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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

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12
13 TAHLIAH BARNETT, an individual,
14 Plaintiff,

15 v.

16 SHIA LABEOUF, an individual,
17 Defendant.

Case No.: 20STCV47437

COMPLAINT FOR:

- 1. **SEXUAL BATTERY;**
- 2. **BATTERY;**
- 3. **ASSAULT;**
- 4. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; AND**
- 5. **GROSS NEGLIGENCE**

DEMAND FOR JURY TRIAL

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22 Plaintiff TAHLIAH BARNETT (hereinafter sometimes referred to as "Plaintiff" or
23 "Tahliah") hereby brings the following causes of action against Defendant SHIA LABEOUF
24 ("LaBeouf" or "Defendant"), with knowledge as to herself and otherwise on information and belief,
25 claim and allege as follows:
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1 **INTRODUCTION**

2 1. Shia LaBeouf hurts women. He uses them. He abuses them, both physically and
3 mentally. He is dangerous. For too long, LaBeouf has sought to excuse his reprehensible actions as
4 the eccentricities of a free-thinking “artist.” Even though his history of violent behavior was well-
5 documented, many in the media have treated LaBeouf as a harmless figure of fun, which has helped
6 enable him to perpetuate his cycle of abuse of women over the years. There is nothing funny about
7 the exploitation of and battering of women. This action has been brought not for personal gain, but
8 to set the record straight, and to help ensure that no more women must undergo the abuse that Shia
9 LaBeouf has inflicted on his prior romantic partners. The days in which LaBeouf can mistreat and
10 harm women with impunity are over.

11 2. Tahliah Barnett, professionally known as FKA twigs, is an internationally successful
12 singer, songwriter, and actor. Tahliah was involved in a tumultuous relationship with LaBeouf
13 shortly after they finished working on the motion picture *Honey Boy*. After LaBeouf had employed
14 a “charm offensive” on Tahliah, a tactic she now knows he used on other women, LaBeouf
15 convinced her to move in with him. LaBeouf was engaging in grooming – gradually gaining
16 Tahliah’s trust and confidence with the intent of abusing her. What followed was a living nightmare
17 for Tahliah. Over a course of months, LaBeouf engaged in a continuous stream of verbal and
18 mental abuse toward Tahliah, belittling her and berating her after the slightest perceived “insult” by
19 LaBeouf. LaBeouf isolated Tahliah from her friends and family, making it so her daily existence
20 and routine revolved around LaBeouf and only LaBeouf. His verbal abuse escalated into physical
21 abuse, during which LaBeouf became increasingly violent toward Tahliah. On one horrific
22 occasion, around Valentine’s Day 2019, LaBeouf forcibly slammed Tahliah against his car and then
23 strangled her, after she was trying to escape from one of his manic tirades. In fact, LaBeouf even
24 admitted to another woman, whom he was cheating on Tahliah with at the time, that he had dragged
25 Tahliah out of his car by her collar. LaBeouf kept Tahliah in a constant state of fear by openly
26 storing live firearms throughout his home, including in the bedroom he shared with Tahliah.
27 Finally, and most dreadfully, LaBeouf knowingly transmitted a serious illness to Tahliah, without
28 ever informing her beforehand that he suffered from this dreadful malady. Tahliah has since learned

1 that LaBeouf has infected other unsuspecting women with his disease. Simply put, LaBeouf's
2 reckless disregard for the health and safety of his partners makes him a danger to women
3 everywhere.

4 3. Although Tahliah has suffered greatly, and will bear the scars of LaBeouf's abuse for
5 the rest of her days, she will not be labeled a victim. Instead, Tahliah has triumphed over LaBeouf's
6 abuse and stands ready to hold him accountable for his actions. Together with Karolyn Pho, another
7 survivor of LaBeouf's abuse, Tahliah sought to avoid this action by requesting LaBeouf voluntarily
8 seek the mental health and substance abuse treatment he so desperately needs, and that he make a
9 donation to a domestic violence shelter. Tahliah and Karolyn simply wanted LaBeouf to take
10 affirmative steps toward healing himself and, in turn, to stop his cycle of domestic violence toward
11 his future partners and keep them from suffering the same physical, sexual, and mental abuse.

12 4. In response to this peaceful overture, LaBeouf played games and downplayed the
13 seriousness of the situation. LaBeouf's attorney cruelly dismissed the sexually transmitted disease
14 LaBeouf had infected Tahliah with as "not that bad." LaBeouf attempted to dissuade Karolyn from
15 allying with Tahliah by sending Karolyn an unsolicited email in which he falsely disparaged
16 Tahliah. LaBeouf also threatened Tahliah, claiming that he was in possession of personal text
17 messages and other information that he could use to embarrass her. In his effort to intimidate
18 Tahliah, LaBeouf engaged Tahliah's former assistant Noelle O'Reilly into improperly providing
19 him with private and confidential information about Tahliah. With these threats, LaBeouf clearly
20 hoped to terrorize Tahliah into submission and keep her from taking any further action. LaBeouf's
21 scare tactics will not work. He has no power over Tahliah anymore.

22 5. Tahliah now brings this action to seek some measure of justice not simply for herself,
23 but for the many other women who have been similarly abused by LaBeouf. Tahliah intends to
24 donate a significant portion of any monies received in this action to charities dedicated to assisting
25 victims of domestic violence. Never again will another woman be forced to undergo the brutal
26 treatment and degradation that Tahliah and others experienced at his hands. This case is being
27 brought on behalf of all those women that LaBeouf has mistreated in the past, and for all those
28 women who will be spared his abuse in the future.

1
2 **PARTIES AND JURISDICTION**

3 6. Plaintiff Tahliah Barnett is, and at all times relevant was, an individual residing in
4 London, England, United Kingdom.

5 7. Defendant LaBeouf is, and at all times relevant was, an individual residing in the
6 County of Los Angeles, State of California.

7 8. The wrongful acts by LaBeouf alleged herein occurred in the County of Los Angeles,
8 State of California.

9 **FACTS COMMON TO ALL CAUSES OF ACTION**

10 **LaBeouf's Abuse of Tahliah**

11 9. Tahliah first met LaBeouf while filming the motion picture "*Honey Boy*" in the early
12 summer of 2018, a film in which both had lead roles. When shooting on the picture wrapped later
13 that year, the two began a romantic relationship. Tahliah was in a vulnerable and sensitive state at
14 the time, as she had recently ended a four-year engagement and was recovering from having painful
15 fibroid tumors removed from her uterus.

16 10. Within a week or two of dating, LaBeouf dramatically professed his love for Tahliah.
17 During the first few months of their relationship, LaBeouf restrained himself to over-the-top
18 displays of affection, eventually winning Tahliah's trust. Once LaBeouf had gained Tahliah's
19 confidence, her living nightmare began.

20 11. Beginning in and around October 2018, LaBeouf convinced Tahliah to go live with
21 him at his Los Angeles home. Once Tahliah had moved in, LaBeouf began regularly exhibiting
22 frequent rage and bouts of jealousy toward Tahliah. On a continual basis, he aggressively accused
23 her of dwelling on her former fiancé (well-known actor Robert Pattinson), and also accused Tahliah
24 of "rushing" him into a relationship. LaBeouf would inexplicably escalate the most inconsequential
25 disagreements—for example, over matters of taste in art—to apocalyptic levels, often forcing
26 Tahliah to stay up all night while he verbally berated her for hours on end about her supposed lack
27 of taste. LaBeouf would take something as innocent as Tahliah kissing another man on the cheek in
28

1 a music video, or being polite to a waiter, as nothing less than a betrayal, an assault on his manhood,
2 and an existential threat to their relationship.

3 12. LaBeouf would literally count the kisses Tahliah would give him in a given day and
4 berate her if she fell short of a target number. He would verbally assault Tahliah if he placed his
5 hand in her lap and she failed to *immediately* reciprocate and place her hand on top of his. He
6 would “end” their relationship on the slightest imagined grievance and then almost immediately
7 resurface, desperate to resume it.

8 13. LaBeouf suffered recurring periods of delusions wherein he armed himself with
9 firearms on the belief “gang members” were going to break down his door at any moment, going so
10 far as to sleep with these guns. Tahliah would be trapped in their shared bed for hours at a time
11 without the ability to even get up to go to the bathroom for fear she would be shot by LaBeouf
12 should he wake up suddenly upon her return to bed.

13 14. LaBeouf’s relentless mental and verbal harassment and mistreatment of Tahliah
14 eventually turned into physical violence. LaBeouf committed physical attacks against Tahliah on
15 multiple occasions, each resulting in personal injuries to Tahliah, not the least of which was
16 LaBeouf’s knowing transmission of a serious disease which has forever altered the course of her
17 life.

18 15. While Tahliah was living with LaBeouf at his Los Angeles home, she remained in
19 constant fear due to the threatening presence of loaded firearms throughout LaBeouf’s home.
20 Beginning in November 2018, LaBeouf insisted on keeping his front door unlocked and sleeping
21 with a loaded rifle at their bedside. LaBeouf demanded Tahliah join him while he watched
22 documentaries about murdered women before bed and refused to allow Tahliah to sleep with any
23 clothing on. In these moments, Tahliah would often text friends in the middle of the night to devise
24 a plan to escape LaBeouf’s home.

25 16. Similarly, when LaBeouf was filming the movie *The Tax Collector*, in which he
26 played a gangster, he took on the role in real life. During one incident, while Tahliah was driving
27 with him, LaBeouf pulled a pistol from a compartment in his car which he boasted to Tahliah was
28 illegal to possess in California. On another occasion, LaBeouf attempted to scare Tahliah by

1 warning her that he pulled out one of his firearms on set and threatened others with it, bragging to
2 Tahliah that he enjoyed “getting their attention.” LaBeouf made the horrific boast to Tahliah that, in
3 order to get into “character” for his role in *The Tax Collector*, he would drive around neighborhoods
4 in Los Angeles and shoot stray dogs. LaBeouf claimed he killed these dogs because he wanted to
5 know what it felt like to take a life so he could get into the “mindset” of a killer, like his role in the
6 movie. LaBeouf knew that Tahliah is a great lover of dogs, and that she is very close to her own
7 dog. LaBeouf’s admission to such wanton animal cruelty profoundly disturbed and terrified
8 Tahliah.

9 17. To celebrate the Valentine’s Day holiday in February 2019, LaBeouf drove Tahliah
10 to a hotel spa for a romantic evening. However, instead of a night of romance, Tahliah was
11 subjected to a torrent of physical abuse from LaBeouf. After she had gone to bed, Tahliah awoke to
12 LaBeouf towering over her and violently squeezing her body and arms against her will. LaBeouf
13 then grasped his hands around Tahliah’s neck and began strangling her while whispering, “If you
14 don’t stop you are going to lose me.” Tahliah was so terrified she could not move and lay there
15 frozen while LaBeouf continued to harm her.

16 18. The following morning, outside of their hotel, LaBeouf threw Tahliah to the ground.
17 And as they drove back to LaBeouf’s house, LaBeouf drove maniacally, removing his seat belt and
18 threatening to crash the car unless Tahliah professed her eternal love for him. Tahliah was horrified
19 by LaBeouf’s actions and feared for her life. LaBeouf eventually stopped at a gas station, and
20 Tahliah desperately attempted to escape from him. However, after Tahliah tried to remove herself
21 and her belongings from the car, LaBeouf violently attacked Tahliah. While in the gas station
22 parking lot, he threw Tahliah against the car and attempted to strangle her violently while screaming
23 in her face. LaBeouf then forced Tahliah back into his car.

24 19. Later, when confronted about this incident by his female friend on September 29,
25 2019, LaBeouf did not deny that he used violence on Tahliah. Indeed, LaBeouf admitted it a text
26 message that, “I do remember removing her [Tahliah] from the car in the desert.” LaBeouf stated
27 that he removed Tahliah “[b]y her arms.” In response, LaBeouf’s friend confronted him with a text
28 message stating, “Shia, you did actually admit to me the incident when you had her [Tahliah] by the

1 collar and were pushing her against the car while she sobbed, and while three male witnesses did
2 nothing at the gas station was true[.]”

3 20. Shortly after the Valentine’s Day incident, on February 25, 2019, Tahliah reached
4 out for help, by texting a close friend and writing, “. . . this is difficult to say but I am sure you
5 know. I have been in an abusive relationship that has isolated me. It’s worse than you could
6 imagine.”

7 21. Tahliah also sought the help of a professional therapist, writing to him on February
8 24, “I have just left an emotionally, physically, and sexually abusive relationship. I have one day
9 out and I’m very confused and overwhelmed I am writing this email because I am hoping that
10 by seeking professional help I can stay out of it and carry on with my life.” Tahliah has continued
11 to seek counseling and psychotherapy from this therapist, as she continues to suffer ongoing mental
12 trauma and distress from LaBeouf’s relentless abuse.

13 22. Tahliah began to slowly distance herself from LaBeouf and his violence. She began
14 this process by planning to escape from LaBeouf when the opportunity arose. However, LaBeouf’s
15 fixation on controlling and surveilling Tahliah made the prospect of escape both difficult and
16 dangerous.

17 23. In and around March 2019, Tahliah attempted to escape from LaBeouf’s abuse. One
18 day, she began packing her bags and belongings, intending to leave Los Angeles and LaBeouf.
19 However, while Tahliah was doing so, LaBeouf showed up unannounced at the rented home where
20 she was staying. The entire incident was witnessed by Tahliah’s housekeeper, who was helping her
21 pack at the time. In her own words, the housekeeper had provided sworn testimony that,
22 “[LaBeouf] yelled at [Tahliah] that she had to come with him. [Tahliah] hesitated and remained
23 where she was in the room. When [Tahliah] refused to go with [LaBeouf], [LaBeouf] appeared to
24 grow angrier and moved toward [Tahliah]. [LaBeouf] then violently grabbed [Tahliah] and lifted
25 her off the ground.”

26 24. Tahliah’s housekeeper further relates that, “[a]fter [LaBeouf] had lifted [Tahliah]
27 into the air, he forcibly carried her into a separate room. I then heard the door to this room lock
28 from the inside. I tried the door and confirmed that it was locked. [LaBeouf] continued to scream

1 at [Tahliah]. He yelled so loudly that I could hear him from outside the room. I waited outside the
2 room while this occurred. [LaBeouf] kept yelling at [Tahliah] for a considerable amount of time.
3 Eventually, I observed [LaBeouf] open the door and exit the room where he had been keeping
4 [Tahliah]. As he left the room, [LaBeouf] first appeared to notice me watching him. [LaBeouf]
5 stared at me but did not say anything.”

6 25. Finally, Tahliah’s housekeeper has testified that, “I quickly went to [Tahliah]’s side
7 to see how she was doing. I observed that [Tahliah] was in a very traumatized state. She appeared
8 to have been crying and her voice was very weak. I asked [Tahliah] if [LaBeouf] had taken her into
9 that room and kept her there against her will. [Tahliah] confirmed that [LaBeouf] had indeed done
10 so.” Unfortunately, LaBeouf soon returned, dashing Tahliah’s plans to escape from him.

11 26. Beginning in and around March 2019, Tahliah began to experience unusual and
12 painful physical symptoms. Shortly thereafter, Tahliah confronted LaBeouf about her symptoms
13 and he admitted that he suffered from a sexually transmitted disease which had been diagnosed
14 years earlier. LaBeouf admitted that he had never told Tahliah about his condition before, even
15 though they had been sexually intimate for many months. Further, LaBeouf admitted that he had
16 experienced a flareup of his disease’s symptoms in December 2019, but worked to hide his outward
17 symptoms from Tahliah by applying makeup. Despite experiencing a flareup of his symptoms,
18 LaBeouf continued to engage in sexual relations with Tahliah, further exposing her to his disease.

19 27. Shocked and horrified by this revelation, Tahliah consulted with her physician who
20 performed blood work and confirmed that Tahliah had been infected with LaBeouf’s disease.
21 Tragically, Tahliah later learned that she was not the first person that LaBeouf had transmitted his
22 disease to. Tahliah discovered that at least one other woman that LaBeouf had been in a
23 relationship with had contracted the disease from him, and that he had engaged in similar attempts
24 to hide his condition from that person while engaging in sexual relations.

25 28. Despite his endless mistreatment of Tahliah, LaBeouf had succeeded in isolating her
26 from her friends, family and others that could help extricate her from the toxic relationship.
27 LaBeouf’s domineering treatment of Tahliah had allowed him to convince her that *he* was a victim,
28 that he genuinely loved her and that he wanted to “repair” their relationship. For the next few

1 months, Tahliah engaged in multiple therapy sessions with LaBeouf, in an attempt to salvage their
2 relationship. However, LaBeouf's unpredictable and violent behavior did not change. Eventually,
3 after Tahliah refused his endless stream of calls and text messages, LaBeouf unceremoniously ended
4 his relationship with Tahliah via a text message. Tahliah later learned that LaBeouf had been
5 cheating with another woman during this time. Finally free from LaBeouf, Tahliah began the long
6 and difficult process of healing from his abuse.

7 **LaBeouf's Prior History of Abuse**

8 29. As part of her path toward healing, Tahliah came into contact with Karolyn Pho
9 ("Karolyn"), another survivor of LaBeouf's abuse. Karolyn dated LaBeouf during the years 2010 to
10 2011. Theirs was a well-documented and public relationship.

11 30. Behind that publicity, however, LaBeouf subjected Karolyn to the same kind of
12 abuse, including physical abuse, he inflicted on Tahliah, fueled by his jealous, impulsive, and
13 irrational ways. For example, just as LaBeouf was fixated on Tahliah's former fiancé and would
14 accuse her, constantly, of still being emotionally drawn to him, LaBeouf would berate Karolyn for
15 something as innocuous as "looking" at the male waiting staff at a restaurant. LaBeouf would
16 furiously claim that Karolyn was attracted to any male, other than himself, that she happened to be
17 "looking" at, instigating needless traumatic arguments with Karolyn.

18 31. Karolyn's experience with LaBeouf was disturbingly similar to Tahliah's,
19 demonstrating his pattern and practice of abusing women. For instance, in February 2012, LaBeouf
20 traveled with Karolyn to New York City for Fashion Week. During their flight east, paid for by
21 Karolyn, LaBeouf angrily berated her for wearing expensive sunglasses and repeatedly humiliated
22 her, causing her to burst into tears in front of other passengers on the airplane. He disappeared the
23 moment he deplaned at JFK airport. Karolyn traveled to their hotel alone, could not find LaBeouf,
24 and went to bed. LaBeouf eventually showed up to the hotel room extremely drunk, waking
25 Karolyn by banging loudly on the door. Karolyn let LaBeouf into their room, where, after babbling
26 incoherently, he promptly passed out on the couch face up. Fearful that LaBeouf might choke on his
27 own vomit in that position, Karolyn helped carry him into a shower, where she sat him upright and
28 turned on the water. LaBeouf continued to sit in this position, mumbling to himself. Believing

1 LaBeouf was no longer in danger, Karolyn returned to bed. Later that night, Karolyn awoke to
2 LaBeouf on top of her—drunk, naked, wet, and screaming. He held her down by her arms, causing
3 intense pain and leaving multiple bruises, and then headbutted her violently causing her to bleed on
4 the hotel bed.

5 32. Likewise, following a party at the Chateau Marmont in early 2011, Karolyn kept
6 LaBeouf from driving home because of how drunk he was. They hailed a taxi. On the ride home to
7 Sherman Oaks, LaBeouf repeatedly berated and verbally assaulted Karolyn in front of the driver,
8 and repeatedly whispered to Karolyn, “You know I’m going to kill you.” Once home, he vomited in
9 the hallway. The next morning, LaBeouf asked Karolyn about the vomit in the hallway, claiming he
10 had "blacked out" and did not remember anything from the prior evening.

11 33. Karolyn has bravely chosen to ally with Tahliah against LaBeouf, in order to protect
12 women from ever again having to endure LaBeouf’s abuse.

13 **LaBeouf’s Documented History of Arrests and Violence**

14 34. Over the years, the media has reported on public examples of LaBeouf’s violent and
15 volatile behavior. In 2007, for instance, LaBeouf was arrested and jailed following an altercation
16 with his next-door neighbor in Van Nuys, California. In 2008, LaBeouf narrowly avoided seriously
17 injuring others when his drunk driving caused him to hit another vehicle, resulting in his arrest.¹ In
18 2011, LaBeouf was involved in a bar fight in Sherman Oaks, California, which resulted in his being
19 detained by police.² In 2014, LaBeouf attended a performance of the musical *Cabaret* on
20 Broadway. LaBeouf was extremely drunk during the performance, and caused such a disturbance
21 that he was arrested during the show’s intermission.³ In 2015, LaBeouf’s drunk and disorderly
22 behavior resulted his arrest on the streets of Austin, Texas.⁴

23 _____
24 ¹ See <https://people.com/crime/shia-labeouf-arrested-for-dui/>

25 ² See <https://www.hollywoodreporter.com/news/shia-labeouf-handcuffed-released-bar-96959>

26 ³ See <https://pagesix.com/2014/06/26/shia-labeouf-arrested-for-disorderly-conduct/>

27 ⁴ See <https://www.usatoday.com/story/life/people/2015/10/09/shia-labeouf-arrested-public-intoxication-in-texas/73694686/>
28

1 35. In 2015, the media widely reported on an incident between LaBeouf and his then-
2 girlfriend Mia Goth (“Goth”). While in Germany, LaBeouf’s vicious verbal assault on Goth was
3 captured on video by passersby. Among other things, LaBeouf told Goth, “I don’t wanna touch
4 you. I don’t wanna be aggressive. This is the kind of shit that makes a person abusive.” LaBeouf,
5 apparently inebriated, blames Goth for “pushing” him. When he eventually leaves the scene,
6 LaBeouf was caught saying, “If I’d have stayed there, I would have killed her.”⁵

7 36. As recently as September 24, 2020, LaBeouf was charged by the Los Angeles City
8 Attorney with misdemeanor battery and theft for allegedly using physical violence to steal a man’s
9 hat.⁶

10 **LaBeouf’s Enlists Tahliah’s Former Assistant to Threaten Her**

11 37. From 2017 until 2019, Tahliah employed Noelle O’Reilly (“O’Reilly”) as her
12 personal assistant. In connection with her employment with Tahliah, O’Reilly was privy to certain
13 private and confidential information concerning Tahliah’s personal life and career that O’Reilly was
14 obligated not to disclose. However, it has since become clear to Tahliah that O’Reilly repeatedly
15 abused her position of trust by engaging in fraud and outright theft. Moreover, O’Reilly undertook
16 most of her misdeeds while Tahliah was away from her home, living with LaBeouf.

17 38. In August through October 2018, after her own application was denied, and desperate
18 to become a member of the exclusive Soho House chain of clubs, O’Reilly committed identity theft
19 and hacking in order to pose as Tahliah so she could “recommend” herself for a club membership.
20 Once O’Reilly was approved, she then stole from Tahliah by paying for her Soho House
21 membership with Tahliah’s money. All of this was done without Tahliah’s knowledge and consent.

24 ⁵ See https://www.huffpost.com/entry/shia-labeouf-mia-goth-public-fight-germany_n_55b64e86e4b0224d8832c8e1

27 ⁶ See <https://www.nbcnews.com/news/us-news/actor-shia-labeouf-charged-misdemeanor-battery-petty-theft-n1241857>

1 39. As if posing as Tahliah in order to gain a club membership was not enough, O'Reilly
2 stole articles of designer clothing from Tahliah and sold them for her own profit via the resale
3 website Vestiaire Collective. O'Reilly then directed that the proceeds from these illicit sales be
4 directed to her personal account with Vestiaire Collective. For instance, on October 4, 2018,
5 O'Reilly emailed Vestiaire stating, "I have a large collection of designer items, 100-150. I can't list
6 them all Account is under this email address." This collection of "designer items" was
7 Tahliah's personal property. This led to a viewing appointment between O'Reilly and Vestiaire
8 representatives on November 14, 2018, at Tahliah's house – without Tahliah's consent and while
9 she was away. The following day, when Vestiaire informed O'Reilly that 15 of the items would
10 need to be returned, O'Reilly had them returned to her own residence – not Tahliah's.

11 40. Unaware of her duplicity, Tahliah confided in O'Reilly about LaBeouf's violent
12 abuse of her. Indeed, O'Reilly took photographs of the bruises that LaBeouf inflicted on Tahliah in
13 February 2019. O'Reilly even sent a text message to Tahliah's friends to warn them that Tahliah
14 was in an abusive relationship. However, soon after Tahliah uncovered O'Reilly's deception and
15 theft, she began to aid LaBeouf in his intimidation campaign against Tahliah. After Tahliah and
16 Karolyn approached LaBeouf about informally resolving this dispute, which would have involved
17 LaBeouf undergoing intensive psychotherapy and substance abuse treatment in addition to donating
18 to a domestic violence shelter, LaBeouf began an intimidation campaign against Tahliah to frighten
19 her from filing this lawsuit. LaBeouf stated that O'Reilly had provided him with sensitive and
20 confidential information, obtained during O'Reilly's employment with Tahliah, which he would use
21 to embarrass Tahliah if she ever went public about LaBeouf's abuse. He also claimed that O'Reilly
22 had provided a statement in which she would claim that Tahliah's February 2019 bruises did not
23 result from LaBeouf's physical violence, but were self-inflicted from a strenuous dancing session
24 Tahliah had that month. By providing confidential information and false statements to LaBeouf,
25 whom she knew had abused Tahliah, O'Reilly not only violated Tahliah's trust and confidence but
26 also her own contractual obligations to Tahliah. Tahliah has since spoken with a high-profile
27 recording artist in the music industry who had also employed O'Reilly as his assistant. That artist
28 informed Tahliah that O'Reilly also engaged in the theft of his property while under his employ.

1 The fact that LaBeouf would enlist such a disreputable person to support his intimidation tactics
2 speaks volumes about his own character, or lack thereof.

3 41. Undeterred by LaBeouf's shameful threats, and determined to keep any more women
4 from being ensnared and abused by such a dangerous man, Tahliah has pressed forward with this
5 action. If LaBeouf will not help himself and address his own demons, Tahliah will do everything in
6 her power to keep him from hurting others. Tahliah has nothing to gain professionally from this
7 action. She intends to donate a significant portion of any monies she receives from LaBeouf to
8 deserving non-profits aimed at helping survivors of domestic abuse. Most importantly, women
9 everywhere are now on notice that LaBeouf is not the tortured artist he portrays himself as: he is a
10 destructive and dangerous man.

11 **FIRST CAUSE OF ACTION FOR SEXUAL BATTERY**
12 **(BY PLAINTIFF AGAINST LABEOUF)**

13 42. Plaintiff re-alleges herein by this reference each and every allegation contained in
14 paragraphs 1 through 41, inclusive, of this Complaint as if set forth fully herein.

15 43. LaBeouf's conduct in transmitting a sexually transmitted disease to Plaintiff was
16 done without Plaintiff's consent and constitutes sexual battery.

17 44. LaBeouf intended to cause and did cause a harmful contact with Plaintiff's person.

18 45. Plaintiff did not consent to LaBeouf's harmful contact with her person.

19 46. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
20 suffered bodily injuries, severe emotional and mental distress and anguish.

21 47. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
22 suffered damages, all in amounts according to proof and in excess of the minimum jurisdiction of
23 this Court.

24 48. LaBeouf performed the foregoing wrongful acts, conduct, and omissions
25 intentionally, fraudulently, maliciously, and oppressively in willful and conscious disregard of
26 Plaintiff's rights and with the intent and design to damage Plaintiff. By reason thereof, Plaintiff is
27 entitled to recover punitive damages in an amount to be determined at the time of trial.
28

1 **SECOND CAUSE OF ACTION FOR BATTERY**

2 **(BY PLAINTIFF AGAINST LABEOUF)**

3 49. Plaintiff re-alleges herein by this reference each and every allegation contained in
4 paragraphs 1 through 48, inclusive, of this Complaint as if set forth fully herein.

5 50. LaBeouf intended to cause and did cause a harmful contact with Plaintiff's person.

6 51. Plaintiff did not consent to LaBeouf's harmful contact with her person.

7 52. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
8 suffered bodily injuries, severe emotional and mental distress and anguish.

9 53. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
10 suffered damages, all in amounts according to proof and in excess of the minimum jurisdiction of
11 this Court.

12 54. LaBeouf performed the foregoing wrongful acts, conduct, and omissions
13 intentionally, fraudulently, maliciously, and oppressively in willful and conscious disregard of
14 Plaintiff's rights and with the intent and design to damage Plaintiff. By reason thereof, Plaintiff is
15 entitled to recover punitive damages in an amount to be determined at the time of trial.

16 **THIRD CAUSE OF ACTION FOR ASSAULT**

17 **(BY PLAINTIFF AGAINST LABEOUF)**

18 55. Plaintiff re-alleges herein by this reference each and every allegation contained in
19 paragraphs 1 through 54, inclusive, of this Complaint as if set forth fully herein.

20 56. LaBeouf acted in a manner such that he intended to cause a harmful touching of
21 Plaintiff.

22 57. LaBeouf touched and assaulted Plaintiff in a harmful manner.

23 58. Plaintiff did not consent to the assaultive conduct committed by LaBeouf.

24 59. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
25 suffered bodily injuries, severe emotional and mental distress and anguish.

26 60. As a direct and proximate result of the aforesaid acts of LaBeouf, Plaintiff has
27 suffered damages, all in amounts according to proof and in excess of the minimum jurisdiction of
28 this Court.

