

STATE OF NEW YORK
SUPREME COURT, COUNTY OF NEW YORK

DAGOBERTO VELEZ a/k/a "STREET
STAR NORBES" or "NORBES,"
Plaintiff,
v.
TROY MITCHELL a/k/a "SMACK WHITE,"
or "SMACK,"
ERIC BEASLEY,
JEAN FRENCH a/k/a "CHEEKO," and
ULTIMATE RAP LEAGUE, LLC, a/k/a
"URL,"
Defendants.

Index No. _____

SUMMONS

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the attorneys for the plaintiff within 20 days after service of this summons, exclusive of the days of service (or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York). In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint. New York County is designated as the place of trial pursuant to CPLR § 503(a) based on the the fact that a substantial part of the events giving rise to the claims asserted herein occurred in New York County.

Dated: September 10, 2020

Attorneys for Plaintiff

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9/10/2020

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DAGOBERTO VELEZ a/k/a "STREET
STAR NORBES" or "NORBES,"

Plaintiff,

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TROY MITCHELL a/k/a "SMACK WHITE,"
or "SMACK,"

ERIC BEASLEY,

JEAN FRENCH a/k/a "CHEEKO," and

ULTIMATE RAP LEAGUE, LLC, a/k/a
"URL,"

Defendants.

VERIFIED COMPLAINT

Index No.: _____

JURY TRIAL DEMANDED

Plaintiff Dagoberto Velez a/k/a "Street Star Norbes" or "Norbes," by and through his attorneys, Jamar W. Creech, Landon M. White, and Martinis M. Jackson, by way of Complaint against Defendants Troy Mitchell a/k/a "SMACK White" or "SMACK," Eric Beasley, Jean French a/k/a "Cheeko," and Ultimate Rap League, LLC, a/k/a "URL" alleges as follows:

THE PARTIES

(1) Plaintiff Dagoberto Velez is an individual that regularly conducted business, in the state of New York, with and on behalf of the Ultimate Rap League, LLC, a New York limited liability company.

- (2) Upon information and belief, Defendant Troy Mitchell is an individual residing in Springfield Gardens, NY.
- (3) Upon information and belief, Defendant Eric Beasley is an individual residing in New York, NY.
- (4) Upon information and belief, Defendant Jean French is an individual residing in Deer Park, NY.
- (5) Defendants Troy Mitchell, Eric Beasley, and Jean French regularly conduct business, in the state of New York, with and on behalf of the Ultimate Rap League, LLC.
- (6) Upon information and belief, Defendant Ultimate Rap League, LLC, is a limited liability company organized under the laws of the state of New York. Its resident agent is United States Corporation Agents, Inc., whose address is 7014 13th Avenue, Suite 202, Brooklyn, NY 11228.

JURISDICTION AND VENUE

- (7) The Supreme Court of the State of New York, in the County of New York, has jurisdiction of this action under § 301 of the Civil Practice Law and Rules (“CPLR”), as Defendants are all domiciled or conduct business in the State of New York.
- (8) The Supreme Court of the State of New York, in the County of New York, has jurisdiction of this action under § 302 of the Civil Practice Law and Rules (“CPLR”), as Plaintiff transacts business within the State of New York on behalf of Ultimate Rap League LLC.

(9) Venue is proper in the County of New York under § 503 of the Civil Practice Law Rules (“CPLR”) since Plaintiff and all Defendants reside or are domiciled in the State of New York. Some of the business at issue in this action is found within the County of New York.

FACTS COMMON TO ALL CAUSES OF ACTION

(10) In 2009, Plaintiff was approached by Defendants to be a partner and to form what would become the Ultimate Rap League.

(11) Plaintiff Velez, Defendant Troy Mitchell, Defendant Eric Beasley, and Defendant Jean French agreed that Plaintiff’s pivotal role in the partnership was to create the structure for the Ultimate Rap League.

(12) On or about October 26, 2009, the Ultimate Rap League began its operations as a New York general partnership with Troy Mitchell, Jean French, Eric Beasley, and Dagoberto Velez as partners.

(13) The purpose of the Ultimate Rap League was to conduct acapella rap battles targeting the urban culture and hip-hop music genre through live events. The battles were then uploaded to the company’s YouTube channel to reach a worldwide audience.

(14) Currently, Defendant Ultimate Rap League, LLC, operates in the following industries: “Entertainers & Entertainment Groups” (Standard Industrial Classification (SIC) Code: 7929) and “Computer Programming Services” (SIC Code: 7371).

- (15) The description that on many of the battles on the Ultimate Rap League YouTube channel reads in pertinent part, “FOLLOW THE MOVEMENT @URLTV @SMACKWHITE @BEASLEYNYC @STREETSTARNORBES @RAIN910 @THISISTWIZZ @BELIKEIKE @NUNU_NELLZ @WEGOHARDTV @PSWISS300 @EBLTV @PAPILAPUGH[.]” The section entitled “About Ultimate Rap League” reads as follows: “URLTV, also known as Ultimate Rap League, is the home of smack URL on YouTube and the world’s largest platform for the MC Battle Culture. You’ll find URL Rap Battles vs Tay Roc, Tsu Surf, Chess, Charlie Clips, Brizz Rawsteen, Rum Nitty and many more!”
- (16) In the earliest years of the company, ticket sales from the live events were the primary source of revenue for the Ultimate Rap League. The income from the live events was supplemented by the Ultimate Rap League’s YouTube revenue. However, in 2015 the primary source of revenue would shift to pay-per-view events on WatchBattleLive.com (\$40 - \$50 per event) and then to the URLTV mobile application (also referred to as the “URLTV App”). The URLTV App is a subscription-based platform (\$7.99 per month) that was released in 2019.
- (17) From 2009 to 2020, Plaintiff, as a partner, executed many activities that include but were not limited to, the following: recruiting talent (on-screen and support staff), engaging in promotions, hosting battle rap events, organizing

battle rap events, executing contracts, raising capital, and developing business concepts for the Ultimate Rap League.

(18) From 2009 to the present, the Ultimate Rap League has featured the talent that Plaintiff has secured to perform for the company at its live events and on its digital platforms.

(19) From 2009 to the present, the Ultimate Rap League has not held a single battle rap event without any of the talent acquired by Plaintiff.

(20) From 2009 to the present, the Ultimate Rap League held events domestically and internationally, and Plaintiff was instrumental in executing these events.

(21) The events detailed in this Complaint are some of the events held by the Ultimate Rap League from 2009 to the present.

(22) The Ultimate Rap League held its first event on or about Saturday, October 31, 2009, which was hosted by Troi Torain a/k/a “STAR,” a popular media personality. The main event was between Justin Edwards a/k/a “Math Hoffa” and Randy Sullivan a/k/a “T-Rex.” The battle was held in New York and uploaded to the YouTube social media platform. As of the filing of this Complaint, this battle has over 1 million views. That event also featured the following battles: “Young Miles” vs. “Rich Dolarz,” “Big T” vs. “Deacon Frost,” and “X Factor” vs. “Cortez.”

(23) On or about Sunday, December 13, 2009, the Ultimate Rap League hosted an event in St. Louis, Missouri entitled “Midwest Massacre” that

featured the following battles: “Conceited” vs. “Jesse James,” “Yung Ill” vs. “Calicoe,” “Hitman Holla” vs. “Big T,” “Young Miles” vs. “Aye Verb,” and “X Factor” vs. “Remy D.”

(24) On or about Saturday, February 6, 2010, the Ultimate Rap League hosted an event in New York that featured the following battles: “Soul Khan” vs. “Deacon Frost,” “Calicoe” vs. “Nuborn,” “Shotgun Suge” vs. “Hollyhood,” “DNA” vs. “Oun P,” “Head ICE” vs. “Tech 9,” “Hollow da Don” vs. “Big T,” “Tsu Surf” vs. “Yung Ill.”

(25) On or about Saturday, March 27, 2010, the Ultimate Rap League hosted an event in New York that featured the following battles: “Shotgun Suge” vs. “Heartless,” “Hitman Holla” vs. “Cortez,” “Calicoe” vs. “Rich Dolarz,” “DNA” vs. “Tsu Surf,” “Conceited” vs. “Goodz,” and “Aye Verb” vs. “Math Hoffa.”

(26) On or about Saturday, April 24, 2010, the Ultimate Rap League held tryout events to get new talent to join the roster.

(27) On or about Sunday, June 27, 2010, the Ultimate Rap League hosted an event in New York, NY, that featured the following battles: “Shotgun Suge” vs. “Tay Roc,” “O-Red” vs. “Black Haze,” “Hash 100” vs. “Scripts,” “Express Money,” vs. “Roosevelt.”

(28) On or about Sunday, August 29, 2010, the Ultimate Rap League hosted an event in New York, NY, that featured the following battles: “Big Kannon” vs. “Mo Dirdee,” “Tech 9” vs. “X Factor,” “O-Red” vs. “Young Kannon,” “Juicezilla” vs. “Syah Boy,” and “Prophit” vs. “Millennium L’s.”

- (29) On or about Sunday, September 26, 2010, the Ultimate Rap League hosted an event in New York, NY that featured the following battles: “Marv Won” vs. “Cortez,” “Calicoe” vs. “Shotgun Suge,” “Big T” vs. “DNA,” “Sco” vs. “Hash 100,” “KP” vs. “AR 16.” “K-Shine” vs. “Tay Roc” faced each other in a “One Off” Battle.
- (30) On or about Sunday, December 12, 2010, the Ultimate Rap League hosted an event in New York, NY, that featured “Hitman Holla” vs. “Arsonal” as the main event.
- (31) On or about Wednesday, February 9, 2011, the Ultimate Rap League hosted a “One Off” Battle between “Yung Ill” vs. “Rich Dolarz.”
- (32) On or about Saturday, March 26, 2011, the Ultimate Rap League hosted its first Proving Grounds event in New York, NY. Proving Grounds is a concept that was created by Plaintiff to develop and highlight emerging talent for the Ultimate Rap League.
- (33) On or about Sunday, March 27, 2011, the Ultimate Rap League hosted the inaugural “Night of Main Events (NOME)” in New York, NY. NOME would become a signature event for the Ultimate Rap League.
- (34) On or about Saturday, June 11, 2011, the Ultimate Rap League hosted an event in New York, NY that featured the following battles: “Bill Collector” vs. “M. Ciddy” and “John John da Don” vs. “B Magic.”

- (35) On or about Saturday, August 6, 2011, the Ultimate Rap League hosted an event in New York, NY, that featured the following battles: “Young Kannon” vs. “Sco,” “QP” vs. “Rosenberg Raw,” and “JC” vs. “Time Bomb.”
- (36) On or about Sunday, August 7, 2011, the Ultimate Rap League hosted what would become their flagship event, the inaugural “Summer Madness” in New York. The event featured the following battles: “Tsu Surf” vs. “K-Shine,” “Hollow da Don” vs. “Hitman Holla,” “T-Rex” vs. “Conceited,” “Midwest Miles” vs. “Tech 9,” “DNA” vs. “X Factor,” “Aye Verb” vs. “Charlie Clips,” and “Math Hoffa” vs. “Calicoe.”
- (37) On Tuesday, October 11, 2011, at approximately 12:40 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxxxx@gmail.com), with courtesy copies to Defendant Troy Mitchell (xxxxxxxxxxxx@gmail.com) and Defendant Jean French (xxxxxxxx@urltv.tv) with the subject line “PG Battles line up.”
- (38) On or about Saturday, December 3, 2011, the Ultimate Rap League hosted “Motor City Mayhem” at Saint Andrews Hall in Detroit, Michigan that featured the following battles: “Arsonal” vs. “Calicoe,” “X Factor” vs. “Rich Dolarz,” “JC” vs. “Rosenberg Raw,” “Aye Verb” vs. “O-Red,” “B Magic” vs. “Young Kannon,” “Tay Roc” vs. “Qleen Paper,” and “Big Kannon” vs. “M Ciddy.” The event also featured a “One Off” battle between “Tsu Surf” and “Big T.”
- (39) On or about Sunday, February 5, 2012, the Ultimate Rap League hosted an event in New York, NY entitled “Superbowl Sunday VIP Event” that

featured the following battles: “Charlie Clips” vs. “X Factor,” “Rosenberg Raw” vs. “B Magic,” “John John da Don” vs. “Bill Collector,” “Yung Ill” vs. “Conceited,” and “Cortez” vs. “T-Rex.” “Cortez” vs. “T-Rex” battle did not happen, and the “Yung Ill” vs. “Conceited” battle has never been released.

(40) On Friday, February 10, 2012, at approximately 12:14 PM EST, Plaintiff sent an email with the subject line “PG March 24th” to Defendant Eric Beasley (xxxxxxxxxxx@gmail.com) and Defendant Jean French (xxxxxxxx@gmail.com).

(41) On or about Friday, February 18, 2012, the Ultimate Rap League hosted an event in Stockton, California entitled “Da Jungle” that featured the following battles: “Tsu Surf” vs. “Brixx Belvy,” “Tall T” vs. “Shotgun Suge,” “Lotta Zay” vs. “Deadman,” and “Hash 100s” vs. “Sazoo.”

(42) On or about Saturday, February 25, 2012, the Ultimate Rap League hosted an event in St. Louis, Missouri, entitled “King of the Arch.” That event featured the following battles: “Hitman Holla” vs. “Aye Verb,” “Black Dollar GE” vs. “Calicoe,” “JC” vs. “GA,” and “Qleen Paper” vs. “Jus Juice.” The “GE” vs. “Calicoe” battle has never been released.

(43) On Thursday, March 15, 2012, at approximately 6:05 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxxxxxxxx@gmail.com) and Defendant Jean French (xxxxxxxx@gmail.com) with the subject line “Final pg card.”

(44) On or about March 25, 2012, the Ultimate Rap League hosted an event in New York, NY, entitled “Any Given Sunday.” That event featured the

following battles: “Tech 9” vs. “DNA” “Rich Dolarz” vs. “Tay Roc,” “Young Kannon” vs. “Swave Sevah,” “Bill Collector” vs. “QP,” and “B Magic” vs. “Real Deal.”

(45) On or about Sunday, June 17, 2012, the Ultimate Rap League hosted an event in Markham, Illinois, entitled “Night of Main Events (NOME) 2.” That event featured the following battles: “Charlie Clips” vs. “Big T,” “Yung Ill” vs. “Cortez,” “Aye Verb” vs. “X Factor,” “QP” vs. “John John da Don,” “Sco” vs. “KP,” “JC” vs. “Young Kannon,” “O-Red” vs. “Big Kannon,” and “Conceited” vs. “Young Miles.” “Conceited” vs. “Young Miles” did not happen. “Cortez” vs. “Yung Ill” has never been released. Professional football player Gerald McCoy attended this event due to the relationship with Plaintiff.

(46) On or about Saturday, July 15, 2012, the Ultimate Rap League hosted an event in New York, NY, entitled “Poison Pen Rude Awakening.” That event featured “Math Hoffa” vs. “Marv Won.”

(47) On or about Sunday, August 19, 2012, the Ultimate Rap League hosted “Summer Madness 2” at Webster Hall in New York that featured the following battles: “Murda Mook” vs. “Iron Solomon,” “Calicoe” vs. “Loaded Lux,” “Serious Jones” vs. “Charlie Clips,” “T-Rex” vs. “Aye Verb,” “DNA” vs. “E Ness,” and “Hitman Holla” vs. “John John da Don.” “JC” vs. “Chilla Jones” participated in a “One Off” battle that weekend. Several celebrities attended this event, including Sean “Diddy” Combs, Kamaal Fareed a/k/a “Q-Tip,” and Trevor Smith a/k/a “Busta Rhymes.”

- (48) On Thursday, October 11, 2012, at approximately 7:27 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) and Defendant Troy Mitchell (xxxxxxxxxx@gmail.com) with the subject line “Pg card.”
- (49) On or about Saturday, November 17, 2012, the Ultimate Rap League hosted an event at Club Rebel in New York, NY, entitled “Revelations” that featured the following battles: “Tay Roc” vs. “Cortez,” “K-Shine” vs. “John John da Don,” “B Magic” vs. “Chilla Jones,” “Bigg K” vs. “Rosenberg Raw,” “QB” vs. “Jaz the Rapper.”
- (50) On or about Saturday, December 8, 2012, the Ultimate Rap League hosted a “Proving Grounds One Off” battle between “Syah Boy” and “Lotta Zay.”
- (51) On or about Friday, November 9, 2012, the Ultimate Rap League hosted an event at Webster Hall in New York, NY, entitled “Armageddon” that featured the following battles: “Yung Ill” vs. “JC,” and “Conceited” vs. “Tsu Surf.”
- (52) On Saturday, February 9, 2013, at approximately 7:08 PM EST, Plaintiff sent an email without a subject line to Defendant Eric Beasley (xxxxxxxxxx@gmail.com). The email has a lineup of matchups between battle rappers.

- (53) On or about Wednesday, February 13, 2013, the Ultimate Rap League hosted an event in New York, NY, that featured a rematch between “Math Hoffa” and “Dose.”
- (54) On or about Saturday, March 9, 2013, the Ultimate Rap League hosted an event entitled “Unfinished Business” in New York, NY that featured the following battles: “Goodz” vs. “X Factor,” “K-Shine” vs. “DNA,” and “Tone Montana” vs. “Lotta Zay.”
- (55) On or about Saturday, April 20, 2013, the Ultimate Rap League hosted an event at SOB’s in New York, NY, that featured the following battles: “Shotgun Suge” vs. “Bill Collector,” “Math Hoffa,” vs. “John John da Don,” “Dose” vs. “Lotta Zay,” and “Nuborn” vs. “Sco.” The “Dose” vs. “Lotta Zay” battle has never been released.
- (56) On or about Saturday, April 27, 2013, the Ultimate Rap League hosted a co-branded event with Go-Rilla Warfare battle league in Chicago, Illinois entitled “Go-Rilla Warfare Genesis,” that featured the following battles: “Pooh Bear” vs. “JC” and “Young Kannon” vs. “M Ciddy.”
- (57) On or about Saturday, May 11, 2013, the Ultimate Rap League hosted a co-branded event with Go-Rilla Warfare battle league in Chicago, Illinois entitled “Go-Rilla Warfare & URL presents Orientation.” The event was hosted by battle rappers “Big T” and “Big Kannon.”
- (58) On or about Saturday, May 18, 2013, the Ultimate Rap League hosted an event in New York, NY that featured the following battles: “Tone Montana”

vs. “Danja Zone,” “Cortez” vs. “Tech 9,” and “B Magic” vs. “Tay Roc.” The “Cortez” vs. “Tech 9” battle has never been released.

(59) On or about Saturday, June 22, 2013, the Ultimate Rap League hosted “Night of Main Events (NOME) 3” in New York, NY that featured the following battles: “Hollow da Don” vs. “Tsu Surf,” “Hitman Holla” vs. “Conceited,” “Big T” vs. “K-Shine,” “Charlie Clips” vs. “B Magic,” “DNA” vs. “Chilla Jones,” and “T-Rex” vs. “Dizaster.” Kevin Durant, then of the NBA’s Oklahoma City Thunder, and professional boxer Adrien Broner were both in attendance.

(60) On or about Thursday, June 27, 2013, the Ultimate Rap League hosted an event at the PNA Hall in Jackson, Mississippi, called “Inception” that featured the main event battle between “Jonny Spitfire” and “Jonesville.” Plaintiff was the host for this event.

(61) On Sunday, July 7, 2013, at approximately 7:23 PM EST, Plaintiff sent Defendant Eric Beasley (xxxxxxxxxxxxx@gmail.com) an email with the subject line “Summer madness card.”

(62) On Saturday, July 13, 2013, BET uploaded a video to its YouTube channel; the video shows that Ultimate Rap had three battle rappers perform on “106 & Park Backroom” -- “T-Rex,” “Goodz,” and “Aye Verb.” Defendant Troy Mitchell appeared in the video to promote the upcoming “Ultimate Freestyle Friday Tournament.”

(63) On Friday, July 19, 2013, the Ultimate Rap League debuted on Black Entertainment Television (BET) with its “Ultimate Freestyle Friday

Tournament.” This multi-week tournament was held during BET’s number-one rated show “106 & Park.” This tournament would mark the first of three seasons of this event on national television. Plaintiff shared duties with Defendants Eric Beasley, Troy Mitchell, and Jean French to host the tournament. Plaintiff and Defendant Troy Mitchell regularly appeared on television for the duration of the tournament.

- (64) On or about Sunday, July 21, 2013, the Ultimate Rap League hosted an event in St. Louis, Missouri, that featured the main event battle of “Arsonal” vs. “Aye Verb.”
- (65) On or about Sunday, September 8, 2013, the Ultimate Rap League hosted “Summer Madness 3” that featured the following battles: “Big T” vs. “O-Red,” “Calicoe” vs. “T-Rex,” “Arsonal” vs. “K-Shine,” “Ms. Hustle” vs. “Jaz the Rapper,” “Tay Roc” vs. “Ill Will.” Professional football player Gerald McCoy attended this event after being invited by Plaintiff.
- (66) On or about Friday, October 4, 2013, the Ultimate Rap League hosted an event at the A3C Festival in Atlanta, GA. The event featured the following battles: “John John da Don” vs. “Cortez” and “Rich Dolarz” vs. “JC.” “Rich Dolarz” vs. “JC” has never been released.
- (67) On or about Saturday, October 26, 2013, the Ultimate Rap League hosted an event in New York, NY entitled “Sole Survivor” that featured the following battles: “B Magic” vs. “DNA,” “John John da Don” vs. “JC,” “Big Kannon” vs. “Syah Boy,” and “Charlie Clips” vs. “Yung Ill.”

- (68) On or about Saturday, December 14, 2013, the Ultimate Rap League hosted an event in New York, NY entitled “Born Legacy” that featured the following battles: “Charlie Clips” vs. “Tsu Surf,” “JC” vs. “Tay Roc,” “K-Shine” vs. “Yung Ill,” “B Magic” vs. “Ill Will,” and “Ah Di Boom” vs. “Steams.”
- (69) In an interview on YouTube uploaded on Tuesday, December 24, 2013, entitled “The Untold Truth,” Defendant Eric Beasley responded to a question from battle rap blogger, “Chris Unbias,” who asked, in part, “Can you let people know who is part of URL?” He stated at the 8:09 mark that “URL consists of E. Beasley, which is myself, Smack, Cheeko, and Norbes. Everybody wears different hats.” No other individuals associated or affiliated with the URL at this time were mentioned in this statement. As of the filing of this Complaint, the video has more than 48,000 views.
- (70) On Tuesday, February 4, 2014, at approximately 3:15 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) with the subject line: “Bet roster.”
- (71) On Thursday, March 6, 2014, at approximately 8:18 AM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) with the subject line “Uff guest list.” The email has the names of battle rappers and professional athletes.
- (72) On or about Friday, March 21, 2014, the Ultimate Rap League hosted an event in Pittsburgh, Pennsylvania entitled “Steel City Smackdown” that featured the following battles: “Real Deal” vs. “Rosenberg Raw,” “Lotta Zay”

vs. “Nuborn,” and “Rone” vs. “Danja Zone.” “Rone” vs. “Danja Zone” has never been released.

(73) On or about Saturday, May 17, 2014, the Ultimate Rap League hosted an event in New York entitled “NOME 4 Warm Up” that featured the following battles: “DNA” vs. “Prez Mafia,” “Ah Di Boom” vs. “Sco,” “Steams” vs. “Anubis,” “Dot” vs. “Prep,” and “Xcel” vs. “Stash.”

(74) On or about Saturday, June 7, 2014, the Ultimate Rap League hosted “Night of Main Events (NOME) 4” in New York that featured the following battles: “John John da Don” vs. “Reed Dollaz,” “T-Rex” vs. “Cortez,” “Big T” vs. “B Magic,” “Goodz” vs. “Aye Verb,” “DNA” vs. “Ill Will,” and “Ms. Hustle” vs. “Young Gattas.” Jason Phillips, a/k/a “Jadakiss,” a famous hip hop recording artist, was present as a special guest and hosted the “Goodz” vs. “Aye Verb” battle.

(75) In June 2014, Fuse television network aired a five-episode television series entitled “Road to Total Slaughter” in partnership with Shady Films and Electus Digital. The television series would lead up to the pay-per-view battle rap event backed by recording artist Marshall Mathers a/k/a “Eminem” known as “Total Slaughter” on July 12, 2014, at the Hammerstein Ballroom in New York. Several well-known battle rappers from the Ultimate Rap League participated in the television series and the event, including “Hollow da Don,” “Loaded Lux,” “Murda Mook,” “Arsonal,” “Aye Verb,” “T-Rex,” “Big T,” “Cortez,”

“Daylyt,” “Dizaster,” “Marv Won,” and “Math Hoffa.” Plaintiff secured some of this talent for the Ultimate Rap League.

(76) On Monday, June 30, 2014, at approximately 9:15 AM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) with the subject line: “Uff season 3.” This email refers to the third season of the Ultimate Freestyle Friday tournament that aired on Black Entertainment Television as part of the show “106 and Park.”

(77) On Monday, June 30, 2014, at approximately 9:26 AM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) with the subject line “Contracts.”

(78) On Sunday, August 10, 2014, at approximately 7:38 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxx@gmail.com) with no subject line. The email has the names of battle rappers, telephone numbers, and cities in the United States purportedly where they live.

(79) On Friday, September 26, 2014, the Ultimate Rap League hosted a “Proving Grounds” event at Black Star Video in New York, NY, that featured a main event battle between “Dre Dennis” and “Tink da Demon.”

(80) On or about Saturday, September 27, 2014, the Ultimate Rap League hosted an event in New York entitled “Summer Madness 4 Warm Up” that featured the following battles: “Head ICE” vs. “K-Shine” “Shotgun Suge” vs. “Charron,” “Prez Mafia” vs. “Steams,” “Danja Zone” vs. “KG da Poet,” “Ah Di Boom” vs. “HA Double,” and “Uno Lavo” vs. “Young X.”

- (81) On or about Sunday, September 28, 2014, the Ultimate Rap League hosted an event in New York entitled “Summer Madness 4” that featured the following battles: “Tsu Surf” vs. “Hitman Holla,” “B Magic” vs. “Conceited,” “John John da Don” vs. “Aye Verb,” “T-Rex” vs. “Charlie Clips,” and “DNA” vs. “Tay Roc.” “Arsonal” vs. Ill Will” was also scheduled for this event but did not take place.
- (82) On or about Saturday, October 4, 2014, the Ultimate Rap League hosted an event at the Celebrity Theatre in Phoenix, Arizona, entitled “Duel in the Desert” that featured the main event between “Arsonal” and “Rum Nitty.” The event was hosted by Defendant Troy Mitchell, “Calicoe” and “Ness Lee.” However, when the battles were released on YouTube, they were under the “King of the Dot” battle league.
- (83) On or about Thursday, November 13, 2014, the Ultimate Rap League hosted an event called the “A3C Rap Battle” the main event was a battle between “Saint Mic” and “Chess.”
- (84) On or about Saturday, January 24, 2015, the Ultimate Rap League hosted a co-branded event in London, England, with “Gift of Gab & Eurl” in conjunction with the URL’s “Proving Grounds” brand. Plaintiff was a co-host for this event.
- (85) On or about Saturday, February 28, 2015, the Ultimate Rap League hosted an event at Black Star Music and Video in New York, NY, entitled “Special One Off Event” that featured a battle between “Th3 Saga” and “Prep.”

On that same day, the Ultimate Rap League hosted a “Proving Grounds” event that featured a “One Off” battle “Rum Nitty” vs. “Steams” in Las Vegas, Nevada.

(86) On or about Sunday, March 1, 2015, the Ultimate Rap League hosted a “Proving Grounds Official Tryouts” event in Las Vegas, Nevada.

(87) On or about Saturday, March 28, 2015, the Ultimate Rap League hosted an event at the Gramercy Theatre in New York entitled “Rookies vs. Vets.” That event featured the following battles: “T-Top” vs. “Charlie Clips” “Brizz Rawsteen” vs. “Aye Verb,” “K-Shine” vs. “Mr. Wavy,” “Chess” vs. “DNA,” “Th3 Saga,” vs. “Shotgun Suge,” “Prep” vs. “John John da Don,” and “Sno” vs. “Real Deal.” Plaintiff created and developed the idea for this event. It became so popular in the battle rap community that some people have been expecting the second event for years. As of the filing of this complaint, there are reports from Defendant Ultimate Rap League, LLC, and talent from the URL that “Rookies vs. Vets 2” has been confirmed.

(88) On or about Sunday, April 5, 2015, the Ultimate Rap League hosted an event in New York entitled “NOME 5 Quiet Room Warm Up.” That event featured the following battles: “Steams” vs. “Dre Dennis” vs. “Automatic Ray,” “Craig Lamar” vs. “Xcel” vs. “Danja Zone,” and “Ah di Boom” vs. “Daylyt” vs. “Chef Trez.”

(89) On Monday, April 20, 2015, Defendant Ultimate Rap League, LLC, transferred \$1,000.00 into the personal account of Plaintiff.

- (90) On or about Friday, May 8, 2015, the Ultimate Rap League hosted a “Proving Grounds” event at Black Star Music & Video in New York, NY, that featured a “One Off” battle between “B Magic” and “Ty Law.”
- (91) On or about Saturday, May 9, 2015, the Ultimate Rap League hosted “Night of Main Events (NOME) 5” at Irving Plaza in New York, NY that featured the following battles: “Charlie Clips” vs. “Hollow da Don,” “Tsu Surf” vs. “Tay Roc,” “Aye Verb” vs. “K-Shine,” “DNA” vs. “Serius Jones,” and “Jaz the Rapper” vs. “O’fficial.” This event would be the URL’s first pay-per-view event on the Watch Battle Live platform. Plaintiff secured the sponsor for the main event battle between “Charlie Clips” and “Hollow da Don.” World-famous recording artist Aubrey “Drake” Graham made a guest appearance at this event.
- (92) On or about Saturday, July 25, 2015, the Ultimate Rap League hosted an event in Gramercy Theatre in New York, New York entitled “Redemption” that featured the following battles: “T-Rex” vs. “Danny Myers,” “T-Top” vs. “Shotgun Suge,” “Tay Roc” vs. “Brizz Rawsteen,” “Dot” vs. “Bill Collector,” “Chilla Jones” vs. “Prep,” and a 2-on-2 battle between “DNA” and “K-Shine” vs. “Chess” and Steams.”
- (93) On or about July 31, 2015, the Ultimate Rap League hosted a “Proving Grounds” event at Shambala Studios in Los Angeles, California. That event featured a main event battle between “Mr. Millz” and “Automatic Ray.”

- (94) On or about Saturday, August 1, 2015, the Ultimate Rap League hosted an event in Los Angeles, California entitled “Traffic” that featured the following battles: “KG the Poet” vs. “B Magic,” “Danny Myers” vs. “Danja Zone,” “Rum Nitty” vs. “Chess,” “Young Kannon” vs. “Steams,” and “Tink da Demon” vs. “Diesel.” “Daylyt” vs. “Big T” was also scheduled, but the battle did not happen.
- (95) On or about Wednesday, August 12, 2015, Plaintiff sent an email to Defendant Jean French, at the email address, cheeko@urltv.com, about his idea for a “Last Man Standing Tournament.” The email read, in pertinent part: “16 mcs will battle all in one night. Single round elimination. No one will know who they are battling until they hit the stage n there # is randomly drawn. Each round is 2 min 30 seconds and will be judged on the spot by 5 respected judges...until the final 2 square off with the winner receiving 30k and be crowned the last man standing[.]”
- (96) On or about Saturday, September 26, 2015, the Ultimate Rap League hosted “Summer Madness 5” at Irving Plaza in New York, NY that featured the following battles: “Loaded Lux” vs. “Charlie Clips,” “Tay Roc” vs. “Calicoe,” “Big T” vs. “Shotgun Suge,” “K-Shine” and “DNA” vs. “Chess” and “Steams,” “John John da Don” vs. “Mr. Wavy,” “Ms. Hustle” vs. “O’fficial,” and “T-Rex” vs. “T-Top.”
- (97) On or about Sunday, September 27, 2015, the Ultimate Rap League hosted an event at the Brooklyn Nights Bar in Brooklyn, NY, entitled “Summer

Madness 5 Proving Grounds” that featured a “One Off” battle between “Cyssero” and “Cortez.”

- (98) In an interview uploaded on October 13, 2015, on the YouTube Channel, “hiphopisreal.com,” entitled “Beasley on Norbes Importance to URL: Battle Rap Needs Norbes & Addresses the Kentucky Incident,” the interviewer, battle rap blogger, “Knowledge Tha God,” said to Defendant Eric Beasley: “Talk to me about one of your partners, Norbes . . . being one of the faces of the URL.” At the 0:58 mark, Defendant Beasley said: “If Norbes left, it would be boring.”
- (99) On or about Saturday, October 24, 2015, the Ultimate Rap League hosted a “Proving Grounds” at The Salmines Studios in Mesa, Arizona. That event featured a main event battle between “Profesy” and “Mr. Mills.”
- (100) On or about Friday, November 13, 2015, the Ultimate Rap League hosted an event entitled “Road 2 Proving Grounds” at Club Vine in Hartford, Connecticut.
- (101) On or about Saturday, December 12, 2015, the Ultimate Rap League hosted at the Gramercy Theater in New York, NY, entitled “A Perfect Day to Die” that featured the following battles: “Tay Roc” vs. “John John da Don,” “Chilla Jones” vs. “Th3 Saga,” “DNA” vs. “Brizz Rawsteen,” “Uno Lavoz” vs. “Cortez,” “Charlie Clips” vs. “Shotgun Suge.” “X Factor” vs. “K-Shine” was also scheduled for this event, but it did not occur. “Uno Lavoz” vs. “Cortez” has never been released.

- (102) On or about Sunday, December 13, 2015, the Ultimate Rap League hosted an event in Brooklyn, New York, entitled “A Perfect Day to Die Proving Grounds” that featured the following “One Off” battles: “Anubis” vs. “Saint Mic,” “Dre Dennis” vs. “Tone Montana,” and “Bonnie Godiva” vs. “Myverse.”
- (103) On or about Saturday, January 23, 2016, the Ultimate Rap League hosted a “Proving Grounds” event at the Regal Sky Lounge in Milwaukee, Wisconsin. Plaintiff co-hosted this event with “Miz DaGreat.” Plaintiff organized this event.
- (104) On or about Saturday, February 6, 2016, the Ultimate Rap League hosted an event entitled “Superbowl Bash” at Sev Lounge in Brooklyn, New York.
- (105) On Saturday, February 13, 2016, the Ultimate Rap League hosted an event at Taboo Nightclub in Pittsburgh, Pennsylvania, entitled “Dead on Arrival.” That event featured the following battles: “Aye Verb” vs. “Real Deal,” “Swave Sevah” vs. “Th3 Saga,” “Rum Nitty” vs. “Danja Zone,” and “E Ness” vs. “Steams.”
- (106) On or about Saturday, March 5, 2016, the Ultimate Rap League hosted a “Proving Grounds” event in Brooklyn, NY, that featured the main event battle between “J Murda” vs. “Big Hann.”
- (107) On or about Saturday, March 5, 2016, the Ultimate Rap League hosted an event in New York entitled “Born Legacy 2.” That event featured the following battles: “Cortez” vs. “Chilla Jones,” “Ave” vs. “Rum Nitty,” “Chess”

vs. “Red Dollaz,” “Mike P” vs. “Tink da Demon,” “Young X” vs. “Dot,” “Bonus” vs. “Nunn Nunn,” and “Bangz” vs. “Jerry Wess.”

(108) On or about Saturday, March 26, 2016, the Ultimate Rap League hosted at Irving Plaza in New York, NY, entitled “Double Impact,” a card that featured all 2-on-2 battles. That event featured the following battles: “DNA” and “K-Shine” vs. “Tay Roc” and “Tsu Surf,” “Chilla Jones” and “B Magic” vs. “T-Top” and “Brizz Rawsteen,” “Charlie Clips” and “John John da Don” vs. “Big T” and “Th3 Saga,” “Math Hoffa” and “Cortez” vs. “Aye Verb” and “Yung Ill,” and “Chess” and “Steams” vs. “Marv Won” and “Quest McCody.”

(109) On Thursday, April 14, 2016, at approximately 10:40 PM, Plaintiff responded to an email to secure a venue for the Ultimate Rap League. The email stated that “[w]e agreed to 8pm. My partner is gonna drop the deposit off tomorrow[.]”

(110) On or about Saturday, May 7, 2016, the Ultimate Rap League hosted an event at TFK in San Leandro, California, entitled “URL West Proving Grounds One Off.” That event featured the following “One Off” battles: “Emerson Kennedy” vs. “Young Kannon” and “Profecy” vs. “HA Double.”

(111) On or about Sunday, May 22, 2016, the Ultimate Rap League hosted a “Proving Grounds” event in Brooklyn, NY, that featured the main event battle between “Ryda” and “Fettucine 20.”

(112) On or about Saturday, June 4, 2016, the Ultimate Rap League hosted an event at Highland Ballroom in New York, NY, entitled “Unfinished

Business 2: A Special V.I.P. Event.” That event featured the following battles: “Tsu Surf” and “Tay Roc” vs. “DNA” and “K-Shine,” “Shotgun Suge” vs. “Brizz Rawsteen,” “T-Top” vs. “Math Hoffa,” “Rum Nitty” vs. “Charlie Clips,” and “Big T” vs. “John John da Don.”

(113) On or about Sunday, July 24, 2016, Plaintiff and Defendant Troy Mitchell were in Los Angeles, California, on the set of the movie entitled “Bodied” to appear in the movie as characters. No other Ultimate Rap League partners, associates, or staff members appeared in the movie. The movie was an American battle-rap comedy-drama film. The movie, released in the United States on November 2, 2018, was directed by Joseph Khan and produced by Eminem. The budget for the film was \$15 million.

(114) On Saturday, July 30, 2016, at approximately 6:53 PM EST, Plaintiff received an email with the subject line: “SMACK/URL 8/27 & 8/28” about an executed contract for an event scheduled for the Ultimate Rap League on August 27 and 28, 2016.

(115) On or about Sunday, August 7, 2016, the Ultimate Rap League hosted a “Proving Grounds” event at Refuge Live in Chicago, Illinois. That event featured the main event battle between “Mr. Mills” and “Bonus.” Plaintiff was the host for this event.

(116) On or about Saturday, August 27, 2016, the Ultimate Rap League hosted a two-day event in Brooklyn, NY, entitled “Born Legacy 3.” The battles that occurred on the first day included the following: “Rum Nitty” vs. “Ill Will,” “Th3

Saga” vs. “Chess,” “Tink da Demon” vs. “Swave Sevah,” “Nunn Nunn” vs. “Prez Mafia,” and “Bedaffi Green” vs. “Glueazy.” The second day, on or about August 28, 2016, featured the following battles: “Tech 9” vs. “Jerry Wess,” “Mike P” vs. “Daylyt,” “Prep” vs. “Lotta Zay,” “Dre Dennis,” vs. “Jai 400 Block,” “Gutta” vs. “Reepah Rell,” and “Nu Jerzey Twork” vs. “Dougy.”

(117) On or about Saturday, September 10, 2016, the Ultimate Rap League hosted an event in Encino, California, entitled “Traffic 2 Proving Grounds.” “Geechi Gotti” performed at this event.

(118) On or about Sunday, September 11, 2016, the Ultimate Rap League hosted an event at The Airliner in Los Angeles, California, entitled “Traffic 2.” That event featured the following battles: “Pass” vs. “Brizz Rawsteen,” “KG the Poet” vs. “DNA,” “Danny Myers” vs. “Young Kannon,” “HA Double” vs. “Stuey Newton,” and “Profecy” vs. “Dre Dennis.”

(119) On or about Saturday, October 8, 2016, the Ultimate Rap League hosted a “Proving Grounds” event in Denver, Colorado. The main event was a battle between “J-Money” and “Automatic Ray.”

(120) On or about Sunday, November 6, 2016, the Ultimate Rap League hosted a “Proving Grounds – The Hunger 2” event at Honey Comb Hideout in Brooklyn, NY, featuring two “One Off” battles. That event featured the following battles: “J Murda” vs. “Ty Law” and “Mo Mula” vs. “Billy Boondocks.”

(121) On or about Sunday, November 20, 2016, the Ultimate Rap League hosted “Night of Main Events (NOME) 6” at Irving Plaza in New York, NY that

featured the following battles: “Tsu Surf” vs. “T-Top,” “Tay Roc” vs. “Rum Nitty,” “Chess” vs. “Ave,” “Arsonal” vs. “Brizz Rawsteen,” and “Charlie Clips” vs. “Ill Will.” “DNA” vs. “Daylyt” was scheduled for this event, but it did not take place.

(122) On or about Sunday, December 11, 2016, the Ultimate Rap League hosted an event at The Riot Room in Kansas City, Missouri, entitled “Proving Grounds – Midwest vs. The World.” This event featured a “One Off” battle between “Saint Mic” and “Reepah Rell.”

(123) On or about Saturday, December 17, 2016, the Ultimate Rap League hosted an event in Brooklyn, NY, entitled “Born Legacy 4.” That event featured the main event battle between “Ave” and “O-Red.” Professional football player Gerald McCoy attended this event after being invited by Plaintiff.

(124) On or about Saturday, January 28, 2017, the Ultimate Rap League hosted an event in New York, NY, entitled “Born Legacy 4” that featured the following battles: “Jaz” vs. “E Hart,” “Mr. Wavy” vs. “Bill Collector,” “Steams” vs. “Danny Myers,” “Chef Trez” vs. “Mike P,” “Prez Mafia,” vs. “Money Bagz,” “Nu Jerzey Twork” vs. “Glueazy,” and “Franchise” vs. “Brooklyn Carter.”

(125) On or about Saturday, March 11, 2017, the Ultimate Rap League hosted an event in Brooklyn, NY entitled “Born Legacy 5” that featured the following battles: “Ave” vs. “O-Red,” “Qleen Paper” vs. “Nu Jerzey Twork,” “JC” vs. “Chef Trez,” “Th3 Saga” vs. “Tink da Demon,” and a 2-on-2 battle between “Ryda”

and “Jakkboy Maine” vs. “Snake Eyez” vs. “Dougy.” Professional football player Gerald McCoy attended this event after being invited by Plaintiff.

(126) On or about Saturday, April 8, 2017, the Ultimate Rap League hosted “Night of Main Events (NOME) 7” at Irving Plaza in New York, NY that featured the following battles: “T-Rex” vs. “K-Shine,” “Goodz” vs. “T-Top,” “Tay Roc” vs. “Chess,” “Shotgun Suge” vs. “Ave,” and “Ill Will” vs. “Brizz Rawsteen.” Also, there was a surprise battle between “Mike P” and “Nu Jerzey Twork.” There was another surprise battle between battle rap media personalities, “Jay Blac” vs. “Queenzflip.”

(127) On or about Sunday, April 9, 2017, the Ultimate Rap League hosted a Proving Grounds event entitled “Hunger 3” at the Honey Comb Hideout in New York, New York. The main event was a battle between “Mr. Mills” and “R Streetz.” Plaintiff’s name is prominently displayed on the advertisement for this event.

(128) On or about Saturday, May 13, 2017, the Ultimate Rap League hosted an event in Los Angeles, California, entitled “Proving Grounds: that featured a “One-Off” battle between “Geechi Gotti” and “Stuey Newton.”

(129) On or about Sunday, June 11, 2017, the Ultimate Rap League hosted an event entitled “Ascension” at Blackthorn51 in Elmhurst, New York. The main event was “Cortez” vs. “Prez Mafia.”

- (130) On or about Saturday, June 24, 2017, the Ultimate Rap League hosted an event at Irving Plaza in New York, NY entitled “Double Impact 2” this event featured all 2-on-2 battles similar to its predecessor “Double Impact.”
- (131) On or about Sunday, June 25, 2017, the Ultimate Rap League hosted an event entitled “Proving Grounds – More Hunger” at the Honey Comb Hideout in New York, NY. That event featured a “One Off” battle between “Brooklyn Carter” and “Tee Why.”
- (132) On Friday, July 7, 2017, at approximately 10:01 AM EST, Plaintiff received an automated email from Google Suite with the subject line “Welcome to urltv.tv.” The account created was for the username “tickets@urltv.tv.”
- (133) On or about Saturday, July 29, 2017, the Ultimate Rap League hosted an event in Brooklyn, New York, entitled “Born Legacy: Supreme.” That event featured the main event battle between “Nu Jerzey Twork” and “Ill Will.”
- (134) On or about Sunday, July 30, 2017, the Ultimate Rap League hosted an event at Honey Comb Hideout in New York, NY, entitled “Born Legacy: Supreme – Proving Grounds.”
- (135) On or about Saturday, August 5, 2017, the Ultimate Rap League hosted an event called “The Survivor Series” at The Lexington Theatre in Los Angeles, California. The event featured two “One Off” battles: “Geechi Gotti” vs. “Glueazy” and “Stuey Newton” vs. “Reepah Rell.”
- (136) On or about Wednesday, August 16, 2017, Plaintiff, with the knowledge and consent of the Ultimate Rap League, executed an agreement on behalf of

the Ultimate Rap League for sponsorship with Al Capone Premium Cigarillos. Al Capone Premium Cigarillos would be prominently displayed at many URL battle events and would appear on the videos uploaded to YouTube during this time.

(137) On or about Saturday, September 9, 2017, the Ultimate Rap League hosted an event at the Honeycomb Hideout in New York, NY called “Summer Madness 6 – Proving Grounds” that featured the main event battle between “Chef Trez” vs. “Prep.”

(138) On or about Sunday, September 10, 2017, the Ultimate Rap League hosted an event at Irving Plaza in New York, NY, called “Summer Madness 6.” The main event battle was “Hollow da Don” vs. “Tay Roc.”

(139) On or about Monday, September 11, 2017, battle rappers “Big T,” “Math Hoffa” and “Cortez” appeared on “Sway’s Universe” “Friday Fire Cypher” on Sirius XM radio on Eminem’s station “Shade 45.” Plaintiff Troy Mitchell also appeared on this broadcast.

(140) On or about Saturday, November 11, 2017, the Ultimate Rap League hosted a two-day event at Nexus Social Lounge in Los Angeles, California called “Traffic 3: To Live & Die in LA.” The main event battle was “Dizaster” vs. “Tay Roc.”

(141) On or about Saturday, December 9, 2017, the Ultimate Rap League hosted a pay-per-view event called “Smack Volume 1.” The main event battle was “Rum Nitty” vs. “Iron Solomon.”

- (142) On or about Sunday, January 7, 2018, the Ultimate Rap League hosted an event at Club Lavish in Wilmington, Delaware. The featured battle was a “One Off” between “Lexx Luthor” and “E Ness.”
- (143) On or about Saturday, January 20, 2018, the Ultimate Rap League hosted an event called “Survivor Series DMV” at The Top in Richmond, Virginia. The main event battle was “Nu Jerzey Twork” vs. “Mr. Wavy.”
- (144) On or about Saturday, March 3, 2018, the Ultimate Rap League hosted a “One Off” event at The Lexington Theatre in Los Angeles, California, that featured a battle between “Th3 Saga” and “Emerson Kennedy.”
- (145) On or about Friday, March 23, 2018, the Ultimate Rap League hosted a “Proving Grounds” event at The Lexington Theater in Los Angeles, California.
- (146) On or about Saturday, March 31, 2018, the Ultimate Rap League hosted a pay-per-view event entitled “Smack Volume 2.” The main event battle was “Arsonal” vs. “Hollow da Don.”
- (147) On or about Sunday, April 8, 2018, the Ultimate Rap League hosted a “Proving Grounds” event in Brooklyn, New York. Plaintiff’s name appears in the advertisement for this event.
- (148) On or about Saturday, May 12, 2018, the Ultimate Rap League hosted an event at Club Phantom in Raleigh, North Carolina, entitled “Born Legacy: Supreme 2.” The main event was a battle between “DNA” and “O-Red.”
- (149) On or about Saturday, May 19, 2018, the Ultimate Rap League hosted an event called “Civil War: Western Conference” at The Lexington Theater in

Los Angeles, California. This event featured a “One Off” battle between “Profesy” and “Dre Vishiss.”

(150) On or about Saturday, June 2, 2018, the Ultimate Rap League hosted a two-day event in Richmond, Virginia. The main event battle was between “Mr. Wavy” and “Chef Trez.” The second day was the “Proving Grounds” and “One Off” event.

(151) On or about Saturday, June 16, 2018, the Ultimate Rap League hosted an event in Milwaukee, Wisconsin, entitled “Proving Grounds – URL Central Division.” Plaintiff’s name appears in this advertisement, and he hosted this event along with “Miltown Bloe.”

(152) On or about Saturday, June 23, 2018, the Ultimate Rap League hosted a pay-per-view event, “Night of Main Events (NOME) 8” at Warehouse Live in Houston, Texas. The main event battle was between “Tsu Surf” and “Rum Nitty.”

(153) On Saturday, June 30, 2018, at approximately 2:16 PM EST, Plaintiff exchanged text messages with Defendant Beasley about promoting an Ultimate Rap League event on August 4, 2018, in Atlanta, Georgia. In the message, Plaintiff supplied promotional material for Defendant Beasley’s feedback. Defendant Beasley stated the intention to do a “trailer first.”

(154) On July 2, 2018, at approximately 2:20 PM EST, Defendant Eric Beasley sent Plaintiff text messages inquiring if he had obtained a signed contract for the venue and if he collected all the money from sponsors. Defendant Beasley

asked Plaintiff to get the contract sent to him so that “we can read it” and asked Plaintiff, “if your [*sic*] free let’s get on phone in a few.” Defendant Beasley said further that “[w]hen we get on we’ll go over budget.” Plaintiff responded affirmatively.

(155) On or about Monday, July 7, 2018, the Ultimate Rap League hosted an event entitled “Initiation: Proving Grounds” at The Lexington Theater in Los Angeles, California. This event featured two “One Off” battles: “Yung Griz” vs. “Fettucine 20,” and “Cali Smoov” vs. “Bedaffi Green.”

(156) On Thursday, July 12, 2018, at approximately 4:17 PM EST, Plaintiff sent by a text message Defendant Eric Beasley promotional material for an Ultimate Rap League event at Wildpitch Underground in Atlanta, GA.

(157) On Tuesday, July 17, 2018, at approximately 3:14 PM EST, Plaintiff sent a text message to Defendant Eric Beasley saying that “I need that aug 4th trailer ASAP.” Plaintiff was requesting promotional material for a “Proving Grounds” event scheduled to take place in Atlanta, Georgia.

(158) On Sunday, July 22, 2018, at approximately 6:20 PM EST, Defendant Eric Beasley sent a text message to Plaintiff that said, “[a]ny word from ya man about the faceoffs in Vegas.” Defendant Beasley also said, “[a]lso ask em what night does Floyd do his weekly event Thurs or Friday[.]” Plaintiff responded that “Ima hit him now. It should be a go.” Plaintiff responded, “[h]it him. Waiting on Floyd now[.]” The reference to “Floyd” in these messages is

retired world champion professional boxer and current boxing promoter, Floyd “Money” Mayweather, Jr.

(159) On or about Saturday, August 4, 2018, the Ultimate Rap League hosted an event entitled “Proving Grounds: Chapter One – ATL” at Wildpitch Underground in Atlanta, Georgia. The main event battle was a “One Off” between “Dre Dennis” and “Lu Castro.”

(160) On Sunday, August 5, 2018, at approximately 9:57 PM EST, Plaintiff and Defendant Beasley continued discussions about securing the Mayweather Gym for an upcoming Ultimate Rap League event. Defendant Beasley said, “It would be iconic in Mayweather Gym.”

(161) On or about Saturday, August 11, 2018, the Ultimate Rap League hosted its flagship pay-per-view event “Summer Madness 7” in Las Vegas, Nevada. The main event was a battle between “Tay Roc” and “Hitman Holla.” Floyd “Money” Mayweather, Jr. made a guest appearance at this event. Because of his contacts, Plaintiff was able to secure Mr. Mayweather’s appearance and obtain the Mayweather Boxing Gym for the preliminary activities for the event.

(162) On Monday, September 10, 2018, at approximately 9:49 PM EST, Defendant Eric Beasley sent a text message to Plaintiff that said the following: “Do u have a promo for your next event on the battle for Sept 22[.]” Plaintiff responded “Flyer, and I’m working on a trailer.” These messages dealt with promotions for a URL event scheduled to take place in Atlanta, Georgia.

- (163) On Monday, September 10, 2018, at approximately 9:52 PM EST, Plaintiff asked Defendant Eric Beasley the following: “R u releasing the don vs. patt battle[.]” Defendant Eric Beasley responded “Weds[.]” Plaintiff’s question was about releasing a battle between “Don Marino” and “Gunpowder Patt.”
- (164) On or about Sunday, September 16, 2018, the Ultimate Rap League hosted an event entitled “Banned” that featured a battle between “Steams” and “Jakkboy Maine.”
- (165) On September 18, 2018, at approximately 10:29 AM EST, Plaintiff and Defendant Eric Beasley exchanged text messages about the current state of the “Proving Grounds” and the identification of talent. Plaintiff referenced the level of talent that he brought to the URL. Defendant Beasley acknowledged Plaintiff’s abilities to find talent. Defendant Beasley said, “U saw them and knew for sure they were good.”
- (166) On Friday, September 21, 2018, at approximately 4:00 AM EST, Plaintiff and Defendant Beasley were exchanging text messages about social media comments between Plaintiff and some battle rap bloggers.
- (167) On Friday, September 21, 2018, at approximately 9:13 AM EST, Plaintiff sent a text message to Defendant Eric Beasley, discussing the “Proving Grounds” and “Born Legacy” events that said: “Yes. N [sic] I’m trying to set something up in Miami or back in atl. A couple sponsors hit me[.]”

Plaintiff was discussing the business around possible events in Miami, Florida, or Atlanta, Georgia.

(168) On or about Saturday, September 22, 2018, the Ultimate Rap League hosted an event at Wildpitch Underground in Atlanta, Georgia, entitled “Red Dot” that featured a “One Off” battle between “Chef Trez” and “Big Kannon.”

(169) On Saturday, September 22, 2018, at approximately 6:46 PM EST, Plaintiff sent a text message to Defendant Eric Beasley that said: “Swamp is a star bro.” As of the filing of this Complaint, “Swamp” is a featured performer for the Ultimate Rap League after having gone through the “Proving Grounds.”

(170) On or about Saturday, October 13, 2018, the Ultimate Rap League hosted an event at Club Amazura in Jamaica, New York, entitled “The Strike 2.5.” Defendants held this event in response to allegations from the battle rap community regarding the revenue that the URL was receiving from pay-per-view events compared with the battlers’ compensation for those events. There were allegations that the URL had recently made \$2.5 million.

(171) On Sunday, October 28, 2018, at approximately 3:45 AM EST, Defendant Eric Beasley sent Plaintiff a text message and said: “Swamp is [fire emoji], [fire emoji], [fire emoji].” Defendant Beasley was acknowledging Plaintiff’s assessment of the talent of the battle rapper “Swamp.”

(172) On Sunday, October 28, 2018, at approximately 4:08 AM EST, Plaintiff sent a text message to Defendant Eric Beasley that said: “So when u was gonna

tell me I'm not getting a ticket for London[.]” Plaintiff was asking about his travel arrangements for “Summer Madness 8.”

(173) On or about Saturday, November 10, 2018, the Ultimate Rap League hosted its flagship pay-per-view event “Summer Madness 8” at The Steel Yard in London, England. The main event battle was “Hollow da Don” vs. “John John da Don.” Plaintiff would miss this significant event because he did not have a plane ticket from Defendant Ultimate Rap League, LLC.

(174) On or about Sunday, November 18, 2018, the Ultimate Rap League hosted an event in Richmond, Virginia, entitled “Prey for Me.” This event featured both “Proving Grounds” battles and “One Off” battles.

(175) On Thursday, December 6, 2018, at approximately 3:01 PM EST, Plaintiff sent a text message to Defendant Eric Beasley; the message had the flyer for the Proving Grounds event scheduled for December 8, 2018, in Atlanta, Georgia.

(176) On or about Saturday, December 8, 2018, the Ultimate Rap League hosted an event at Wildpitch Underground in Atlanta, Georgia, entitled “Proving Grounds Atlanta: The Southern Select.” Plaintiff’s name appears in the advertisement for this event.

(177) On about Saturday, December 15, 2018, the Ultimate Rap League hosted a pay-per-view event entitled “Smack Volume 3.” The main event battle featured “K-Shine” vs. “Geechi Gotti.”

(178) On Friday, December 21, 2018, at approximately 3:37 PM EST, Defendant Eric Beasley sent a text message to Plaintiff about a discrepancy with the URL logo appearing on a flyer for a “Proving Grounds” event. Defendant Beasley said, in pertinent part, “[y]ou have to give approval of all flyers before they go out.” Plaintiff, in response, stated, “I told them to switch the flyer when I first seen it. I thought it was done.”

(179) On Wednesday, January 9, 2019, Plaintiff received \$5,000.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

(180) On Wednesday, January 9, 2019, Plaintiff received \$500.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

(181) On or about Sunday, January 13, 2019, the Ultimate Rap League hosted an event entitled “Western Conference: Proving Grounds” at Catch One in Los Angeles, California.

(182) On or about Saturday, February 9, 2019, the Ultimate Rap League hosted a pay-per-view event entitled “Smack Volume 4.” The main event battle was “John John da Don” vs. “O-Red.” Professional football player Gerald McCoy attended this event after being invited by Plaintiff.

(183) On Thursday, February 14, 2019, Plaintiff received \$1,750.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

- (184) On or about Friday, February 22, 2019, the Ultimate Rap League began its three-day event called “Banned Legacy” at The Top in Richmond, Virginia.
- (185) On or about Saturday, March 2, 2019, the Ultimate Rap League hosted its event at Denver Open Media in Denver, Colorado, entitled “Road to Traffic: PGs Denver.”
- (186) On Thursday, March 7, 2019, Plaintiff received a text message from Timothy Hinshaw from Amazon to schedule a meeting to discuss the Ultimate Rap League coming to the Twitch digital streaming platform. Plaintiff responded that “Tomorrow at 7pm me n my partner Beasley will be on the phone[.]”
- (187) On Friday, March 8, 2019, Plaintiff and Defendant Beasley met with Mr. Hinshaw from Amazon.
- (188) On Saturday, March 9, 2019, Plaintiff received, via an electronic transfer, \$1,750.00 from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (189) On Thursday, March 28, 2019, with the knowledge and consent of the Ultimate Rap League, Plaintiff sent \$1,000.00 to the battle rapper Santrez Jackson a/k/a “Chef Trez” from his account. The payment was to cover the obligation of Defendant Ultimate Rap League, LLC, for Mr. Jackson’s upcoming performance at “Born Legacy 6.”

- (190) On Friday, March 29, 2019, Plaintiff received \$1,000.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (191) Plaintiff covered the expenses for the hotel accommodations for the talent of the Ultimate Rap League in Tampa, Florida, from Thursday, March 28, 2019, to Monday, April 1, 2019. The total cost was \$3,166.65. The price covered the following individuals: Santrez Jackson, Raekwon Washington, Dagoberto Velez, Marcus Fantroy, Brad Arthur, Dino Gardner, Nigel Bennett, Julian Carter, Tyaun Bogan, Michael Pulice, Brandon Chambers, Jermaine Robinson, Joshua Browning,
- (192) On Friday, March 29, 2019, Plaintiff received \$6,000.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (193) On or about Saturday, March 30, 2019, the Ultimate Rap League hosted an event entitled “Born Legacy 6” in Tampa, Florida. The main event battle was between “Geechi Gotti” vs. “Chess.” The battles from “Born Legacy 6” were uploaded to the URLTV App.
- (194) On Friday, April 12, 2019, at approximately 8:54 PM EST, Plaintiff sent a text message to Defendant Beasley expressing his frustrations with the Ultimate Rap League. After Plaintiff showed years of loyalty to the company, Plaintiff said that “[Defendant Beasley], [Defendant Mitchell], [Defendant French] [are] or were my partners. At this point. I don’t even know anymore.

We came in this [expletive] together. And now, yah [sic] act like that never happened.” Defendant Beasley’s text message response to Plaintiff’s message never denied the existence of a partnership.

(195) On or about Saturday, April 20, 2019, the Ultimate Rap League hosted an event entitled “Road to Traffic: Arizona Proving Grounds” at The Warehouse in Phoenix, Arizona.

(196) On or about Saturday, April 27, 2019, the Ultimate Rap League hosted a pay-per-view event entitled “Resolution” at The Mansion Elan in Atlanta, Georgia. This event marked the URL debut of hip-hop recording artist, Barry Reese a/k/a “Cassidy” going against “Goodz.”

(197) On Monday, April 29, 2019, Plaintiff received \$7,575.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

(198) On or about Friday, May 17, 2019, the Ultimate Rap League began its three-day event entitled “Banned Legacy II” at The Workshop in Richmond, Virginia.

(199) On or about Saturday, June 8, 2019, the Ultimate Rap League hosted its pay-per-view event “Night of Main Events (NOME) 9” in Houston, Texas. The main event battle was between “Aye Verb” and “Loaded Lux.”

(200) On Thursday, June 13, 2019, Plaintiff received \$3,000.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

- (201) On Monday, June 17, 2019, at approximately 6:28 PM EST, Plaintiff responded to an email from Defendant Eric Beasley (xxxxxxxxxxxx@gmail.com) in which Defendant Beasley was requesting email addresses for certain battle rappers.
- (202) On Wednesday, June 19, 2019, Plaintiff received \$400.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (203) On Monday, June 24, 2019, at approximately 4:56 PM EST, Plaintiff sent an email to Defendant Eric Beasley (xxxxxxxxxxxx@gmail.com) that had the email addresses of certain battle rappers.
- (204) On or about Saturday, June 29, 2019, the Ultimate Rap League hosted an event entitled “Civil War 2” at 88 Monks in Los Angeles, California. The main event battle was between “Emerson Kennedy” and “Jey the Nitewing.”
- (205) On Thursday, July 4, 2019, Plaintiff received \$850.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (206) On Thursday, July 11, 2019, Plaintiff received \$5,700.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (207) Plaintiff covered expenses for hotel accommodations of the talent of the Ultimate Rap League for an event in Tampa, Florida, from Thursday, July 11, 2019, to Monday, July 15, 2019. The total cost was \$3,096.28. The price covered

the following individuals: Raekwon Washington, Joshua Browning, Brad Arthur, Luis Lebron, Dino Gardner, Gregory Bumpass, Calvin Ford, Brandon Chambers, Jailene Bulnes, John Cooper, Justin Driver, Nathan Green, Santrez Jackson, Wilbert Guarino, Tarin Waters, Julian Carter, and Marcus Fantroy.

(208) On or about Friday, July 12, 2019, the Ultimate Rap League hosted an event entitled “Born Legacy: Proving Grounds 7” at The Brixx Lounge in Tampa, Florida.

(209) On or about Saturday, July 13, 2019, the Ultimate Rap League hosted an event entitled “Born Legacy 7” in Tampa, Florida. The main event battle was between “Geechi Gotti” and “John John da Don.” The battles from Born Legacy 7 were uploaded to the URLTV App.

(210) On or about Saturday, July 20, 2019, the Ultimate Rap League hosted an event entitled “Banned Legacy III” in Richmond, Virginia.

(211) On Friday, August 9, 2019, Plaintiff received \$1,500.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.

(212) On or about Saturday, August 10, 2019, the Ultimate Rap League hosted its pay-per-view event entitled “Summer Impact,” a concept that fused “Summer Madness” and “Double Impact” and featured all 2-on-2 battles.

- (213) On Thursday, August 15, 2019, Plaintiff received \$4,100.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (214) On or about Saturday, August 24, 2019, the Ultimate Rap League hosted an event entitled “Proving Grounds Department: City of New York” at 4th Floor Studios in Brooklyn, New York.
- (215) On or about Thursday, September 5, 2019, Plaintiff covered the travel expenses and secured a flight for battle rapper Raekwon Washington a/k/a “Chess.” The flight was from New York to Cleveland, Ohio, leaving on Thursday, September 26, 2019, and returning on Monday, September 30, 2019. The cost of the flight was \$186.60. The dates coincide with the Ultimate Rap League’s “Born Legacy 8” event.
- (216) On or about Thursday, September 5, 2019, Plaintiff covered the travel expenses and secured a flight for battle rapper William Bolden a/k/a “Ill Will.” The flight was from Detroit, Michigan, to Cleveland, Ohio, leaving on Thursday, September 26, 2019, and returning on Monday, September 30, 2019. The cost of the flight was \$158.60. The dates coincide with the Ultimate Rap League’s “Born Legacy 8” event.
- (217) On or about Saturday, September 7, 2019, the Ultimate Rap League hosted a pay-per-view event entitled “Summer Impact Reloaded” at Amarzura in Queens, New York. The main event battle was between “Murda Mook” and “Calicoe” vs. “T-Top” and “Brizz Rawsteen.”

- (218) On Tuesday, September 24, 2019, at 8:04 PM EST, Plaintiff received an email from battle rapper Jessica Fisher a/k/a “O’fficial” with the subject line: “Official Preformance [sic] Agreement.pdf.”
- (219) On Thursday, September 26, 2019, Plaintiff received \$6,300.00 via an electronic transfer from professional football player Gerald McCoy to cover expenses of the Ultimate Rap League.
- (220) On or about Saturday, September 28, 2019, the Ultimate Rap League hosted an event entitled “Born Legacy 8” in Cleveland, Ohio. The battles from “Born Legacy 8” were uploaded to the URLTV App.
- (221) On or about Tuesday, October 1, 2019, the Ultimate Rap League hosted an event entitled “Survivor Series NY: The Return.”
- (222) On or about Saturday, October 5, 2019, the Ultimate Rap League hosted an event entitled “Road to Traffic 4” that featured the main event battle between “Stuey Newton” and “Danny Myers.”
- (223) On or about Sunday, October 6, 2019, the Ultimate Rap League hosted an event entitled “Lockdown” in Philadelphia, Pennsylvania. The main event battle was between “Cassidy” and “Arsonal.”
- (224) On or about Tuesday, October 8, 2019, the Ultimate Rap League had its talent featured at the 2019 BET Hip Hop Awards, which aired on Black Entertainment Television (BET). The battlers that appeared on the show were: “DNA,” “Shotgun Suge,” “Geechi Gotti,” and “T-Top.” Plaintiff secured some of this talent for the Ultimate Rap League.

- (225) On or about Friday, November 1, 2019, the Ultimate Rap League began its three-day event entitled “Survivor Series Maryland” at Club Martini in Fort Washington, Maryland.
- (226) On or about Saturday, November 16, 2019, the Ultimate Rap League hosted an event entitled “Red Dot 3” in Atlanta, Georgia. Plaintiff’s name and likeness appear in the advertisement for this event.
- (227) On or about Saturday, December 7, 2019, the Ultimate Rap League hosted an event entitled “Gridlock” at Bruddahs Bar & Grill in Gardena, California. The main event battle was between “Hollow da Don” and “Danny Myers.”
- (228) On or about Sunday, December 8, 2019, the Ultimate Rap League hosted an event entitled “Traffic: Charity Event” at Los Globos in Los Angeles, California.
- (229) On or about Saturday, December 14, 2019, the Ultimate Rap League hosted a two-day event entitled “Smack Volume 5.” The first day was available on pay-per-view. The second day was a live in-person event.
- (230) On or about Saturday, January 11, 2020, the Ultimate Rap League hosted a pay-per-view event entitled “Royalty” at The Top in Richmond, Virginia. The main event battle was between “Ms. Hustle” and “40 B.A.R.R.S.”
- (231) On or about Saturday, January 25, 2020, the Ultimate Rap League hosted a “Proving Grounds” event in Queens, New York. Plaintiff’s name and likeness appear in the advertisement for this event.

- (232) On or about Saturday, January 25, 2020, the Ultimate Rap League began a two-day event, “URLTV App Private Event 1.” The battles from this event later appeared on the URLTV App.
- (233) In February 2020, Defendant Ultimate Rap League, LLC, announced its partnership with world-renowned recording artist, Aubrey “Drake” Graham and Caffeine, Inc., to supply battle rap content on Caffeine’s social broadcasting platform.
- (234) On or about Friday, February 28, 2020, while Plaintiff was interviewing another battle rapper, “Rum Nitty,” he was attacked by Raivon Anderson a/k/a “Nu Jerzey Twork.” The incident was captured on video by an eyewitness and uploaded to various social media platforms, and Plaintiff was subjected to harassment by the battle rap community. Defendants were aware of the incident and its presence on different social media platforms.
- (235) In a YouTube video uploaded on the Ultimate Rap League channel, on February 29, 2020, entitled: “Genesis: Smack and Beasley discuss Caffeine Partnership | URLTV,” Defendant Mitchell and Defendant Beasley talked about Caffeine and the URL.
- (236) On or about Saturday, February 29, 2020, the Ultimate Rap League hosted its first event on the Caffeine social broadcasting platform. The event was called “Genesis.” According to Caffeine’s press release, 140,000 battle rap fans viewed the live streaming event. The main event battle was between “Nu Jerzey Twork” and “Geechi Gotti.” “Nu Jerzey Twork” took part in the main

event despite attacking Plaintiff the previous day. Professional football player Gerald McCoy attended this event after being invited by Plaintiff (this occurred before he was attacked by “Nu Jerzey Twork”). Caffeine experienced technical difficulties with the amount of traffic that it was receiving during this event.

(237) Shortly after the incident, Defendants Troy Mitchell and Eric Beasley explicitly stated that there would be some disciplinary action taken against “Nu Jerzey Twork” for the incident with Plaintiff. To date, Plaintiff does not know of any disciplinary action levied against “Nu Jerzey Twork.” Shortly after attacking Plaintiff Velez, “Nu Jerzey Twork” would be featured in a battle during the series entitled “Quarantined” during the COVID-19 pandemic.

(238) On or about Saturday, March 14, 2020, the Ultimate Rap League began a two-day event, “URLTV App Private Event 3.” The battles from this event are being released on the URLTV App.

(239) On or about Saturday, March 14, 2020, the Ultimate Rap League hosted an event at the Silverlake Lounge in Los Angeles, California, entitled “Only the Strong.” This would be an event of featuring all judged battles.

(240) On or about Wednesday, April 1, 2020, the Ultimate Rap League released a battle on the URLTV App entitled “Quarantined” between “Tay Roc” and “Mike P.”

(241) On or about Sunday, April 26, 2020, Defendant Ultimate Rap League, LLC, offered a five-year exclusive contract Michael Jones a/k/a “Gunpowder Patt.” Plaintiff secured this talent for the Ultimate Rap League, and Plaintiff

told Defendants that he wanted to promote this talent in 2020. Defendants publicly “dissolved” their relationship with Plaintiff two days after this offer was made. Defendant Ultimate Rap League, LLC, taking further preemptive measures against Plaintiff, offered a similar deal to other talents during this time.

- (242) On or about Monday, April 27, 2020, the Ultimate Rap League hosted a series of battles called “Quarantined Sterilized,” and the battles would be released on the URLTV App. One of the featured battles was between “Geechi Gotti” and “B Magic.”
- (243) On or about Tuesday, April 28, 2020, the Ultimate Rap League issued a public statement entitled “The Ultimate Rap League Dissolves Relationship with Street Star Norbes.” In their statement, The Ultimate Rap League, among other things, acknowledged a “business relationship” with “Street Star Norbes.”
- (244) On or about Saturday, May 23, 2020, the Ultimate Rap League began its multi-week 16-person tournament airing on Caffeine. The winner of the tournament received \$25,000 and an opportunity to perform at “NOME X.” “Fonz” was the winner of the tournament, a talent that was brought to the URL by the Plaintiff.
- (245) On or about Monday, June 8, 2020, the Ultimate Rap League began a series of battles entitled “Quarantined Sterilized 2.”

- (246) On or about Wednesday, July 1, 2020, Caffeine announced that it raised \$113 million in a Series D round of funding and that battle rap will be its “anchor” content and highlighted its relationship with the Ultimate Rap League.
- (247) On Saturday, July 11, 2020, the Ultimate Rap League hosted “Night of Main Events (NOME) X.” The event aired live on Caffeine, and the battles were later uploaded to the URLTV App. The main event battle was between “Tsu Surf” and “Loaded Lux.”
- (248) On Saturday, August 1, 2020, the Ultimate Rap League hosted an event entitled “Ultimate Madness 2” that streamed live on Caffeine. The event is a multi-week 16-person tournament. The winner of the tournament receives \$25,000.00 and will appear on “Summer Madness X” scheduled for Saturday, September 19, 2020. The “Ultimate Madness 2” event features a celebrity guest judge, recording artist, and actor, Clifford Smith, a/k/a “Method Man.”
- (249) During the broadcast of the “Ultimate Madness 2” event on Saturday, August 1, 2020, the Ultimate Rap League and Caffeine aired footage of Plaintiff without his consent on Caffeine.tv. Some of the footage appeared before the battle between “Tink da Demon” and “Franchise.”
- (250) During the broadcast of the “Rookies vs. Vets 2 and Battle Showcase” event on Saturday, August 8, 2020, the Ultimate Rap League and Caffeine aired footage of Plaintiff without his consent on Caffeine.tv. The footage appeared before the battle between “Jey the Nitewing” and “Shotgun Suge.”

(251) During the broadcast of the “Battle Showcase” event on Saturday, August 29, 2020, the Ultimate Rap League and Caffeine aired footage of Plaintiff without his consent on Caffeine.tv. The footage appeared before the battle between “Prep” and “Emerson Kennedy.”

(252) Beginning around 2015, at the demand of an outside investor known as “Harry,” the Ultimate Rap League began showing battles on pay-per-view through the WatchBattleLive.com platform, a platform owned by “Harry.” “Harry” had previously made several investments into the Ultimate Rap League over the years and would continue financing events for the Ultimate Rap League in the future. “Harry” has been publicly acknowledged by Defendants Troy Mitchell and Eric Beasley, along with some battle rappers.

(253) Plaintiff managed and controlled the Proving Grounds talent developmental system of the Ultimate Rap League.

(254) Plaintiff brought the following talent to the Ultimate Rap League, all of whom currently average over one million (1,000,000) views on the YouTube platform for their battles according to the online battle rap index VerseTracker (versetracker.com): Rajon Cox a/k/a “Tsu Surf,” Nigel Bennett a/k/a “Hollow da Don,” Gerald Fulton, Jr. a/k/a “Hitman Holla,” Toranio Hightower a/k/a “Calicoe,” and Donte Richardson a/k/a “Tay Roc.”

(255) Plaintiff was also responsible for bringing the following talent to the Ultimate Rap League: Reggie Sergile a/k/a “Conceited”; Terrance Bredford a/k/a “Big T”; Ernesto Cortez a/k/a “Cortez”; Eric St. John a/k/a “DNA”; Hamid

Wright a/k/a “O-Red”; Jimmie Newsome a/k/a “Shotgun Suge”; Jonathan Magee a/k/a “John John da Don”; Jerry Douglas a/k/a “B Magic”; Eric Wilkinson a/k/a “Bill Collector”; Ron Corbin a/k/a “Qleen Paper”; Chaz Duncan a/k/a “Aye Verb”; Marlon Bell a/k/a “Yung Ill”; Julian Carter a/k/a “JC”; “Ave”; Emerson Kennedy; Jerry Freeman a/k/a “Jerry Wess”; William Bolden a/k/a “Ill Will”; “Bigg K”; Jerome Jones a/k/a “Chilla Jones”; Melvin Bryant a/k/a “T-Top”; “Brizz Rawsteen”; Raekwon Washington a/k/a “Chess”; Luis Lebron a/k/a “Th3 Saga”; Brandon Chambers a/k/a “Prep”; Marcus Fantroy a/k/a “Geechi Gotti”; Raivon Anderson a/k/a “Nu Jerzey Twork”; Kyle Gross a/k/a “Rosenberg Raw”; Magenta Bracey a/k/a “Jaz the Rapper”; DaJuan Wilson a/k/a “Big Kannon”; Danny Myers; Don Marino; “Jey the Nightwing”; “Real Sikh”; Andrew Gray a/k/a “Sno”; Ty Bogan a/k/a “Fonz”; Mike Pulice a/k/a “Mike P”; Santrez Jackson a/k/a “Chef Trez”; Bryan Harris a/k/a “Ryda”; Pedro Mendoza a/k/a “Young Kannon”; Dijon Galley a/k/a “Prez Mafia”; Shaun Paige a/k/a “Swamp”, Michael Jones a/k/a “Gunpowder Patt,” and Kareem Washington a/k/a “Steams.” This is not an exhaustive list of all the talent that Plaintiff brought to the Ultimate Rap League.

(256) Beginning in 2013, the talent of the Ultimate Rap League received contracts to perform at various events throughout the year. The contracts specified, among other things, the date of the event and how much they would be paid for their performances. It was customary for the battle rappers to receive a deposit around the time the contract was signed and to receive the

balance of their compensation the day of the event. As the years progressed, the contracts became more sophisticated, including payment covering multiple performances, which could span several months or at least a year.

(257) The compensation for the battle rappers of the Ultimate Rap League ranged from approximately \$1,000 per battle for the emerging talent identified as “Proving Grounds battlers” or “PGs” to as high as roughly \$90,000 (single battle or multiple battles) for the so-called “Top-Tier battler.”

(258) Plaintiff would share profits, when made available, from some of the URL events, more specifically, “Born Legacy” and “Proving Grounds” events, with Defendants. Plaintiff distributed profits to Defendants in cash.

(259) Plaintiff is a significant contributor to the Ultimate Rap League, reaching over 1 million subscribers on YouTube, getting exposure on national television, and landing its deal with Caffeine, Inc.

(260) Plaintiff never received a contract, in writing, for the plethora of services that he was providing to the Ultimate Rap League or a written employment agreement from the Ultimate Rap League.

(261) Plaintiff often appeared on camera to represent the Ultimate Rap League on various media platforms.

(262) Plaintiff’s image and likeness often appeared on advertisements and videos for the Ultimate Rap League.

- (263) Plaintiff never received notice that the Ultimate Rap League was changing its entity structure from a general partnership to a limited liability company and vice versa.
- (264) Plaintiff had the actual authority to bind the Ultimate Rap League to contracts and to engage in negotiations for various business opportunities.
- (265) Plaintiff, with the knowledge and consent of the Ultimate Rap League, used his bank accounts to pay for expenses of the Ultimate Rap League.
- (266) Plaintiff and Defendants Troy Mitchell, Eric Beasley, and Jean French verbally agreed to be partners of the Ultimate Rap League.
- (267) Plaintiff was not the custodian of the financial records of the Ultimate Rap League.
- (268) Plaintiff's name and likeness continue to appear in many videos currently on YouTube on the official Ultimate Rap League channel and other digital media platforms.
- (269) Plaintiff is an integral part of developing the Ultimate Rap League into becoming "The World's Most Respected MC Battle Arena."

COUNT ONE
(Wrongful Dissolution)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

- (270) Plaintiff adopts by reference the allegations contained in paragraphs one through 269 of this Complaint with the same effect as if herein fully set forth.

- (271) Between approximately October 26, 2009, and April 28, 2020, Defendants have made admissions that Plaintiff is a partner or joint venturer of the Ultimate Rap League.
- (272) Plaintiff received notice that he was no longer apart of the Ultimate Rap League partnership or joint venture via a statement released from Defendant Ultimate Rap League, LLC.
- (273) Defendant Beasley and Defendant Mitchell both stated that Plaintiff was fired and in no way involved with the Ultimate Rap League, LLC.
- (274) Defendants did not pay to Plaintiff in cash, the net amount due to Plaintiff from the partnership or joint venture minus Plaintiff's liabilities.
- (275) Defendants did not provide Plaintiff of an accounting of the business or any type of audit before making the statement that Plaintiff was in no way involved with the Ultimate Rap League, LLC.
- (276) As a result of the wrongful dissolution, Plaintiff is now entitled to enforce payment from Defendants and rights to the partnership or joint venture property via dissolution and winding up.
- (277) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest and costs.

COUNT TWO

(Misrepresentation)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(278) Plaintiff adopts by reference the allegations contained in paragraphs one through 277 of this Complaint with the same effect as if herein fully set forth.

(279) Defendants released false statements to third parties that Plaintiff was fired as an employee and no longer involved and doing business on behalf of the Ultimate Rap League.

(280) Defendants knew that at no time since the start of the Ultimate Rap League in 2009, did the partners ever represent Plaintiff as anything but a partner in the URL.

(281) Over more than a decade with the Ultimate Rap League, Defendants never presented an IRS Form W-2 or IRS Form 1099 to Plaintiff.

(282) Defendants' statements were made by Defendants with the sole purpose of defrauding Plaintiff.

(283) Defendants using the platforms to spread the fraudulent statements left Plaintiff with no choice but to rely on the statements.

(284) Defendants actions have caused Plaintiff to be financially and emotionally damaged because of Defendants' statements.

(285) WHEREFORE, Plaintiff Velez demands judgment against Defendants in the amount to exceed \$500,000, with interest and costs as well as any recovery this Honorable Court sees fit.

(286) FURTHER, Plaintiff requests that this Court force a winding up of the partnership and declare that Plaintiff is the sole owner of the business under New York Partnership Law §§ 63 and 68.

COUNT THREE
(Negligent Misrepresentation)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(287) Plaintiff adopts by reference the allegations contained in paragraphs one through 286 of this Complaint with the same effect as if herein fully set forth.

(288) For over ten years, Plaintiff made a statement to Plaintiff and third parties that Plaintiff was a partner of the URL.

(289) Defendants had a duty of care to Plaintiff. This duty of care required Defendants to provide Plaintiff with an accurate splitting of profits and the transmittal of the correct URL information to partners and third parties.

(290) Defendant was negligent in its actions by not properly splitting profits and by telling Plaintiff he was a partner when he was not.

(291) Defendants intended for Plaintiff to rely on these assertions and to produce content, obtain sponsorships, and aid the URL in building contacts within the battle rap and business communities.

(292) Defendants knew that Plaintiff would rely on the statements.

(293) Plaintiff's actions include borrowing funds, getting sponsorships, helping the URL with national placement on syndicated cable television, and building more than 80% of the URL talent. Plaintiff was justified in reliance

based on many interviews with third parties by Defendants, and the many conversations Plaintiff had with Defendants.

(294) As a result of the conduct of negligent misrepresentations by Defendants, Plaintiff incurred damages.

(295) WHEREFORE, Plaintiff demands judgment against Defendants in the amount to exceed \$500,000, with interest and costs.

COUNT FOUR
(Breach of Fiduciary Duty)
(Troy Mitchell, Eric Beasley, Jean French)

(296) Plaintiff adopts by reference the allegations contained in paragraphs one through 295 of this Complaint with the same effect as if herein fully set forth.

(297) Plaintiff Velez, Defendant Mitchell, Defendant Beasley, Defendant French, and Defendant Mitchell were engaged in a partnership to grow the battle rap business known as the Ultimate Rap League. This firm has been involved in the battle rap business for over ten years.

(298) Plaintiff Velez and Defendants shared profit and losses on an equal basis and, over the past ten years, worked together in the business of battle rap, developing a prestigious league known for its excellent work.

(299) Before February 11, 2020, Defendants were in negotiations with Caffeine, Inc., an organization that produces digital content and garners streams to its website. Caffeine invited Defendants to partner by creating

battle rap content through the URL that would become the anchor programming of Caffeine's streaming application.

(300) Defendants and Caffeine discussed, over at least six months, the affiliation of URL with Caffeine and Defendants' ability to, among other things, recruit battle rappers, develop talent, and produce battle rap content for the Caffeine platform.

(301) Defendants did not disclose any of these discussions to Plaintiff Velez. However, Defendants did approach several battle rappers, many of whom were initially brought to the URL by Plaintiff, and without disclosure to Plaintiff, solicited the services of the battle rappers for Caffeine when Defendants knew they would try to dissolve the relationship with Plaintiff.

(302) Defendants also poached content that was created by Plaintiff, much of the content Defendants rejected in partner meetings, used the ideas to pitch to Caffeine as added value for Caffeine's application, even though Defendants undermined and suppressed the contributions of Plaintiff.

(303) Defendants and Caffeine, Inc., in February 2020, completed and announced a partnership in which the URL would supply content for Caffeine.

(304) In April of 2020, Defendants notified Plaintiff Velez via a public statement that Plaintiff no longer had any affiliation with the URL.

(305) Defendants, as partners to Plaintiff Velez, were accountable to Plaintiff as fiduciaries. As partners, Defendants owed Plaintiff and the partnership the duty of loyalty and good faith, without any self-interest or self-dealing.

(306) Defendants breached their fiduciary duties to Plaintiff Velez by secretly taking Plaintiff's ideas for content and presenting it in negotiating the deal with Caffeine, soliciting and securing the services of battle rap talent to perform on the Caffeine platform, and putting out a statement stating Plaintiff Velez was no longer involved in any capacity with the URL.

(307) By Defendants' breach of their fiduciary duties owed to Plaintiff, Plaintiff suffered damages.

(308) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest and costs.

COUNT FIVE

(Breach of an Oral Joint Venture or Partnership Agreement)

(Troy Mitchell, Eric Beasley, Jean French)

(309) Plaintiff adopts by reference the allegations contained in paragraphs one through 308 of this Complaint with the same effect as if herein fully set forth.

(310) Plaintiff and Defendants in October of 2009 had an oral agreement to partner to form the Ultimate Rap League.

(311) Plaintiff organized battle rap events, and he was present at several different events during this time.

(312) Before 2009, Defendants were not putting on rap battles in a "versus" competitive format as an organization.

- (313) Around 2003, Troy Mitchell recorded content and released the recorded footage on DVDs known within the hip-hop industry as “SMACK DVDs.” Some of the DVDs had rap battles, although this was not the primary focus of the DVD series. The first battle appeared on “SMACK DVD Vol. 3,” a battle between Jarvis Mills a/k/a “Jae Millz” and Sharod Sims a/k/a “Sire Castro” hosted by Sean “P. Diddy” Combs. The battles in the series would become famous, but the series was stopped around 2008.
- (314) Troy Mitchell wanted to produce SmackTube, with the help of Plaintiff, but due to Defendant Mitchell’s lack of resources in the battle rap community and lack of funding, SmackTube was an epic failure.
- (315) Around 2009, Eric Beasley worked as an Artists and Repertoire (A&R) for Asylum Records in New York, NY.
- (316) Around 2009, upon information and belief, Jean French, known as “Cheeko,” was a music producer and computer technician.
- (317) While Defendant Beasley was employed by Asylum Records, Plaintiff, Defendant Beasley, and Defendant Mitchell would have regular meetings at Atlantic Records found at 1290 6th Avenue, New York, NY 10104, to conduct the business of the Ultimate Rap League. Defendant French would be absent from specific meetings because of schedule conflicts.
- (318) Plaintiff was the manager of “Math Hoffa,” who was considered one of the best battle rappers at the time, and some regard today as a legend.
- (319) Before 2009 there was no Ultimate Rap League.

(320) The first event produced by the Parties of this lawsuit was headlined by "Math Hoffa."

(321) The agreement was that the four partners (Mitchell, Beasley, French, and Velez) would be equal partners that would not only help with the production but split all profits equally.

(322) As of April 2020, Defendants claim that after more than ten years of promoting Plaintiff as a partner, that Plaintiff is simply an independent contractor.

(323) Defendants have not adequately split profits with Plaintiff and have not informed Plaintiff of material decisions affecting the company.

(324) Therefore, Defendants have breached the oral contract with Plaintiff.

(325) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT SIX

(Breach of the Implied Covenant of Good Faith and Fair Dealing)

(Troy Mitchell, Eric Beasley, Jean French)

(326) Plaintiff adopts by reference the allegations contained in paragraphs one through 325 of this Complaint with the same effect as if herein fully set forth.

(327) In 2009, the parties entered into a partnership agreement that would consist of the parties receiving an equal split of the business.

(328) All the partners had a duty to act in good faith on the other partners in all negotiations involving the URL.

(329) Defendants had a duty to ensure that their actions would in no way hinder Plaintiff from receiving the fruits of the agreement.

(330) Defendants did not provide Plaintiff with an accounting of the books, did not provide Plaintiff with the splits from profits, and concealed or misrepresented Plaintiff's involvement with the URL to third parties.

(331) Upon being approached about the books and profits, Defendants released a statement saying that Plaintiff was no longer involved in the company and that the relationship was "dissolved."

(332) Plaintiff then sent demand and through counsel. Defendants refused to negotiate and instead said that Plaintiff was an independent contractor. At no time, over the last decade, was there ever any sign by Defendants that Plaintiff was simply an independent contractor.

(333) Considering the facts and circumstances that Defendants, even with counsel, have failed to negotiate in good faith the profits owed to Plaintiff, Defendants have injured Plaintiff.

(334) WHEREFORE, Plaintiff demands judgment against Defendants in the amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT SEVEN
(Promissory Estoppel)
(Troy Mitchell, Eric Beasley, Jean French)

(335) Plaintiff adopts by reference the allegations contained in paragraphs one through 334 of this Complaint with the same effect as if herein fully set forth

(336) Defendants pledged that along with Plaintiff that the four would begin the partnership of the Ultimate Rap League. Plaintiff believed that his contribution would make him fully vested as a partner, and thus he would have an equal share percentage of the company with Defendants.

(337) In reliance on the pledges received from Defendants, Plaintiff obtained financing from his contacts, created content, got talent, and secured sponsorships on behalf of the Ultimate Rap League. The work by Plaintiff with the URL began on or about October 26, 2009.

(338) Plaintiff has requested his rightful equal share of funds received by the Ultimate Rap League, but Defendants have wrongfully denied the payment of those requests. Injustice will result if Defendants' pledge is not enforced.

(339) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT EIGHT
(Unjust Enrichment)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

- (340) Plaintiff adopts by reference the allegations contained in paragraphs one through 339 of this Complaint with the same effect as if herein fully set forth.
- (341) Defendants are owners of a battle rap league that has produced over 200 events in ten years, many of which are uploaded to streaming or social media platforms to generate income.
- (342) Before October 26, 2009, Plaintiff began working with Defendants in developing content and talent acquisition.
- (343) For the following ten years, Plaintiff helped Defendants or produced by himself, a total, taken together, of more than 200 shows, many of which are streamed on the URLTV mobile application, Caffeine, WatchBattleLive.com, and the official URL channel on YouTube.
- (344) Plaintiff had full authority to produce content via the brand.
- (345) Plaintiff engaged many contractors to solidify venues, hotel rooms, and talent.
- (346) The content created by Plaintiff for the URL has conferred a benefit upon Defendants of at least Twenty-Five Million Dollars (\$25,000,000).
- (347) Defendants were aware of and knew the benefits conferred upon the URL by Plaintiff during this period.
- (348) Defendants' acceptance and retention of the content made to the URL by Plaintiff while Defendants knew the content being made by Plaintiff to the

URL makes it inequitable for Defendants to keep these benefits without payment of their value.

(349) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT NINE
(Quantum Meruit)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(350) Plaintiff adopts by reference the allegations contained in paragraphs one through 349 of this Complaint with the same effect as if herein fully set forth.

(351) On or about October 26, 2009, Plaintiff diligently began pursuing business for the URL, devoting substantial time over many years to talent management, sponsorship development, and content creation.

(352) After working on business related to the URL for ten years, Plaintiff received notice from URL that he was no longer involved with the URL. Plaintiff had logged over 20,000 hours in the ten years on working on the URL business.

(353) In July 2020, Plaintiff learned that URL had partnered with Caffeine to be its anchor content, where Caffeine raised over 100 million dollars to invest in battle rap content.

(354) Plaintiff has cooperated with Defendants and has helped to grow the brand of the URL.

(355) Plaintiff gave valuable services to the URL to receive from Defendants a fee for these services. Defendants accepted these services, received a benefit of such services, and knew that Plaintiff expected to be paid for such services.

(356) All services given by Plaintiff to the URL and the named Defendants were provided under such circumstances that Defendants knew Plaintiff expected to be paid. On multiple occasions, when Plaintiff talked to Defendants and through social media posts, Plaintiff made it clear he expected to be paid for the value of his services if any monetary funds were received by Defendants through the URL brand.

(357) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest and costs.

COUNT TEN

(Equitable Accounting)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(358) Plaintiff adopts by reference the allegations contained in paragraphs one through 357 of this Complaint with the same effect as if herein fully set forth.

(359) On or about Tuesday, April 28, 2020, Plaintiff, along with Defendants Troy Mitchell, Eric Beasley, and Jean French, had a telephone conversation about Plaintiff's interest in the organization, and Plaintiff asked for an offer to

buy out his equitable interest in the Ultimate Rap League. Plaintiff was assured by Defendants that they would think about it and present him with an offer.

(360) On or about Tuesday, April 28, 2020, Defendant Ultimate Rap League, LLC, published a press release on various social media platforms, saying that it is dissolving its relationship with Plaintiff.

(361) After waiting for more than 60 days, Plaintiff never received a formal offer from the Ultimate Rap League to buy out his interest.

(362) Plaintiff sent a demand letter by certified mail to the registered agent for Defendant Ultimate Rap League, LLC, on July 1, 2020, to settle his partnership interest with the Ultimate Rap League.

(363) Defendants Ultimate Rap League, LLC, Troy Mitchell, Eric Beasley, and Jean French, did not acknowledge receipt of the demand letter after having the document for approximately two weeks.

(364) On or about July 22, 2020, Plaintiff, by certified mail, sent a formal demand for an inspection of the books and records of the Ultimate Rap League and a demand for an accounting of financial information of the Ultimate Rap League from 2009 to the present.

(365) On or about July 28, 2020, Plaintiff received a response from counsel for Defendants about the demand letters dated July 1, 2020, and July 22, 2020, respectively, denying his status as a partner in the Ultimate Rap League and thus the denying his right to inspect the books and for an accounting.

(366) Absent an equitable accounting from Defendants; Plaintiff is without an adequate remedy in law to assess the value of his interest in the Ultimate Rap League or any compensation due to him.

(367) WHEREFORE, Plaintiff demands an accounting of the business records of the Ultimate Rap League, LLC, its subsidiaries, and any successors in interest from 2009 to present.

COUNT ELEVEN

(Violation of the Right of Publicity - NY CLS Civ R § 51)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(368) Plaintiff adopts by reference the allegations contained in paragraphs one through 367 of this Complaint with the same effect as if herein fully set forth.

(369) Between October 31, 2009, and present, Defendants held events in New York where they sold tickets.

(370) Defendants used Plaintiff's name and likeness on promotional flyers and social media posts to advertise the event.

(371) This advertisement was done without the written consent of Plaintiff.

(372) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest and costs.

COUNT TWELVE

(Conversion)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(373) Plaintiff adopts by reference the allegations contained in paragraphs one through 372 of this Complaint with the same effect as if herein fully set forth.

(374) Plaintiff verbally agreed to have an equal partnership with Defendants in the Ultimate Rap League. Based on this agreement, Plaintiff's proprietary interest in the Ultimate Rap League is twenty-five percent (25%).

(375) Defendants executed a deal with Caffeine, Inc., announced as a partnership. A partnership with Caffeine would have affected Plaintiff's interest, and it was done without Plaintiff's consent.

(376) Plaintiff agreed to the requests of Defendants to use content created by Plaintiff for the URLTV App.

(377) Over the ten years of working on content, Plaintiff created the content that has been used for the URLTV App and the streaming company Caffeine.

(378) On or about April 28, 2020, Defendants, without any prior notice, published a statement to sever ties with Plaintiff.

(379) Plaintiff requested a return of the content he created, but Defendants refused Plaintiff's demand. Defendants claimed that Plaintiff was simply an independent contractor, and therefore the content was work product.

(380) Defendant's retention of the content was intentional, without justification, and constituted a conversion of Plaintiff's property.

(381) WHEREFORE, Plaintiff Velez demands judgment against Defendants in an amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT THIRTEEN
(Defamation)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(382) Plaintiff adopts by reference the allegations contained in paragraphs one through 381 of this Complaint with the same effect as if herein fully set forth.

(383) Between October 29, 2009, and April 11, 2020, Defendants portrayed Plaintiff as one of the partners and stakeholders of the URL.

(384) In a written statement from the URL on or about April 28, 2020, Defendants said that Plaintiff was no longer involved with the URL.

(385) In interviews with bloggers, Defendant Mitchell and Defendant Beasley knew the statements would get out to thousands of URL followers knowingly made the false and defamatory statements about Plaintiff.

(386) In the alternative, Defendants negligently made false and defamatory statements about Plaintiff.

(387) All Defendants understood the statements to be defamatory.

(388) Defendants acted with the knowledge of the falsity of the statements and with the intent to harm Plaintiff's chances of furthering his career within

the rap battle community when publishing the false and defamatory statements about Plaintiff.

(389) As a result of the false and defamatory statements published by Defendants, the character and reputation of Plaintiff were harmed, his standing and reputation within the rap battle community were impaired, and he suffered mental anguish and personal humiliation.

(390) As a direct and proximate result of the false and defamatory statements published by Defendants, Plaintiff was hindered from working on other projects and thereby suffered a loss of future income, which he would have earned from putting on other battle rap events.

(391) WHEREFORE, Plaintiff demands judgment against Defendants in an amount to exceed \$500,000, with interest, costs, and any all other relief to which this Court finds him entitled.

COUNT FOURTEEN

(Declaratory Relief – Determine the Existence of Partnership)
(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(392) Plaintiff adopts by reference the allegations contained in paragraphs one through 391 of this Complaint with the same effect as if herein fully set forth.

(393) Plaintiff insists that after more than ten years of creating and developing the brand and structure of the Ultimate Rap League, securing

capital, having the authority to bind all Defendants to contracts, and acquiring over 80% of the talent, Plaintiff is a partner of the URL.

(394) Defendants claim that after more than ten years of presenting Plaintiff as a partner of the URL to third parties, sponsors, and media, that Plaintiff is simply an independent contractor.

(395) There exists an actual controversy of a justiciable issue between Plaintiff and Defendants within the Jurisdiction of this Court, involving the rights and liabilities of the parties.

(396) A declaration judgment by this court will terminate this controversy.

COUNT FIFTEEN

(Declaratory Relief – Dissolution by Decree of Court)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(397) Plaintiff adopts by reference the allegations contained in paragraphs one through 396 of this Complaint with the same effect as if herein fully set forth.

(398) The Ultimate Rap League claimed in the April 28, 2020 press release that the relationship with the Plaintiff had been dissolved.

(399) Plaintiff has not received any monetary value based on his interests in the partnership.

(400) Plaintiff has not received any monetary value for his ten years of service.

(401) The only tangible benefit received by Plaintiff was a free subscription to the URLTV App. The present value of this subscription is \$7.99 per month.

(402) Defendants later terminated the complimentary subscription was upon receiving undersigned counsel’s demand for an accounting and a proper dissolution of the partnership.

(403) Defendant Beasley and, in particular, Defendant Mitchell claimed in interviews that their decision regarding Plaintiff “was business . . . NAMSAYN?!”

(404) Upon inquiry from undersigned counsel on Plaintiff’s interests in the Ultimate Rap League, Defendants later claimed that Plaintiff was an independent contractor for more than ten years.

(405) Defendant Ultimate Rap League’s keeper of records, Defendant French, failed to give Plaintiff material information about monetary deals with third parties and refused to allow Plaintiff to obtain an accounting of the Ultimate Rap League books.

(406) Defendants later claimed that Plaintiff was an independent contractor.

(407) At no point between 2009 and April of 2020 did Defendants ever make claims that Plaintiff was anything but a partner of the Ultimate Rap League.

(408) There exists an actual controversy of a justiciable issue between Plaintiff and Defendants within the jurisdiction of this Court, involving the rights and liabilities of the parties.

(409) A declaration judgment by this court will terminate this controversy.

COUNT SIXTEEN
(Declaratory Relief – Plaintiff’s Rights to Partnership’s Property)

(Troy Mitchell, Eric Beasley, Jean French, Ultimate Rap League, LLC)

(410) Plaintiff adopts by reference the allegations contained in paragraphs one through 409 of this Complaint with the same effect as if herein fully set forth.

(411) Plaintiff insists that Defendants wrongfully dissolved the Ultimate Rap League partnership.

(412) Plaintiff is entitled to the property of the URL and may expel the partners after the proper dissolution of the property of the partnership.

(413) Defendants claim that Plaintiff is owed nothing.

(414) There exists an actual controversy of a justiciable issue between Plaintiff and Defendants within the jurisdiction of this Court, involving the rights and liabilities of the parties.

(415) A declaration judgment by this court will terminate this controversy.

PRAYER FOR RELIEF

WHEREFORE, because of the foregoing, Plaintiff Dagoberto Velez hereby respectfully requests the following relief:

(A) Compensatory damages for Thirty Million Dollars (\$30,000,000); and a ten percent (10%) royalty, in perpetuity, of all the quarterly revenue of the Ultimate Rap League, LLC, its subsidiaries, and any successors in interest;

(B) Punitive damages for Ten Million Dollars (\$10,000,000);

(C) Reliance damages for Two Hundred Fifty Thousand Dollars (\$250,000);

- (D) (1) Judicial declaration that Plaintiff is a partner of the Ultimate Rap League;
 - (2) Judicial declaration that there be an equitable accounting of the records of the Ultimate Rap League and that there is winding up and dissolution of the business; and
 - (3) Judicial declaration that Plaintiff has both equitable and legal title to the property of the Ultimate Rap League upon dissolution.
- (E) For a trial by jury in this action of all issues so triable;
- (F) Costs of suit; and
- (G) Such other and further relief as the court deems just and proper.

Dated: September 10, 2020

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