as a genre of music, social media and streaming created a broader appetite for the desire of reality rap.

67. In 2018 labels began to have a deeper appetite for more profit and a deeper appetite for a more authentic drill rap artist in Chicago. That desire for profit and authenticity led to the systematic signing, marketing and promoting of gang members engaged in the most egregious criminal conduct, inclusive of murder, robbery, assaults.

68. From 2018-2020 UMG/Interscope, Sony/Alamo, OTF, Empire sought to capitalize from the rivalry of OTF, King Von and FBG Duck. They all consistently promoted the music designed to target, intimidate, taunt, threaten and foretell the killing of FBG Duck.

69. These entities did not stop there. After the brutal killing of FBG Duck they continued to promote his killing for profit and glorify his killing for more influence, more popularity and more profit.

70. This was not unique to FBG Duck, King Von, OTF and Chicago drill artists. This was a custom and practice of these entities that utilized this guerrilla marketing strategy tactic and applied this strategy to other cities in the United States and globally.

71. UMG/Interscope, Sony/Alamo, OTF, Empire promoted these gang members, who were engaged in robbery, murder and assault, and other criminal activity as global influencers for profit. They established an audience for these gang members who companies could use to promote products or the gang members themselves could promote their own products, usually in their everyday life with the façade of authenticity. These defendants maximally exploited the connection between killing and music designed to profit from the realism.

72. Influencers excel at creating content that is visually appealing and designed to look genuine instead of scripted. This type of marketing is extremely effective, particularly with teens. The video that depicted the killing of FBG Duck was released, marketed, and promoted by UMG/Interscope, Sony/Alamo, OTF and Empire further fueling and co-signing the death of this young man.

73. UMG/Interscope, Sony/Alamo, OTF, Empire salivated in the profit garnered by the depiction and eventual killing of FBG Duck. So much so that Lil Durk an international artist celebrated through music the demise of FBG Duck, which UMG/Interscope, Sony/Alamo, OTF, Empire marketed, promoted for profit furthering the activities of the O-block criminal enterprise.

COUNT 1: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
LIL DURK

74. Plaintiffs restate, re-allege and incorporate by reference, paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

75. As alleged herein, Defendants Lil Durk, OTF, King Von, C-Murda, Kenny Mac, Los, C-Thang, OTF Muwop, and Ralph Turpin entered into agreements with each other, the O-Block criminal enterprise, the Black Disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

76. In furtherance of the agreements the defendants entered into the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

77. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, Black Disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, encouraged, and/or carried out the tortious acts described in the Counts 11-13, Count 18-46, Count 65,67 of this cause of action set forth herein.

78. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the

status of King Von, Lil Durk, (O-Block) a criminal enterprise, through the use of social media platforms and music.

79. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

80. Lil Durk, King Von, OTF Muwop, OTF, further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

81. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendants. Furthermore, the aforementioned acts or omissions of the defendants were a proximate cause or contributing cause to the injuries and death suffered by Carlton Weekly a/k/a FBG Duck on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant Lil Durk, jointly and severally for all damages in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 2: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
ONLY THE FAMILY ENTERTAINMENT “OTF”

82. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

83. As alleged herein, Defendants Lil Durk, OTF, King Von, C-Murda, Kenny Mac, Los, C-Thang, OTF Muwop, Ralph Turpin entered into agreements with each other, the O-Block criminal enterprise, the black disciple’s street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

84. In furtherance of the agreements the defendants entered, the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

85. By participating in the agreement to commit these tortious acts with groups such as O-Block a criminal enterprise, black disciple’s street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged and/or carried out the tortious acts described in the in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

86. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von’s economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block’s respective and joint business interests, including but not limited to ensuring the public’s continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the

status of King Von, Lil Durk, O-Block, a criminal enterprise through the use of social media platforms and music.

87. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

88. Lil Durk, King Von, OTF Muwop, OTF, further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

89. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendants were a proximate cause or contributing cause to the injuries suffered by Carlton Weekly a/k/a FBG Duck and his ultimate death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant "OTF", jointly and severally for all damages in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 3: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
ESTATE OF KING VON, FOREVER AND A DAY LLC, KING VON AS AGENT
OF OTF

90. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

91. As alleged herein, Defendant decedent King Von entered into agreements with Lil Durk, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin, the O-Block criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

92. In furtherance of the agreements the defendants entered the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

93. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged, and/or carried out the tortious acts described in the in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

94. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the

status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

95. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

96. Lil Durk, King Von, OTF Muwop, OTF, further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

97. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendants. Furthermore, the aforementioned acts or omissions of the defendant was a proximate cause or contributing cause to the injuries suffered of Carlton Weekly a/k/a FBG Duck and his eventual death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant Estate of King Von, FOREVER AND A DAY LLC, King Von as agent of OTF, jointly and severally for all damages in an amount that will fully compensate them for all legally

recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 4: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
C-MURDA

98. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

99. As alleged herein, Defendants Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop and Ralph Turpin entered into agreements with each other, the O-Block criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

100. In furtherance of the agreements the defendants entered, the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

101. By participating in the agreement to commit these tortious acts with groups such as O-Block a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

102. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not

limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

103. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

104. Lil Durk, King Von, OTF Muwop, OTF, further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

105. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendant were a proximate cause or contributing cause to the injuries suffered by Carlton Weekly a/k/a FBG Duck and his ultimate death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant C-Murda jointly and severally for all damages in an amount that will fully compensate

them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 5: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
KENNY MAC

106. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

107. As alleged herein, Defendants Lil Durk, OTF, King Von, C-Murda, Kenny Mac, Los, C-Thang, OTF Muwop, Ralph Turpin entered into agreements with each other, the (O-Block) criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

108. In furtherance of the agreements the defendants entered, the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

109. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

110. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not

limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

111. Lil Durk, King Von, OTF Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

112. Lil Durk, King Von, OTF Muwop, OTF, further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

113. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendants were a proximate cause or contributing cause to the injuries suffered of Carlton Weekly a/k/a FBG Duck and ultimately his death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant Kenny Mac jointly and severally for all damages in an amount that will fully

compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 6: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST LOS

114. Plaintiffs restate, re-allege and incorporate paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

115. As alleged herein, Defendants Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin entered into agreements with each other, the O-Block criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

116. In furtherance of the agreements the defendants entered, the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

117. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

118. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not limited to ensuring the public's continued appetite and interest in their music, brand, image and

criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

119. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

120. Lil Durk, King Von, OTF Muwop, OTF, Los, C-Thang, Kenny Mac, C-Murda, and Ralph Turpin further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

121. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendants were a proximate cause or contributing cause to the injuries suffered by Carlton Weekly a/k/a FBG Duck and ultimately his death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant LOS jointly and severally for all damages in an amount that will fully compensate them

for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 7: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
C-THANG

122. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

123. As alleged herein, Defendant C-Thang entered into agreements with Lil Durk, OTF, Los, King Von, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin, the O-Block criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

124. In furtherance of the agreements the defendants entered, the Defendants committed the tortious acts described in in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

125. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged, and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

126. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not

limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

127. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

128. Lil Durk, King Von, OTF Muwop, OTF, Los, C-Thang, Kenny Mac, C-Murda, and Ralph Turpin further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

129. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendant was a proximate cause or contributing cause to the injuries suffered of Carlton Weekly a/k/a FBG Duck and his eventual death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant C-Thang, jointly and severally for all damages in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 8: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
OTF MUWOP, OTF MUWOP AS AGENT OF OTF

130. Plaintiffs restate, re-allege and incorporate paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

131. As alleged herein, Defendant OTF MUWOP entered into agreements with Lil Durk, OTF, Los, C-Thang, Kenny Mac, C-Murda, King Von, and Ralph Turpin, the (O-Block) criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

132. In furtherance of the agreements the defendants entered into, the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 (causes of action set forth herein.

133. By participating in the agreement to commit these tortious acts with groups such as O-Block a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed, encouraged and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

134. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil

Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

135. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

136. Lil Durk, King Von, OTF Muwop, OTF, Los, C-Thang, Kenny Mac, C-Murda, and Ralph Turpin further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

137. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendants. Furthermore, the aforementioned acts or

omissions of the defendant was a proximate cause or contributing cause to the injuries suffered of Carlton Weekly a/k/a FBG Duck and his eventual death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant OTF MUWOP jointly and severally for all damages in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 9: CIVIL CONSPIRACY
ALL PLAINTIFFS AGAINST
RALPH TURPIN

138. Plaintiffs restate, re-allege and incorporate paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

139. As alleged herein, Defendant Ralph Turpin entered into agreements with Lil Durk, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin, the O-Block criminal enterprise, the black disciple's street gang to commit a battery, assault and wrongful death of FBG Duck, to promote their commercial interests in maximizing profits from the control of and sale of music in the third largest music market.

140. In furtherance of the agreements the defendants entered into the Defendants committed the tortious acts described in Counts 11-13, Count 18-46, Count 65, causes of action set forth herein.

141. By participating in the agreement to commit these tortious acts with groups such as (O-Block) a criminal enterprise, black disciple's street gang; Lil Durk, OTF, King Von, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin planned, assisted, committed encouraged and/or carried out the tortious acts described in Counts 11-13, Count 18-46, Count 65, 67 causes of action set forth herein.

142. The collective activities of Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop, and Ralph Turpin were designed knowingly and purposefully for Lil Durk, OTF, King Von's economic and pecuniary benefit and were performed in furtherance of OTF, Lil Durk, King Von, O-Block's respective and joint business interests, including but not limited to ensuring the public's continued appetite and interest in their music, brand, image and criminal activity and to control the drill rap music genre in Chicago. Their actions increased the status of King Von, Lil Durk, (O-Block), a criminal enterprise through the use of social media platforms and music.

143. Lil Durk, King Von, OTF, Los, C-Thang, Kenny Mac, C-Murda, OTF Muwop and Ralph Turpin engaged in a civil conspiracy to conceal the plan and the murder of FBG Duck from the plaintiffs, consumers, public at large, law enforcement.

144. Lil Durk, King Von, OTF Muwop, OTF, Los, C-Thang, Kenny Mac, C-Murda, and Ralph Turpin further conspired to mislead the government and consumers by engaging in deceitful tactics to prevent the plaintiff, law enforcement or government from discovering the plan and bounty on FBG Ducks life to kill him.

145. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one

or more of the acts or omissions of the Defendant. Furthermore, the aforementioned acts or omissions of the defendant was a proximate cause or contributing cause to the injuries suffered of Carlton Weekly a/k/a FBG Duck and his eventual death on August 4, 2020.

WHEREFORE, Plaintiffs respectfully demands judgment in its favor and against the Defendant RALPH TURPIN jointly and severally for all damages in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 10: SURVIVAL ACTION – CIVIL CONSPIRACY

Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly against DEFENDANTS LIL DURK, OTF, ESTATE OF KING VON, FOREVER AND A DAY LLC, KING VON AS AGENT OF OTF, C-MURDA, LOS, C-THANG, KENNY MAC, OTF MUWOP, OTF MUWOP AS AGENT OF OTF, RALPH TURPIN

146. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, adopt and set forth paragraphs 1-145 of this Complaint at Law as though set forth fully at length herein.

147. Some or all of Lil Durk, OTF, King Von, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, OTF Muwop as agent of OTF, Ralph Turpin wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

148. Plaintiff Lasheena Weekly as independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, Ralp Turpin, Estate of King Von, Forever and a Day LLC, King Von as agent of OTF, in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 11: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST LIL DURK, LIL DURK AS AGENT OF OTF

149. Plaintiff Lasheena Weekly as the Independent Administrator of the Estate of Calton Weekly reallege and incorporate by reference paragraphs 1 through 73, paragraphs 74-81 of this Complaint at Law as though set forth fully at length herein.

150. At all times relevant, Lil Durk was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage, participate, approve any tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

151. At all times relevant Lil Durk owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

152. Lil Durk, owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

153. Lil Durk owed a duty commensurate with the extreme risks posed by his decision to engage in the highly risky activity of signing known gang members, marketing, promoting, advertising, distributing and selling music by these known gang members designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure people.

154. Lil Durk owed a duty commensurate with the extreme risks posed by his decision to continue to associate, affiliate, and condone the violent conduct of King Von knowing that King Von was targeting, threatening, placed a bounty on the life of FBG Duck, and engaged in taunts and acts of intimidation toward FBG Duck.

155. Lil Durk breached these duties by engaging in, planning, approving the bounty on FBG Duck's life and condoning the acts of violence King Von engaged when he knew or should have known of the violent conduct, and violent histories of King Von and other known gang members he affiliated, specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that he collaborated, monitored and approved and released.

156. Lil Durk breached these duties by his wrongful conduct alleged herein in the preceding and succeeding paragraphs, and by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by condoning, approving, funding the hit and/or bounty placed on the life of FBG Duck by King Von. Lil Durk with other aforementioned defendants conspired to kill FBG Duck and to cover up that killing.

157. Lil Durk knew long before 2020 that King Von had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of violence and reality rap based on committing real acts of violence on FBG Duck and the public at large. Lil Durk welcomed King Von's infamy into their labels' brand because Lil Durk understood that

reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

158. Lil Durk also knew that many of the potential consumers who would receive the marketing and branding messages were young people who were prone to sensationalized violence and was obsessed with artists having “bodies” and rapping about real-life crimes and violence.

159. Lil Durk undertook some or all of the wrongful conduct previously alleged despite knowing that King Von, OTF Muwop and other signed gang members were a menace and had engaged in acts of violence over a period of years. Lil Durk also knew that King Von and himself had for years been sending threatening messages, lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that Lil Durk, King Von, (O-Block), black disciples despised.

160. Lil Durk undertook some or all of the wrongful conduct alleged herein with the knowledge and expectation that the killing of FBG Duck or any killing or criminal activity would increase his streams, drive up his records sales, and enhance his brand for profits.

161. Some or all of Lil Durk’s wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

162. Some or all of Lil Durk wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by

King Von, and himself. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting Lil Durk to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

163. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheen Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant Lil Durk, in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 12: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as independent Administrator for the Estate of Carlton Weekly
AGAINST ONLY THE FAMILY ENTERTAINMENT “OTF”

164. Plaintiff Lasheena Weekly as the independent Administrator of the Estate of Calton Weekly reallege and incorporate by reference paragraphs 1 through 73, paragraphs 82 through 89 of this Complaint at Law as though set forth fully at length herein.

165. At all times relevant, OTF by and through its agents and/or employees were required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois through its agents and/or employees.

166. At all times relevant OTF by and through its agents and/or employees, owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

167. OTF owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

168. OTF owed a duty commensurate with the extreme risks posed by its decision to engage in the highly risky activity of signing known gang members with a history of violent criminal conduct inclusive of murder, robbery, assaults and batteries, marketing, promoting, advertising, distributing and selling music by these known gang members designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure people and assist in the financing and funding to carry out criminal activity.

169. OTF owed a duty to exercise reasonable care when marketing, distributing, promoting, advertising and selling music targeting FBG Duck.

170. OTF breached these duties by signing known gang members, employing known gang members, engaging in marketing, distribution, and sales practices to further a criminal enterprise and conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they monitored, approved and released and continued to commit violent acts against others.

171. OTF breached these duties by implicitly or tacitly approving, engaging in, participating in, financing, the hit and/or bounty placed on the life of FBG Duck by King Von, Lil

Durk, which led to the battery, assault and wrongful death in violation of Illinois civil statues on August 4, 2020, of FBG Duck. OTF through its executives, agents and/or employees conspired to kill FBG Duck and to cover up that killing.

172. OTF carried out marketing, distribution and sales practices, despite the admissions by these gang members to their violent conduct and gang affiliations and should have refrained from signing these individuals, marketing the music created by these individuals, building the brands of known gang members as artists which made them particularly appealing to young people and criminals and not publishing advertisements in places where young people are likely to view them, maximizing profits for these known gang members to facilitate and carry out an ordered hit on FBG Duck.

173. OTF knew long before 2020 that King Von and (O-Block) had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of violence and reality rap based on committing real acts of violence on FBG Duck and the public at large. OTF welcomed King Von's infamy into their labels' brand because OTF understood that reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

174. OTF also knew that many of the potential consumers who would receive its marketing and branding messages were young people who were prone to sensationalized violence and was obsessed with artists having "bodies" and rapping about real-life crimes and violence. OTF crafted its advertisements and marketing strategies to appeal to young folks with precisely these appetites.

175. OTF undertook some or all of the wrongful conduct previously alleged despite knowing that King Von, OTF Muwop and other gang members signed to their labels were a

menace and had engaged in acts of violence over a period of years. OTF also knew that King Von and Lil Durk had for years been sending threatening messages and lyrics to FBG Duck, simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, (O-Block), and the black disciple street gang despised.

176. OTF undertook some or all of the wrongful conduct alleged herein with the knowledge and expectation that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brand for profits.

177. Some or all of OTF wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

178. Some or all of OTF's wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting OTF, to liability pursuant to 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

179. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant OTF in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 13: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST ESTATE OF KING VON, FOREVER AND A DAY LLC, KING VON
AS AGENT OF OTF

180. Plaintiff Lasheena Weekly as the administrator of the Estate of Calton Weekly re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 90 through 97 as though set forth fully at length herein.

181. At all times relevant Estate of King Von, Forever and a Day, and King Von as agent of OTF, by and through the actions of decedent King Von was required to comply with all statutory and common laws in the state of Illinois, and had a duty to not engage, participate, approve any tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

182. At all times relevant Estate of King Von, Forever and a Day, King Von as agent of OTF by and through decedent King Von owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, not to approve a tortious act upon his person, not to conspire to kill or place a bounty on the life of FBG Duck and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

183. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through decedent King Von owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

184. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through decedent King Von owed a duty commensurate with the extreme risks posed by his decision to engage in the highly risky activity of placing a bounty on the life of FBG Duck and requesting that known gang members kill FBG Duck for monetary payment. Furthermore, King Von owed a duty not to continuously market, promote, advertise, distribute, stream, create and sale music designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure people.

185. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through the decedent King Von owed a duty to exercise reasonable care when creating, marketing, distributing, promoting, advertising and selling music targeting FBG Duck while knowing that he was subject to a bounty he put on the life of FBG Duck.

186. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through the decedent King Von, breached these duties by engaging in conduct approving, authorizing, placing a bounty on the life of FBG Duck to kill him and advertising this bounty to known gang members.

187. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through decedent King Von breached these duties by implicitly or tacitly authorizing, participating in the bounty he placed on the life of FBG Duck, and in the battery, assault and wrongful death in violation of Illinois civil statues that was carried out on FBG Duck on August 4, 2020. King Von along with other defendants in this action conspired to kill FBG Duck and to cover up that killing. King Von further breached these duties by for a pro longed period of time, he taunted, threatened,

intimated and continuously engaged in conduct to threaten and intimidate FBG Duck while knowing that he placed a bounty on the life of FBG Duck. This conduct emboldened and incentivized OTF Muwop, C-Thang, Los, D-Thang, Kenny Mac, Ralph Turpin to carry out his orders and the hit he placed on the life of FBG Duck.

188. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through the decedent King Von knew long before August 4, 2020, that he wanted FBG Duck dead. King Von by his membership and alliance with (O-Block) had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of violence and reality rap, based on committing real acts of violence on FBG Duck and the public at large. King Von made it clear he was not a rapper and used rap to rob, steal and injure other artists and used rap to gain access to other artists and celebrities. King Von understood that reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image which led to profits for his criminal organization (O-Block).

189. Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through the decedent King Von knew that many of the potential consumers who would receive its marketing and branding messages were young people who were prone to sensationalized violence and was obsessed with artists having “bodies” and rapping about real-life crimes and violence. King Von announced to the world that he was a killer and glorified his killings in his social media and music and made it clear he would kill without hesitation and what he did was real. This reality was appealing to young folks with precisely these appetites and induced large streaming revenue and views which gained profit for (O-Block) the criminal enterprise.

190. Estate of King Von by and through King Von for years had been sending threatening messages, lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, O-Block, black disciples despised.

191. Estate of King Von by and through decedent King Von undertook some or all of the wrongful conduct alleged herein with the knowledge and expectation that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brand for profits and would allow OTF to control the trap music market in the third largest consumer market.

192. Some or all of Estate of King Von, Forever and a Day, King von as agent of OTF, by and through the decedent King Von's wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

193. Some or all of The Estate of King Von, Forever and a Day, King Von as agent of OTF, by and through decedent King Von's wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting Estate of King, Forever and

a Day, King Von as agent of OTF, to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

194. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendants Estate of King Von, Forever and a Day LLC and King Von as agent of OTF, in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 14: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as independent Administrator for the Estate of Carlton Weekly
AGAINST “EMPIRE”

195. Plaintiff Lasheena Weekly as the administrator of the Estate of Calton Weekly reallege and incorporate by reference paragraphs 1 through 73 as though set forth fully at length herein.

196. EMPIRE by and through their agents and/or employees owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

197. EMPIRE owed a duty commensurate with the extreme risks posed by its decision to engage in the highly risky activity of signing known gang members, marketing, promoting,

advertising, distributing and selling music by these known gang members designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure people.

198. EMPIRE owed a duty to exercise reasonable care when marketing, distributing, promoting, advertising and selling music targeting, intimidating, threatening FBG Duck.

199. EMPIRE owed a duty to exercise reasonable care not to extend its brand, market, distribute music to known gang members to fund, finance and support known criminal activity and to further a criminal enterprise.

200. EMPIRE breached these duties by engaging in marketing, distribution, and sales practices to further a criminal enterprise and criminal conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they marketed, monitored, approved, distributed.

201. EMPIRE carried out these marketing, distribution and sales practices, despite the admissions by these gang members to their violent conduct and gang affiliations and should have refrained from marketing the music, building the brands of known gang members as artists which made them particularly appealing to young people and criminals and not publishing advertisements in places where young people are likely to view them maximizing profits for these known gang members to facilitate and carry out an ordered hit on FBG Duck.

202. EMPIRE knew long before August 4, 2020, that King Von had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of reality rap based on committing real acts of violence on FBG Duck and the public at large. EMPIRE welcomed King Von's infamy into their label's brand because Empire understood that

reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

203. EMPIRE also knew that many of the potential consumers who would receive its marketing and branding messages of the music created by King Von were young people who were prone to sensationalized violence and was obsessed with artists having “bodies” and rapping about real-life crimes and violence. EMPIRE crafted its advertisements and marketing strategies to appeal to young folks with precisely these appetites.

204. EMPIRE undertook some or all of the wrongful conduct previously alleged despite knowing that King Von was affiliated with other gang members and was a menace and had engaged in acts of violence over a period of years. EMPIRE also knew that King Von had for years been sending threatening messages and lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, (O-Block), black disciples despised.

205. EMPIRE undertook some or all of the wrongful conduct alleged herein with the knowledge that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brands profits.

206. Some or all of EMPIRE’S wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck, committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

207. Some or all of EMPIRE’S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF

Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting EMPIRE to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

208. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant Empire in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 15: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “ALAMO”

209. Plaintiff Lasheena Weekly as the administrator of the Estate of Carlton Weekly reallege and incorporate by reference paragraphs 1 through 73 as though set forth fully at length herein.

210. At all times relevant ALAMO, by and through their agents and/or employees, owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

211. ALAMO owed a duty commensurate with the extreme risks posed by its decision to engage in the highly risky activity of signing known gang members, allowing its branded artist Lil Durk to collaborate with known gang members, and then market, promote, advertise, distribute and sale the music by these known gang members that was designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure or kill him or other people.

212. ALAMO owed a duty to exercise reasonable care when signing known gang members and labels that housed known gang members, marketing, distributing, promoting, advertising and selling music created by known gang members including but not limited to King Von that targeted, threatened the life of FBG Duck.

213. ALAMO breached these duties by engaging in signing known gang members or labels that was used as a hub for known gang members, and engaged in marketing, distribution, and sales practices to further a criminal enterprise and conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they monitored, approved, released and distributed.

214. ALAMO carried out these marketing, distribution and sales practices, despite the admissions by these gang members to their violent conduct and gang affiliations and should have refrained from marketing the music, building the brands of known gang members as artists which made them particularly appealing to young people and criminals and not publishing advertisements in places where young people are likely to view them maximizing profits for these known gang members to facilitate and carry out an ordered hit on FBG Duck.

215. ALAMO knew long before 2020 that King Von had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of violence and reality rap, based on committing real acts of violence on FBG Duck and the public at large. ALAMO welcomed King Von's infamy into their labels' brand by allowing him to collaborate on a myriad of tracks with Lil Durk despite his violent history and his admissions on social media and his music of his violent past and present conduct at that time. Alamo understood that reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

216. ALAMO also knew that many of the potential consumers who would receive its marketing and branding messages of Lil Durk and King Von were young people who were prone to sensationalized violence and was obsessed with artists having "bodies" and rapping about real-life crimes and violence. SONY/ALAMO crafted its advertisements and marketing strategies to appeal to young folks with precisely these appetites.

217. ALAMO undertook some or all of the wrongful conduct previously alleged despite knowing that King Von and other signed gang members on their labels were a menace and had engaged in acts of violence over a period of years. ALAMO also knew that King Von and Lil Durk had for years been sending threatening messages and lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, (O-Block), black disciples despised.

218. ALAMO undertook some or all of the wrongful conduct previously alleged despite knowing that Lil Durk was aligned with King Von, a member or affiliate of (O-Block) and the Black disciple's street gang and allowed Lil Durk access to its brand to fund and finance King Von and their criminal enterprise (O-Block).

219. ALAMO undertook some or all of the wrongful conduct alleged herein with the knowledge that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brand for profits.

220. Some or all of ALAMO'S wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck, that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

221. Some or all of ALAMO'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting Lil Durk, OTF, SONY, ALAMO, EMPIRE to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

222. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-

kin of Carlton Weekly, and against Defendant, Alamo in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 16: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “SONY”

223. Plaintiff Lasheena Weekly as the administrator of the Estate of Carlton Weekly reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

224. At all times relevant SONY, by and through their agents and/or employees, owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

225. SONY owed a duty commensurate with the extreme risks posed by its decision to engage in the highly risky activity of signing known gang members, allowing its branded artist Lil Durk to collaborate with known gang members, and then market, promote, advertise, distribute and sale the music by these known gang members that was designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure or kill him or other people.

226. SONY owed a duty to exercise reasonable care when signing known gang members and labels that housed known gang members, marketing, distributing, promoting, advertising and selling music created by known gang members including but not limited to King Von that targeted, threatened the life of FBG Duck.

227. SONY breached these duties by engaging in signing known gang members or labels that was used as a hub for known gang members, and engaged in marketing, distribution, and

sales practices to further a criminal enterprise and conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they monitored, approved, released and distributed.

228. SONY carried out these marketing, distribution and sales practices, despite the admissions by these gang members to their violent conduct and gang affiliations and should have refrained from marketing the music, building the brands of known gang members as artists which made them particularly appealing to young people and criminals and not publishing advertisements in places where young people are likely to view them maximizing profits for these known gang members to facilitate and carry out an ordered hit on FBG Duck.

229. SONY knew long before 2020 that King Von had a vendetta against FBG Duck, sought to rob and kill in the music industry, and consistently sought to build a brand of violence and reality rap, based on committing real acts of violence on FBG Duck and the public at large. SONY welcomed King Von's infamy into their labels' brand by allowing him to collaborate on a myriad of tracks with Lil Durk despite his violent history and his admissions on social media and his music of his violent past and present conduct at that time. Alamo understood that reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

230. SONY also knew that many of the potential consumers who would receive its marketing and branding messages of Lil Durk and King Von were young people who were prone to sensationalized violence and was obsessed with artists having "bodies" and rapping about real-

life crimes and violence. SONY crafted its advertisements and marketing strategies to appeal to young folks with precisely these appetites.

231. SONY undertook some or all of the wrongful conduct previously alleged despite knowing that King Von and other signed gang members on their labels were a menace and had engaged in acts of violence over a period of years. SONY also knew that King Von and Lil Durk had for years been sending threatening messages and lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, (O-Block), black disciples despised.

232. SONY undertook some or all of the wrongful conduct previously alleged despite knowing that Lil Durk was aligned with King Von, a member or affiliate of (O-Block) and the Black disciple's street gang and allowed Lil Durk access to its brand to fund and finance King Von and their criminal enterprise (O-Block).

233. SONY undertook some or all of the wrongful conduct alleged herein with the knowledge that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brand for profits.

234. Some or all of SONY'S wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck, that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

235. Some or all of SONY'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF

Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting Lil Durk, OTF, SONY, ALAMO, EMPIRE to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

236. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant, Sony in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 17: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST UMG/INTERSCOPE

237. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly restate, re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

238. At all times relevant UMG/INTERSCOPE, by and through their agents and/or employees, owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

239. UMG/INTERSCOPE owed a duty commensurate with the extreme risks posed by its decision to engage in the highly risky activity of signing known gang members, allowing its branded artist Lil Durk to collaborate with known gang members, and then market, promote, advertise, distribute and sale the music by these known gang members that was designed to taunt, torment, intimidate and threaten to kill FBG Duck and seriously injure or kill him or other people.

240. UMG/INTERSCOPE owed a duty to exercise reasonable care when marketing, distributing, promoting, advertising and selling music created by Lil Durk, King Von that targeted FBG Duck.

241. UMG/INTERSCOPE owed a duty to exercise reasonable care when signing known gang members and labels that housed known gang members, marketing, distributing, promoting, advertising and selling music created by known gang members including but not limited to King Von and Lil Durk that targeted, threatened the life of FBG Duck.

242. UMG/INTERSCOPE breached these duties by engaging in signing known gang members or labels that was used as a hub for known gang members, and engaged in marketing, distribution, and sales practices to further a criminal enterprise and conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they monitored, approved, released and distributed.

243. UMG/INTERSCOPE breached these duties by engaging in marketing, distribution, and sales practices to further a criminal enterprise and conduct of known gang members when they knew or should have known of the violent conduct, and violent histories of these known gang members specifically when the known gang members consistently disclosed their violent behavior and pasts on social media platforms and in their music that they monitored, approved and released.

244. UMG/INTERSCOPE carried out these marketing, distribution and sales practices, despite the admissions by these gang members to their violent conduct and gang affiliations and should have refrained from marketing the music, building the brands of known gang members as artists which made them particularly appealing to young people and criminals and not publishing advertisements in places where young people are likely to view them maximizing profits for these known gang members to facilitate and carry out an ordered hit on FBG Duck.

245. UMG/INTERSCOPE knew long before 2020 that Lil Durk and King Von had a vendetta against FBG Duck. They also knew King Von sought to rob and kill in the music industry, and consistently sought to build a brand of violence from reality rap based on committing real acts of violence on FBG Duck and the public at large. UMG/INTERSCOPE welcomed King Von's infamy into their labels' brand by allowing him to collaborate on a myriad of tracks with Lil Durk despite his violent history and his admissions on social media and his music disclosing his violent past and present conduct at that time. UMG/INTERSCOPE also understood that reality rap, violence, controversy, beefs and notoriety were good for driving increased record sales, streams and views, for building a brand and profiting from a violent image.

246. UMG/INTERSCOPE also knew that many of the potential consumers who would receive its marketing and branding messages of Lil Durk and King Von were young people who were prone to sensationalized violence and was obsessed with artists having "bodies" and rapping

about real-life crimes and violence. UMG/INTERSCOPE crafted its advertisements and marketing strategies to appeal to young folks with precisely these appetites.

247. UMG/INTERSCOPE undertook some or all of the wrongful conduct previously alleged despite knowing that Lil Durk, King Von and other gang members on their labels were a menace and had engaged in acts of violence over a period of years. UMG/INTERSCOPE also knew that King Von and Lil Durk had for years been sending threatening messages and lyrics to FBG Duck simply because he was a musical artist who grew up in a rival gang territory that OTF, Lil Durk, King Von, (O-Block), black disciples despised.

248. UMG/INTERSCOPE undertook some or all of the wrongful conduct alleged herein with the knowledge that the killing of FBG Duck or any killing or criminal activity would increase streams, drive records sales, and enhance a brand for profits and could control the drill rap/trap music genre in the third largest market.

249. Some or all of UMG/INTERSCOPE'S wrongful conduct as alleged herein, whether taken singularly or in any combination, increased the likelihood that the murder and/or wrongful death of FBG Duck, that was committed on August 4, 2020, would occur, amplified the lethality of the shooting and increased the risk that FBG Duck, would be shot, be injured, suffer mental anguish or be killed.

250. Some or all of UMG/INTERSCOPE'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and facilitated the financing of the bounty placed on the life of FBG Duck and encouraged and/or incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) –

DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting UMG/INTERSCOPE to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

251. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheen Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant UMG/INTERSCOPE in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 18: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “C-MURDA”

252. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly restate, re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 98 through 105 of this Complaint at Law as though set forth fully at length herein.

253. At all times relevant C-Murda was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

254. At all times relevant C-Murda owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and

to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

255. C-Murda owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

256. C-Murda breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by shooting FBG Duck and by carrying out the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. C-Murda along with other defendants in this case conspired to kill FBG Duck and to cover up that killing.

257. Some or all of C-Murda's wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the shooting and killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024 of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting C-Murda to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

258. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant C-Murda, in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 19: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “KENNY MAC”

259. Plaintiff Lasheena Weekly as the Independent Administrator of the Estate of Carlton Weekly restate, reallege and incorporate by reference paragraphs 1 through 73, paragraphs 106 through 113 of this Complaint at Law as though set forth fully at length herein.

260. At all times relevant KENNY MAC was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

261. At all times relevant KENNY MAC owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

262. KENNY MAC owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

263. KENNY MAC breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by carrying out the shooting and the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. KENNY MAC along

with other defendants in this case conspired to shoot and kill FBG Duck and to cover up that killing.

264. Some or all of KENNY MAC'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024 of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting C-Murda to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

265. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant KENNY MAC in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 20: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “LOS”

266. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly restate, reallege and incorporate by reference paragraphs 1 through 73, paragraphs 114 through 121 as though set forth fully at length herein.

267. At all times relevant LOS was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

268. At all times relevant LOS owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

269. LOS owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

270. LOS breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by carrying out the shooting and the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. LOS along with other defendants in this case conspired to shoot and kill FBG Duck and to cover up that killing.

271. Some or all of LOS’S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024 of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. As a result, the next-of-kin of the decedent Carlton Weekly:

C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting LOS to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

272. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant LOS in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 21: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST “C-THANG”

273. Plaintiff Lasheena Weekly as the Independent Administrator of the Estate of Carlton Weekly restate, re-allege and incorporate by reference, paragraphs 1 through 73, paragraphs 122-129 of this Complaint at Law as though set forth fully at length herein.

274. At all times relevant C-THANG was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

275. At all times relevant C-THANG owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily

integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

276. C-THANG owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

277. C-THANG breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by carrying out the shooting and the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. C-THANG along with other defendants in this case conspired to shoot and kill FBG Duck and to cover up that killing.

278. Some or all of C-THANG'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024 of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W. (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting C-THANG to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

279. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-

kin of Carlton Weekly, and against Defendant C-THANG in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 22: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST "OTF MUWOP" as agent of OTF

280. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly restate, re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 130 through 137 of this Complaint at Law as though set forth fully at length herein.

281. At all times relevant OTF MUWOP was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

282. At all times relevant OTF MUWOP owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

283. OTF MUWOP owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

284. OTF MUWOP breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by carrying out a shooting and the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. OTF MUWOP along with other defendants in this case conspired to shoot, to kill FBG Duck and to cover up that killing.

285. Some or all of OTF MUWOP'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024 of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W. (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting OTF MUWOP to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

286. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendants OTF MUWOP, OTF MUWOP as agent of OTF in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 23: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST "RALPH TURPIN"

287. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly restate, re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 138 through 145 of this Complaint at Law as though set forth fully at length herein.

288. At all times relevant RALPH TURPIN was required to comply with all statutory and common laws in the state of Illinois and had a duty to not engage in tortious conduct toward any citizen of the state of Illinois or engage in any tortious conduct on the streets of Chicago, Illinois.

289. At all times relevant RALPH TURPIN owed a duty of care to Carlton Weekly, not to commit a tortious act upon his person, and not to infringe on his personal liberty, and bodily integrity and to not commit a battery, assault on his person in violation of Illinois criminal statutes and civil statutes.

290. RALPH TURPIN owed at least the general duty imposed on all persons and companies not to expose others to reasonably foreseeable risks of injury.

291. RALPH TURPIN breached these duties by committing a battery, assault and wrongful death in violation of Illinois civil statutes on August 4, 2020, by carrying out the hit and/or bounty placed on the life of FBG Duck by King Von, Lil Durk. RALPH TURPIN along with other defendants in this case conspired to kill FBG Duck and to cover up that killing.

292. Some or all of RALPH TURPIN'S wrongful conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, and was so convicted on January 17, 2024, murder in aid of racketeering activity and conspiracy to commit murder in aid of racketeering against FBG Duck. As a result,

the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting RALPH TURPIN to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

293. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant RALPH TURPIN in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 24 SURVIVAL-NEGLIGENCE WRONGFUL DEATH
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS LIL DURK, OTF, UMG/INTERSCOPE, SONY, ALAMO,
EMPIRE, ESTATE OF KING VON, FOREVER AND A DAY LLC, KING VON AS
AGENT OF OTF, C-MURDA, LOS, C-THANG, KENNY MAC, OTF MUWOP, RALPH
TURPIN

294. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, re-allege, paragraphs 149-293 of this Complaint at Law as though set forth fully at length herein.

295. Some or all of Lil Durk, OTF, UMG/Interscope, Sony, Alamo, Empire, Estate of King Von, Forever and a Day LLC, King Von as agent of OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, Ralph Turpin's wrongful conduct as alleged herein, whether taken singularly

or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on the life of FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

296. Plaintiff Lasheena Weekly as Independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, OTF, UMG/INTERSCOPE, Sony, Alamo, Empire, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, Ralph Turpin, Estate of King Von, Forever and a Day LLC, King Von as an agent of OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 25: BATTERY
ALL PLAINTIFFS AGAINST LIL DURK

297. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. (“Plaintiffs,” for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 74-81 of this Complaint at Law as if set forth herein.

298. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over 32 rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

299. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered and the death that Carlton Weekly suffered.

300. On or about January 17, 2024, Defendants, "C Murda, "Kenny Mac, "Los," "C Thang," "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. Ralp Turpin was found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity.

301. All of these aforementioned individuals in paragraph 297 were members, affiliates, agents of (O-Block) and/or OTF and/or Lil Durk and/or King Von.

302. Lil Durk was a member, affiliate of (O-Block), black disciple's street gang, Lamron street gang and founded OTF which housed members of different sects of black disciple's street gang and members of (O-Block) a criminal enterprise.

303. Lil Durk appointed King Von as a high-ranking member of OTF having full knowledge King Von was a high-ranking member in (O-Block). King Von had a close relationship with Lil Durk for a prolonged period of time.

304. King Von with the approval of Lil Durk placed a One Hundred thousand bounty on the life of FBG Duck and the members of (O-Block) and OTF became hit men setting in motion the events of August 4, 2020.

305. This intentional conduct by Lil Durk and King Von placing a \$100,000.00 bounty on the life of FBG Duck and ordering gang members to carry out the hit on FBG Duck set in motion the events that occurred on August 4, 2020 and was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injures and the death of Carlton Weekly as set forth in the preceding and succeeding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant LIL DURK in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 26: BATTERY
ALL PLAINTIFFS AGAINST THE ESTATE OF KING VON, FOREVER AND A
DAY LLC, KING VON AS AGENT OF OTF

306. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, adopt, reallege, paragraphs 1 through 73, paragraphs 90 through 97 of this Complaint at Law as if set forth herein.

307. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

308. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered, and the death Carlton Weekly suffered.

309. On or about January 17, 2024, Defendants, "C Murda, "Kenny Mac, "Los", "C Thang," "OTF Muwop", were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. Ralph Turpin was found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity.

310. All of these aforementioned individuals in paragraph 307 were members, affiliates, agents of (O-Block), OTF, and/or Lil Durk and/or King Von. At all times herein King Von was an actual or apparent agent of OTF.

311. King Von was a high-ranking member of (O-Block) and OTF and had a close relationship with Lil Durk, OTF MUWOP and the other defendants convicted of murder.

312. King Von placed a One Hundred-Thousand-dollar bounty on the life of FBG Duck to have him killed and the members of (O-Block), OTF and the black disciples became his hit men setting in motion the events of August 4, 2020.

313. This conduct by King Von placing a One Hundred Thousand dollar bounty on the life of FBG Duck to have him killed and ordering gang members to carry out the hit on FBG Duck set in motion the events that occurred on August 4, 2020 and was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injures and ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendants Estate of King Von, Forever and a Day, King Von as agent of OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 27: BATTERY
ALL PLAINTIFFS AGAINST "C-Murda"

314. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, adopt, reallege, paragraphs 1 through 73, paragraphs 98 through 105 of this Complaint at Law as if set forth herein.

315. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana

store. Five men inclusive of C-Murda, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds stuck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round stuck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

316. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gun shot injuries they each suffered and the ultimate death of Carlton Weekly.

317. On or about January 17, 2024, Defendants, "C Murda, "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. Ralph Turpin was found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity.

318. This conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injures and the ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant C-MURDA in an amount that will fully compensate them for

all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 28: BATTERY
ALL PLAINTIFFS AGAINST "KENNY MAC"

319. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, adopt, reallege, paragraphs 1 through 73, paragraphs 106 through 113 of this Complaint at Law as if set forth herein.

320. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men including Kenny Mac, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds stuck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round stuck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

321. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gun shot injuries they each suffered and the ultimate death of Carlton Weekly.

322. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity,

conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck.

323. This conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injures and the ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant KENNY MAC in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 29: BATTERY
ALL PLAINTIFFS AGAINST "LOS"

324. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 114 through 121 of this Complaint at Law as if set forth herein.

325. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men including LOS, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds stuck

Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

326. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gun shot injuries they each suffered and the ultimate death of Carlton Weekly.

327. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck.

328. This conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injures and the ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant LOS in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 30: BATTERY
ALL PLAINTIFFS AGAINST "C-THANG"

329. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 122 through 129 of this Complaint at Law as if set forth herein.

330. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

331. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered.

332. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck.

333. This conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injuries and the death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant C-THANG in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 31: BATTERY
ALL PLAINTIFFS AGAINST "OTF MUWOP", OTF MUWOP AS AGENT OF
OTF

334. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 130 through 137 of this Complaint at Law as if set forth herein.

335. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men including OTF MUWOP, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck

Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

336. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered.

337. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. At all times herein OTF MUWOP acted as or was an agent of OTF.

338. This conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injuries and the ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant OTF MUWOP, and OTF MUWOP as agent of OTF, in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 32: BATTERY
ALL PLAINTIFFS AGAINST "RALPH TURPIN"

339. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate,

re-allege, adopt paragraphs 1 through 73, paragraphs 138 through 145 of this Complaint at Law as if set forth herein.

340. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on 68 E. Oak Street, Chicago, IL waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

341. Ralph Turpin who was shopping on or near 68 Oak Street in the high-end retail area came in contact with Carlton Weekly a/k/a FBG Duck. He immediately notified the members of (O-Block), OTF and alerted them of the location of FBG Duck. This conduct set in motion the shooting on August 4, 2020, and the injuries each plaintiff suffered and the ultimate death of Carlton Weekly.

342. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered.

343. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton

Weekly a/k/a FBG Duck. Ralph Turpin was found guilty of murder in aid of racketeering activity and conspiracy to commit murder in aid of racketeering activity.

344. The conduct by this defendant was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injuries and the ultimate death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant RALPH TURPIN in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages.

COUNT 33: SURVIVAL-BATTERY

**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS LIL DURK, ESTATE OF KING VON, FOREVER AND A DAY
LLC, C-MURDA, LOS, C-THANG, KENNY MAC, OTF MUWOP, OTF MUWOP AS
AGENT OF OTF, RALPH TURPIN**

345. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt paragraphs 297 through 344 of this Complaint at Law as though set forth fully at length herein.

346. Some or all of Lil Durk, OTF, Estate of King Von, Forever and a day LLC, King Von as agent of OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, OTF Muwop as agent of OTF, Ralph Turpin's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and/or ordered hit or

bounty placed on the life of FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

347. Plaintiff Lasheena Weekly as Independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, OTF Muwop as agent of OTF, Ralph Turpin, Estate of King Von, King Von as agent of OTF, Forever and a Day LLC, in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 34: ASSAULT
ALL PLAINTIFFS AGAINST LIL DURK

348. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams (“Plaintiffs,” for the purpose of this Count) restate, reallege, adopt paragraphs 1-73, paragraphs 74 through 81 of this Complaint at Law as if set forth herein.

349. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store and sitting in a vehicle on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

350. This intentional conduct by the defendant shooters was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

351. Lil Durk and King Von's actions by placing a bounty on the life of FBG Duck set in motion the events that transpired on August 4, 2020, that caused severe injuries to plaintiffs and even the death of Carlton Weekly.

352. Plaintiffs did not consent to the defendant shooters actions or the actions of Lil Durk or King Von which set in motion the events on August 4, 2020, when the shooters discharged their firearms in the direction of the plaintiffs.

353. On or about January 17, 2024, Defendants "C Murda," "Kenny Mac," "Los," "C-Thang," "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams. All of these individuals were members or affiliates of OTF, (O-Block) a criminal enterprise and of Lil Durk and King Von and were acting at the direction, behest of Lil Durk and King Von.

354. This intentional conduct by this defendant was a direct and proximate cause of the shooting that took place on August 4, 2020 on oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant Lil Durk in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 35: ASSAULT
ALL PLAINTIFFS AGAINST ESTATE OF KING VON, FOREVER AND A DAY
LLC, KING VON AS AGENT OF OTF

355. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams (“Plaintiffs,” for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 90 through 97 of this Complaint at Law as if set forth herein.

356. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

357. This intentional conduct by the defendant shooters was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

358. Lil Durk and King Von’s actions by placing a bounty on the life of FBG Duck set in motion the events that transpired on August 4, 2020, that caused severe injuries to plaintiffs and even death to Carlton Weekly.

359. Plaintiffs did not consent to the defendant shooters actions or the actions of Lil Durk or King Von which set in motion the events on August 4, 2020, when the shooters discharged their firearms in the direction of the plaintiffs.

360. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

361. The intentional conduct by the decedent King Von described in the preceding paragraphs were a direct and proximate cause of the shooting that took place on August 4, 2020 on oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant Estate of King Von, Forever and a Day, King Von as agent of OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 36: ASSAULT
ALL PLAINTIFFS AGAINST "C-MURDA"

362. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 98 through 105 of this Complaint at Law as if set forth herein.

363. When the defendant shooters fired well over thirty-rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

364. This intentional conduct by the defendant shooters was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

365. Plaintiffs did not consent to the defendant shooters actions on August 4, 2020, when they discharged their firearms in their direction.

366. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

367. This intentional conduct by this defendant shooter was a direct and proximate cause of the shooting that took place on August 4, 2020 on oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant C-Murda in an amount that will fully compensate them for

all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 37: ASSAULT
ALL PLAINTIFFS AGAINST “KENNY MAC”

368. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams (“Plaintiffs,” for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 106 through 113 of this Complaint at Law as if set forth herein.

369. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

370. This intentional conduct by the defendant shooters were outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

371. Plaintiffs did not consent to the defendant shooters actions on August 4, 2020, when they discharged their firearms in their direction.

372. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. “Los” and “OTF Muwop” were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. “C-Murda”, “Kenny Mac” were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

373. This intentional conduct by this defendant shooter was a direct and proximate cause of the shooting that took place on August 4, 2020 on 68 E. Oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant Kenny Mack in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 38: ASSAULT
ALL PLAINTIFFS AGAINST "LOS"

374. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 114 through 121 of this Complaint at Law as if set forth herein.

375. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

376. This intentional conduct by the defendant shooters was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

377. Plaintiffs did not consent to the defendant shooters actions on August 4, 2020, when they discharged their firearms in their direction.

378. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

379. This conduct by this defendant shooter was a direct and proximate cause of the shooting that took place on August 4, 2020 on oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant "Los" in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 39: ASSAULT
ALL PLAINTIFFS AGAINST "C-THANG"

380. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 122-129 of this Complaint at Law as if set forth herein.

381. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious

intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

382. This intentional conduct by the defendant shooter was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

383. Plaintiffs did not consent to the defendant shooters actions on August 4, 2020, when they discharged their firearms in their direction.

384. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

385. This intentional conduct by this defendant shooter was a direct and proximate cause of the shooting that took place on August 4, 2020 on Oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendant C-Thang in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 40: ASSAULT
ALL PLAINTIFFS AGAINST "OTF MUWOP" MUWOP AS AGENT OF OTF

386. Plaintiff LaSheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 130 through 137 of this Complaint at Law as if set forth herein.

387. When the defendant shooters fired well over thirty-two rounds at customers waiting in a line to enter the Dolce Gabbana retail store on August 4, 2020, they acted with malicious intent, intending to cause serious physical injuries, up to and including death, and to traumatize anyone who was in line or close proximity of the shooting and who escaped without being killed.

388. This conduct by the defendant shooter was outrageous and directly caused Plaintiffs to experience reasonable apprehension of imminent offensive contact.

389. Plaintiffs did not consent to the defendant shooters actions on August 4, 2020, when they discharged their firearms in their direction.

390. On August 4, 2020, MUWOP was an actual or apparent agent of OTF. He was signed as an artist to OTF and a close ally and confidant to Lil Durk and King Von and acted on the orders of King Von and Little Durk as an agent of OTF.

391. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

392. The conduct by this defendant shooter was a direct and proximate cause of the shooting that took place on August 4, 2020 on Oak street, resulting in each of the Plaintiffs' injuries as set forth in the preceding paragraphs, including, but not limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against the defendants OTF Muwop, OTF Muwop as agent of OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave later granted to amend to add such claim, punitive damages.

COUNT 41: SURVIVAL-ASSAULT

Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly against DEFENDANTS LIL DURK, ESTATE OF KING VON, FOREVER AND A DAY LLC, KING VON AS AGENT OF OTF, C-MURDA, LOS, C-THANG, KENNY MAC, OTF MUWOP, OTF MUWOP AS AGENT OF OTF, RALPH TURPIN

393. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt paragraphs 348 through 392 of this Complaint at Law as though set forth fully at length herein.

394. Some or all of Lil Durk, Estate of King Von by and through the actions of King Von, Forever and a day LLC by and through the actions of King Von, King Von as agent of OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, OTF Muwop as agent of OTF's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and/or incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain,

suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

395. Plaintiff Lasheena Weekly as Independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, Estate of King Von by and through the actions of decedent King Von, Forever and a Day by and through the actions of decedent King Von, King Von as agent of OTF, C-Murda, Los, C-Thang, Kenny Mac, OTF Muwop, OTF Muwop as agent of OTF, in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 42: AIDING AND ABETTING ASSAULT AND BATTERY
ALL PLAINTIFF'S AGAINST LIL DURK

396. Plaintiffs Lasheena Weekly as administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 74 through 81 of this Complaint at Law as though set forth fully at length herein.

397. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson was shopping at the Dolce Gabbana store on Oak Street waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men, all with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae

Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds stuck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round stuck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

398. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered, and the death suffered by Carlton Weekly.

399. On or about January 17, 2024, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

400. All of these aforementioned individuals in paragraph 399 were members, affiliates, and/or agents of (O-Block), OTF, Lil Durk and King Von.

401. Lil Durk was a member, affiliate, of (O-Block), black disciple's street gang, Lamron street gang and founded OTF which housed members of different sects of the black disciple's street gang and members of the (O-Block) a criminal enterprise.

402. Lil Durk appointed King Von as a high-ranking member of OTF having full knowledge King Von was a high-ranking member in (O-Block) and knew his extensive violent history of committing batteries, robberies, murders in Chicago. King Von had a special

relationship with Lil Durk in which King Von accepted direction, advice and counsel from Lil Durk. Lil Durk financially supported King Von throughout his incarceration and gave him an opportunity to attach himself to his music brand once released from incarceration to acquire the financial means to support the activities of (O-Block) the criminal enterprise. Despite having full knowledge that King Von wanted to expand his violent conduct by making music artists a target to rob and commit violent acts against, Lil Durk positioned, assisted and financed King Von and his activities to acquire the financial means to carry out his plan to kill FBG Duck.

403. Lil Durk was aware of the violent history and present of King Von and knew that he would kill instantly.

404. OTF Muwop was a member, affiliate, of (O-Block), black disciple's street gang, OTF and was a close ally and confidant of Lil Durk and King Von. Lil Durk and King Von knew that OTF Muwop would kill instantly.

405. Lil Durk knew of the vendetta King Von and (O-Block) had against FBG Duck and approved, encouraged, financed and ratified King Von's taunts, threats and actions directed at FBG Duck and the shooting that took place on August 4, 2020, injuring Davon Brinson and Cashae Williams and killing FBG Duck.

406. King Von with the approval of Lil Durk placed a One Hundred thousand bounty on the life of FBG Duck and the members of (O-Block) and OTF including OTF Muwop, became hit men setting in motion the events of August 4, 2020.

407. Lil Durk aided and abetted King Von's plan to have FBG Duck killed and supported the plan by financial means in order to have their plan executed and carried out by the defendant shooters, members of the (O-Block) criminal enterprise.

408. Lil Durk provided substantial assistance and encouragement in accomplishing the shooting on August 4, 2020, resulting in the injuries to Davon and Cashae and the injuries and death of FBG Duck.

409. This intentional conduct by Lil Durk and King Von along with placing a \$100,000.00 bounty on the life of FBG Duck and ordering gang members to carry out the hit on FBG Duck set in motion the events that occurred on August 4, 2020 and was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injuries and the death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the defendant LIL DURK in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 43: AIDING AND ABETTING ASSAULT AND BATTERY
ALL PLAINTIFF'S AGAINST ESTATE OF KING VON, FOREVER AND A DAY
LLC, KING VON AS AGENT OF OTF

410. Plaintiffs Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, Davon Brinson, Cashae Williams. ("Plaintiffs," for the purpose of this Count) restate, reallege, adopt paragraphs 1 through 73, paragraphs 90 through 97 of this Complaint at Law as though set forth fully at length herein.

411. On August 4, 2020, plaintiff decedent Carlton Weekly and plaintiff Davon Brinson were shopping at the Dolce Gabbana store on Oak Street waiting in line to enter the store. Plaintiff Cashae Williams was sitting in a car directly in front of the Dolce Gabbana store. Five men, all

with guns, wearing masks, pulled in front of Dolce Gabbana, jumped out the cars and began shooting at Carlton Weekly firing well over thirty-two rounds. Two of those rounds struck Cashae Williams in her hand and wrist. Three of those rounds struck Davon Brinson in his chest, right leg and back. Sixteen of those rounds struck Carlton Weekly. Two rounds struck Mr. Weekly in the neck. One round struck his chest. Four rounds struck Mr. Weekly in his back. One round struck his right buttock. One round struck his left buttock. One round struck his left upper arm. One round struck his left index finger, and one round struck his left little finger (4th Finger). Two rounds struck his left thigh. One round struck his right thigh. One round struck his lower leg.

412. The plaintiffs gave no consent to the conduct perpetrated on their individual person resulting in the gunshot injuries they each suffered and the death of Carlton Weekly.

413. On or about January 17, 2024, Defendants, "C Murda," "Kenny Mac," "Los," "C Thang," and "OTF Muwop," were all found guilty of murder in aid of racketeering activity, conspiracy to commit murder in aid of racketeering activity and use of a firearm causing the death of Carlton Weekly a/k/a FBG Duck. "Los" and "OTF Muwop" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Davon Brinson. "C-Murda", "Kenny Mac" were also found guilty of assault in aid of racketeering activity and use of a firearm during and in relation to the assault against Cashae Williams.

414. All of these aforementioned individuals in paragraph 413 were members, affiliates, agents of (O-Block), OTF, Lil Durk and King Von.

415. King Von was a high-ranking member within the (O-Block) criminal enterprise and black disciple's street gang and had a duty and responsibility to financially contribute to the criminal organization and the black disciples. King Von had come up through the ranks of (O-

Block) and the black disciples and gained status by committing acts of violence inclusive of robberies, batteries, assaults and murders.

416. Lil Durk appointed King Von as a high-ranking member of OTF having full knowledge King Von was a high-ranking member in (O-Block) and black disciples and knew his extensive violent history of committing batteries, robberies, murders in Chicago. King Von had a special relationship with Lil Durk in which King Von accepted direction, advice and counsel from Lil Durk. Lil Durk financially supported King Von throughout his incarceration and gave him an opportunity to attach himself to his music brand once released from incarceration to acquire the financial means to support the activities of (O-Block) the criminal enterprise. Despite having full knowledge that King Von wanted to expand his violent conduct by making music artists a target to rob and commit violent acts against, Lil Durk positioned, assisted and financed King Von and his activities to assist him in acquire the financial means to carry out his plan to kill FBG Duck.

417. OTF Muwop was a member, affiliate, of (O-Block), black disciple's street gang, OTF and was a close ally and confidant of Lil Durk and King Von. Lil Durk and King Von knew that OTF Muwop would kill instantly.

418. King Von had a vendetta against FBG Duck who was a rival musical artist on the rise in Chicago and lived in an area on 63rd and St. Lawrence which was a rival area to (O-Block). King Von consistently taunted, threatened and displayed aggression toward FBG Duck for years.

419. King Von placed a One hundred-thousand-dollar bounty on the life of FBG Duck and the members of (O-Block) and OTF became hit men setting in motion the events of August 4, 2020.

420. King Von aided and abetted the shooters of (O-Block) by incentivizing and encouraging the (O-Block) members to carry out such a brazen and horrific killing of FBG Duck

on August 4, 2020. In the process they severely injured Davon Brinson and Cashae Williams who were innocent victims caught up in the scheme and plan of Lil Durk, King Von and OTF.

421. King Von provided the financial assistance and encouragement in accomplishing the shooting on August 4, 2020, resulting in the injuries to Davon and Cashae and the injuries and death of FBG Duck.

422. This intentional conduct by King Von along with placing a \$100,000.00 bounty on the life of FBG Duck and ordering gang members to carry out the hit on FBG Duck set in motion the events that occurred on August 4, 2020 and was a direct and proximate cause of the shooting on August 4, 2020 and each of the Plaintiffs' injuries and the death of Carlton Weekly as set forth in the preceding paragraphs, including but limited to past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity and past and future medical expenses and related expenses.

WHEREFORE, Plaintiffs respectfully request that judgement be entered individually in their favor and against the Estate of King Von, Forever and a Day LLC and King Von as an agent of OTF, in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 44: SURVIVAL-AIDING & ABETTING ASSAULT & BATTERY
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS LIL DURK, ESTATE OF KING VON, FOREVER AND A DAY
LLC, KING VON AS AGENT OF OTF

423. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt paragraphs 396-422 of this complaint at Law as though set forth fully at length herein.

424. Some or all of Lil Durk, Estate of King Von by and through the actions of decedent King Von, Forever and a day LLC by and through the actions of decedent King Von, King Von as an agent of OTF's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and/or ordered hit or bounty placed on the life of FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

425. Plaintiff Lasheena Weekly as independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, Estate of King Von, Forever and a Day LLC, and King Von as agent of OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 45: NEGLIGENCE
ALL PLAINTIFFS AGAINST "LIL DURK"

426. Plaintiffs restate, reallege and incorporate by reference paragraphs 1 through 73, paragraphs 74 through 81 of this Complaint at Law as though fully set forth herein.

427. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding

musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

428. At all relevant times, Lil Durk and OTF owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, collaborating, branding, promoting, management, operation, marketing, advertising, supervision and control over the artists they signed and collaborated, the music created and released by and through the label and promoted by Lil Durk individually and through his label OTF so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

429. Lil Durk knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder, robbery, assault. He knew or should have known that other artists, inclusive of OTF MUWOP a known member of (O-Block) and black disciples street gang and/or associate, close ally to King Von, whom they signed to OTF, were active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block). Lil Durk knew or should have known the gang members he and his label signed, or he collaborated would use his platform, notoriety and influence to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

430. Lil Durk breached his duty of care owed to all persons, including Plaintiffs and their decedents, through his affirmative malfeasance, actions and business decisions, including signing, developing, branding, releasing music, marketing, advertising, promoting, collaborating, supervising, and exercising control of active gang members inclusive of King Von and OTF Muwop. His actions would assist these gang members in the taunting, intimidation, threatening of

other artists and assisted the gang members in acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on Lil Durk's own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowingly signed King Von to OTF knowing that he was an active gang member and had committed or participated in several batteries, assaults, and murders in Chicago.
- b) Knowingly signed other gang members to OTF inclusive of members from 600, Lamron, THF, Black disciples, O-Block, when he was aware of these individuals' criminal histories and violent conduct.
- c) Knowing used a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization and to finance a \$100,000.00 bounty placed on the life of FBG Duck.
- d) Employed known gang members in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Knowingly participated, approved whether tacit or directly, the hit or bounty placed on the life of FBG Duck by King Von.
- f) Actively participated or was present for the commission of crimes inclusive of robbery, assault and battery by King Von.
- g) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- h) Conspired to commit the murder of FBG Duck.
- i) Participated in the cover up of the conspiracy to murder FBG Duck.
- j) Actively created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- k) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- l) Failed to properly monitor the music being created and released by artists they signed.
- m) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by his artists targeting other musicians.

- n) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- o) Failed to recognize the danger of signing, producing, developing, collaborating and providing a platform of millions of followers to active gang members.
- p) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- q) Assisted and enabled King Von to market his music targeting FBG Duck and increasing the risk to FBG Duck's life by repeatedly collaborating with him and exposing him to his brand and followers.
- r) Failed to properly monitor its artists and the music they were releasing, threatening the life of and taunting other musical artists.
- s) Failed to monitor King Von after he demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- t) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- u) Provided a worldwide platform of millions of followers to King Von and (O-Block), to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.
- v) Enabled, supported and financed King Von despite knowing King Von continued to commit crimes and profit from those crimes by collaborating and making music with him detailing the crimes he was actively engaged in or had committed.
- w) Enabled King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- x) Enabled King von to finance the criminal enterprise of (O-Block) and assisted him in establishing a global brand for (O-Block) a criminal organization.
- y) Promoted and established King Von as a high-ranking individual within OTF. An act that emboldened and encouraged other gang members to commit acts of violence to achieve rank within OTF.
- z) Otherwise used a lawful incorporated entity, a music label, to conduct unlawful business of (O-Block), to acquire, preserve and protect power, territory, operations and

- proceeds through the use of threats, intimidation and violence including murder and other acts of violence. in furtherance of the acts of (O-Block) the criminal enterprise.
- aa) Promoted and branded (O-Block) and its members and associates, including marketing and promoting their claims and responsibility for acts of violence committed by (O-Block) while taunting other musicians such as FBG Duck.
 - bb) Aided in the branding of King Von and (O-Block) to increase their status using social media platforms, and music.
 - cc) Knowingly profiting from the taunting, intimidating and threatening of FBG Duck and the killing of FBG Duck.
 - dd) Knowingly used OTF as a hub for gang members to gain notoriety, popularity and financial gain to support a criminal enterprise.
 - ee) Knowingly disregarded a pattern of violence and criminal conduct by King Von and other members of (O-Block).

431. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant.

432. As a direct and proximate result of the aforementioned conduct and breach of duty, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant in an amount that will fully compensate them for all legally

recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 46: NEGLIGENCE
ALL PLAINTIFFS AGAINST “OTF”

433. Plaintiffs restate, re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 82 through 89 of this Complaint at Law as though fully set forth herein.

434. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

435. At all relevant times OTF owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, collaborating, branding, promoting, management, operation, marketing, advertising, supervision and control over the artists, the music created and released by and through the label and promoted by and through the label OTF so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

436. OTF knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder, robbery, assault. They knew or should have known that other artists, inclusive of OTF MUWOP a known member of (O-Block) and black disciples street gang and/or associate, close ally to King Von and Lil Durk whom they signed to OTF, were active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block). OTF knew or should have known the gang members they signed, or affiliated or their artists collaborated would use its

platform, for notoriety and influence to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

437. OTF breached its duty of care owed to all persons, including Plaintiffs and their decedents, through its affirmative malfeasance, actions and business decisions, including signing known gang members, developing, branding, releasing music, marketing, advertising, promoting, collaborating, supervising, and exercising control of active gang members inclusive of King Von and OTF Muwop. That its actions would assist these individuals in the taunting, intimidating, threatening of other artists and assist them in acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on OTF's own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowingly signed King Von to OTF knowing that he was an active gang member and had committed or participated in several batteries, assaults, and murders in Chicago.
- b) Knowingly signed other gang members to OTF inclusive of members from 600, Lamron, THF, Black disciples, O-Block, when he was aware of these individuals' criminal histories and violent conduct.
- c) Knowingly used a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization and to finance a \$100,000.00 bounty placed on the life of FBG Duck.
- d) Employed known gang members in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Knowingly participated, approved whether tacit or directly, the hit or bounty placed on the life of FBG Duck by King Von.
- f) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- g) Actively created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.

- h) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- i) Failed to properly monitor the music being created and released by artists they signed.
- j) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by its artists targeting other musicians.
- k) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- l) Failed to recognize the danger of signing, producing, developing, collaborating and providing a platform of millions of followers to active gang members.
- m) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- n) Assisted and enabled King Von to market his music targeting FBG Duck and increasing the risk to FBG Duck's life by repeatedly allowing him to collaborate with Lil Durk exposing him to Durk's brand and followers.
- o) Failed to properly monitor its artists and the music they were releasing, threatening the life of and taunting other musical artists.
- p) Failed to monitor King Von after he demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeting FBG Duck.
- q) Failed to monitor and observe King Von after he publicly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- r) Provided a worldwide platform of millions of followers to King Von and (O-Block), to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.
- s) Enabled, supported and financed King Von despite knowing King Von's continued support and branding of (O-Block) gang members and criminal enterprise despite knowing King Von's disdain, public threats, taunts, intimidation displayed toward FBG Duck.
- t) Enabled King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.

- u) Enabled King von to finance the criminal enterprise of (O-Block) and assisted him in establishing a global brand for O 'Block a criminal organization.
- v) Promoted and established King Von as a high-ranking individual within OTF. An act that emboldened and encouraged other gang members to commit acts of violence to achieve rank within OTF.
- w) Otherwise used a lawful incorporated entity, a music label, to conduct unlawful business of (O-Block), to acquire, preserve and protect power, territory, operations and proceeds through the use of threats, intimidation and violence including murder and other acts of violence.
- x) Promoted and branded (O-Block) and its members and associates, including marketing and promoting their claims and responsibility for acts of violence committed by (O-Block) while taunting other musicians such as FBG Duck.
- y) Aided in the branding of King Von and (O-Block) to increase their status using social media platforms, and music.
- z) Knowingly profiting from the taunting, intimidating and threatening of FBG Duck and the killing of FBG Duck.
- aa) Knowingly used OTF as a hub for gang members to gain notoriety, popularity and financial gain to support a criminal enterprise.
- bb) Knowingly disregarded a pattern of violence and criminal conduct by King Von and other members of (O-Block) it affiliated.

438. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty of care, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant.

439. As a direct and proximate result of the aforementioned conduct and breach of duty of care, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 47: NEGLIGENCE
ALL PLAINTIFFS AGAINST ALAMO

440. Plaintiffs restate, reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

441. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

442. At all relevant times Alamo was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, marketed music for various artists. Alamo was contracted with Lil Durk and OTF to promote, distribute, market, sale and build a global brand for Lil Durk and OTF and used certain title tracks linked to King Von, Lil Durk and OTF. Alamo coordinated, targeted, promoted, released certain title tracks of Lil Durk, King Von aimed at intimidating, threatening and eventual killing of FBG Duck. It promoted, influenced, and supported the killing of FBG Duck and profited from his death.

443. Alamo engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, developed, promoted, distributed the music they created and assisted in the creation of a brand for these gang members as artists to earn revenue. This conduct assisted and fueled rival gang beefs and allowed gang members and Alamo to profit from the violence and killings of rival gang members.

444. At all relevant times, Alamo was subject to at least the general duty imposed on all persons not to expose others to reasonably foreseeable risks of injury.

445. In fact, because Alamo engaged in the highly risky activity of signing known gang members and affiliates of gangs, they had a heightened duty to not expose others to foreseeable harm.

446. Alamo had a duty to exercise reasonable care in marketing, promoting, distributing, selling, streaming certain title tracks by known gang members and to refrain from engaging in any activity creating a reasonably foreseeable risk of injury to others inclusive of Plaintiffs.

447. At all relevant times, Alamo owed a duty to the public and plaintiffs and their decedents to market and distribute its music in a commercially reasonable manner. As the distributor, marketer, seller, and major accessor to streaming platforms of music they had a duty to refrain from signing gang members and marketing, promoting, distributing and selling the reality rap music of gang members to teenagers and young adults who have an appetite for violent entertainment. This conduct directly assists, supports the development of a global brand for gang members and directly aids in their ability to acquire monetary resources to further the criminal activity of the gang members. This conduct provided King Von the means to place a \$100,000.00 dollar bounty on the life of FBG Duck and the ability to make good on that bounty once FBG Duck was murdered.

448. Alamo knew or should have known that adolescents and young adults are more prone to impulsive and risky behavior, including violent behavior, than other age groups. Particularly, young adults who were known to be gang members and gang affiliates.

449. At all relevant times, Alamo owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, branding, promoting, management, operation, marketing, advertising, supervision and control over the artists they signed, the music created and released by and through its label and promoted by Lil Durk, King Von individually and through their respective labels so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

450. Alamo knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder, robbery, assault. They knew or should have known that Lil Durk, was affiliated with King Von and was a gang member or affiliate of a gang. They knew or should have known other artists, inclusive of OTF MUWOP a known associate and close ally to King Von and Lil Durk, were all active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block).

451. Alamo knew or should have known that the gang members they signed and financed would use its platform, notoriety and influence of the label and its artists to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

452. Alamo breached its duties of care owed to all person, including Plaintiffs and their decedents, through its affirmative malfeasance, policies, actions and business decisions, including; signing known gang members, developing, branding, releasing music, marketing, advertising, promoting, supervision, control of active gang members inclusive of King Von, Lil Durk and OTF

Muwop, when they assisted these individuals in the taunting, intimidating, threatening of other artists and assisting them in acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on its own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowing allowed King Von to collaborate with its artists knowing that he was an active gang member and had committed or participated in several robberies' assaults and murders in Chicago.
- b) Knowingly signed Lil Durk who they knew was a gang member and was aware of his associates and affiliations and the individuals around him who had known criminal histories and gang affiliations.
- c) Signed and financed OTF when they knew Lil Durk was using a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization and to taunt, intimidate, threaten and kill FBG Duck.
- d) Continued to contract with OTF and Lil Durk when they knew he was repeatedly signing gang members as artists and placing them in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Continued to support, promote, release music of Lil Durk and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery committed by King Von.
- f) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- g) Actively created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- h) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- i) Failed to properly monitor the music being created and released by artists they signed inclusive of Lil Durk.
- j) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by their artists targeting other musicians.

- k) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- l) Failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- m) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- n) Enabled King Von to market his music targeting FBG Duck increasing the risk to FBG Duck's life.
- o) Failed to properly monitor its artists and the music they were releasing that was taunting, threatening the life of FBG Duck.
- p) Failed to monitor Lil Durk and King Von after they demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- q) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- r) Provided a worldwide platform of millions of followers to King Von and (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged inclusive of the killing of FBG Duck.
- s) Emboldened King Von to continue to commit crimes and profit from those crimes by authorizing collaborations with its artists when King Von was making music, making social media posts detailing the crimes he was actively engaged in or had committed.
- t) Provided King Von a platform that allowed him to acquire the means to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- u) Enabled King Von to be able to finance a criminal enterprise (O-Block).
- v) They assisted King Von and (O-Block) in establishing individual global brands by providing them a global platform.
- w) Knowingly profiting from the killing and death, taunting, intimidating and threatening of FBG Duck.
- x) Knowingly disregarded a pattern of violence and criminal conduct by King Von and the disclosures of such violence.

453. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant Alamo.

454. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty by Defendant Alamo, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant Alamo in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 48: NEGLIGENCE
ALL PLAINTIFFS AGAINST UMG/INTERSCOPE

455. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

456. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit

from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

457. At all relevant times UMG/Interscope was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, marketed music for various artists. On or about 2016-2021 UMG/INTERSCOPE was contracted with ALAMO to promote, distribute, market, sale and build a global brand for ALAMO artists and labels and used certain title tracks linked to King Von, Lil Durk and OTF. UMG/INTERSCOPE coordinated, targeted, promoted, released, distributed certain title tracks of Alamo artists and labels such as OTF, Lil Durk, King Von aimed at intimidating, threatening and eventually killing of FBG Duck. It financed, promoted, influenced, and supported the killing of FBG Duck and profited from his death.

458. UMG/INTERSCOPE engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, financed, created, promoted their music and developed, created a brand for these gang members as artists. This conduct assisted and fueled rival gang beefs to sell music and allowed UMG/INTERSCOPE to profit from the violence and killings of rival gang members.

459. At all relevant times, UMG/INTERSCOPE was subject to at least the general duty imposed on all persons not to expose others to reasonably foreseeable risks of injury.

460. In fact, because UMG/INTERSCOPE engaged in the highly risky activity of signing, marketing, promoting and distributing music of known gang members and affiliates of gangs, they had a heightened duty to not expose others to foreseeable harm.

461. UMG/Interscope had a duty to exercise reasonable care in marketing, promoting, selling, streaming, distributing certain title tracks by known gang members and to refrain from engaging in any activity creating a reasonably foreseeable risk of injury to others.

462. At all relevant times, UMG/Interscope owed a duty to the public and plaintiffs and their decedents to market its music in a commercially reasonable manner. As the distributor, marketer, seller, major accessor to streaming platforms for music they had a duty to refrain from marketing, promoting and selling the reality rap music of gang members and their affiliates to teenagers and young adults who have an appetite for violent entertainment. This conduct by UMG/Interscope led directly to the development of a brand and enriched the gang members allowing them to acquire the monetary resources to further their criminal activity and directly assisted King Von in acquiring the means to place a \$100,000.00 dollar bounty on the life of FBG Duck with the ability to make good on that bounty once FBG Duck was murdered.

463. UMG/Interscope knew or should have known that adolescents and young adults are more prone to impulsive and risky behavior, including violent behavior, than other age groups. Particularly, young adults who were known to be gang members and gang affiliates.

464. At all relevant times, UMG/Interscope owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, branding, promoting, management, operation, marketing, advertising, supervision and control over the artists and labels they signed, the music created and released by and through its label and promoted by Alamo, Lil Durk, King Von individually and through their respective labels so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

465. UMG/Interscope knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder,

robbery, assault. They knew or should have known that Lil Durk, was affiliated with King Von and was a gang member or affiliate of a gang. They knew or should have known other artists, inclusive of OTF MUWOP a known associate and close ally to King Von and Lil Durk, were all active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block).

466. UMG/Interscope knew or should have known that the labels they signed and financed, that signed known gang members, would use its platform, notoriety and influence of its label and its artists to further the criminal enterprise of(O-Block) and the criminal activity they were engaged.

467. UMG/Interscope breached its duty of care owed to all person, including Plaintiffs and their decedents, through its affirmative malfeasance, policies, actions and business decisions, including; signing known gang members or labels that housed known gang members, developing, branding, releasing music, marketing, advertising, promoting, supervision, of active gang members inclusive of King Von, Lil Durk and OTF Muwop, when they assisted these individuals in the taunting, intimidating, threatening of FBG Duck. Also, assisted them in acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on its own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowling allowed King Von to collaborate with its artists knowing that he was an active gang member and had committed or participated in several robberies' assaults and murders in Chicago.
- b) Knowingly allowed Alamo to sign Lil Durk who they knew was a gang member and was aware of his associates and affiliations and the individuals around him who had known criminal histories and gang affiliations.
- c) Approved the signing and financing of OTF when they knew Lil Durk was using a lawful incorporated entity as a hub for gang members and used the lawful sale and

distribution of music to further the activities of a criminal organization and to taunt, intimidate, threaten and kill FBG Duck.

- d) Continued to contract with Alamo, OTF and Lil Durk when they knew OTF was repeatedly signing gang members as artists and placing them in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Continued to support, distribute, promote, release, music of Lil Durk and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery committed by King Von.
- f) Knowingly created, released, distributed, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- g) Actively created, released, distributed, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- h) Knowingly promoted, distributed, music created by King Von and social media posts that celebrated and glorified the murders and crimes he had committed which emboldened other gang members to act on King Von's orders and/or bounty to murder FBG Duck.
- i) Failed to properly monitor the music created and released by Alamo, OTF and Lil Durk which were signed to its label.
- j) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by its artists targeting other musicians.
- k) Failed to recognize the inherit danger of releasing, promoting and distributing music targeting another musical artist.
- l) Failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- m) Failed to ensure that the artists and labels they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- n) Enabled King Von to market his music worldwide targeting FBG Duck and earning him the monetary means to carry out the \$100,000.00 dollar bounty on the life of FBG Duck. This conduct increased the risk to FBG Duck's life.
- o) Failed to properly monitor its artists and the music they were releasing that was taunting, threatening the life of FBG Duck.

- p) Failed to monitor Lil Durk and King Von after they demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- q) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- r) Provided a worldwide platform of millions of followers to King Von and (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged inclusive of the killing of FBG Duck.
- s) Emboldened King Von to continue to commit crimes and profit from those crimes by authorizing collaborations with its artists when King Von was making music, making social media posts detailing the crimes he was actively engaged in or had committed.
- t) Provided King Von a platform that allowed him to acquire the means to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- u) Enabled King Von to be able to finance a criminal enterprise (O-Block).
- v) Assisted King Von and (O-Block) in establishing individual global brands by providing them a global platform.
- w) Knowingly profiting from the killing and death, taunting, intimidating and threatening of FBG Duck.
- x) Knowingly disregarded a pattern of violence and criminal conduct by King Von and the disclosures of such violence.

468. As a direct and proximate cause of one or more of the above acts and/or omissions, and breaches of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has

lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant Alamo.

469. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty by Defendant UMG/Interscope, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant UMG/Interscope in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 49: NEGLIGENCE
ALL PLAINTIFFS AGAINST SONY

470. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

471. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk, OTF, and SONY also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

472. At all relevant times SONY was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, and marketed music for various artists. On information and belief SONY acquired Alamo in 2021 assuming the assets and liabilities of Alamo. Alamo was contracted with Lil Durk and OTF to promote, distribute, market, sale and build a global brand for Lil Durk and OTF and used certain title tracks linked to King Von, Lil Durk and OTF. Alamo coordinated, targeted, promoted, released certain title tracks of Lil

Durk, King Von aimed at intimidating, threatening and eventual killing of FBG Duck. It promoted, influenced, and supported the killing of FBG Duck and profited from his death.

473. SONY engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, developed, promoted, distributed the music they created and assisted in the creation of a brand for these gang members as artists to earn revenue. This conduct assisted and fueled rival gang beefs and allowed gang members and Sony to profit from the violence and killings of rival gang members.

474. At all relevant times, SONY was subject to atleast the general duty imposed on all persons not to expose others to reasonably foreseeable risks of injury.

475. In fact, because SONY engaged in the highly risky activity of signing known gang members and affiliates of gangs, they had a heightened duty to not expose others to foreseeable harm.

476. SONY had a duty to exercise reasonable care in marketing, promoting, distributing, selling, streaming certain title tracks by known gang members and to refrain from engaging in any activity creating a reasonably foreseeable risk of injury to others inclusive of Plaintiffs.

477. At all relevant times, SONY owed a duty to the public and plaintiffs and their decedents to market and distribute its music in a commercially reasonable manner. As the distributor, marketer, seller, and major accessor to streaming platforms of music they had a duty to refrain from signing gang members and marketing, promoting, distributing and selling the reality rap music of gang members to teenagers and young adults who have an appetite for violent entertainment. This conduct directly assists, supports the development of a global brand for gang members and directly aids in their ability to acquire monetary resources to further the criminal activity of the gang members. This conduct provided King Von the means to place a \$100,000.00

dollar bounty on the life of FBG Duck and the ability to make good on that bounty once FBG Duck was murdered.

478. SONY knew or should have known that adolescents and young adults are more prone to impulsive and risky behavior, including violent behavior, than other age groups. Particularly, young adults who were known to be gang members and gang affiliates.

479. At all relevant times, SONY owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, branding, promoting, management, operation, marketing, advertising, supervision and control over the artists they signed, the music created and released by and through its label and promoted by Lil Durk, King Von individually and through their respective labels so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

480. SONY knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder, robbery, assault. They knew or should have known that Lil Durk, was affiliated with King Von and was a gang member or affiliate of a gang. They knew or should have known other artists, inclusive of OTF MUWOP a known associate and close ally to King Von and Lil Durk, were all active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block).

481. SONY knew or should have known that the gang members they signed and financed would use its platform, notoriety and influence of the label and its artists to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

482. SONY breached its duties of care owed to all person, including Plaintiffs and their decedents, through its affirmative malfeasance, policies, actions and business decisions, including;

signing, developing, branding, releasing music, marketing, advertising, promoting, supervision, control of active gang members inclusive of King Von, Lil Durk and OTF Muwop, when they assisted these individuals in the taunting, intimidating, threatening of FBG Duck and acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on its own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowing allowed King Von to collaborate with its artists knowing that he was an active gang member and had committed or participated in several robberies' assaults and murders in Chicago.
- b) Knowingly signed Lil Durk who they knew was a gang member and was aware of his associates and affiliations and the individuals around him who had known criminal histories and gang affiliations.
- c) Signed and financed OTF when they knew Lil Durk was using a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization and to taunt, intimidate, threaten and kill FBG Duck.
- d) Continued to contract with OTF and Lil Durk when they knew he was repeatedly signing gang members as artists and placing them in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Continued to support, promote, release music of Lil Durk and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery committed by King Von.
- f) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- g) Actively created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- h) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- i) Failed to properly monitor the music being created and released by artists they signed inclusive of Lil Durk.

- j) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by their artists targeting other musicians.
- k) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- l) Failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- m) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- n) Enabled King Von to market his music targeting FBG Duck increasing the risk to FBG Duck's life.
- o) Failed to properly monitor its artists and the music they were releasing that was taunting, threatening the life of FBG Duck.
- p) Failed to monitor Lil Durk and King Von after they demonstrated a willingness to taunt, threaten, intimidate and commit acts of violence and continued to release music targeted at FBG Duck.
- q) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- r) Provided a worldwide platform of millions of followers to King Von and (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged inclusive of the killing of FBG Duck.
- s) Emboldened King Von to continue to commit crimes and profit from those crimes by authorizing collaborations with its artists when King Von was making music, making social media posts detailing the crimes he was actively engaged in or had committed.
- t) Provided King Von a platform that allowed him to acquire the means to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- u) Enabled King Von to be able to finance a criminal enterprise (O-Block).
- v) Assisted King Von and (O-Block) in establishing individual global brands by providing them a global platform.
- w) Knowingly profiting from the killing, death, taunting, intimidating and threatening of life of FBG Duck.

- x) Knowingly disregarded a pattern of violence and criminal conduct by King Von and the disclosures of such violence.

483. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant Alamo.

484. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty by Defendant SONY, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant SONY in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 50: NEGLIGENCE
ALL PLAINTIFFS AGAINST EMPIRE

485. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

486. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding

musical artists and creating, producing, marketing and selling music. Lil Durk, OTF, and also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

487. At all relevant times EMPIRE was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, and marketed music for various artists including King Von and OTF. On information and belief EMPIRE was contracted with King Von, OTF to promote, distribute, market, sale music and build a global brand for King Von and OTF and used certain title tracks linked to King Von, Lil Durk and OTF to assist in the building of a global brand for King Von and OTF. Empire coordinated, targeted, promoted, released certain title tracks of King Von and Lil Durk aimed at intimidating, threatening, taunting FBG Duck and assisted and aided King Von in acquiring the funds to carry out the \$100,000.00 bounty placed on the life of FBG Duck. These actions led to the eventual killing of FBG Duck. Empire promoted, influenced, and supported the killing of FBG Duck and profited from his death.

488. EMPIRE engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, developed, promoted, distributed the music they created and assisted in the creation of a brand for these gang members as artists to earn revenue. This conduct assisted and fueled rival gang beefs and allowed gang members and Empire to profit from the violence and killings of rival gang members.

489. At all relevant times, EMPIRE was subject to at least the general duty imposed on all persons not to expose others to reasonably foreseeable risks of injury.

490. In fact, because EMPIRE engaged in the highly risky activity of signing known gang members and affiliates of gangs, they had a heightened duty to not expose others to foreseeable harm.

491. EMPIRE had a duty to exercise reasonable care in marketing, promoting, distributing, selling, streaming certain title tracks by known gang members and to refrain from engaging in any activity creating a reasonably foreseeable risk of injury to others inclusive of Plaintiffs.

492. At all relevant times, EMPIRE owed a duty to the public and plaintiffs and their decedents to market and distribute its music in a commercially reasonable manner. As the distributor, marketer, seller, and major accessor to streaming platforms of music they had a duty to refrain from signing gang members and marketing, promoting, distributing and selling the reality rap music of gang members to teenagers and young adults who have an appetite for violent entertainment. This conduct directly assists, supports the development of a global brand for gang members and directly aids in their ability to acquire monetary resources to further the criminal activity of the gang members. This conduct provided King Von the means to place a \$100,000.00 dollar bounty on the life of FBG Duck and the ability to make good on that bounty once FBG Duck was murdered.

493. EMPIRE knew or should have known that adolescents and young adults are more prone to impulsive and risky behavior, including violent behavior, than other age groups. Particularly, young adults who were known to be gang members and gang affiliates.

494. At all relevant times, EMPIRE owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing of known gang members, distributing, branding, promoting, marketing, advertising, the music created and released by and through its label and promoted by Lil Durk, King Von individually and through their respective labels so as not to create an unreasonable risk of harm to any person, including Plaintiffs and their decedents.

495. EMPIRE knew or should have known that King Von was an active gang member who had committed and continued to commit multiple crimes inclusive of murder, robbery, assault. They knew or should have known that Lil Durk was affiliated with King Von and was a gang member or affiliate of a gang. They knew or should have known other artists, inclusive of OTF MUWOP a known associate and close ally to King Von and Lil Durk, were all active gang members and were continuously engaged in violent crimes and other crimes to further the criminal organization of (O-Block).

496. EMPIRE knew or should have known that the gang members they signed to promote, distribute, finance the marketing and promotion of their music, would use its platform, notoriety and influence to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

497. EMPIRE breached its duty of care owed to all person, including Plaintiffs and their decedents, through its affirmative malfeasance, policies, actions and business decisions, including; signing, distributing, branding, marketing, advertising, promoting, music of active gang members inclusive of King Von, Lil Durk and OTF Muwop, when they assisted these individuals in the taunting, intimidating, threatening of life of FBG Duck and assisting them in acquiring the financing to further their criminal enterprise and criminal activities. These breaches are based on its own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) Knowingly signed King Von to a distribution deal when they knew or should have known he was an active gang member and had committed or participated in several robberies, assaults and murders in Chicago.
- b) Knowingly signed Lil Durk who they knew was a gang member and was aware of his associates and affiliations and the individuals around him who had known criminal histories and gang affiliations.

- c) Signed and distributed OTF artists music, inclusive of King Von, when they knew Lil Durk was using a lawful incorporated entity as a hub for signing gang members and used the lawful sale and distribution of music to further the activities of a criminal organization and to taunt, intimidate, threaten and kill FBG Duck.
- d) Continued to contract with King Von, Lil Durk, OTF when they knew OTF was repeatedly signing gang members as artists and placing them in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- e) Continued to support, promote, distribute music of OTF artists and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery committed by King Von.
- f) Knowingly distributed, marketed music to taunt, intimate and threaten the life of FBG Duck.
- g) Actively distributed, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- h) Knowingly distributed music that targeted FBG Duck and distributed music that celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- i) Failed to properly monitor the music being distributed by artists they signed, including King Von and Lil Durk and OTF artists.
- j) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by King Von, OTF targeting FBG Duck.
- k) Failed to recognize the inherit danger in distributing music targeting another musical artist.
- l) Failed to recognize the danger of signing and distributing music by gang members that targeted FBG Duck and allowed King Von and Lil Durk to utilize its platform and influence with streaming platforms to gain popularity, notoriety, and a global brand for profit.
- m) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists including FBG Duck.
- n) Enabled King Von to market his music targeting FBG Duck, increasing the risk to FBG Duck's life.
- o) Failed to properly monitor the music they distributed that was taunting, threatening the life of FBG Duck.

- p) Failed to monitor Lil Durk and King Von after they demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeting FBG Duck.
- q) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists including FBG Duck.
- r) Assisted in gaining millions of streams and followers for King Von and (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization King Von was a member of (O-Block).
- s) Emboldened King Von to continue to commit crimes and profit from those crimes by authorizing collaborations with its artists when King Von was making music, making social media posts detailing the crimes he was actively engaged in or had committed.
- t) Provided King Von a platform that allowed him to acquire the means to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- u) Enabled King Von to be able to finance a criminal enterprise (O-Block).
- v) They assisted King Von and (O-Block) in establishing individual global brands by providing them a global platform.
- w) Knowingly profiting from the killing and death, taunting, intimidating and threatening of FBG Duck.
- x) Knowingly disregarded a pattern of violence and criminal conduct by King Von and the disclosures of such violence.

498. As a direct and proximate cause of one or more of the above acts and/or omissions, and breaches of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant EMPIRE.

499. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty by Defendant EMPIRE, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant EMPIRE in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 51 SURVIVAL ACTION-NEGLIGENCE

**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS LIL DURK, OTF, UMG/INTERSCOPE, SONY, ALAMO,
EMPIRE**

500. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt paragraphs 427 through 499 of this Complaint at Law as though set forth fully at length herein.

501. Some or all of Lil Durk, OTF, UMG/Interscope, Sony, Alamo, Empire wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on the life of FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

502. Plaintiff Lasheena Weekly as independent Administrator of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Lil Durk, OTF, UMG/INTERSCOPE, Sony, Alamo, Empire, in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 52: INSTUTIONAL NEGLIGENCE
ALL PLAINTIFFS AGAINST “OTF”

503. Plaintiffs restate, reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

504. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

505. ONLY THE FAMILY ENTERTAINMENT, INC., a/k/a “OTF” was an incorporated music label and hub for (O-block) a criminal enterprise, black disciple’s street gang members. OTF was incorporated by Lil Durk, a member of (O-Block) and was the owner of OTF and responsible for signing, hiring, training, retention of employees and/or agents of OTF.

506. At all relevant times Alamo was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, and marketed music for various artists. Alamo was contracted with Lil Durk and OTF to promote, distribute, market, sale and build a global brand for Lil Durk and OTF and used certain title tracks linked to King Von, Lil Durk and

OTF. Alamo, coordinated, targeted, promoted, released certain title tracks of Lil Durk, King Von aimed at intimidating, threatening and eventual killing of FBG Duck. These companies promoted, influenced, and supported the killing of FBG Duck and profited from his death.

507. OTF engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, developed and created a brand for these gang members as artists and fueled rival gang beefs to sell music and profit from the violence and killings of rival gang members.

508. At all relevant times, OTF, owed a duty of care to refrain from negligent conduct and not to expose others to reasonably foreseeable risks of injury.

509. OTF, engaged in the highly risky activity of signing known gang members and affiliates of gangs, hiring known gang members and placing them in positions of executive leadership and leadership within the company. Signed known gang members knowing or should have known that they were engaged in criminal conduct and affiliated with criminal organizations. Hired known gang members knowing or should have known that they were actively participating and/or active members of such gangs.

510. OTF engaged in the highly risky activity of signing known gang members and affiliates of gangs, they had a heightened duty to not expose others to foreseeable harm.

511. OTF knew or should have known that King Von, OTF MUWOP were active gang members who had committed and continued to commit multiple crimes inclusive of assault, robbery, battery and murder. OTF knew or should have known that Lil Durk, King Von, OTF Muwop, D-Thang was affiliated and associated with (O-Block) a criminal enterprise.

512. The defendant OTF breached its duty of care owed to all persons, including Plaintiffs and their decedents, through their affirmative malfeasance, policies, actions and business

decisions, including signing, hiring, training, retention, supervision of its employees, agents. These breaches are based on their own actions, independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) OTF knowingly signed King Von to a record and/or distribution deal knowing that he was an active gang member and had committed or participated in several murders, assaults, batteries, robberies in Chicago.
- b) OTF Knowingly signed OTF MUWOP who they knew was a gang member and was aware of his affiliations and the individuals around him who had known criminal histories and violent conduct such as King Von.
- c) OTF knowingly signed gang members as artists when they knew or should have known they were actively engaged in criminal conduct.
- d) OTF hired and placed known gang members in positions of authority within OTF knowing they were actively involved in criminal conduct and used the label to further the gains of a criminal organization.
- e) Knowingly participated, approved whether tacit or directly, the hit or bounty placed on the life of FBG Duck by King Von.
- f) Continued to support, promote, release music of Lil Durk and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery by King Von which furthered the activities of (O-Block) a criminal enterprise.
- g) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- h) Knowingly created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- i) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- j) Failed to properly monitor the music being created and released by artists they signed.
- k) Failed to properly hire, select, train, supervise, and/or retain its employees and artists, but not limited, to D-Thang, King Von, OTF MUWOP.
- l) Maintained unqualified/ and or reckless executives, including, but not limited to D-Thang and King Von.

- m) Failed to monitor the executives, employees and/or agents they hired or signed to ensure they were not engaged in criminal acts of violence, threatening or taunting of other musical artists.
- n) Failed to screen their executives, employees and/or agents and to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- o) Failed to develop, promulgate, adopt/and/or implement safety policies, procedures, and practices for its employees, artists, executives, including but not limited to D-Thang, King Von, OTF MUWOP.
- p) Permitted, allowed, and/or failed to stop its artists, executives, employees including but not limited to D-Thang, King Von, OTF MUWOP from violating state and federal statutes and regulations, including, but not limited to robbery, assault, murder as well as Title 18, United States Code, Sections 1959(b)1) and 1961(1)and Title 18, United States Code, Section 1959(b)(2).
- q) Failed to provide systematic safety checks of their artists social media posts to ensure they were not threatening, taunting, intimidating other musical artists and/or engaged in acts of violence.
- r) Failed to properly monitor its artists and the music they were releasing, taunting, threatening the life of and taunting other musical artists.
- s) Failed to monitor King Von after he demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- t) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies on other musical artists.
- u) Failed to provide training and/or remedial training to its employees, executives, on signing, contracting, with artists and to properly screen artists as to not promote or further criminal activity of a criminal enterprise.
- v) Carelessly provided a worldwide platform of millions of followers to King Von, (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.
- w) Enabled King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- x) Enabled King von to finance the criminal enterprise of (O-Block) and assisted him in establishing a global brand for (O-Block) a criminal organization.

- y) Knowingly profiting from the killing and death, taunting, intimidating and threatening of FBG Duck.
- z) Knowingly disregarded a pattern of violence and criminal conduct by King Von and the disclosures of such violence.

513. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendants.

514. As a direct and proximate result of the aforementioned conduct and breach of duty, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 53: INSTUTIONAL NEGLIGENCE
ALL PLAINTIFFS AGAINST ALAMO

515. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

516. As previously alleged, Lil Durk is a global artist with influence over millions of fans and followers. Lil Durk and his label OTF are in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. Lil Durk and OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

517. ONLY THE FAMILY ENTERTAINMENT, INC., a/k/a "OTF" an incorporated music label and hub for (O-block) a criminal enterprise, black disciple street gang members. OTF was incorporated by Lil Durk, a member of (O-Block) and was the owner of OTF and responsible for signing, hiring, training, retention of employees and/or agents of OTF.

518. At all relevant times Alamo was a music, media, distribution, promotion and entertainment company who distributed, promoted, released, and marketed music for various artists. Alamo was contracted with Lil Durk and OTF to promote, distribute, market, sale and build a global brand for Lil Durk and OTF and used certain title tracks linked to King Von, Lil Durk and OTF. Alamo, coordinated, targeted, promoted, released certain title tracks of Lil Durk, King Von aimed at intimidating, threatening and eventual killing of FBG Duck. Alamo promoted, influenced, financed and supported the killing of FBG Duck and profited from his death.

519. Alamo engaged in the highly risky activity of targeting young teenage gang members from violent geographical areas, signed, develop and created a brand for these gang members as artists and fueled rival gang beefs to sell music and profit from the violence and killings of rival gang members.

520. At all relevant times, Alamo, owed a duty of care to refrain from negligent conduct in the hiring, supervising, training, retaining, of its staff, employees, executives and/or agents and not to expose others to reasonably foreseeable risks of injury.

521. Alamo engaged in the highly risky activity of signing known gang members and affiliates of gangs, and had a heightened duty to not expose others to foreseeable harm.

522. Alamo knew or should have known that Lil Durk, King Von, OTF MUWOP were active gang members and a member and/or affiliate of (O-Block) a criminal organization who had committed and continued to commit multiple crimes inclusive of assault, robbery, battery and murder. Alamo knew or should have known that Lil Durk was affiliated with King Von, OTF MUWOP.

523. Alamo knew or should have known that the gang members they signed, or its artists collaborated with, would use its platform, notoriety and influence of their artists to further the criminal enterprise of (O-Block) and the criminal activity they were engaged.

524. The defendant breached its duties of care owed to all person, including Plaintiffs and their decedents, through their affirmative malfeasance, policies, actions and business decisions, including signing, hiring, training, retention, supervision of its employees, agents. These breaches are based on the actions of their employees and/or agents and/or executives and is independent of any actions taken by a third party. Those breaches include any and all of the following, in combination or separately:

- a) ALAMO signed OTF when they knew Lil Durk was using a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization.
- b) Continued to contract with OTF and Lil Durk when they knew he was repeatedly signing gang members as artists and placing them in executive positions within OTF to oversee and ensure the furtherance of a criminal enterprise.
- c) Continued to support, promote, release music of Lil Durk and King Von knowing they were actively participating or was present for the commission of crimes inclusive of robbery, assault and battery by King Von.
- d) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.

- e) Actively created, released, marketed, promoted music glorifying, celebrating, the death of FBG Duck.
- f) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- g) Failed to properly monitor the music being created and released by artists they signed.
- h) Failed to properly hire, select, train, supervise, and/or retain its employees and artists, but not limited, to Lil Durk, King Von, OTF MUWOP.
- i) Failed to monitor agents they hired or signed to ensure they were not engaged in criminal acts of violence, threatening or taunting of other musical artists.
- j) Failed to screen their artists/agents and failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- k) Failed to develop, promulgate, adopt/and/or implement safety policies, procedures, and practices for its artists, including but not limited to Lil Durk, King Von, OTF MUWOP.
- l) Failed to provide systematic safety checks of their artists' social media posts to ensure they were not threatening, taunting, intimidating other musical artists and/or engaged in acts of violence.
- m) Failed to properly monitor its artists and the music they were releasing, that was taunting and threatening the life of FBG Duck.
- n) Failed to monitor Lil Durk and King Von after King Von demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- o) Failed to monitor and observe Lil Durk and King Von after King Von openly disclosed his intentions to commit acts of violence and robberies against other musical artists.
- p) Failed to provide training and/or remedial training to its employees, executives, on signing, contracting, with artists and to properly screen artists as to not promote or further criminal activity of a criminal enterprise.
- q) Carelessly provided a worldwide platform of millions of followers to Lil Durk, King Von and Lil Durk and King Von's (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.

- r) Enabled Lil Durk and King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- s) Failed to have protocols to prevent assisting and financing a criminal enterprise (O-Block)
- t) Failed to have protocols to prevent the establishment of a criminal enterprise (O-Block) as a global brand.
- u) Failed to have policies and procedures preventing the profiting from the killing, death, taunting, and threatening of FBG Duck.
- v) Failed to have proper compliance policies in place to prevent it from contributing to the acts of violence disclosed by their artists and to prevent furthering a criminal enterprise.

525. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant ALAMO.

526. As a direct and proximate result of the aforementioned conduct and breach of duty, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant ALAMO in an amount that will fully compensate them for all

legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 54: SURVIVAL ACTION – INSTITUTIONAL NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against OTF, ALAMO,

527. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt paragraphs 503 through 526 of this Complaint at Law as though set forth fully at length herein.

528. Some or all of OTF, Alamo, wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

529. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants OTF, Alamo, in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 55: NEGLIGENT HIRING, SUPERVISION, RETENTION, TRAINING
ALL PLAINTIFFS AGAINST ONLY THE FAMILY ENTERTAINMENT

530. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

531. OTF is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

532. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of OTF and were otherwise its agents.

533. At all relevant times King Von was under the direction, supervision and control of OTF and was otherwise its agent.

534. At all relevant times OTF MUWOP was under the direction, supervision and control of OTF and was otherwise its agent.

535. At all relevant times unknown employees, unknown agents were under the direction, supervision and control of OTF and were otherwise its agents.

536. At all relevant times, OTF owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, hiring, retention, promotion and supervision of their employees and or agents. The conduct of their agents and/or employees created an unreasonable risk of harm to Plaintiff Davon Brinson and Cashae Williams and plaintiff decedent.

537. OTF knew or should have known that Lil Durk, Donte Banks Jr. King Von, OTF MUWOP were active gang members and were affiliated with the criminal organization (O-Block).

538. At all relevant times Dontay Banks Jr. was an executive and/or agent within OTF and was responsible for carrying out the day-to-day operations of OTF inclusive of signing, supervising, promoting and controlling artists they signed.

539. At all relevant times Lil Durk was an executive and/or agent within OTF and was responsible for carrying out the day-to-day operations of OTF inclusive of signing, supervising, promoting and controlling artists they signed.

540. At all relevant times King Von was an executive and/or agent within OTF and was responsible for carrying out tasks cosigned and/or directed by OTF inclusive controlling other agents including but not limited to OTF Muwop and other members of (O-Block).

541. OTF through their agents, supervisors, executives, including but not limited to Dontay Banks, Lil Durk and other supervisors and agents failed to supervise it's employees, agents, and artists to ensure that they were not committing violent acts against FBG Duck, threatening the life of FBG Duck and intentionally attempting to intimidate FBG Duck and failed to monitor/supervise their agents or employees to ensure they were conducting themselves in a lawful manner and providing the services intended under their contractual duties or employment responsibilities and not committing or attempting to commit acts of violence against Plaintiff decedent FBG Duck and Plaintiffs Davon Brinson and Cashae Williams.

542. OTF failed though its agents and/or employees to supervise its agents to prevent creating an environment that fostered abusive and violent actions directed at other artists. They repeatedly signed known gang members including but not limited to King Von and OTF Muwop. They continued to associate and affiliate with King Von and (O-Block) a criminal enterprise who engaged in prolonged conduct to taunt, threaten the life of and who committed acts of violence against FBG Duck.

543. OTF through its agents, employees, executives hired, retained known gang members in executive positions such as Dontay Banks Jr and King Von.

544. OTF thought its agents, employees, executives failed to ensure safe protocols to prevent their executives and/or agents known gang members and affiliates from targeting other rival artists with threats, intimidation and violence.

545. OTF through their agents, supervisors, employees, executives, breached its duty of care that was owed to plaintiff decedent FBG Duck, Plaintiffs Davon Brinson, Cashae Willaims.

Those breaches include any and all of the following, in combination or separately:

- a) Knowling signed, contracted, hired, placed in an executive position King Von within OTF knowing that he was an active gang member and had committed or participated in acts of violence inclusive of robbery and murders in Chicago.
- b) Engaged in a pattern and practice of signing, hiring, contracting with known gang members inclusive of members from 600, Lamron, THF, Black disciples, (O-Block), when they were aware of these individuals' criminal histories and violent conduct.
- c) Hired executives within OTF to knowingly use a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of (O-Block) a criminal organization.
- d) Hied, retained, and promoted known gang members in positions inclusive of executive positions within OTF to oversee and ensure the furtherance of (O-Block) a criminal enterprise.
- e) Retained agents and/or employees within OTF when they knew their agents and/or employees had placed a hit or bounty on the life of FBG Duck.
- f) Actively participated through its agents and/or was present for the commission of crimes inclusive of robbery, assault and battery by King Von and used these acts to further (O-Block) a criminal enterprise.
- g) Knowingly created, released, marketed or produced music to taunt, intimate and threaten the life of FBG Duck.
- h) Knowingly conspired through its executives and other agents to commit the murder of FBG Duck.

- i) Participated in the cover up of the conspiracy to murder FBG Duck.
- j) Actively created, released, marketed, promoted, music glorifying, celebrating, the death of FBG Duck.
- k) Knowingly celebrated and glorified murders committed by King Von which emboldened other gang members to act on the orders and/or bounty to murder FBG Duck.
- l) Failed to properly monitor the music being created and released by artists they signed that targeted, threatened, taunted, intimidated and was directed at FBG Duck.
- m) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by their artists targeting other musicians.
- n) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- o) Failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.
- p) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- q) Enabling King Von to market his music targeting FBG Duck and increasing the risk to FBG Duck's life.
- r) Failed to monitor King Von after he demonstrated a willingness to taunt, threaten, intimate and commit acts of violence and continued to release music targeted at FBG Duck.
- s) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies against other musical artists.
- t) Provided a worldwide platform of millions of followers to King Von (O-Block) to gain notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.
- u) Enabled King Von to continue to commit crimes and profit from those crimes by collaborating and making music with him detailing the crimes he was actively engaged in or had committed. This conduct enabled King Von to finance the bounty placed on the life of FBG Duck.

- v) Enabled King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- w) Enabled King Von to finance the criminal enterprise of (O-Block) and assisted him in establishing a global brand for (O-Block) a criminal organization.
- x) Promoted and established King Von as a high-ranking individual within OTF despite having knowledge of his criminal conduct. An act that emboldened and encouraged other gang members to commit acts of violence to achieve rank within OTF.
- y) Otherwise used a lawful entity a music label to conduct unlawful business of (O-Block) to acquire, preserve and protect power, territory, operations and proceeds through the use of threats, intimidation and violence including murder and other acts of violence. In furtherance of the acts of a criminal organization.
- z) Promoted and enhanced (O-Block) and its members and associates, including marketing and promoting their claims and responsibility for acts of violence committed by (O-Block) taunting other musicians such as FBG Duck.
- aa) Aided King Von and O-Block in increasing their status through the use of social media platforms and music.
- bb) Knowingly profiting from the killing and death, taunting, intimidating and threatening of FBG Duck.
- cc) Knowingly used OTF as a hub for gang members to gain notoriety, popularity and financial gain to support a criminal enterprise.
- dd) Knowingly disregarded a pattern of violence and criminal conduct by King Von.
- ee) Failed to fire executives who were engaged in and participated in the murder of FBG Duck.
- ff) Failed to fire or disengage with any agent or employee who was involved with the murder of FBG Duck.
- gg) Failed to fire, disengage, terminate any and all contracts with any artist or agent who planned, plotted and carried out the murder of FBG Duck.
- hh) Failed to fire, disengage, terminate any and all contract with any artist, agent, executive who planned and plotted the cover up of the bounty put on FBG Duck's life and the actual murder.

546. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant OTF.

547. As a direct and proximate result of one or more of the aforementioned acts or omissions, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

**COUNT 56: SURVIVAL ACTION – NEGLIGENT HIRING, TRAINING,
SUPERVISION, RETENTION
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS OTF**

548. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt and incorporate by reference paragraphs 530 through 547 as though set forth fully at length herein.

549. Some or all of OTF wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to,

and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

550. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 57: VICARIOUS LIABILITY
ALL PLAINTIFF'S AGAINST OTF

551. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

552. OTF is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

553. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of OTF and were otherwise its agents.

554. At all relevant times King Von was under the direction, supervision and control of OTF and was otherwise its agent.

555. At all relevant times OTF MUWOP was under the direction, supervision and control of OTF and was otherwise its agent.

556. At all relevant times unknown employees, unknown agents were under the direction, supervision and control of OTF and were otherwise its agents.

557. Lil Durk was the founder, CEO that maintained the daily responsibility for OTF and was an agent of OTF.

558. The described acts in the preceding and succeeding paragraphs by King Von, OTF Muwop, Dontay Banks, Lil Durk were committed within the scope and control of the agency relationship in furtherance of OTF.

559. That as the principal of King Von, OTF Muwop, Dontay Banks, Lil Durk, OTF is responsible for all of the negligent acts and omissions committed by its agents, and employees acting within the scope of their employment or agency relationship.

560. As a direct and proximate cause of one or more of the acts and/or omissions, described in the preceding and succeeding paragraphs and breach of duties by OTF's agents, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will

continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant OTF.

561. As a direct and proximate result of one or more of the aforementioned acts or omissions and breach of duties by OTF's employees and/or agents, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendant OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 58: SURVIVAL ACTION – VICARIOUS LIABILITY
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS OTF

562. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege and incorporate by reference paragraphs 551 through 561 of this Complaint at Law as though set forth fully at length herein.

563. Some or all of OTF wrongful conduct as alleged herein through its agents, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety,

worry, and fear and realization of impending death from the time he was injured until the time of his death.

564. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 59: VICARIOUS LIABILITY-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS OTF

565. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

566. OTF is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

567. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of OTF and were otherwise its agents.

568. At all relevant times King Von was under the direction, supervision and control of OTF and was otherwise its agent.

569. At all relevant times OTF MUWOP was under the direction, supervision and control of OTF and was otherwise its agent.

570. At all relevant times unknown employees, unknown agents were under the direction, supervision and control of OTF and were otherwise its agents.

571. Lil Durk was principal, executive in control of OTF and was otherwise its agent.

572. The described acts in the preceding and succeeding paragraphs by King Von, OTF Muwop, Dontay Banks, Lil Durk were committed within the scope and control of the agency relationship in furtherance of OTF.

573. That OTF as the principal of King Von, OTF Muwop, Dontay Banks, Lil Durk, OTF is responsible for all of the negligent acts and omissions committed by its agents, and employees acting within the scope of their employment and/or agency relationship.

574. Some or all of the wrongful conduct as alleged herein through the agents and/or employees of OTF, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting OTF to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

575. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant OTF for the acts of its agents and/or employees in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 60: VICARIOUS LIABILITY
ALL PLAINTIFF'S AGAINST SONY/ALAMO

576. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

577. SONY/ALAMO is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. SONY/ALAMO also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

578. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

579. At all relevant times King Von was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

580. At all relevant times OTF MUWOP was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

581. At all relevant times unknown employees, unknown agents of OTF were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

582. Lil Durk was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

583. The described acts in the preceding and succeeding paragraphs by King Von, OTF Muwop, Dontay Banks, Lil Durk were committed within the scope and control of the agency relationship in furtherance of SONY/ALAMO.

584. That as the principal of King Von, OTF Muwop, Dontay Banks, Lil Durk, and/or unknown agents of OTF, SONY/ALAMO is responsible for all of the negligent acts and omissions committed by its agents and/or employees acting within the scope of their employment and/or agency relationship.

585. As a direct and proximate cause of one or more of the acts and/or omissions, described in the preceding and succeeding paragraphs and breach of duties by SONY/ALAMO's agents, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant SONY/ALAMO.

586. As a direct and proximate result of one or more of the aforementioned acts or omissions and breach of duties by SONY/ALAMO's agents, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendants SONY/ALAMO in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

COUNT 61: SURVIVAL ACTION – VICARIOUS LIABILITY
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS SONY/ALAMO

587. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, reallege, adopt, incorporate by reference paragraphs 576 through 586 of this Complaint at Law as if set forth herein.

588. Some or all of SONY/ALAMO's wrongful conduct as alleged herein through its agents, whether taken singularly or in any combination, was a direct and proximate cause for the shooting and in injuries to, and the death of FBG Duck on August 4, 2020, and encouraged the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on the life of FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

589. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant

SONY/ALAMO in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 62: VICARIOUS LIABILITY-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS SONY/ALAMO

590. Plaintiffs reallege and incorporate by reference paragraphs 1 through 53 of this Complaint at Law as though fully set forth herein.

591. SONY/ALAMO is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. SONY/ALAMO also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

592. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

593. At all relevant times King Von was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

594. At all relevant times OTF MUWOP was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

595. At all relevant times unknown employees, unknown agents were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

596. Lil Durk was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

597. The described acts in the preceding and succeeding paragraphs by King Von, OTF Muwop, Dontay Banks, Lil Durk were committed within the scope and control of the agency relationship in furtherance of SONY/ALAMO.

598. That as the principal of King Von, OTF Muwop, Dontay Banks, Lil Durk, SONY/ALAMO is responsible for all of the acts and omissions committed by its agents, and employees acting within the scope of their employment or agency relationship.

599. Some or all of the wrongful conduct as alleged herein through the agents and/or employees of SONY/ALMAO, whether taken singularly or in any combination was a direct and proximate cause of the killing of FBG Duck on August 4, 2020, As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting SONY/ALAMO to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

600. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendants SONY/ALAMO for the acts of its agents and/or employees in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later

granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 63: NEGLIGENT HIRING, SUPERVISION, RETENTION, TRAINING
ALL PLAINTIFFS AGAINST SONY/ALAMO

601. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

602. OTF is in the business of signing, developing, branding musical artists and creating, producing, marketing and selling music. OTF also profit from advertising revenue, brand building revenue, podcast revenue, streaming revenue and sales of records released by the label and distributed worldwide.

603. At all relevant times DONTAY BANKS JR. and the agents/employees of OTF were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

604. At all relevant times King Von was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

605. At all relevant times OTF MUWOP was under the direction, supervision and control of SONY/ALAMO and was otherwise its agent.

606. At all relevant times unknown employees, unknown agents were under the direction, supervision and control of SONY/ALAMO and were otherwise its agents.

607. At all relevant times, SONY/ALAMO owed all persons, including Plaintiffs and their decedents, a duty to exercise reasonable care in the signing, hiring, retention, promotion and supervision of their employees and or agents. The conduct of their agents and/or employees created an unreasonable risk of harm to Plaintiff Davon Brinson and Cashae Williams and plaintiff decedent Carlton Weekly.

608. SONY/ALAMO knew or should have known that Lil Durk, Dontay Banks. King Von, OTF MUWOP were active gang members and were affiliated with the criminal organization (O-Block).

609. At all relevant times Dontay Banks, Lil Durk was an executive within OTF and was responsible for carrying out the day-to-day operations of OTF inclusive of signing, supervising, promoting and controlling artists they signed. SONY/ALAMO knew or should have known that Dontay Banks and Lil Durk held this position and authority at OTF.

610. SONY/ALAMO through their agents, supervisors, executives, failed to supervise it's employees, agents, and artists to ensure that they were not committing violent acts against FBG Duck, threatening the life of FBG Duck and intentionally attempting to intimidate FBG Duck and failed to monitor/supervise their agents or employees to ensure they were conducting themselves in a lawful manner and providing the services intended under their contractual duties or employment responsibilities and not committing or attempting to commit acts of violence against Plaintiff Decedent FBG Duck and Plaintiffs Davon Brinson and Cashae Williams.

611. SONY/ALAMO failed though its agents and/or employees to supervise its agents to prevent creating an environment that fostered abusive and violent actions directed at FBG Duck. They repeatedly signed, promoted and financed known gang members including but not limited to Lil Durk, King Von and OTF Muwop.

612. SONY/ALAMO through its agents/employees/ executives failed to ensure safe protocols to prevent its agents known gang members and affiliates from targeting other rival artists with threats, intimidation and violence.

613. SONY/ALAMO through their agents, supervisors, employees, executives, breached its duty of care that was owed to plaintiff decedent FBG Duck, Plaintiffs Davon Brinson,

Cashae Willaims. Those breaches include any and all of the following, in combination or separately:

- a) Knowingly signed, contracted, hired, Lil Durk, King Von knowing that they were active gang members and were affiliated with, black disciples street gang, Lamron street gang (O-Block”) a criminal organization and that they either had committed, participated or was present for acts of violence inclusive of robbery and murders in Chicago.
- b) Signed/contracted with OTF knowing that they signed, hired, contracted with other gang members or individuals affiliated, inclusive of members from 600, Lamron, THF, Black disciples, (O-Block), when they were aware of these individuals’ criminal histories and violent conduct.
- c) Knowingly signed/contracted with OTF when they knew or should have known OTF used a lawful incorporated entity as a hub for gang members and used the lawful sale and distribution of music to further the activities of a criminal organization.
- d) Knowingly promoted and allowed the use of its brand to develop a brand, influence and notoriety for known gang members within OTF to finance and brand (O-’Block) a criminal enterprise.
- e) Knowingly created, released, marketed or produced music that taunted, intimidated and threaten the life of FBG Duck.
- f) Actively created, released, marketed, promoted, music glorifying, celebrating, the death of FBG Duck.
- g) Knowingly targeted known gang members to sign including but not limited to Lil Durk, OTF, King Von to exploit the violence these individuals were engaged for profit.
- h) Failed to properly monitor the music being created and released by artists they signed whom they knew or should have known were gang members or gang affiliates.
- i) Failed to recognize the danger of intimidation, taunting, threatening of life tactics employed by their artists targeting other musicians and continued to exploit and release that music for profit.
- j) Failed to recognize the inherit danger of releasing music targeting another musical artist.
- k) Failed to recognize the danger of signing, producing, developing and providing a platform of millions of followers to active gang members.

- l) Failed to ensure that the artists they signed were not continually engaged in criminal acts of violence, threatening or taunting of other musical artists.
- m) Enabled King Von to market his music targeting FBG Duck and increasing the risk to FBG Duck's life.
- n) Failed to properly monitor its artists and the music they were releasing that was threatening the life of and taunting FBG Duck.
- o) Failed to monitor King Von after he demonstrated a willingness to taunt, threaten, intimidate and commit acts of violence and continued to release music targeted at FBG Duck.
- p) Failed to monitor and observe King Von after he openly disclosed his intentions to commit acts of violence and robberies against other musical artists.
- q) Provided a global brand and a worldwide platform of millions of followers to King Von, Lil Durk, (O-Block) and assisted them in gaining notoriety, influence and profit to support acts of violence and further the acts of the criminal organization they were engaged.
- r) Enabled King Von to continue to commit crimes and profit from those crimes by allowing collaborations with Lil Durk, whom had millions of followers, knowing that King Von was making music threatening, taunting, intimidating FBG Duck and music detailing the crimes he was actively engaged in or had committed or would commit.
- s) Enabled King Von to finance the One Hundred-thousand-dollar bounty he placed on the life of FBG Duck.
- t) Enabled King Von to finance the criminal enterprise (O-Block) and assisted him in establishing a global brand for (O-Block) a criminal organization.
- u) Assisted in establishing King Von's status as an influential artist despite having knowledge of his criminal conduct. An act that emboldened and encouraged other gang members to commit acts of violence to achieve the same or similar status and influence.
- v) Assisted OTF to use a lawful entity, a music label, to conduct unlawful business of (O-Block) to acquire, preserve and protect power, territory, operations and proceeds through the use of threats, intimidation and violence including murder and other acts of violence. In furtherance of the acts of a criminal organization.
- w) Aided Lil Durk, King Von and (O-Block) in increasing their status through the use of social media platforms and music.
- x) Knowingly profiting from the killing, death, taunting, intimidating and threatening of FBG Duck.

- y) Knowingly disregarded a pattern of violence and criminal conduct by King Von and allowed Lil Durk to continue to collaborate, create, music that was promoted by and through the agents of SONY/ALAMO.
- z) Failed to discontinue promoting, advertising, releasing, collaborations of its artists with King Von knowing that King Von was engaged in acts of violence and criminal conduct and represented (O-Block) a criminal enterprise.
- aa) Failed to discontinue its relationship with Lil Durk and King Von knowing that they were creating and releasing music targeting, threatening the life of, taunting, intimidating FBG Duck.
- bb) Failed to recognize that their agents were targeting and planning the death of FBG Duck.
- cc) Failed to recognize the signs that its agents were engaged in a plot, plan scheme to commit violent acts against FBG Duck.

614. As a direct and proximate cause of one or more of the above acts and/or omissions, and breach of duty, Plaintiffs DAVON BRINSON, CASHAE WILLIAMS suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause them great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiffs have incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of their injuries and will continue to do so in the future. Plaintiffs also have been and will continue to be hindered in their daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendants SONY/ALAMO.

615. As a direct and proximate result of one or more of the aforementioned acts or omissions, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiffs respectfully request that judgment be entered individually in their favor and against Defendants SONY/ALAMO in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages.

**COUNT 64: SURVIVAL ACTION – NEGLIGENT HIRING, TRAINING,
SUPERVISION, RETENTION
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS SONY/ALAMO,**

616. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 601 through 615 of this Complaint at Law as though and set forth the preceding and succeeding paragraphs as if set forth herein.

617. Some or all of SONY/ALAMO's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting and injuries to, and the death of FBG Duck on August 4, 2020. Their actions encouraged and incentivized King Von, Lil Durk, and the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

618. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of

Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants SONY/ALAMO in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 65: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
ALL PLAINTIFFS AGAINST "LIL DURK"

619. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 74 through 81 of this Complaint at Law as though fully set forth herein.

620. The wrongful conduct of Lil Durk as alleged herein, whether taken singularly or in any combination, was extreme and outrageous and directly resulted in the shooting that took place on August 4, 2020.

621. Carlton Weekly, Davon Brinson, Cashae Williams were within the zone of physical danger created by this defendant's wrongful acts, reasonably experienced fear for their own safety, and suffered physical injuries when they were shot by the shooters.

622. This negligent conduct of this Defendant was a direct and proximate cause of the shooting committed in Chicago, IL on August 4, 2020, resulting in each of the plaintiffs' injuries as set forth in the preceding paragraphs, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death. Plaintiff Davon Brinson and Cashae Williams experienced past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant Lil Durk in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed the minimum jurisdictional amount and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 66: SURVIVAL ACTION – NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT “LIL DURK”**

623. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, adopt and incorporate by reference paragraphs 619 through 622 of this Complaint at Law as though set forth fully at length herein.

624. Some or all of Lil Durk’s wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

625. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant Lil Durk

in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 67: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
ALL PLAINTIFFS AGAINST “OTF”

626. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73, paragraphs 82 through 89 of this Complaint at Law as though fully set forth herein.

627. The wrongful conduct of OTF as alleged herein, whether taken singularly or in any combination, was extreme and outrageous and directly resulted in the shooting that took place on August 4, 2020.

628. Carlton Weekly, Davon Brinson, Cashae Williams were within the zone of physical danger created by this defendant’s wrongful acts, reasonably experienced fear for their own safety, and suffered physical injuries when they were shot by the shooters.

629. This negligent conduct of this Defendant was a direct and proximate cause of the shooting committed in Chicago, IL on August 4, 2020, resulting in each of the plaintiffs’ injuries as set forth in the preceding paragraphs, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death. Plaintiff Davon Brinson and Cashae Williams experienced past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant OTF in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed the minimum

jurisdictional amount and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 68: SURVIVAL ACTION – NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS “OTF”,**

630. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt incorporate by reference paragraphs 626 through 629 of this Complaint at Law as though set forth fully at length herein.

631. Some or all of OTF wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

632. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, brings this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 69: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
ALL PLAINTIFFS AGAINST ESTATE OF KING VON, FOREVER AND A DAY
LLC, KING VON AS AGENT OF OTF

633. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73, paragraphs 90 through 97 of this Complaint at Law as though fully set forth herein.

634. The wrongful conduct of KING VON as alleged herein, whether taken singularly or in any combination, was extreme and outrageous and directly resulted in the shooting that took place on August 4, 2020.

635. Carlton Weekly, Davon Brinson, Cashae Williams were within the zone of physical danger created by this defendant's wrongful acts, reasonably experienced fear for their own safety, and suffered physical injuries when they were shot by the shooters.

636. This conduct of this Defendant was a direct and proximate cause of the shooting committed in Chicago, IL on August 4, 2020, resulting in each of the plaintiffs' injuries as set forth in the preceding paragraphs, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death. Plaintiff Davon Brinson and Cashae Williams experienced past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendants Estate of King Von, Forever and a Day LLC, King Von as agent of OTF, in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceeds the minimum jurisdictional amount.

**COUNT 70: SURVIVAL ACTION – NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS**
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS ESTATE OF KING VON, FOREVER AND A DAY LLC, KING
VON AS AGENT OF OTF

637. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 633 through 636 of this Complaint at Law as though fully set forth fully at length herein.

638. Some or all of KING VON’S wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the shooting and ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

639. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants Estate of King Von, Forever and a Day LLC, King Von as agent of OTF in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment

interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 71: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
ALL PLAINTIFFS AGAINST SONY/ALAMO

640. Plaintiffs reallege and incorporate by reference paragraph 1 through 73 of this Complaint at Law as though fully set forth herein.

641. The wrongful conduct of SONY/ALAMO as alleged herein, whether taken singularly or in any combination, was extreme and outrageous and directly resulted in the shooting that took place on August 4, 2020.

642. Carlton Weekly, Davon Brinson, Cashae Williams were within the zone of physical danger created by this defendant's wrongful acts, reasonably experienced fear for their own safety, and suffered physical injuries when they were shot by the shooters.

643. This negligent conduct of this Defendant was a direct and proximate cause of the shooting committed in Chicago, IL on August 4, 2020, resulting in each of the plaintiffs' injuries as set forth in the preceding paragraphs, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death. Plaintiff Davon Brinson and Cashae Williams experienced past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendants SONY/ALAMO in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed

the minimum jurisdictional amount and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 72: SURVIVAL ACTION – NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANTS SONY/ALAMO**

644. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 640 through 643 of this Complaint at Law as though set forth fully at length herein.

645. Some or all of SONY/Alamo's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020, encouraged and incentivized the convicted murderers C-Thang, Los, Kenny Mac, OTF Muwop, C-Murda, Ralph Turpin to carry out the ordered hit or bounty placed on FBG Duck by King Von, Lil Durk. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

646. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendants SONY/Alamo in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later

granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 73: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
ALL PLAINTIFFS AGAINST OTF MUWOP AS AGENT OF OTF

647. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73, paragraphs 130 through 137 of this Complaint at Law as though fully set forth herein.

648. OTF MUWOP's conduct in firing multiple rounds at the plaintiffs while waiting to enter a store to shop, and while sitting in a vehicle in a high-end retail area in Chicago on August 4, 2020 was extreme and outrageous.

649. The plaintiffs suffered severe physical injuries when they were shot by the shooters including but not limited to OTF MUWOP and reasonably experienced fear for their own safety.

650. This intentional conduct by this defendant was a direct and proximate cause of the shooting committed in Chicago, IL on August 4, 2020, resulting in each of the plaintiffs' injuries as set forth in the preceding paragraphs, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death. Plaintiff Davon Brinson and Cashae Williams experienced past and future pain, suffering, disability, loss of normal life, anxiety, severe emotional distress, lost income, lost future income, lost earning capacity, and past and future medical expenses and related expenses.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendants in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed the minimum jurisdictional amount and if leave is later granted to amend to ass such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 74: SURVIVAL ACTION – INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**
**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT OTF MUWOP AS AGENT OF OTF**

651. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 647 through 650 of this Complaint at Law as though set forth fully at length herein.

652. Some or all of the defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the shooting, resulting in injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

653. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the Estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 75: WRONGFUL DEATH-WILLFUL AND WANTON MISCONDUCT
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST CITY OF CHICAGO

654. On August 4, 2020, and at all times relevant to the matters in this complaint, defendant CITY OF CHICAGO was a municipal corporation in the County of Cook, State of Illinois.

655. On August 4, 2020, at all times relevant to the matters in this complaint, defendant CITY OF CHICAGO maintained a police department which employed officers who acted as agents and employees of CITY OF CHICAGO.

656. On August 4, 2020, at all times relevant to the matters in this complaint, defendant CITY OF CHICAGO maintained a Chicago fire department which responded to emergency medical services.

657. On or about August 4, 2020, certain agents and employee police officers of the defendant CITY OF CHICAGO responded to a report of a shooting at or near 68 East Oak Street, Chicago, IL in the city of Chicago.

658. On or about August 4, 2020, certain agents, employee police officers of the defendant CITY OF CHICAGO arrived at or about 68 East Oak Street and came upon plaintiff decedent Carlton Weekly lying on the ground suffering from multiple gunshot wounds and plaintiff Davon Brinson and Cashae Williams also suffering from gunshot wounds.

659. Carlton Weekly was lying on the ground bleeding from multiple gunshot wounds and had been shot 16 times all over his body. Mr. Weekly was shot in his neck, his chest back, right buttock, left upper arm, index finger, left thigh, right thigh and lower leg.

660. Davon Brinson was struck by three bullets in his chest, right leg and back.

661. Cashae Williams was struck by 2 bullets in her hand.

662. Prior to the Chicago Fire Department Medical Services arriving police officer Carly Cervantez approached Carlton Weekly and asked him where he was shot. Carlton Weekly told officer Cervantez that he was shot all over his body.

663. Officer Cervantez visibly seen that Carlton Weekly was shot multiple times all over his body.

664. Upon the arrival of the Chicago Police officers and Chicago Fire Department personnel they failed to render critical aid to Carlton Weekly and left him laying on the ground for approximately 17 minutes before transporting him to a hospital.

665. The City of Chicago police officers instructed Chicago EMS to render aid to Davon Brinson and Cashae Willaims and not Carlton Weekly.

666. The City of Chicago Police officers instructed the Chicago EMS not to transport Carlton Weekly immediately to the hospital.

667. The failure to transport Carlton Weekly immediately to a nearby hospital caused a severe delay in the critical care and treatment Carlton Weekly needed to possibly save his life.

668. On or about August 4, 2020, and at all times alleged herein, it was the duty of City of Chicago, through its agents and employee police officers and EMS, to obtain immediate medical care on behalf of Carlton Weekly when they knew from their observations and the statements of Carlton Weekly that he was in need of immediate medical care and treatment.

669. On August 4, 2020, CITY OF CHICAGO, voluntarily assumed the duty to provide medical services when they responded to a 911 call and was notified that a citizen had been shot at 68 East Oak Street. Upon their arrival and approach of Carlton Weekly when they observed him suffering from multiple gunshot wounds, they assumed responsibility to render immediate aid inclusive of immediate transport to a nearby hospital.

670. On or about August 4, 2020, defendant CITY OF CHICAGO, through its agents and employee police officers failed to summon and allow medical EMS to provide immediate medical care to Carlton Weekly.

671. On or about August 4, 2020, defendant CITY OF CHICAGO, through its agents and employee police officers prevented and ordered the Chicago EMS not to render medical aid to Carlton Weekly.

672. On or about August 4, 2020, defendant CITY OF CHICAGO, through its agents and employee police officers prevented and ordered the Chicago EMS not to immediately transport Carlton Weekly to a hospital leaving him lying on the ground bleeding out for approximately seventeen minutes.

673. On or about August 4, 2020, defendant CITY OF CHICAGO, through its agents and employee EMS officers followed the orders of the Chicago Police officers and failed to render aid or transport Carlton Weekly to the hospital immediately.

674. On or about August 4, 2020 defendant CITY OF CHICAGO's conduct was recklessly willful and wanton and it acted in a manner that showed an utter indifference to or conscious disregard for the safety of Carlton Weekly, when they left Carlton Weekly lying on the ground for approximately seventeen minutes and failed to take reasonable action to summon appropriate medical treatment, render immediate medical care, and immediately transport Carlton Weekly to a nearby hospital roughly five minutes away when it knew that he needed immediate medical treatment.

675. On or about August 4, 2020, as a proximate result of the foregoing willful and wanton acts or omissions by defendant CITY OF CHICAGO through its agents and employees, Carlton Weekly suffered injuries of a personal and pecuniary nature which resulted in his death.

676. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting CITY OF CHICAGO to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

677. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant CITY OF CHICAGO, in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, which substantially exceed the minimum jurisdictional amount.

COUNT 76: SURVIVAL ACTION – WILLFUL AND WANTON CONDUCT
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against “CITY OF CHICAGO”

678. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt and incorporate by reference paragraphs 654 through 677 of this Complaint at Law as though set forth fully at length herein.

679. Some or all of this defendant wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

680. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, which substantially exceed the minimum jurisdictional amount.

COUNT 77: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as independent Administrator for the Estate of Carlton Weekly
AGAINST “DOLCE & GABBANA”

681. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Calton Weekly re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

682. At all times relevant, Defendant, DOLCE & GABBANA, was a company that owned, operated, managed, and/or controlled the premises at 68 East Oak Street, in the City of Chicago, County of Cook, and State of Illinois.

683. DOLCE & GABBANA, knew or should have known of the uptick in armed robberies, assaults with weapons, and shootings in this luxury retail area prior to and including August 4, 2020.

684. On information and belief on or about August 4, 2020, and at all times material Chicago police officers were stationed on Oak Street and the high-end retail area on foot patrol due to the rise in armed robberies, assaults with weapons and attempted shootings in the area.

685. On information and belief on or about August 4, 2020, and at all times material all storefronts in this high-end retail area inclusive of DOLCE & GABBANA hired armed security guards in response to the uptick in armed robberies, assaults with weapons and violent acts against their customers.

686. On information and belief DOLCE & GABBANA was informed of the rise in violent crimes in the area and assumed the responsibility to contract with security companies in direct response to the increase in armed robberies and assaults with weapons in the area.

687. On information and belief on or about August 4, 2020, and at all times material DOLCE & GABBANA, knew or should have known of the armed lootings and smash and grabs that were taking place in the high-end retail. The high-end retail stores in this area, inclusive of DOLCE & GABBANA were the target of the armed smash and grabs.

688. On or about August 4, 2020, DOLCE & GABBANA., voluntarily assumed the duty to provide protection to its invitees by placing a security guard on its premises, more specifically on its sidewalk directing customers to stand in line prior to entering the establishment.

689. On or about August 4, 2020, DOLCE & GABBANA, failed to provide adequate security for DAVON BRINSON, CARLTON WEEKLY as an establishment who knowingly accepted responsibility for the well-being of DAVON BRINSON and CARLTON WEEKLY as a patron/invitee of DOLCE & GABBANA.

690. On information and belief approximately twenty to thirty minutes prior to the shooting of Carlton Weekly and Davon Brinson and prior to each of these plaintiff's being directed to stand in a roped off line by the defendant DOLCE & GABBANA, an unknown man was chased by another unknown man who was armed with a gun down oak street directly in front of DOLCE

& GABBANA store. The unknown man being chased was screaming for help and trying to get into stores along oak street inclusive of DOLCE & GABBANA.

691. On information and belief DOLCE & GABBANA through its employees, contractors, agents, witnessed this incident and knew that an unknown man with a gun was chasing another man down the street threatening to shoot him.

692. On or about August 4, 2020, DOLCE & GABBANA failed to implement proper security and safety protocols through its agents and/or contractors by failing to secure its patrons and/or failed to terminate its policy or directives of having patrons stand outside in a roped off line when approximately thirty minutes prior to the shooting of Carlton Weekly and Davon Brinson a man was wielding a gun at another man threatening to shoot him directly in front of Dolce & Gabbana.

693. On or about August 4, 2020 DOLCE & GABBANA, failed to implement the proper security and safety protocols through its agents and/or contractors by failing to discharge his firearm, abandoning his post at the instance of violence, and failed to take action to reasonably protect its invitees as an establishment who knowingly and voluntarily undertook the responsibility for the well-being of DAVON BRINSON and CARLTON WEEKLY as a patron/invitee of DOLCE & GABBANA.

694. At all times material to this action, the Defendant DOLCE & GABBANA including its agents, servants and employees knew or should have known through the exercise of reasonable care that gun related crimes would result in injury to its invitees and had a duty to see that its patrons and/or invitees including DAVON BRINSON, CARLTON WEEKLY were free from annoyance of injury at 68 East Oak Street in City of Chicago, County of Cook, State of Illinois.

695. At all times material to this action Defendant DOLCE & GABBANA, had a duty to act, by its employees, servants or agents as a reasonable person and or entity should act to place adequate security and/or implement adequate mitigative security measures on the premises to ensure the safety and security of its invitees.

696. On or about August 4, 2020, the DOLCE & GABBANA, store located at 68 East Chicago, County of Cook, State of Illinois was open to the general public, with any member of the public invited to shop for luxury clothes.

697. At all times material to this action, DOLCE & GABBANA, was in a special relationship with invitees on its premises and had a duty to take reasonable action to protect invitees from foreseeable damages caused by third persons.

698. At all times material to this action, the DOLCE & GABBANA, had a duty to take reasonable affirmative action to protect its invitees from misconduct of third persons when the danger is apparent, and the circumstances are such as to put a prudent person on notice of the probability of danger.

699. At all times relevant to the facts of this complaint, the defendant, DOLCE & GABBANA, had a duty of reasonable care in the implementation of its security measures of the Oak Street store and to avoid exposing its' customers to an unreasonable risk of harm.

700. At all times material to this action, the Defendant, DOLCE & GABBANA,, breached its duty in one or more of the following ways:

- a) Forced patrons to stand in a line outside of the store in an area where patrons would be exposed to third party gun violence.
- b) Failed to terminate its policy or directive to have customers wait in a roped off line directly in front of the store when they knew just thirty minutes prior to the plaintiffs arriving at the store and being directed to stand in line, that a man was wielding a gun and chasing and threatening to shoot another man directly in front of the Dolce Gabbana store.

- c) Failed to inform the plaintiffs of the incident and impending danger prior to being directed to stand in a roped off line.
- d) Failed to implement safety protocols for customers ie schedule appointments instead of directing customers to wait in line due to the impending danger and the incident that happened thirty minutes prior to them directing the plaintiffs to wait in the roped off line.
- e) Utilized a roping maze system for the customer line outside of the store which served to prevent customers from fleeing impending danger particularly when the shooting began. Specifically, when they knew or should have known a man was chasing another man with a gun threatening to shoot him directly in front of their store.
- f) Failed to adequately monitor, supervise and control the ingress and egress of the retail establishment on August 4, 2020.
- g) Failed to establish a corporate policy which set restrictions on the number of people allowed to wait in the line prior to entering the store.
- h) Failed to establish a corporate policy which set appointments for customers to shop instead of waiting in line knowing the uptick in gun violence in the area.
- i) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- j) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- k) Mandated and directed customers to wait in a roped off line to enter their retail establishment.
- l) Failed to have adequate trained security to react to the gun violence that occurred on August 4, 2020.
- m) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- n) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for its customers.
- o) Failed to assess the danger of the man with a gun chasing another man down the street directly in front of Dolce & Gabbana threatening to shoot him thirty minutes prior to the plaintiffs being directed to wait in a roped off line.

- p) Failed to respond appropriately to the danger of a man chasing another man directly in front of its store with a gun threatening to shoot him.
- q) Failed to ensure the safety of Davon Brinson and Carlton Weekly.
- r) Failed to protect the life of Davon Brinson and Carlton Weekly.
- s) Was otherwise careless and negligent.

701. Some or all of DOLCE & GABBANA'S conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the death of FBG Duck on August 4, 2020. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting DOLCE & GABBANA, to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

702. Plaintiff Lasheena Weekly as independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheen Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant DOLCE & GABBANA in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 78: SURVIVAL ACTION – NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT DOLCE & GABBANA

703. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate adopt, incorporate by reference paragraphs 681 through 702 of this Complaint at Law as though set forth fully at length herein.

704. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

705. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 79– NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly,
DAVON BRINSON, AGAINST DOLCE & GABBANA

706. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

707. At all times relevant, Defendant, DOLCE & GABBANA, was a company that owned, operated, managed, and/or controlled the premises DOLCE & GABBANA at 68 East Oak Street, in the City of Chicago, County of Cook, and State of Illinois.

708. DOLCE & GABBANA, knew or should have known of the increase in armed robberies, assaults with weapons, and shootings in this luxury retail area prior to and including August 4, 2020.

709. On information and belief on or about August 4, 2020, and at all times material Chicago police officers were stationed on oak street and the high-end retail area on foot patrol due to the rise in armed robberies, assaults with weapons and attempted shootings in the area.

710. On information and belief on or about August 4, 2020, and at all times material all storefronts in this high-end retail area inclusive of DOLCE & GABBANA hired armed security guards in response to the increase in violence including but not limited to armed robberies, assaults with weapons.

711. On information and belief DOLCE & GABBANA was informed of the increase in violent crimes in the area and assumed the responsibility to contract with security companies due to the rise in armed robberies and assaults with weapons.

712. On information and belief on or about August 4, 2020, and at all times material DOLCE & GABBANA., knew or should have known of the armed lootings and smash and grabs

that were taking place in the high-end retail area. These armed smash and grabs targeted high end retail stores in the area inclusive of DOLCE & GABBANA.

713. On or about August 4, 2020, DOLCE & GABBANA voluntarily assumed the duty to provide protection to its invitees by placing a security guard on its premises, more specifically on its sidewalk directing customers to stand in line prior to entering the establishment.

714. On or about August 4, 2020, DOLCE & GABBANA., failed to provide adequate security for DAVON BRINSON, CARLTON WEEKLY as an establishment who knowingly accepted responsibility for the well-being of DAVON BRINSON and CARLTON WEEKLY as a patron/invitee of DOLCE & GABBANA.

715. On information and belief on or about twenty to thirty minutes prior to the shooting of Carlton Weekly and Davon Brinson and prior to each of these plaintiffs being directed to stand in a roped off line by the defendant DOLCE & GABBANA an unknown man was chased by another unknown man who was armed with a gun directly in front of DOLCE & GABBANA store. The unknown man being chased was screaming for help and trying to get into stores along oak street inclusive of DOLCE & GABBANA.

716. On information and belief DOLCE & GABBANA through its employees, contractors, agents, witnessed this incident, and knew that an unknown man with a gun was chasing another man down the street threatening to shoot him.

717. On or about August 4, 2020 DOLCE & GABBANA failed to implement proper security and safety protocols through its agents and/or contractors by failing to secure its patrons and/or failed to terminate its policy or directives of having patrons stand outside in a roped off line when thirty minutes prior, a man was wielding a gun at another man threatening to shoot him directly in front of Dolce & Gabbana.

718. On or about August 4, 2020, DOLCE & GABBANA failed to implement the proper security and safety protocols through its agents and/or contractors by failing to discharge his firearm, abandoning his post at the instance of violence, and failed to take action to reasonably protect its invitees as an establishment who knowingly and voluntarily undertook the responsibility for the well-being of DAVON BRINSON and CARLTON WEEKLY as a patron/invitee of DOLCE & GABBANA.

719. At all times material to this action, the Defendant DOLCE & GABBANA including its agents, servants and employees knew or should have known through the exercise of reasonable care that gun related crimes would result in injury to its invitees and had a duty to see that its patrons and/or invitees including DAVON BRINSON, CARLTON WEEKLY were free from annoyance of injury at 68 East Oak Street in City of Chicago, County of Cook, State of Illinois.

720. At all times material to this action Defendant DOLCE & GABBANA had a duty to act, by its employees, servants or agents as a reasonable person and or entity should act to place adequate security and/or implement adequate mitigative security measures on the premises to ensure the safety and security of its invitees.

721. On or about August 4, 2020, the DOLCE & GABBANA store located at 68 East Chicago, County of Cook, State of Illinois was open to the general public, with any member of the public invited to shop for luxury clothes.

722. At all times material to this action, DOLCE & GABBANA., was in a special relationship with invitees on its premises and had a duty to take reasonable action to protect invitees from foreseeable damages caused by third persons.

723. At all times material to this action, DOLCE & GABBANA, had a duty to take reasonable affirmative action to protect its invitees from misconduct of third persons when the

danger is apparent and the circumstances are such as to put a prudent person on notice of the probability of danger.

724. At all times relevant to the facts of this complaint, DOLCE & GABBANA, had a duty of reasonable care in the implementation of its security measures of the Oak Street store and to avoid exposing its' customers to an unreasonable risk of harm.

725. At all times material to this action, DOLCE & GABBANA, breached its duty in one or more of the following ways:

- a) Forced patrons to stand in a line outside of the store in an area where patrons would be exposed to third party gun violence.
- b) Failed to terminate its policy or directive to have customers wait in a roped off line directly in front of the store when they knew just thirty minutes prior to the plaintiffs arriving and being directed to stand in a roped off line that a man was wielding a gun, chasing and threatening to shoot another man directly in front of the Dolce Gabbana store.
- c) Failed to inform the plaintiffs of the incident and impending danger prior to being directed to stand in a roped off line.
- d) Failed to implement safety protocols for customers ie schedule appointments instead of directing customers to wait in line due to the impending danger and the incident that happened thirty minutes prior to the agents of Dolce & Gabbana directing the plaintiffs to wait in the roped off line.
- e) Utilized a roping maze system for the customer line outside of the store which served to prevent customers from fleeing when the shooting began when they were aware of a man chasing another man with a gun threatening to shoot him directly in front of their store.
- f) Failed to adequately monitor, supervise and control the ingress and egress of the retail establishment on August 4, 2020.
- g) Failed to establish a corporate policy which set restrictions on the number of people allowed to wait in the line prior to entering the store.
- h) Failed to establish a corporate policy which set appointments for customers to shop instead of waiting in line knowing the increase in gun violence in the area.

- i) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- j) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- k) Mandated and directed customers to wait in a roped off line to enter their retail establishment.
- l) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- m) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- n) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for its customers.
- o) Failed to assess the danger of the man with a gun chasing another man in front of their store threatening to shoot him thirty minutes prior to the plaintiffs being directed to wait in a roped off line.
- p) Failed to respond appropriately to the danger of a man chasing another man directly in front of its store with a gun threatening to shoot him.
- q) Failed to ensure the safety of Davon Brinson and Carlton Weekly.
- r) Failed to protect the life of Davon Brinson and Carlton Weekly.
- s) Was otherwise careless and negligent.

726. As a direct and proximate result of Defendant DOLCE & GABBANA, breaches of duties, detailed above, Plaintiff DAVON BRINSON was shot multiple times and severely injured while standing in the line waiting to enter DOLCE & GABBANA at 68 East Oak Street on August 4, 2020.

727. As a direct and proximate result of Defendant DOLCE & GABBANA breaches of duties, detailed above, Plaintiff decedent Carlton Weekly was shot multiple times, severely injured

while standing in the line waiting to enter DOCLE & GABBANA at 68 East Oak Street on August 4, 2020. Carlton Weekly eventually died of his injuries on August 4, 2020.

728. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant DOLCE & GABBANA.

729. As a direct and proximate result of one or more of the aforementioned acts or omissions, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, and death as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant DOLCE 7 GABBANA in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed the minimum jurisdictional amount and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 80: SURVIVAL ACTION – NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT DOLCE & GABBANA

730. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 706 through 729 of this Complaint at Law as though set forth fully at length herein.

731. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

732. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 81 – NEGLIGENT HIRING-RETENTION-SUPERVISION
ALL PLAINTIFFS AGAINST DOLCE & GABBANA

733. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

734. On or about August 4, 2020, and at all times relevant hereto, Defendant DOLCE & GABBANA, voluntarily assumed, hired, contracted with to perform, and/or owed a duty of care to ensure PICORE INTERNATIONAL and/or TOP TIER provide security services at the DOLCE & GABBANA retail establishment located at 68 East Oak Street Chicago, County of Cook, State of Illinois to ensure the safety of all persons and property and for the protection of life.

735. That on or about August 4, 2020, and at all times relevant hereto, Defendant DOLCE & GABBANA voluntarily assumed, contracted to perform, and/or owed a duty to exercise reasonable and ordinary care and caution in the hiring, supervising, of PICORE INTERNATIONAL and/or TOP TIER and/or its agents, employees, and/or servants, so as to avoid causing injuries and/or allowing third parties to cause injuries to customers and/or business invitees at the DOLCE & GABBANA store including DAVON BRINSON and CALTON WEEKLY.

736. At all times material to this action, in breach of one or more of its aforesaid duties, the Defendant, DOLCE & GABBANA, by its agents, servants or employees, acted or failed to act as follows when they knew, or should have known, that the security services provided by TOP TIER were insufficient in that:

- a) Knowingly contracted and hired Picore/Top Tier when they knew or should have known that PICORE INTERNATIONAL and/or TOP TIER did not have, or had insufficient programs, policies, and/or procedures to instruct its agents, employees, and/or servants how to handle individuals engaged in violent acts and or acts of deadly force upon customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA.
- b) Knowingly contracted and hired Picore/Top Tier when they knew or should have known that PICORE INTERNATIONAL and/or TOP TIER did not have, or had

- insufficient programs, policies, and/or procedures and/or training and failed to adequately instruct its agents, employees, and/or servants on security awareness training and situational training including how to act in emergency situations with violent offenders and/or acts of persons discharging firearms, at or near Defendant DOLCE & GABBANA retail establishment.
- c) Knowingly contracted and hired Picore/Top Tier when they knew or should have known that PICORE INTERNATIONAL and/or TOP TIER failed to have and/ or had insufficient programs, policies, and/or procedures to instruct its agents, employees, and/or servants on how to effectively communicate security issues or concerns pertaining to violent acts committed on the premises or against Defendant DOLCE & GABBANA customers, invitees.
 - d) Knowingly contracted and hired Picore/Top Tier when they knew or should have known that PICORE INTERNATIONAL and/or TOP TIER did not have, or had insufficient programs, policies post orders or procedures to instruct or direct its agents/officers/personnel on how to effectively communicate security issues or concerns.
 - e) Knowingly contracted and hired Picore/Top Tier when they knew or should have known that PICORE INTERNATIONAL and/or TOP TIER failed to adequately and/or properly train its agents, employees, and/or servants to handle, control, detain, and/or make safe the DOLCE & GABBANA.
 - f) PICORE INTERNATIONAL and/or TOP TIER failed to adequately and/or properly supervise its agents, employees, and/or servants.
 - g) PICORE INTERNATIONAL and/or TOP TIER failed to adequately investigate the backgrounds of its agents, employees, and/or servants.
 - h) PICORE INTERNATIONAL and/or TOP TIER failed to ensure their agents, employees, and/or servants to remain at their post and to respond to any/all violent threats aimed at/directed to DOLCE & GABBANA USA INC., customers, invitees or persons on the premises of DOLCE & GABBANA USA INC.
 - i) PICORE INTERNATIONAL and/or TOP TIER failed to have adequate and sufficient number of security personnel on the premises to respond to individuals engaged in violent acts and or acts of deadly force upon its customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA USA INC.
 - j) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
 - k) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.

- l) Mandated and directed customers to wait in a roped off line to enter the retail establishment.
- m) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- n) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- o) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for its customers when it knew that thirty minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce & Gabbana on Oak Street with a gun threatening to shoot him. Particularly, when this incident was witnessed by agents of Dolce & Gabbana.
- p) Failed to assess the danger of the man with a gun chasing another man down the street threatening to shoot him thirty minutes prior to the plaintiffs being directed to wait in a roped off line.
- q) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him.
- r) Failed to ensure the safety of Davon Brinson and Carlton Weekly.
- s) Failed to protect the life of Davon Brinson and Carlton Weekly.

737. That on or about August 4, 2020, and at all times relevant hereto, Defendant DOLCE & GABBANA had a duty to ensure the security and/or safety of its customers, invitees and/or had a duty to ensure all safety/security protocols were implemented followed and sufficient to protect its customers, invitees but failed to adequately cure the insufficiencies of PICORE INTERNATIONAL and/or TOP TIER described in the preceding sub paragraphs.

738. That on or about August 4, 2020, and at all times relevant hereto, Defendant DOLCE & GABBANA knew, or should have known, that the provision of security services provided by PICORE INTERNATIONAL and/or TOP TIER was insufficient, and that the deficiency created a risk to individuals at and within the retail establishment.

739. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant DOLCE & GABBANA.

740. As a direct and proximate result of one or more of the aforementioned acts or omissions, Plaintiff decedent Carlton weekly sustained physical pain and suffering, mental suffering, and death as a result of the injuries he sustained on August 4, 2020.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, which substantially exceed the minimum jurisdictional amount and if leave is later granted to amend to ass such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 82: SURVIVAL ACTION – NEGLIGENT HIRING-RETENSION-
SUPERVISION**
**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT DOLCE & GABBANA**

741. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 733 through 740 of this Complaint at Law as though set forth fully at length herein.

742. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

743. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 83: NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator for the Estate of Carlton Weekly
AGAINST PICORE INTERNATIONAL

744. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Calton Weekly reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein

745. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, voluntarily assumed, contracted to perform, and owed a duty of care to provide security services at Dolce & Gabbana for the individuals who

were invitees and customers of the store and to ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

746. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, voluntarily assumed and was contracted with Dolce & Gabbana to provide and owed a duty of care to provide adequate and proper security services to the individuals and ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

747. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, employed one security personnel (“Security”) to assist in the operation of a retail establishment in order to provide customers and/or business invitees with a safe environment on the aforesaid premises.

748. On or about August 4, 2020, PICORE INTERNATIONAL through its agents, contractors and/or employees was performing security duties at 68 East Oak Street, City of Chicago, State of Illinois, and acting within the course and scope of their employment and agency with the Defendant, DOLCE & GABBANA.

749. On or about August 4, 2020, the Defendant, PICORE INTERNATIONA had in place rules and procedures that their personnel were obligated to follow to observe, monitor, to protect all persons while securing 68 East Oak Street, City of Chicago, State of Illinois.

750. On information and belief approximately twenty to thirty minutes prior to Carlton Weekly being directed to stand in a roped off line directly outside the entrance to the Dolce & Gabbana store an unknown man was chased by another unknown man who was armed with a gun, down oak street directly in front of the Dolce & Gabbana store. The unknown man being chased was screaming for help and trying to get into stores along oak street inclusive of Dolce & Gabbana.

The security personnel at the Dolce & Gabbana witnessed and was aware of this incident prior to directing Davon Brinson and Carlton Weekly to stand in line directly at the entrance of the Dolce & Gabbana.

751. On information and belief DOLCE & GABBANA through its employees, contractors, agents, witnessed this incident, and knew that an unknown assailant with a gun was chasing another man down the street threatening to shoot him. This conduct was a danger to the customers, invitees of Dolce & Gabbana that they continued to direct to wait in line in front of the store.

752. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees were present when third parties began shooting at the patrons of DOLCE & GABBANA while waiting in line to enter the retail establishment.

753. On or about August 4, 2020, the Plaintiff, CARLTON WEEKLY was a business invitee, customer, and lawfully present at the aforesaid establishment.

754. On or about August 4, 2020, as the Plaintiffs awaited entry to the retail establishment, the Plaintiffs suffered multiple gunshot wounds by individuals who approached the store and opened fire on Carlton Weekly.

755. On or about August 4, 2020, the security guard employed, positioned and stationed on the sidewalk was present at the time, during and directly after the assailants opened fire on the patrons waiting in line to enter the DOLCE & GABBANA establishment.

756. On or about August 4, 2020, PICORE INTERNATIONAL by and through its duly authorized agents and employees, including the security guard, failed to adequately respond to the

shooting of the patrons waiting in line to enter the retail establishment and the shooting was prolonged as the assailants continued to open fire.

757. PICORE INTERNATIONAL personnel fled the scene, abandoned his post and continued to allow the unknown assailants to assault, batter, and severely injure the Plaintiff, CARLTON WEEKLY, who sustained a magnitude of severe injuries including, but not limited to multiple gunshot wounds and death.

758. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL by and through its duly authorized agents and employees, owed the Plaintiff, CARLTON WEEKLY a duty to exercise reasonable and ordinary care to avoid causing injury to its customers and/or business invitees and to protect its patrons, customers, and invitees from injuries of third persons.

759. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through its duly authorized agents and employees, acted or failed to act as follows:

- a) Improperly operated, managed, maintained, and controlled the premises and sidewalk in such a way that its customers, including CARLTON WEEKLY were unnecessarily exposed to third party acts of violence or crime.
- b) Utilized a rope maze system which prevented or impeded customers from fleeing when the shooting started.
- c) Failed to properly and adequately supervise, patrol, or monitor the outer area of the retail establishment.
- d) Failed to provide the necessary personnel to protect against the misconduct of, business invitees and third parties at 68 East Oak Street, City of Chicago, State of Illinois, County of Cook that would cause injuries to other customers on the premises, including CARLTON WEEKLY.
- e) Failed to properly and adequately train the security personnel providing security to customers.
- f) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.

- g) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- h) Mandated and directed customers to wait in a roped off line to enter the retail establishment.
- i) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- j) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- k) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for the customers when it knew that thirty minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce & Gabbana with a gun threatening to shoot him.
- l) Failed to ensure the safety of Carlton Weekly.
- m) Failed to protect the life of Carlton Weekly.
- n) Failed to have the appropriate number of security personnel to prevent or deter the conduct on August 4,2020.
- o) Failed to assess the danger of the man with a gun chasing another man down the street directly in front of Dolce & Gabbana threatening to shoot him with the gun. Particularly when this incident was witnessed by the security personnel.
- p) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him.
- q) Fled the scene during the period of time when customers were under attack.
- r) Failed to adequately respond to third parties discharging firearms at its patrons while waiting in line to enter the retail establishment.
- s) Failed to provide an armed security guard and/ or failed to have their armed security guard take reasonable action to protect against the action of third parties committing violent acts against customers and/or business invitees.
- t) Permitting the abandoning and/or the abandoning of the security guard posts.
- u) Failed to meet contractual obligations relating to the provisions of security services.
- v) Failed to properly allocate security officers.

w) Was otherwise carless or negligent.

760. Some or all of acts and/or conduct as alleged herein, whether taken singularly or in any combination was a direct and proximate cause of the death of FBG Duck on August 4, 2020. As a result, the next-of-kin of the decedent Carlton Weekly: C.D. (Son) – DOB 8/11/2011, A.B. (Son) DOB 12/5/15, C. W (Daughter) DOB 2/18/16 have suffered great losses of a personal and pecuniary nature, including but not limited to the loss of companionship and society of the decedent, mental grief, sorrow, and anguish, subjecting PICORE INTERNATIONAL to liability pursuant to 740 ILCS 180/1, *et.seq.*, commonly known as the Wrongful Death Act.

761. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 740 ILCS 180/1, *et seq.*, commonly known as the Wrongful Death Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully request that judgment be entered in favor of the next-of-kin of Carlton Weekly, and against Defendant PICORE INTERNATIONAL in an amount necessary to fully and fairly compensate the next-of-kin for their losses compensable under the Wrongful Death Act, prejudgment interest, costs, and, if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 84: SURVIVAL ACTION – NEGLIGENCE-WRONGFUL DEATH
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT PICORE INTERNATIONAL

762. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 744 through 761 of this Complaint at Law as though set forth fully at length herein.

763. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

764. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant PICORE INTERNATIONAL in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 85: NEGLIGENCE

Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
DAVON BRINSON AGAINST PICORE INTERNATIONAL

765. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

766. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, voluntarily assumed, contracted to perform, and owed a duty of care to provide security services at Dolce & Gabbana for the individuals who

were invitees and customers of the store and to ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

767. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, voluntarily assumed and was contracted with Dolce & Gabbana to provide and owed a duty of care to provide adequate and proper security services to the individuals and ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

768. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees, employed one security personnel (“Security”) to assist in the operation of a retail establishment in order to provide customers and/or business invitees with a safe environment on the aforesaid premises.

769. On or about August 4, 2020, PICORE INTERNATIONAL through its agents, contractors and/or employees was performing security duties at 68 East Oak Street, City of Chicago, State of Illinois, and acting within the course and scope of their employment and agency with the Defendant, DOLCE & GABBANA.

770. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, had in place rules and procedures that their personnel were obligated to follow to observe, monitor, to protect all persons while securing 68 East Oak Street, City of Chicago, State of Illinois.

771. On information and belief approximately twenty to thirty minutes prior to Davon Brinson and Carlton Weekly being directed to stand in a roped off line directly outside the entrance to the Dolce & Gabbana store an unknown man was chased by another unknown man who was armed with a gun, down oak street directly in front of the Dolce & Gabbana store. The unknown man being chased was screaming for help and trying to get into stores along oak street inclusive

of Dolce & Gabbana. The security personnel at the Dolce & Gabbana witnessed and was aware of this incident prior to directing Davon Brinson and Carlton Weekly to stand in line directly at the entrance of the Dolce & Gabbana.

772. On information and belief DOLCE & GABBANA through its employees, contractors, agents, witnessed this incident, and knew that an unknown assailant with a gun was chasing another man down the street threatening to shoot him. This conduct was a danger to the customers, invitees of Dolce & Gabbana that they continued to direct to wait in line in front of the store.

773. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through their duly authorized agents and employees were present when third parties began shooting at the patrons of DOLCE & GABBANA while waiting in line to enter the retail establishment.

774. On or about August 4, 2020, the Plaintiff, DAVON BRINSON, CARLTON WEEKLY were business invitees, customers, and lawfully present at the aforesaid establishment.

775. On or about August 4, 2020, as the Plaintiffs awaited entry to the retail establishment, the Plaintiffs suffered multiple gunshot wounds by individuals who approached the store and opened fire on Carlton Weekly.

776. On or about August 4, 2020, the security guard employed, positioned and stationed on the sidewalk was present at the time, during and directly after the assailants opened fire on the patrons waiting in line to enter the DOLCE & GABBANA establishment.

777. On or about August 4, 2020, PICORE INTERNATIONAL by and through its duly authorized agents and employees, including the security guard, failed to adequately respond to the

shooting of the patrons waiting in line to enter the retail establishment and the shooting was prolonged as the assailants continued to open fire.

778. PICORE INTERNATIONAL personnel fled the scene, abandoned his post and continued to allow the unknown assailants to assault, batter, and severely injure the Plaintiff, DAVON BRINSON and CARLTON WEEKLY, as a result they sustained a magnitude of severe injuries including, but not limited to multiple gunshot wounds.

779. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL by and through its duly authorized agents and employees, owed the Plaintiff, DAVON BRINSON, and CARLTON WEEKLY, a duty to exercise reasonable and ordinary care to avoid causing injury to his customers and/or business invitees and to protect its patrons, customers, and invitees from injuries of third persons.

780. On or about August 4, 2020, the Defendant, PICORE INTERNATIONAL, by and through its duly authorized agents and employees, acted or failed to act as follows:

- a) Improperly operated, managed, maintained, and controlled the premises and sidewalk in such a way that its customers, including DAVON BRINSON, CARLTON WEEKLY were unnecessarily exposed to third party acts of violence or crime.
- b) Utilized a rope maze system which prevented or impeded customers from fleeing when the shooting started.
- c) Failed to properly and adequately supervise, patrol, or monitor the outer area of the retail establishment.
- d) Failed to provide the necessary personnel to protect against the misconduct of, business invitees and third parties of DOLCE & GABBANA that would cause injuries to other customers on the premises, including DAVON BRINSON AND CARLTON WEEKLY.
- e) Failed to properly and adequately train the security personnel providing security to customers.

- f) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- g) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- h) Mandated and directed customers to wait in a roped off line to enter the retail establishment.
- i) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- j) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- k) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for the customers when it knew that thirty minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce & Gabbana with a gun threatening to shoot him.
- l) Failed to ensure the safety of Carlton Weekly and Davon Brinson.
- m) Failed to protect the life of Carlton Weekly and Davon Brinson.
- n) Failed to assess the danger of the man with a gun chasing another man down the street directly in front of Dolce & Gabbana threatening to shoot him with the gun. Particularly when this incident was witnessed by the security personnel.
- o) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him as it directly impacts the safety of its customers.
- p) Fled the scene during the period of time when customers were under attack.
- q) Failed to adequately respond to third parties discharging firearms at its patrons while waiting in line to enter the retail establishment.
- r) Failed to provide adequate armed security guard to take reasonable action to protect against the action of third parties committing violent acts against customers and/or business invitees.
- s) Permitting the abandoning and/or the abandoning of the security guard posts.
- t) Failed to meet contractual obligations relating to the provisions of security services.

- u) Failed to properly allocate security officers.
- v) Was otherwise carless or negligent.

781. As a direct and proximate cause of one or more of the above acts and/or omissions. Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant PICORE INTERNATIONAL.

782. As a direct and proximate result of the aforementioned conduct and breach of duty of care, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 86: SURVIVAL ACTION – NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT PICORE INTERNATIONAL

783. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 765 through 782 of this Complaint at Law as though set forth fully at length herein.

784. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

785. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant PICORE INTERNATIONAL in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 87: NEGLIGENT HIRING-RETENTION-SUPERVISION
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, DAVON
BRINSON AGAINST PICORE INTERNATIONAL

786. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

787. On or about August 4, 2020, and at all times relevant hereto, Defendant PICORE INTERNAIONAL, voluntarily assumed, hired, contracted with to perform, and/or owed a duty of care to ensure TOP TIER provide security services at the DOLCE & GABBANA retail

establishment located at 68 East Oak Street Chicago, County of Cook, State of Illinois to ensure the safety of all persons and property and for the protection of life.

788. Prior to August 4, 2020, and at all relevant times, PICORE INTERNATIONAL contracted with TOP TIER to provide security services at Dolce & Gabbana to ensure the safety of all persons and property and for the protection of life.

789. That on or about August 4, 2020, and at all times relevant hereto, Defendant PICORE INTERNATIONAL., voluntarily assumed, contracted to perform, and/or owed a duty to exercise reasonable and ordinary care and caution in the hiring, supervising, of TOP TIER and/or its agents, employees, and/or servants, so as to avoid causing injuries and/or allowing third parties to cause injuries to customers and/or business invitees at the DOLCE & GABBANA, including Plaintiffs, DAVON BRINSON, CARLTON WEEKLY.

790. At all times material to this action, in breach of one or more of its aforesaid duties, the Defendant, PICORE INTERNATIONAL, by its agents, servants or employees, acted or failed to act as follows when they knew, or should have known, that the security services provided by TOP TIER were insufficient in that:

- a) Knowingly hired and/or contracted with Top Tier when TOP TIER did not have, or had insufficient programs, policies, and/or procedures to instruct its agents, employees, and/or servants how to handle individuals engaged in violent acts and or acts of deadly force upon customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA.
- b) Knowingly hired and/or contracted with Top Tier when TOP TIER did not have, or had insufficient programs, polices, and/or procedures and/or training and failed to adequately instruct its agents, employees, and/or servants on security awareness training and situational training including how to act in emergency situations with violent offenders and/or acts of persons discharging firearms, at or near Defendant DOLCE & GABBANA retail establishment.
- c) TOP TIER failed to have and/ or had insufficient programs, polices, and/or procedures to instruct its agents, employees, and/or servants on how to effectively communicate

security issues or concerns pertaining to violent acts committed on the premises or against Defendant DOLCE & GABBANA customers, invitees.

- d) TOP TIER did not have, or had insufficient programs, policies post orders or procedures to instruct or direct its agents/officers/personnel on how to effectively communicate security issues or concerns.
- e) TOP TIER failed to adequately and/or properly train its agents, employees, and/or servants to handle, control, detain, and/or make safe the DOLCE & GABBANA.
- f) TOP TIER failed to adequately and/or properly supervise its agents, employees, and/or servants.
- g) TOP TIER failed to adequately investigate the backgrounds of its agents, employees, and/or servants.
- h) TOP TIER failed to ensure their agents, employees, and/or servants to remain at their post and to respond to any/all violent threats aimed at/directed to DOLCE & GABBANA USA INC., customers, invitees or persons on the premises of DOLCE & GABBANA USA INC.
- i) TOP TIER failed to have adequate and sufficient number of security personnel on the premises to respond to individuals engaged in violent acts and or acts of deadly force upon its customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA USA INC.
- j) TOP TIER failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- k) TOP TIER failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- l) TOP TIER mandated and directed customers to wait in a roped off line to enter the retail establishment.
- m) Failed to have adequate trained security to react to the gun violence that occurred on August 4, 2020.
- n) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- o) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for its customers when it knew that 30 minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce &

Gabbana on Oak Street with a gun threatening to shoot him. Particularly, when this incident was witnessed by the security officers.

- p) Failed to assess the danger of the man with a gun chasing another man down the street threatening to shoot him 30 minutes prior to the plaintiffs being directed to wait in a roped off line.
- q) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him.
- r) Failed to ensure the safety of Davon Brinson and Carlton Weekly.
- s) Failed to protect the life of Davon Brinson and Carlton Weekly.
- t) PICORE INTERNATIONAL and/or TOP TIER was otherwise careless and negligent.

791. That on or about August 4, 2020, and at all times relevant hereto, Defendant PICORE INTERNATIONAL, had a duty to ensure the security and/or safety of its customers, invitees and/or had a duty to ensure all safety/security protocols were implemented followed and sufficient to protect its customers, invitees but failed to adequately cure the insufficiencies of TOP TIER described in the preceding sub paragraphs.

792. That on or about August 4, 2020, and at all times relevant hereto, Defendant PICORE INTERNATIONAL, knew, or should have known, that the provision of security services provided by TOP TIER was insufficient, and that the deficiency created a risk to individuals at and within the retail establishment.

793. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be

hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant PICORE INTERNATIONAL

794. As a direct and proximate result of the aforementioned conduct and breach of duty of care, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant PICORE INTERNATIONAL in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, and if leave is later granted to amend to ass such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 88: SURVIVAL ACTION – NEGLIGENT HIRING-RETENSION-
SUPERVISION**
**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against PICORE INTERNATIONAL**

795. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 786 through 794 of this Complaint at Law as though set forth fully at length herein.

796. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

797. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 89: NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly,
DAVON BRINSON AGAINST TOP TIER SAFETY INC.

798. Plaintiffs reallege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though set forth fully at length herein.

799. On or about August 4, 2020, the Defendant, TOP TIER, by and through their duly authorized agents and employees, voluntarily assumed, contracted to perform, and owed a duty of care to provide security services at Dolce & Gabbana for the individuals who were invitees and customers of the store and to ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

800. On or about August 4, 2020, the Defendant, TOP TIER, by and through their duly authorized agents and employees, voluntarily assumed and was contracted with PICORE INTERNATIONAL AND Dolce & Gabbana to provide and owed a duty of care to provide adequate and proper security services to the individuals and ensure the safety of all persons and property and for the protection of life at Dolce & Gabbana.

801. On or about August 4, 2020, the Defendant, TOP TIER, by and through their duly authorized agents and employees, employed one security personnel (“Security”) to assist in the operation of a retail establishment in order to provide customers and/or business invitees with a safe environment on the aforesaid premises.

802. On or about August 4, 2020, TOP TIER through its agents, contractors and/or employees was performing security duties at 68 East Oak Street, City of Chicago, State of Illinois, and acting within the course and scope of their employment and agency with the Defendant, DOLCE & GABBANA.

803. On or about August 4, 2020, the Defendant, TOP TIER, had in place rules and procedures that their personnel were obligated to follow to observe, monitor, to protect all persons while securing 68 East Oak Street, City of Chicago, State of Illinois.

804. On information and belief approximately twenty to thirty minutes prior to Davon Brinson and Carlton Weekly being directed to stand in a roped off line directly outside the entrance to the Dolce & Gabbana store an unknown man was chased by another unknown man who was armed with a gun, down oak street directly in front of the Dolce & Gabbana store. The unknown man being chased was screaming for help and trying to get into stores along oak street inclusive of Dolce & Gabbana. The TOP TIER security personnel at the Dolce & Gabbana witnessed and was aware of this incident prior to directing Davon Brinson and Carlton Weekly to stand in line directly at the entrance of the Dolce & Gabbana.

805. On information and belief TOP TIER through its employees, contractors, agents, witnessed this incident, and knew that an unknown assailant with a gun was chasing another man down the street threatening to shoot him. This conduct was a danger to the customers, invitees of Dolce & Gabbana that they continued to direct to wait in line in front of the store.

806. On or about August 4, 2020, the Defendant, TOP TIER, by and through their duly authorized agents and employees were present when third parties began shooting at the patrons of DOLCE & GABBANA while waiting in line to enter the retail establishment.

807. On or about August 4, 2020, the Plaintiff, DAVON BRINSON, CARLTON WEEKLY were business invitees, customers, and lawfully present at the aforesaid establishment.

808. On or about August 4, 2020, as the Plaintiffs awaited entry to the retail establishment, the Plaintiffs suffered multiple gunshot wounds by individuals who approached the store and opened fire on Carlton Weekly.

809. On or about August 4, 2020, the TOP TIER security guard employed, positioned and stationed on the sidewalk was present at the time, during and directly after the assailants opened fire on the patrons waiting in line to enter the DOLCE & GABBANA establishment.

810. On or about August 4, 2020, TOP TIER by and through its duly authorized agents and employees, including the security guard, failed to adequately respond to the shooting of the patrons waiting in line to enter the retail establishment and the shooting was prolonged as the assailants continued to open fire.

811. TOP TIER personnel fled the scene, abandoned his post and continued to allow the unknown assailants to assault, batter, and severely injure the Plaintiff, DAVON BRINSON and CARLTON WEEKLY, and they sustained a magnitude of severe injuries including, but not limited to multiple gunshot wounds.

812. On or about August 4, 2020, the Defendant, TOP TIER by and through its duly authorized agents and employees, owed the Plaintiff, DAVON BRINSON, and CARLTON WEEKLY, a duty to exercise reasonable and ordinary care to avoid causing injury to its customers

and/or business invitees and to protect its patrons, customers, and invitees from injuries of third persons.

813. On or about August 4, 2020, the Defendant, TOP TIER, by and through its duly authorized agents and employees, acted or failed to act as follows:

- a) Improperly operated, managed, maintained, and controlled the premises and sidewalk in such a way that its customers, including DAVON BRINSON, CARLTON WEEKLY were unnecessarily exposed to third party acts of violence or crime.
- b) Utilized a rope maze system which prevented or impeded customers from fleeing when the shooting started.
- c) Failed to properly and adequately supervise, patrol, or monitor the outer area of the retail establishment.
- d) Failed to provide the necessary personnel to protect against the misconduct of, business invitees and third parties of DOLCE & GABBANA that would cause injuries to other customers on the premises, including DAVON BRINSON AND CARLTON WEEKLY.
- e) Failed to properly and adequately train the security personnel providing security to customers.
- f) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- g) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- h) Mandated and directed customers to wait in a roped off line to enter the retail establishment.
- i) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- j) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- k) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for the customers when it knew that thirty minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce & Gabbana with a gun threatening to shoot him.

- l) Failed to ensure the safety of Carlton Weekly and Davon Brinson.
- m) Failed to protect the life of Carlton Weekly and Davon Brinson.
- n) Failed to assess the danger of the man with a gun chasing another man down the street directly in front of Dolce & Gabbana threatening to shoot him with the gun. Particularly when this incident was witnessed by the security personnel.
- o) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him.
- p) Fled the scene during the period of time when customers were under attack.
- q) Failed to adequately respond to third parties discharging firearms at its patrons while waiting in line to enter the retail establishment.
- r) Failed to provide adequate armed security guards to take reasonable action to protect against the action of third parties committing violent acts against customers and/or business invitees.
- s) Permitting the abandoning and/or the abandoning of the security guard posts.
- t) Failed to meet contractual obligations relating to the provisions of security services.
- u) Failed to properly allocate security officers.
- v) Was otherwise careless or negligent.

814. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant TOP TIER.

815. As a direct and proximate result of the aforementioned conduct and breach of duty of care by the defendant TOP TIER, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant TOP TIER in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 90: SURVIVAL ACTION – NEGLIGENCE
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against DEFENDANT TOP TIER SAFETY INC

816. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 798 through 815 of this Complaint at Law as though set forth fully at length herein.

817. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

818. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of

Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

COUNT 91 – NEGLIGENT HIRING-RETENTION-SUPERVISION
Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly,
DAVON BRINSON AGAINST TOP TIER SAFETY INC.

819. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 73 of this Complaint at Law as though fully set forth herein.

820. On or about August 4, 2020, and at all times relevant hereto, Defendant TOP TIER, voluntarily assumed, hired, contracted with to perform, and/or owed a duty of care to ensure its agents, employees provide appropriate security services at the DOLCE & GABBANA USA INC., retail establishment located at 68 East Oak Street Chicago, County of Cook, State of Illinois to ensure the safety of all persons and property and for the protection of life.

821. Prior to August 4, 2020, and at all relevant times, PICORE INTERNATIONAL sub-contracted with TOP TIER to provide security services at Dolce & Gabbana to ensure the safety of all persons and property and for the protection of life.

822. That on or about August 4, 2020, and at all times relevant hereto, Defendant TOP TIER., voluntarily assumed, contracted to perform, and/or owed a duty to exercise reasonable and ordinary care and caution in the hiring, supervising, of its agents, employees, and/or servants, so as to avoid causing injuries and/or allowing third parties to cause injuries to customers and/or business invitees at the DOLCE & GABBANA, including Plaintiffs, DAVON BRINSON, CALTON WEEKLY.

823. At all times material to this action, in breach of one or more of its aforesaid duties, the Defendant, TOP TIER, by its agents, servants or employees, acted or failed to act as follows when they knew, or should have known, that the security services its agents were providing were insufficient in that:

- a) Did not have, or had insufficient programs, policies, and/or procedures to instruct its agents, employees, and/or servants how to handle individuals engaged in violent acts and or acts of deadly force upon customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA.
- b) Did not have, or had insufficient programs, policies, and/or procedures and/or training and failed to adequately instruct its agents, employees, and/or servants on security awareness training and situational training including how to act in emergency situations with violent offenders and/or acts of persons discharging firearms, at or near Defendant DOLCE & GABBANA retail establishment.
- c) Failed to have and/ or had insufficient programs, policies, and/or procedures to instruct its agents, employees, and/or servants on how to effectively communicate security issues or concerns pertaining to violent acts committed on the premises or against Defendant DOLCE & GABBANA customers, invitees.
- d) Did not have, or had insufficient programs, policies post orders or procedures to instruct or direct its agents/officers/personnel on how to effectively communicate security issues or concerns.
- e) Failed to adequately and/or properly train its agents, employees, and/or servants to handle, control, detain, and/or make safe the DOLCE & GABBANA.
- f) Failed to adequately and/or properly supervise its agents, employees, and/or servants.
- g) Failed to adequately investigate the backgrounds of its agents, employees, and/or servants.
- h) Failed to ensure their agents, employees, and/or servants to remain at their post and to respond to any/all violent threats aimed at/directed to DOLCE & GABBANA USA INC., customers, invitees or persons on the premises of DOLCE & GABBANA USA INC.
- i) Failed to have adequate and sufficient number of security personnel on the premises to respond to individuals engaged in violent acts and or acts of deadly force upon its customers, invitees or any individual on the premises of Defendant DOLCE & GABBANA USA INC.

- j) Failed to properly organize the line of people waiting to enter the retail establishment on August 4, 2020, such that customers would not be excessively delayed in their ability to respond to an emergency.
- k) Failed to allow waiting customers to enter the store when the store did not contain excessive numbers of individuals.
- l) Mandated and directed customers to wait in a roped off line to enter the retail establishment.
- m) Failed to have adequately trained security to react to the gun violence that occurred on August 4, 2020.
- n) Failed to have the appropriate number of security personnel to prevent or deter the conduct that occurred on August 4, 2020.
- o) Failed to ensure the primary purpose of security function to prevent and deter acts of violence for its customers when it knew that thirty minutes before directing the plaintiffs to stand in a roped off line that a man was chasing another man in front of Dolce & Gabbana on Oak Street with a gun threatening to shoot him. Particularly, when this incident was witnessed by the security officers.
- p) Failed to assess the danger of the man with a gun chasing another man down the street threatening to shoot him thirty minutes prior to the plaintiffs being directed to wait in a roped off line.
- q) Failed to respond appropriately to the danger of a man chasing another man directly in front of Dolce & Gabbana with a gun threatening to shoot him.
- r) Failed to ensure the safety of Davon Brinson and Carlton Weekly.
- s) Failed to protect the life of Davon Brinson and Carlton Weekly.
- t) TOP TIER through its agents or employees was otherwise careless and negligent.

824. That on or about August 4, 2020, and at all times relevant hereto, Defendant TOP TIER, had a duty to ensure the security and/or safety of its customers, invitees and/or had a duty to ensure all safety/security protocols were implemented followed and sufficient to protect its customers, invitees but failed to adequately cure the insufficiencies of TOP TIER described in the preceding sub paragraphs.

825. That on or about August 4, 2020, and at all times relevant hereto, Defendant TOP TIER, knew, or should have known, that the provision of security services its agents were providing was insufficient, and that the deficiency created a risk to individuals at and within the retail establishment.

826. As a direct and proximate cause of one or more of the above acts and/or omissions, Plaintiff, DAVON BRINSON, suffered and will continue to suffer severe and permanent injuries which injuries have caused and will continue to cause him great pain and suffering and disfigurement in the future. Further, as a result of the injuries sustained, Plaintiff has incurred and become liable for large sums of money for medical expenses in endeavoring to be cured of his injuries and will continue to do so in the future. Plaintiff also has been and will continue to be hindered in his daily affairs and activities, has lost income and is likely to lose income in the future, all arising from the injuries suffered as a direct and proximate result of one or more of the acts or omissions of the Defendant TOP TIER

827. As a direct and proximate result of the aforementioned conduct and breach of duty of care by Top Tier, Plaintiff decedent Carlton weekly sustained physical pain, mental suffering, and incurred economic damages, including lost future income.

WHEREFORE, Plaintiff respectfully request that judgment be entered individually in their favor and against the Defendant TOP TIER in an amount that will fully compensate them for all legally recoverable damages, prejudgment interest, and costs, and if leave is later granted to amend to ass such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

**COUNT 92: SURVIVAL ACTION – NEGLIGENT HIRING-RETENTION-
SUPERVISION**
**Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly
against TOP TIER**

828. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, restate, adopt, incorporate by reference paragraphs 819 through 827 of this Complaint at Law as though set forth fully at length herein.

829. Some or all of this defendant's wrongful conduct as alleged herein, whether taken singularly or in any combination, was a direct and proximate cause for the injuries to, and the death of FBG Duck on August 4, 2020. As a result, Carlton Weekly experienced conscious pain, suffering, severe emotional distress, anxiety, worry, and fear and realization of impending death from the time he was injured until the time of his death.

830. Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, bring this action pursuant to the provisions of 755 ILCS 5/27-6 commonly known as the Illinois Survival Act.

WHEREFORE, Plaintiff Lasheena Weekly as Independent Administrator of the Estate of Carlton Weekly, deceased, respectfully requests that judgment be entered in favor of the Estate of Carlton Weekly on behalf of the next of kin of Carlton Weekly and against the Defendant TOP TIER in an amount necessary to fully and fairly compensate the estate for all compensable losses under 755 ILCS 5/27-6, prejudgment interest, costs, and if leave is later granted to amend to add such a claim, punitive damages, which substantially exceed the minimum jurisdictional amount.

Respectfully submitted,

DINIZULU LAW GROUP, LTD.

By: /s/ Roosevelt Allen, III

Roosevelt Allen, III
One of Plaintiff ' Attorneys

Roosevelt Allen III
Yao Dinizulu
Rowland Edwards
DINIZULU LAW GROUP LTD.
Attorneys for Plaintiff
221 North LaSalle Street
Suite 1100
Chicago, IL 60601
(312) 384-1920
Firm. No: 44300
allen@dinizululawgroup.com
dinizulu@dinizululawgroup.com
edwards@dinizululawgroup.com
FBGDuckCase@dinizululawgroup.com