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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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12 ROVIER CARRINGTON,  
13 Plaintiff,

14 vs.

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16 NATIONAL AMUSEMENTS, INC.,  
17 PARAMOUNT GLOBAL,  
18 PARAMOUNT PICTURES  
19 CORPORATION, GOOGLE,  
20 GODADDY, VARIETY, THE  
21 HOLLYWOOD REPORTER & THE  
22 HONORABLE KATHERINE POLK  
23 FAILLA,

24 Defendants.

CASE NO:

**VERIFIED COMPLAINT FOR  
DECLARATORY RELIEF AND  
DAMAGES DUE TO VIOLATIONS  
OF PLAINTIFF’S RIGHT TO  
REDRESS GRIEVANCES TO THE  
GOVERNMENT, DUE PROCESS  
RIGHTS, VIOLATIONS OF THE  
AMERICANS WITH  
DISABILITIES ACT,  
DEFAMATION PER SE,  
NEGLIGENCE & DURESS AS A  
DEFENSE TO FORMATION OF  
CONTRACT REGARDING A PLEA**

**JURY TRIAL DEMANDED**

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27 **I. The Parties to This Complaint**

- 28
1. Plaintiff, ROVIER CARRINGTON, is a resident of Los Angeles, California.
  2. Defendant NATIONAL AMUSEMENTS, INC. is a privately owned theater

1 company and mass media holding company based in Norwood, Massachusetts,  
2 and incorporated in Maryland while operating and conducting business in Los  
3 Angeles, California. Defendant PARAMOUNT GLOBAL is an American  
4 corporation, formed through the merger of CBS Corporation and the second  
5 incarnation of Viacom. Paramount Global is headquartered in Manhattan, New  
6 York, NY while operating and conducting business in Los Angeles, California  
7 and throughout the world. Paramount Global owns and operates among other  
8 properties, MTV Networks, Comedy Central, Logo Network, and their main  
9 asset, PARAMOUNT PICTURES CORPORATION, a film studio, with its  
10 headquarters in Los Angeles, California.

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16 3. Defendant PARAMOUNT PICTURES CORPORATION,  
17 (“PARAMOUNT” or “PARAMOUNT PICTURES”) is an American film  
18 studio and a subsidiary of Paramount Global.

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20 4. Defendant GOOGLE LLC is an American multinational technology  
21 company, with its headquarters in Mountain View, California.

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23 5. Defendant GODADDY, Inc. is an American publicly traded internet domain  
24 registration and hosting company, headquartered in Tempe, AZ.

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26 6. Defendant HON. KATHERINE POLK FAILLA is a United States District  
27 Court Judge in the Southern District of New York. Judge Failla is sued in her  
28 individual and official capacity, for violations of the ADA, for violations from  
the United States Constitution.

1           **II.    Basis for Jurisdiction**

2           7. Plaintiff asserts original federal subject matter jurisdiction under 42 U.S.C.  
3           § 1983 et. seq. (the Civil Rights Act), 28 U.S.C. § 2201 et. seq. (the  
4           Declaratory Judgment Act), 42 U.S.C. §§ 12101 (the Americans with  
5           Disabilities Amendments Act) et seq (2008), U.S. Const. amend. 1 (the Right  
6           to Redress Grievances), U.S. Const. amend. XIV, § 5 (the Due Process Clause),  
7           and U.S. Const. amend. XIV, § 1 (the Due Process Clause as Applied to the  
8           States). The claims that arise under the laws of the State of California, have  
9           supplemental jurisdiction to the above federal subject matter jurisdiction  
10          claims, as they arise from the same transaction and set of occurrences.

11                           **Statement of Claim**

12           **III.    First Amendment Right to Redress our Government for**  
13           **Grievances**

14           8. The U.S. Const. amend. 1 (the Right to Redress Grievances) says that  
15           Congress may make no law that will prohibit citizens “to petition the  
16           Government for a redress of grievances.” This basic freedom allows to seek  
17           redress for complaints without fear of reprisal. It has been expanded to include  
18           state governments, courts, and executive branches<sup>1</sup>. Communication, to be  
19           protected as a Petition for Redress, would have to contain no falsehoods nor  
20           rise to the level of frivolity. The right to petition includes under its umbrella the

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<sup>1</sup> Congressional Research Service. "U. S. Constitution Annotated: Amendment I, Rights of Assembly and Petition". Legal Information Institute. Cornell Law School. Retrieved May 1, 2023.

1 legal right to sue the government.<sup>2</sup>

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3 9. Plaintiff Carrington filed a complaint in The United States District Court,  
4 Southern District of New York, Case No. 18-CV-04609-KPF, in *Carrington v.*  
5 *Graden et al.* (“New York Suit”) where he sought relief from sexual assaults  
6 against Brad Grey, Brian Graden and Paramount Pictures, which commenced  
7 when Carrington was a minor. As proof, Carrington’s attorneys submitted  
8 emails as evidence in the amended complaint without Carrington’s consent.  
9 Attached as Exhibit 1 is a true and correct copy of a text message between  
10 Carrington and his counsel evidencing that Carrington never saw the amended  
11 complaint before it was filed. The emails were verified as authentic by an  
12 independent neutral third-party named FTI, who was hired by the defendants.  
13 Despite such, Carrington has been accused of perjury for falsifying emails and  
14 for signing a false affidavit, to which, Carrington has evidence showing his  
15 former attorneys filed the amended complaint, the emails, and an altered  
16 affidavit without notifying him, causing Carrington to fire his counsel and  
17 request a dismissal without prejudice, which was denied, causing Carrington to  
18 request a venue change in the New York case.  
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26 10. There is currently a protective order, stemming from the above New York  
27 Suit, that bars Plaintiff Carrington’s grievances, which he was never able to  
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<sup>2</sup> Newton, Adam. "*Petition - Right to sue*". First Amendment Center. Archived from the original on March 24, 2011.

1 fully litigate in a fair and neutral court with his Due Process and other rights  
2 being afforded. After the New York Suit was dismissed with prejudice due to  
3 the defendants and their attorney's committing fraud, Plaintiff Carrington filed  
4 a suit in the Central District of California (the California Suit). During the  
5 California suit, Defendant Judge Failla and Paramount Pictures pressured  
6 Carrington into withdrawing the suit with prejudice. The cumulation of said  
7 event, in turn, clearly violated Plaintiff Carrington's Right to Redress under the  
8 First Amendment.  
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12 11. It is well settled that First Amendment rights are not immunized from  
13 regulation when they are used as an integral part of conduct which violates a  
14 valid statute. *Giboney v. Empire Storage Co.*, 336 U. S. 490 (1949). Yet,  
15 Plaintiff Carrington only attempted to bring claims for true grievances and  
16 asked for meaningful access to the courts as protected by Due Process, to do  
17 such. He continues to assert the veracity of such emails his attorneys provided  
18 as evidence and denies that he falsified or otherwise altered them in any  
19 manner. Moreover, as shown in the video, which shall be submitted as  
20 evidence, Plaintiff Carrington was under duress when he entered into the plea  
21 for the related perjury charge.  
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27 **IV. Fifth and Fourteenth Right to Due Process of Law**  
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12. The Fifth Amendment to the United States Constitution provides in part  
that "no person shall be... deprived of life, liberty, or property, without due

1 process of law....” U.S. Const. art. I, § 8, cl. 5. This is applied to the States  
2 through the Fourteenth Amendment. U.S. Const. art. XIV. This clause  
3 promises that before depriving a person of a property interest that person is  
4 given notice of the actions, and an opportunity to be heard. As a threshold  
5 issue, these interests may only be enforced from deprivation by a state actor.  
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7 Additionally, as shown in detail below, the Americans with Disabilities Act  
8 and further the Amendment Act, strengthen the spirit of the Due Process  
9 clause by calling for such access to be meaningful.  
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13 13. Plaintiff Carrington contends that he was not afforded a chance to bring  
14 forth evidence for his claims in the New York Suit, as the independent third-  
15 party verifications were not taken as truthful. Despite this evidence, including  
16 multiple witnesses who provided declarations to the court, Plaintiff  
17 Carrington was still denied Due Process to bring forth his claims and seek  
18 redress. This is the property right that is being deprived for Plaintiff.  
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22 14. Due Process requires that the procedures by which laws are applied must  
23 be evenhanded, so that individuals are not subjected to the arbitrary exercise  
24 of government power. This right is a “basic aspect of the duty of government  
25 to follow a fair process of decision making when it acts to deprive a person of  
26 his possessions. The purpose of this requirement is not only to ensure  
27 abstract fair play to the individual. Its purpose, more particularly, is to  
28 protect his use and possession of property from arbitrary encroachment....”

1 Thus, the notice of hearing and the opportunity to be heard “must be granted  
2 at a meaningful time and in a meaningful manner.” *See Armstrong v. Manzo*,  
3 380 U.S. 545, 552, (1965); *Tumey v. Ohio*, 273 U.S. 510 (1927); and *In re*  
4 *Murchison*, 349 U.S. 133 (1982).  
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7 15. Plaintiff Carrington was not afforded Due Process due to errors in the  
8 New York Suit, that took place ultimately led to him being accused of  
9 falsifying evidence despite independent verification. On February 7, 2019,  
10 Judge Failla, sitting over the New York Suit, agreed to dismiss the case  
11 without prejudice if Plaintiff was cleared of falsifying the emails in question,  
12 so that he could re-file his lawsuit in Los Angeles. Plaintiff Carrington agreed  
13 to dismiss his request for change of venue in exchange for allowing FTI to  
14 mirror image his iPhone and receive his email data from Google, GoDaddy  
15 and Office365, for at-issue-communications only. Judge Failla agreed that  
16 once this process was completed, if Plaintiff Carrington did not falsify  
17 emails, she would dismiss the case without prejudice, but if it was found that  
18 he did alter or delete email content, Judge Failla would grant sanctions. On  
19 February 13, 2019, a subpoena was issued to submit the information to the  
20 neutral third-party forensic expert, FTI.  
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27 16. Yet, amid this one-sided investigation, Google and GoDaddy released raw  
28 data reports to the Defendants attorney, Larry Stein rather than FTI, despite  
the subpoena order strictly stating provide the data to FTI. Google did submit

1 1/2 of Carrington's data reports to FTI, only after Carrington exchanged  
2 several emails with Google's legal department, who stated they were giving  
3 his data to Larry Stein rather than FTI. FTI eventually cleared 3/3 of Plaintiff  
4 Carrington's data reports of no wrongdoing after Carrington provided FTI the  
5 data illegally collected by Larry Stein, who provided the data to Variety and  
6 The Hollywood Reporter, in order for both publications to publish the  
7 sensitive data and claim a forensic expert discovered Carrington faked emails  
8 to back false rape accusations. The Defendants sought sanctions and, in their  
9 brief, filed their own falsified conclusions of the raw data to prevent  
10 Carrington from dismissing the New York case without prejudice as promised  
11 by Judge Failla. This is the crux of the issue, which caused Plaintiff  
12 Carrington to have perjury charges filed against him, as he named Judge  
13 Failla as a Defendant in the California Lawsuit. Carrington wishes to prove  
14 that he has not committed any falsehoods and be permitted to seek justice for  
15 his original claims.  
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23 17. Moreover, on September 11, 2020, almost a year after the original case  
24 ended, Judge Failla filed a permanent injunction against Plaintiff Carrington  
25 in the New York Suit, which barred him from further attempting to bring his  
26 claims. The injunction was granted after Judge Failla and the defendants  
27 learned they would be sued in Los Angeles federal court for the fraud  
28 committed in the New York case.

1 18. All parties were sued regardless as the permanent injunction was only  
2 granted by Judge Failla to prevent Carrington from exposing her bias conduct  
3 and fraud, consisting of her deleting the defendants' falsified documents from  
4 the docket within the same hour Carrington filed the authentic review of his  
5 raw data. Carrington's documents also exposed the defendants of disobeying  
6 the subpoena order and using their relationships with Variety and The  
7 Hollywood Reporter to defame him.  
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11 19. Judge Failla willingly violated federal procedure throughout the New York  
12 case, in order to protect the defendants, allowing Brian Graden to continue  
13 sexually abusing male minors of color.  
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16 20. Once the suit was filed in Los Angeles, Judge Failla and her co-  
17 defendants, including Larry Stein, Carrington's former attorney and sexual  
18 abuser, made threats toward Carrington and his attorney via court orders and  
19 emails to dismiss the case with prejudice or be jailed and his attorney fined  
20 \$500 per business day until the case was dismissed with prejudice.  
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23 21. Once Judge Failla helped herself and her co-defendants holding  
24 Carrington and his attorney in contempt for filing the California case, she set  
25 February 22, 2021 as the date for Carrington to self-surrender and for fines of  
26 \$500 per business day to begin accruing against his attorney if they did not  
27 dismiss the California case with prejudice by that date.  
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22. During the contempt hearing, Carrington's attorney raised his health

1 problems, which prevented him from going outside his home during Covid  
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3 19. Judge Failla swiftly requested Carrington's health records, which she  
4 ultimately used against Carrington in order to get him to dismiss his case  
5 against her and her co-defendants, denying his request for in-home  
6 incarceration.  
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9 23. Judge Failla ordered U.S. marshals to Carrington's home, and stated they  
10 could use necessary force to enter and arrest him, if he did not submit a  
11 dismissal with prejudice in the California case. Judge Failla's repeated threats  
12 caused Carrington to withdraw his California suit as his health would have  
13 turned fatal if contracted Covid 19. This is the crux of the case at hand, as  
14 Judge Failla was a named Defendant in this suit, and she ordered the  
15 permanent injunction, a year after dismissing the New York suit with  
16 prejudice (despite her prior agreement to dismiss without prejudice so that  
17 Plaintiff could refile), which was after she discounted FTI's independent  
18 investigation that showed his emails submitted as proof were not found to  
19 have been falsified. The cumulative effect of these events caused a  
20 deprivation of Plaintiff Carrington's rights as described above.  
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26 24. In civil cases, a balancing test is used to see if Due Process was infringed  
27 upon, that evaluates the government's chosen procedure with respect to the  
28 private interest affected, the risk of erroneous deprivation of that interest  
under the chosen procedure, and the government interest at stake. *See*

1 *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). Plaintiff Carrington is now  
2 facing a deprivation of his liberty through perjury charges due to the actions  
3 of the above-captioned Defendants. This is a serious private right, which the  
4 government chose procedure infringed upon and is still a looming issue that  
5 must be rectified. The chosen procedure grossly outweighs Plaintiff  
6 Carrington's freedom.  
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10 25. The Hollywood Reporter, Variety, and other publications stated Plaintiff  
11 pled guilty, as he faked emails that led to his arrest, however The Hollywood  
12 Reporter and Variety have known since becoming familiar with Carrington  
13 that his claims are authentic and here lies a Hollywood machine by the name  
14 of National Amusements, Inc., Paramount Global and Paramount Pictures,  
15 using their powerhouse attorneys and assets to obliterate a male victim who is  
16 courageous enough to reveal his sinister abuse, starting at the age of 17,  
17 inflicted by Sumner Redstone, Brian Graden, Brad Grey, Sumner Redstone,  
18 Harvey Weinstein and Larry Stein.  
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23 **V. Referenced Sexual Abuse from Carrington's Los Angeles Suit -**  
24 **Showing background into why the Defendants would commit**  
25 **fraud to conceal Carrington's claims.**

26 26. In the world of show business there are several executives who operate  
27 and control what is placed on the big and small screen until they are  
28 dethroned or deceased. These executives abuse power by forcing talent to  
comply with rules to gain remarkable success or become an entertainment

1 mogul. They include Sumner Redstone, Harvey Weinstein, Brad Grey, and  
2 Brian Graden. Rovier Carrington had the misfortune of involvement with all  
3 four moguls throughout a ten-year period while attempting to build his  
4 producing and screenwriting career.  
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7 27. Mr. Carrington became a chess piece in Redstone's board game company,  
8 National Amusements, Inc. Through National Amusements, Redstone  
9 controlled Viacom CBS, Paramount Pictures, MTV, Paramount Network,  
10 Brad Grey, Brian Graden, Harvey Weinstein and all actors, producers,  
11 directors and executives under the National Amusements umbrella. Redstone  
12 also controlled Carrington with strings that came with consistent instructions  
13 and limited movement outside of his control. Utilizing his controls, Redstone  
14 compelled Carrington into situations that resulted in sexual violence  
15 committed by himself, Grey, Graden, Weinstein, and others, which were later  
16 covered up with threats, physical force, and lawyers not afraid to commit  
17 fraud and defamation to silence a victim.  
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23 28. At the age of 16, Carrington formed a relationship with a variety of  
24 executives at Viacom (Paramount Global). Once Carrington, age 22, was  
25 introduced to Sumner Redstone, Redstone viewed Carrington as "boyfriend  
26 material" for his many executives to share for romance and creative ideas.  
27 Redstone was among the small number of Hollywood moguls who decide the  
28 next Hollywood Star. Redstone also chose the love interest for his executives.

1 Carrington was placed in the love interest category with potential to become  
2 a star due to his exotic appearance. Redstone, Weinstein, Grey and Graden  
3 continually told Carrington that his mixed features and skin tone afforded  
4 him the opportunity to make it in the entertainment business. They all  
5 demanded that Carrington never allow his skin tone to darken, as appearing  
6 “too black” would turn them off and end his career.  
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10 29. Brian Graden is known for the weekly sex parties at his Hollywood Hills  
11 home, which, Brad Grey and Sumner Redstone attended regularly until their  
12 recent deaths. These parties provide teenage boys, celebrity men, alcohol, and  
13 drugs to be shared amongst many seasoned executives and employees under  
14 Viacom CBS, Paramount, MTV, VH1, Logo and other sister companies. The  
15 parties are usually filmed to blackmail certain executives and employees, as  
16 well as the celebrities in attendance, so that favors are owed and control is  
17 provided to Graden and the higher-up executives at Viacom CBS, (Paramount  
18 Global).  
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23 30. Carrington was manipulated into sex parties hosted by Redstone,  
24 Weinstein, Grey and Graden for their entertainment and to own his freedom.  
25 In show business, people arrange compromising incidents, placing you at  
26 their mercy: Carrington was drugged, sexually abused, and recorded on film.  
27 He was told that if he were to disobey or become disloyal, the videos of his  
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1 sexual abuse would be released, ruining his image and opportunities in the  
2 business.  
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4 **Brian Graden in Summer 2006**

5 31. In late June or early July 2006, 17-year-old Rovier Carrington was  
6 recruited by several executives at Viacom CBS in Santa Monica, California,  
7 to film an episode of MTV's "Parental Control" & "Next." Carrington was  
8 introduced to Brian Graden, the President of Programming for MTV, VH1,  
9 CMT and later, LGBT channel, Logo. Graden asked Carrington his age, to  
10 which Carrington said 17. Graden told Carrington of his power at Viacom  
11 CBS, and invited Carrington to dinner at a restaurant to discuss opportunities  
12 with Viacom CBS. Carrington accepted Graden's offer, meeting him later that  
13 evening at his Hollywood Hills home.  
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18 32. Carrington arrived with friend who watched Graden greet Carrington as  
19 he welcomed him into his home alone. Graden initially discussed business  
20 with Carrington in his living room, prior to moving to personal information,  
21 such as Carrington's romantic affairs. Carrington stated he had a long-term  
22 girlfriend, as Graden disappeared into the kitchen to pour Carrington a  
23 cocktail, which Carrington did not realize was drug infused. Once Graden  
24 returned, he boasted of his development role in the TV series "South Park."  
25 Graden insisted that Carrington drink his cocktail. Apprehensive, Carrington  
26 began to drink. Graden came closer to Carrington after two sips. Graden  
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1 asked if Carrington still wanted dinner, but before Carrington could respond,  
2 Graden suggested they stay in. Carrington said he felt ill, as his body  
3 temperature rose, and his head began spinning. Carrington attempted to  
4 stand, but he couldn't maintain his balance. Carrington expressed his terrible  
5 state, but Graden ignored him and began French kissing Carrington.  
6 Carrington's vision became blurred as he fell onto the couch. Graden picked  
7 up Carrington's immobilized body and carried him into an upstairs bedroom,  
8 placing him onto the bed. Graden removed his clothing, sliding into bed with  
9 Carrington. Carrington repeated his horrible state and protested, but Graden  
10 began removing Carrington's clothes while saying, "You need air after  
11 drinking too much." Carrington said, "Stop." Graden's predatory conduct  
12 increased, as he double slapped Carrington's face "for denouncing him."  
13 Carrington began going in and out of consciousness. Graden whispered into  
14 Carrington's ear, "Other boys your age obey orders." Graden shoved his  
15 unprotected penis into Carrington's rectum several times. Carrington begged  
16 Graden to stop, however Graden continued the sexual abuse. Carrington yet  
17 again went in and out of consciousness, which infuriated Graden. Graden  
18 began slapping and choking Carrington, yelling "Wake up." "Enjoy daddy's  
19 raw cock." Graden filmed every moment of Carrington's traumatic first  
20 sexual encounter. Graden ejaculated inside Carrington's rectum before  
21 allowing him freedom to move. Carrington managed to crawl into Graden's  
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1 master bathroom, as Graden lay naked on the bed. Carrington discovered he  
2 suffered massive blood loss and damage to his rectum, requiring weeks to  
3 heal. Once Carrington emerged from the bathroom, Graden smiled and said,  
4 “You did great.” Graden grabbed Carrington’s clothes and said, “You should  
5 leave.” Graden told Carrington, “You’ll be a star, if you keep quiet about our  
6 encounter.” Graden kissed Carrington’s forehead and said, “This better stay  
7 between us.”  
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11 **October 2010 Paramount Pictures, Sumner Redstone**

12 33. Rovier Carrington created, produced, and starred in “The Life of a  
13 Trendsetter,” a reality show that Carrington uploaded to youtube.com on  
14 October 21, 2010, which caught the eye of Paramount’s Executive Producer  
15 and Casting Director, Reno Logan. Logan called the same day of the  
16 uploading, requesting that Carrington appear at Paramount the following day  
17 (Oct 22) to discuss signing the show.  
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21 34. Tony DiSanto, MTV’s President of Programming, also contacted  
22 Carrington about an offer to sign Trendsetter. Logan told Carrington that with  
23 his Executive Producer title at Paramount, he could be an asset to Carrington’s  
24 career. Logan shared ideas for Carrington to improve “The Life of a  
25 Trendsetter,” before moving forward with Tony DiSanto’s offer. Logan desired  
26 an Executive Producer title on the show, in addition to Executive Producing  
27 Carrington’s dark comedy “Inheritance,” which Carrington was building while  
28

1 on the reality show. Logan wanted Paramount to sign “Inheritance,” which  
2 would have been a crossover and lucrative deal. Logan presented Carrington to  
3 other executives at Paramount because, according to Logan, Carrington was  
4 “alluring and appeared underage.”  
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7 35. Logan utilized Carrington’s appearance and projects to book meetings with  
8 Sumner Redstone, now deceased. Redstone loved the idea of owning  
9 Carrington’s cutting-edge projects under Viacom CBS, which he felt would  
10 produce revenue in the millions for National Amusements, Inc.  
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13 36. Logan began sending Carrington to more executives, including Sumner  
14 Redstone, who called him “brilliant” and “adorable.” Redstone reviewed  
15 Carrington’s show content and demanded he get an office on the lot. On  
16 October 25, 2010, Redstone asked Carrington for a private meeting to discuss  
17 him “joining the family.” Logan pushed Carrington to meet with Redstone, as  
18 he could elevate both of their careers and “green light” production on  
19 Carrington’s shows. Logan didnt elaborate on what to expect but told  
20 Carrington to “obey Mr. Redstone.”  
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24 **October 27, 2010, Sumner Redstone at Paramount**  
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26 37. On or about October 27, 2010, Carrington was driven to Paramount by a  
27 personal town car sent by Redstone. Carrington’s manager and a friend  
28 followed in a separate car. Carrington arrived at Paramount to meet Redstone  
for a one-on-one business meeting, which occurred within Redstone’s town

1 car. Redstone's driver stood outside the car once Carrington entered the  
2 backseat with Redstone. Redstone inquired about Carrington's loyalty.  
3 Redstone said loyalty is rewarded with green lighting projects and if  
4 Carrington wanted to be rewarded, he should be in concurrence. Carrington  
5 told Redstone loyalty is fine, if Redstone didn't allow his executives to  
6 sexually assault him, such as Brian Graden raping him when he was a minor.  
7 Redstone stated that Graden was lucrative to him, he supports everything  
8 Graden does, and Carrington should too, if he were to "join the family."  
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10 38. Redstone asked: "Was Brian [Graden] your first?" and "How old were  
11 you?" Carrington said: "Yes. 17." Redstone said: "You still appear 17. Don't  
12 tell people otherwise." Redstone asked: "How good was the sex?" and "Did  
13 Brian leave a gift in you?" Carrington attempted to exit the car as he was  
14 uncomfortable, but the child lock prevented him. Redstone: "Not so fast."  
15 Redstone grabbed Carrington's face and said harshly: "Don't disrespect me."  
16 Redstone began to massage Carrington's thighs and undo his belt and jeans.  
17 Carrington asked Redstone not to touch him. Redstone slapped Carrington's  
18 mouth and said, "Relax." Redstone pulled Carrington's pants and briefs below  
19 his knees, grabbing Carrington's penis with his rough and cold hands.  
20 Carrington declined Redstone, but he continued massaging his penis and  
21 testicles. Redstone spat on Carrington penis several times. Redstone said  
22 Carrington had "A perfect Jewish dick." Redstone continued massaging  
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1 Carrington while demanding: Carrington would meet someone very important  
2 soon and he better obey all orders and remain loyal to him, or else. Once  
3 Redstone finished assaulting Carrington, he alerted his driver to unlock the  
4 door. Redstone smiled at Carrington and said, “Loyalty,” as Carrington walked  
5 away fixing his pants. Carrington walked into the arms of his manager and a  
6 friend as they stood nearby.  
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10 **November 2010 Reno Logan**

11 39. Carrington and a friend had a meeting with Logan inside his Paramount  
12 office to discuss Carrington’s reality show. Logan requested Carrington  
13 audition for his upcoming film. Carrington was asked to pretend to be dead, as  
14 Logan pretended to shoot him with a gun. The next audition process involved  
15 Carrington flirting with Logan. Logan requested Carrington have a few shots  
16 of liquor to get ‘more involved in the scene.’ Carrington began drinking.  
17 Logan mentioned that Redstone was happy with Carrington. Logan began  
18 massaging his own penis while saying Carrington should cast Logan’s son in  
19 his reality show, and possibly date him. Logan asked if Carrington was good at  
20 “sucking dick,” and if he could handle his “long and thick dick,” which he  
21 pulled through his jeans. Logan walked towards Carrington and hugged him  
22 from behind, rubbing his penis against Carrington’s anus. Logan laughed off  
23 his assault, as Carrington pulled away. Logan demanded Carrington make him  
24 a lot of money with his projects, and insisted Carrington meet with Redstone  
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1 for instructions on how to please a known actor, who had arrived on the lot in a  
2 red Ferrari.  
3

4 **November 23, 2010, Sumner Redstone MTV/Viacom Contract**

5 40. On or about November 23, 2010, Sumner Redstone signed an  
6 entertainment contract with Carrington for Viacom to produce Carrington's  
7 "The Life of a Trendsetter" with MTV, on condition Carrington gave Redstone  
8 creative control of the cast and a percentage of Carrington's dark comedy  
9 "Inheritance." Redstone agreed to allow Carrington to film his reality show on  
10 the Paramount lot, but demanded that Carrington obey his "daily rules," and  
11 only work with producers Redstone approved.  
12  
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14

15 **December 2010 Brad Grey (Deceased)**

16  
17 41. Carrington was introduced to Brad Grey (deceased), Chairman/CEO of  
18 Paramount Pictures, at Paramount by Sumner Redstone, who demanded  
19 Carrington obey Grey's demands. Grey said he loved fashionable people who  
20 commanded a room as Carrington did. Grey explained his current relationship  
21 with Cassandra was for appearances, as they were both gay. Grey became  
22 overly touchy with Carrington on the lot, despite Carrington's decline. Grey  
23 and Carrington had dinner at the Polo Lounge the same evening. Grey drove  
24 Carrington home and while sitting in front of his place, Grey began forcefully  
25 kissing Carrington. Carrington was highly uncomfortable, but decided to go  
26 along after Grey threatened to tell Redstone he wasn't willing to "play the  
27  
28

1 game.” Grey told Carrington that he could make or break his career, depending  
2 on his “participation.” Grey played Usher’s music and pulled out a cigar. Grey  
3 demonstrated with his lips on the cigar what he wanted to do to Carrington.  
4 Grey pulled Carrington’s jeans down. Grey kept repeating how good  
5 Carrington’s “Jewish dick” tasted. Grey begged Carrington to climax in his  
6 mouth or else he wouldn’t let him back on Paramount’s lot. Carrington  
7 complied.  
8  
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10

11 **December 2010 “The Fighter” Premiere Grauman’s Theater**

12 42. Carrington arrived with two friends. Carrington was introduced to Mark  
13 Wahlberg, who was always respectful, and assaulted by Redstone. Redstone  
14 asked Grey if Carrington was obeying? Grey relayed he was indeed.  
15 Carrington told Redstone; Grey forced oral sex. Redstone laughed and stated,  
16 “As he should.” “You better learn to like it, if you want your projects greenlit.”  
17 Redstone grabbed Carrington’s anus, pulling him from behind and wrapping  
18 his blazer around Carrington. Redstone said he wanted to watch Grey “fuck”  
19 Carrington inside his home, and it should be arranged before Grey left for New  
20 York.  
21  
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26 **January 13, 2011, Brad Grey Management and Development Contract**

27 43. Brad Grey signed a management and development contract for Paramount  
28 Pictures with Carrington on or about January 13, 2011. Grey agreed to manage  
Carrington’s career and appear with Carrington in his reality show “The Life

1 of a Trendsetter,” as the executive producer of Carrington’s dark comedy  
2 “Inheritance.” The reality show would capture the casting, development, and  
3 filming of “Inheritance” at Paramount.  
4

5 **January 16, 2011, Golden Globe Awards (Beverly Hilton)**  
6

7 44. Grey requested Carrington’s attendance at the Golden Globes. Carrington  
8 arrived with his two friends and his manager. Grey introduced Carrington to  
9 Chairman and CEO of HBO, Richard Plepler and Cassandra Grey. Grey  
10 requested he and Carrington discuss business in a suite upstairs. Grey’s  
11 conduct instantly became aggressive once inside the room. Grey held a cigar  
12 and bottle of tequila. There was no mention of business. Grey pushed  
13 Carrington onto the floor and held him down while pouring tequila down his  
14 throat. Grey pulled his pants and underwear down before pulling down  
15 Carrington’s. Grey shoved his penis in Carrington’s face, as he poured more  
16 tequila down his throat. Grey constantly repeated how good their “Jewish  
17 bodies felt on one another.” Carrington yelled for Grey to stop, however, Grey  
18 demanded Carrington show him respect, if he wanted to continue at Paramount  
19 Pictures. Carrington yelled for his manager and friend to help him, as they  
20 were outside the room. Grey started hitting Carrington in the face and chest to  
21 shut him up. Grey turned Carrington onto his stomach and banged his head  
22 into the floor to weaken him, as he slid his unprotected penis inside  
23 Carrington’s anus. Grey brutally raped Carrington for 10-15 minutes. Grey  
24  
25  
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1 placed Carrington onto the bed while he was immobilized and bloody. Grey  
2 placed Carrington's legs over his shoulders before ejaculating inside him. Grey  
3 told Carrington he loved him but needed him to remain silent about their  
4 growing relationship, as his public relationship to his fiancé, Cassandra, meant  
5 a lot for his image as a straight man.  
6  
7

8 **January 17, 2011, Reno Logan and Sumner Redstone**  
9

10 45. Carrington told Logan in detail about Grey raping him, however, Logan  
11 didn't care and told Carrington, he should be glad Brad Grey chose him.  
12 Redstone told Carrington he wasn't "loyal" by continuing to complain about  
13 rape. Redstone said if Carrington didn't start playing along, he would blacklist  
14 Carrington.  
15  
16

17 ///

18 **January 30, 2011, Screen Actors Guild Awards**  
19

20 46. Grey introduced Carrington to Harvey Weinstein on January 30, 2011, at  
21 the Screen Actors Guild Awards. Grey told Weinstein that Carrington was a  
22 new addition to the Paramount family. Grey said Weinstein could be a massive  
23 asset to Carrington's career, given he helped Grey commence his own career.  
24 Grey suggested they all work together on Carrington's dark comedy  
25 "Inheritance."  
26  
27

28 47. February 7, 2011, Audi and Weinstein party at Chateau Marmot. On  
February 7, 2011, Carrington attended a party at Chateau Marmot hosted by

1 Audi and Weinstein. Harvey Weinstein asked Carrington to meet him in a  
2 private section. Weinstein pinned Carrington in a corner with Carrington's  
3 friends nearby. Weinstein told Carrington: "I want what Brad raves about."  
4 Weinstein called Carrington a "Lenny Kravitz look-alike" and said he would  
5 "have my way with" Carrington later that evening. Carrington avoided further  
6 contact with Weinstein that evening and left before any unwanted approaches.  
7  
8

9  
10 **February 14, 2011, Sumner Redstone**

11 48. Redstone demanded Carrington meet him outside his Beverly Park Estate  
12 and ride with him to an invite, however they met on Sunset Blvd. Redstone  
13 told Carrington to wear business casual clothing as they were attending an  
14 event. Redstone's driver opened the backdoor for Carrington to sit with  
15 Redstone. Redstone's face was bleeding on one side, which he kept wiping.  
16 Redstone's finger was cut with a band-aid halfway on. Redstone forced  
17 Carrington to apply a new band-aid to his cut finger while Redstone massaged  
18 his own chest with his other hand. Carrington was nervous, as he was unaware  
19 of Redstone's mental state. Redstone grabbed Carrington and told him to relax.  
20  
21

22 49. Redstone's driver started to drive faster. Carrington was told to continue  
23 seeing Grey, as Grey was in love with him. Carrington complained about Grey  
24 raping him the month prior. Redstone told Carrington to shut up. Redstone said  
25 Grey and Harvey Weinstein were going to produce his dark comedy  
26 "Inheritance," and he should thank him. Carrington thanked Redstone, but  
27  
28

1 Redstone wanted an “oral thank you.” Redstone kissed Carrington’s lips and  
2 demanded Carrington kiss his penis. Carrington could not exit the situation, as  
3 the car was in motion. Once Carrington kissed Redstone’s penis, Redstone told  
4 Carrington, “You’re welcome.” Redstone’s driver pulled over and released  
5 Carrington from the car.  
6  
7

8 **February 25, 2011, Tom Ford Grand Opening Rodeo Drive**  
9

10 50. Grey instructed Carrington to meet a “business connection” at the Luxe  
11 hotel next door to discuss “Inheritance.” Harvey Weinstein appeared at the bar  
12 with a room key. Weinstein demanded they go upstairs to discuss the show, as  
13 he gripped Carrington’s shoulder with his hand, while rubbing his erect penis  
14 into Carrington’s back. Carrington refused to do anything with Weinstein.  
15 Weinstein screamed, “Get your ass up.” Weinstein pulled Carrington from his  
16 chair, while his manager was present. Weinstein said Redstone and Grey would  
17 hear about his refusal. Weinstein called Carrington a “Stupid fucking bitch  
18 who’s going to be sorry.” Grey scolded Carrington in front of his fiancé  
19 Cassandra for declining Weinstein.  
20  
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24 **February 27, 2011, Vanity Fair party**  
25

26 51. Carrington and his friends encountered Sumner Redstone and his grandson.  
27 Redstone expressed Carrington’s sexual declines to Grey and Weinstein were  
28 keeping him from succeeding. Redstone threatened to have Carrington  
psychically harmed by a “fixer” if he continued discussing being assaulted by

1 himself and Grey. Redstone said he and others could touch Carrington  
2 whenever the fuck they wanted. Redstone proceeded to spit in Carrington's  
3 face and threatened to blacklist and sue him if he didn't "alter his thinking."  
4

5  
6 **February 2011 Tony DiSanto**

7 52. Tony DiSanto, MTV's President of Programming after Brian Graden's exit,  
8 offered Carrington a recurring role on a new series set to film in Atlanta  
9 entitled "Teen Wolf." DiSanto Executive Produced the series and attempted to  
10 purchase Carrington's silence after DiSanto came onto him. DiSanto expressed  
11 his friendship with Brian Graden and how they shared young men in the past,  
12 but DiSanto stopped engaging after becoming a family man. DiSanto said, he  
13 wishes he could have shared Carrington with Graden or now if possible.  
14 DiSanto apologized for his behavior and began making phone calls to the head  
15 casting director to arrange further movement for Teen Wolf, but Carrington  
16 refused the role to remain in Los Angeles for his reality show and dark  
17 comedy.  
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23 **March 2011 Shari Redstone**

24 53. Carrington spoke with Shari Redstone to discuss her father, Sumner  
25 Redstone, Brad Grey and Harvey Weinstein sexually assaulting him. Shari  
26 Redstone promised Carrington the sexual assaults would end and thanked him  
27 for telling her. However, they did not end.  
28

**April 2011 Brad Grey and Sumner Redstone**

1 54. Carrington met with Grey and Redstone at Grey's Holmby Hills estate in  
2 the late morning, just days before Grey's wedding to Cassandra. During the  
3 meeting, Redstone and Grey told Carrington that a "business meeting" had  
4 been set up at the Peninsula Hotel in the afternoon with Harvey Weinstein, who  
5 was in town for his movie premiere, "Hoodwinked Too!" saying, "Harvey  
6 agreed to sign onto 'Inheritance' as an executive producer." Redstone said: "If  
7 you want to be taken seriously as a screenwriter, having Grey and Weinstein  
8 attached would solidify your career." They told him that Harvey would have an  
9 actress there that he was thinking of casting in the production, so the meeting  
10 would be strictly professional. They told Carrington not to leave the meeting  
11 until Weinstein had officially signed on.  
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17 55. Grey then served Carrington a spiked cocktail and insisted that he drink  
18 before sex with them. Grey said their threesome with Redstone would be "your  
19 wedding gift to me and Cassandra." Carrington refused. Grey struck  
20 Carrington in the chest, knocking the wind out of him. Redstone reminded  
21 Carrington that he would have his "fixers" beat him to a pulp if he did not  
22 behave. Redstone then demanded that Carrington strip, while both men  
23 removed their clothing. Once they were nude, Redstone sat in a chair and  
24 required Carrington sit on his lap. Redstone placed his tongue down  
25 Carrington's throat while rubbing Carrington's body in order to gain an  
26 erection. Once Redstone was erect, Grey rubbed lube onto Redstone's penis.  
27  
28

1 Redstone asked Grey to choke Carrington's neck while Redstone inserted his  
2 unprotected penis into Carrington's anus. Redstone directed Grey to  
3 masturbate while he watched him rape Carrington. Redstone asked Carrington,  
4 "Do you love being raped?" continuing: "Rape is just sex;" "You love sex;"  
5 "You love rape;" "It's all the same." After several minutes of Redstone forcing  
6 Carrington to ride his penis while facing him, Grey repositioned Carrington's  
7 body to face the opposite direction while Redstone's penis remained inside  
8 Carrington's anus. Grey French kissed Carrington before forcing Carrington's  
9 head to perform oral sex on Grey. Grey became more aggressive, insisting  
10 Redstone "cum inside his ass before I shove my dick in there." Redstone  
11 proceeded to climax inside of Carrington's anus while Carrington performed  
12 oral sex on Grey. Grey pulled Carrington's bottom off Redstone's penis before  
13 placing his penis inside of Carrington anus while standing up. Redstone sat  
14 back in the chair, holding Carrington's legs up while Grey positioned himself  
15 in and out of Carrington's anus. Grey began French kissing Carrington while  
16 raping him. Redstone cheered Grey on until Grey climaxed inside of  
17 Carrington's anus and then moved into Carrington's mouth to finish. Grey  
18 said: "Swallow my cum, so you remember who owns you." Redstone  
19 commented calmly: "Loyalty." Once they allowed Carrington to leave, they  
20 told him to go to the Peninsula Hotel and wait at the hotel bar until Weinstein  
21 arrived.  
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**April 2011 Peninsula Hotel, Harvey Weinstein**

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2  
3 56. Shortly thereafter, Weinstein’s female assistant took Carrington to a suite  
4 upstairs. Carrington had his manager come up with them and stand outside the  
5 room. Weinstein welcomed Carrington into the room where an unknown  
6 actress lounged. Within minutes of standing in the living room, Weinstein  
7 offered Carrington a drink as the actress pulled out cocaine. Weinstein instantly  
8 removed his pants, despite Carrington saying the meeting was not supposed to  
9 be inappropriate. Weinstein demanded the actress and Carrington snort lines  
10 from his erect penis before sucking it. Weinstein jerked his penis in between  
11 lines being snorted from his penis by the actress. Weinstein yelled, “Suck it.”  
12 Carrington refused. Weinstein became angry, pulling Carrington down by his  
13 long hair, forcing Carrington onto his knees. Weinstein held Carrington’s hair  
14 in his hand while pushing Carrington’s mouth into his cocaine-covered penis,  
15 which displayed blood. Weinstein repeated “Do as you’re told, you know the  
16 rules.” Weinstein pointed to contracts and said we’d discuss business after he  
17 came. Weinstein released Carrington’s hair from his hand after several minutes  
18 of forced oral sex. Weinstein and the actress disappeared into the bathroom.  
19 Carrington became lightheaded and sick due to the cocaine. Carrington entered  
20 the next room to lie on the bed in the fetal position, which helped decrease the  
21 pain. Carrington hoped Weinstein would have sympathy for his pain and focus  
22 on business, as he was not to leave until Weinstein signed onto “Inheritance.”  
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1 57. Weinstein emerged from the bathroom bare; he aggressively turned  
2 Carrington onto his back with his knees pointed up. Weinstein got on top of  
3 Carrington with an erect penis and lied in between his legs with his penis  
4 rubbing against Carrington's anus. Weinstein kissed and licked Carrington's  
5 face and lips. Weinstein lifted himself, as he held Carrington down with one  
6 hand. The actress assisted Weinstein in removing Carrington's drivers and  
7 pants. Carrington couldn't remove Weinstein's heavy hand to prevent his  
8 actions, so he shouted for them to stop. The actress removed Carrington's  
9 briefs to his ankles. Weinstein lay back in between Carrington's legs as his  
10 knees were pointed up. Carrington tried pushing Weinstein off, but his weight  
11 overpowered him. Carrington begged Weinstein to stop multiple times.  
12 Weinstein said, "After I cum, boy." Weinstein ripped Carrington's briefs from  
13 his ankles and began licking his fingers as he repeatedly placed them inside  
14 Carrington's anus.  
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21 58. Weinstein spat on his unprotected erect penis before impelling Carrington's  
22 anus. Carrington screamed through the pain while trying to wiggle from under  
23 him, as Weinstein ripped tissue while going in and out. Weinstein became more  
24 aggressive and livider with Carrington, wishing he'd enjoy the rape. Weinstein  
25 kept telling Carrington how good he felt. Weinstein finally ejaculated inside  
26 Carrington, which weakened him and allowed Carrington to wriggle away.  
27 Carrington grabbed his clothes and ran out of the hotel despite Weinstein  
28

1 saying he'd ruin his career. Weinstein followed Carrington while bare,  
2 screaming, "You're fucked." "I'm an important man." Carrington complained  
3 to Brad Grey and Sumner Redstone, but they didn't help. Carrington  
4 complained to Reno Logan, but he told Carrington to remain silent yet again.  
5  
6

7 **May 5, 2011, Beverly Wilshire Hotel Grey, and Tom Cruise**

8 59. Newly married Grey introduced Carrington to Tom Cruise and his family.  
9 Cassandra Grey was intoxicated while speaking to Carrington about her  
10 husband's love affair with Carrington. Tom Cruise inserted himself into the  
11 conversation and asked Carrington for a threesome with Grey later that  
12 evening. Cruise said, "I heard how tight and warm your ass is." Cruise pulled  
13 Grey closer and whispered to Carrington, "I want to fuck you with both our  
14 dicks inside you at the same time." Grey offered to host the threesome that  
15 evening as a gift to Tom Cruise for his special day, but Carrington managed to  
16 bow out that evening.  
17  
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21 **June 8, 2011, Regency Village Theater "Super 8" premiere**

22 60. Grey pushed Carrington against the bathroom wall, kissing his face and  
23 lips while begging him to be his boyfriend. Grey offered Carrington trips  
24 around the world on the jet and shopping after visiting countless museums, but  
25 Carrington declined and relayed, he wasn't interested and only wanted his  
26 shows produced. Grey became angry, mentioning their shared gatherings with  
27 several known actors, producers, and directors, but Carrington declined him  
28

1 again. Grey grabbed Carrington's penis, licked his face, and stated, "You'll  
2 never work again." "You don't listen." "I have you by the balls." Grey pushed  
3 Carrington to the floor in front of Carrington's manager and the Vice Chairman  
4 of Paramount, Rob Moore.  
5

6  
7 **July and August 2011**

8 61. During July and August 2011 Grey and Redstone appeared separately a few  
9 times at Carrington's condominium in the Hollywood Hills, demanding that  
10 Carrington sign a Non-Disclosure Agreement ("NDA") and delete the emails  
11 and text regarding their sexual abuse. Carrington declined each time.  
12

13  
14 **October 3, 2011 "Footloose" Premiere at Regency Village Theater**

15 62. Carrington and friends encountered Redstone and Grey at the Premiere of  
16 "Footloose" at the Regency Village Theater on October 3, 2011. In the  
17 presence of Grey and Carrington's friends, Redstone offered Carrington \$30  
18 Million as a settlement for the "rape," but told Carrington he could not pursue  
19 a career in entertainment if he were to accept. Carrington declined, causing  
20 contention between himself, Redstone, and Grey. Redstone threatened to sue  
21 Carrington, as he was still under contract. Grey threatened to ruin Carrington's  
22 life with the assistance of the "fixers" on payroll at Paramount. Redstone  
23 chimed in, "You're not fully white," "No one will believe you," and in a long-  
24 drawn-out comment: "Black... listed." Carrington soon discovered that his  
25 career had been blacklisted from all National Amusements, Inc. owned  
26  
27  
28

1 companies as well as other major studios.

2  
3 **June - July 2014 HBO**

4 63. In June and July of 2014, Michael Lombardo, the President of  
5 Programming at HBO, fell in love with Carrington's dark comedy  
6 "Inheritance." Lombardo told Carrington he loved his writing and storytelling  
7 style and wanted to make an offer to sign the series. After two months of  
8 promises, Lombardo told Carrington that he would not move forward with the  
9 offer because of Sumner Redstone and Brad Grey, who used their power to  
10 prevent the deal. Grey held major influence at HBO, Executive Producing such  
11 shows as "The Sopranos" and "Real Time with Bill Maher" for HBO.  
12  
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15  
16 **August 2014 - Brian Graden**

17 64. Brian Graden reemerged into Carrington's life after reaching out to  
18 apologize for sexually abusing him while he was a minor. Graden pleaded for  
19 Carrington's forgiveness and promised to Executive Produce Carrington's  
20 reality show "The Life of a Trendsetter," if Carrington were to depart his  
21 current working relationship with two prominent Producers and his affluent  
22 and well-known cast. Carrington expressed Sumner Redstone and Brad Grey  
23 held him on the National Amusements, Inc. blacklist and ruined his working  
24 relationship with HBO, by which Graden promised to help remove Carrington  
25 from Redstone's blacklist. Graden persuaded Carrington to allow him full  
26 control of his career and become his "additional boyfriend," as Photographer  
27  
28

1 Ted Sun was the first. Graden explained that Ted Sun arranged and filmed their  
2 sex parties at Graden's Hollywood Hills home, but Graden didn't have an  
3 emotional connection with Sun, which he said he desired with Carrington.  
4

5 65. Graden found Carrington to be intelligent, fashionable, and compassionate,  
6 which caused Graden to fall in love. Graden and Carrington entered a two-year  
7 personal and business relationship, ending in the summer of 2016 after  
8 Carrington realized Graden stole his reality show concept "Finding Prince  
9 Charming" and sold it to Logo Network.  
10  
11

12  
13 **October 1, 2014, Brian Graden's Hollywood Hills home**

14 66. Graden insisted he and Carrington discuss business by the pool with  
15 cocktails. Graden announced an offer he received to be the President of  
16 Programming for the Discovery Channel. Graden expressed his excitement for  
17 the offer and for Carrington's new reality show with Lawrence Fishburne's  
18 daughter, Montana Fishburne.  
19

20  
21 67. Graden suggested they continue talking inside the pool. Carrington entered  
22 the pool with swimwear, Graden followed bare. Carrington expressed his  
23 reality show ideas with Graden until two older bare men exited the guesthouse.  
24 Carrington inquired who the men were, but Graden exited the pool to prepare  
25 new cocktails. Graden returned and insisted Carrington drink the cocktail  
26 before they entered the guesthouse alone. Unbeknownst to Carrington, the  
27 cocktail was laced with drugs, causing Carrington to feel highly sexual and  
28

1 lightheaded. Carrington became numb while on the bed with Graden. Graden  
2 expressed his love for Carrington as he removed his swimwear. Graden  
3 conducted multiple sex acts before entering Carrington's rectum unprotected.  
4 Graden ejaculated inside of Carrington's rectum without permission. Graden  
5 allowed the bare men to enter the guesthouse with a camera. Carrington was  
6 impaired due to the laced drink but was able to beg the men to stop. Both men  
7 ignored Carrington's request and took turns inside his rectum unprotected,  
8 despite his continuous protests. Graden filmed the encounter while both men  
9 "double penetrated" Carrington's rectum at once (one from behind the victim  
10 and one from below), an extremely painful experience. Graden demanded that  
11 if Carrington wishes for him to continue with his offer to produce his dark  
12 comedy and reality show, Carrington should accept all his fantasies. Both men  
13 then ejaculated inside of Carrington. Graden told Carrington "Loved every  
14 time, but this was the best."  
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21 **April 22, 2015, Contract signing with Graden**

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23 68. Late in the afternoon of April 22, 2015, Carrington met with Graden alone  
24 at the Mondrian Hotel in West Hollywood. At this meeting, Graden started out  
25 with cocktails which had been prepared prior to Carrington's arrival, assuredly  
26 with GHB. After a drink, Graden presented two contracts to Carrington,  
27 explained to Carrington what they (presumably) meant. Carrington did not  
28 fully read them. He told Carrington that one was with Brian Graden Media to

1 produce Carrington’s reality show and his dark comedy, and the other was a  
2 Non-Disclosure Agreement (“NDA”) which Graden required before he would  
3 sign the production contract. He explained that as a condition, the production  
4 contract required full control of Carrington’s career and his email passwords.  
5 The NDA covered Graden’s underage sex with Carrington and all other sexual  
6 contacts with Viacom CBS personnel. The contracts were fully executed, and  
7 Carrington gave Graden his password.  
8

9  
10  
11 69. Graden immediately went into Carrington’s cell phone and deleted all  
12 emails implicating Sumner Redstone, Brad Grey, and Harvey Weinstein, as  
13 they required to remove him from the Blacklist. Thereafter, Graden plied  
14 Carrington with another cocktail and said: “Leave me with something to  
15 remember, since you’re going to Palm Beach tonight,” followed by his usual  
16 sexual abuse. Upon leaving the meeting, Carrington did not receive copies of  
17 the contracts. In fact, he never received copies.  
18  
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21  
22 **June 6, 2015, Brian Graden’s house**

23 70. Graden prepared cocktails while demanding that Carrington’s publicists  
24 build his image for Carrington to star in “Finding Prince Charming.” The  
25 business discussion turned into sex. During sex, Carrington felt his heartbeat  
26 and body temperature increasing. Carrington expressed he felt he was dying  
27 and wanted to call an ambulance. Carrington exited the bed, searching for his  
28 iPhone. Graden took Carrington’s iPhone, refusing his call for help.

1 71. Graden placed Carrington inside the shower, as he stood inside with him.  
2 Carrington lay on the floor with hard pressure water constantly covering him.  
3 Graden began having sex with Carrington, but Carrington could not endure the  
4 intercourse. Graden became aggressive, telling Carrington to leave, as he  
5 didn't want him to "die in his home." Graden begged Carrington not to see a  
6 doctor if he wanted Graden to proceed with producing his finding love reality  
7 show. Graden said the following to Carrington that night:  
8  
9

11 "I drugged you to increase the sex."

12 "Papi wanted his Prince to take his dick all night."

13 "Please don't call 911. I can get into trouble if you say I drugged  
14 you."

15 "I have shows airing right now. You won't get a show if you tell."

16 "Don't ruin daddy. You love Daddy right?"

17 "You're Daddy's good nigga right?"

18 "I love you my Prince."

19 Once the drugging wore off, Graden said, "Glad you feel better."

20 ///

21 **June 2015 Brian Graden's house**

22 72. Graden held a party at his home, which Carrington arrived at with three  
23 friends. The party was advertised as an entertainment party, but Carrington  
24 discovered it was a sex gathering with underage boys and several Executives  
25 under Viacom CBS. After seeing Graden and several underage boys,  
26 Carrington attempted to leave. However, Graden became argumentative and  
27 abusive. Graden slapped and choked Carrington in front of his friends. Graden  
28 told Carrington if he shared witnessing Graden and several know figures

1 performing sex acts with the boys, Graden wouldn't produce his shows, despite  
2 the recently signed contracts. Carrington was told, "He'd be blacklisted again,  
3 and Sumner Redstone would make it permanent this time."

4  
5 **June 2016 Brian Graden's house**  
6

7 73. Graden apologized to Carrington for all the physical and sexual abuse he  
8 committed, as well as several men employed by Graden who inflicted indelible  
9 scars onto Carrington. Graden expressed his distaste for the Redstones, as he  
10 wished to get out of their working relationship to focus on his unrevealed  
11 music career. Graden ripped up Carrington's NDA and business contract and  
12 threw them away, freeing Carrington to sign and produce shows with other  
13 studios. Graden said he signed a new reality show with Logo Network thanks  
14 to the "new rhythm" Carrington provided him, but he couldn't go into details,  
15 other than Logo's hesitation about Graden's escort, Robert Sepulveda Jr.,  
16 starring in the show. Graden said Logo's executives knew Graden and his other  
17 boyfriend, Ted Sun, participated in filmed sex with Robert, causing their fear  
18 of a scandal and lawsuit. Graden said a famous figure would also be joining the  
19 show.  
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26 74. Carrington went through Graden's iPhone and MacBook Air to get details  
27 about the show and discovered videos of his sexual assaults, from the time he  
28 was underage until recently, as well as other young men. Carrington demanded  
that Graden erase the videos, but he refused. The videos pictured Graden and

1 other executives participating in the acts of sex, including Graden's attorney,  
2 Larry Stein. Stein kissed Carrington and committed anal intercourse (penile  
3 penetration into Carrington in both the missionary position and 'doggie style,')  
4 and with other teenage boys, all while the victims were unconscious. Graden  
5 threatened to show the videos of Carrington to other Executives if he  
6 mentioned the video collection or tried writing about their relationship on his  
7 website "TheCarringtonDiaries.com" or inside one of his screenplays.  
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11 **November 6, 2016 Brad Grey**

12 75. Brad and Cassandra Grey approached Carrington and his friend at "Dan  
13 Tana's" in West Hollywood, CA. Grey asked how Carrington's career was  
14 going after Grey had seen him on red carpets and in interviews promoting his  
15 website, "TheCarringtonDiaries.com." Grey demanded Carrington come back  
16 into his life and leave Graden if he wanted things to be easier for himself. Grey  
17 grabbed at Carrington's penis and relayed, "I miss our Jewish bodies rubbing  
18 against each other." Grey suggested Carrington join him in China for the  
19 premiere of Paramount's new film "Allied," as Cassandra wouldn't be  
20 attending. Carrington told him: "Fuck off. I haven't forgotten how you raped  
21 me and blacklisted my career." Grey relayed, "Your career won't succeed  
22 without me or Paramount fucking you. Fuck your career." "No one with a  
23 name will touch you, but you know that from experience." Grey laughed about  
24 Graden producing "Finding Prince Charming" without Carrington as the star.  
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1 Grey shared, “Brian shared videos of him fucking you,” “I came while  
2 watching every video.”  
3

4 **November 6, 2016: The Polo Lounge**

5 76. Carrington had dinner with friends after his encounter with Brad Grey.  
6 Grey’s close friend, Bob Saget, arrived with John Mayer and another  
7 gentleman and sat right next to Carrington’s booth. Saget made derogatory  
8 remarks to Carrington, causing Carrington to excuse himself from the table.  
9 Saget then followed Carrington into the restroom, calling him a “whore” and  
10 “cocksucker,” saying, “You like sucking cock, right? Suck mine. I know you  
11 do it well.” He cornered Carrington, pushing him onto the sink, and said,  
12 “Treat me like Brad.” When someone entered the restroom, Saget left.  
13 Carrington returned to his table and had to tolerate Saget continuing derogatory  
14 comments until John Mayer told him to stop.  
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20 **June 2016: Graden Steals Carrington Shows**

21 77. In June 2016, Graden signed “Finding Prince Charming,” whereby Logo  
22 Network agreed to premiere the show on their network, with Graden as the  
23 creator and Executive Producer. Graden stole the show from Carrington.  
24 Promotion for the show came out in July 2016. Finally, after a year of not  
25 talking to Graden, in August 2017, Carrington confronted Graden for stealing  
26 “Finding Prince Charming.” Graden admitted that he stole it and gave the  
27 starring role to his escort, Robert Sepúlveda, Jr. Graden’s attorney, Larry Stein  
28

1 assisted Graden in concealing his admission, in exchange for Graden’s offer to  
2 Executive Produce Carrington’s new dark comedy “Heiristocracy.” Graden  
3 allowed Carrington creative control and gave him permission to include other  
4 known Producers, like Darren Stein, who saw it as an opportunity to work with  
5 Graden.  
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8 78. In September 2017 Graden read “Heiristocracy’s” pilot and discovered  
9 Carrington had detailed his underage relationship with Graden, in addition to  
10 the sexual abuse Carrington suffered from Brad Grey, Harvey Weinstein and  
11 Sumner Redstone. Graden punched Carrington in the face multiple times and  
12 threatened to blacklist the show and compelled Darren Stein to decline his  
13 Producer offer.  
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17 79. In October 2017 Darren Stein removed himself from “Heiristocracy” via  
18 email, after Brian Graden’s influence. Within two minutes, Stein sent a follow-  
19 up email with the exact context minus Brian Graden’s name. Stein had initially  
20 agreed to be attached to “Heiristocracy”  
21  
22

23 **November 2017 Variety**

24 80. Carrington’s publicist reached out to Executive Editor Debra Birnbaum  
25 regarding Brian Graden’s toxic and inappropriate relationship with Carrington.  
26 Birnbaum and Carrington discussed Graden drugging, raping and physically  
27 abusing Carrington over a 10-year span. Birnbaum learned Graden used  
28 physical force and blacklisting threats to keep Carrington silent about it.

1 Birnbaum spoke with eight witnesses and gathered evidence from Carrington,  
2 confirming the abuse of Carrington. Birnbaum stated that Carrington was  
3 “Stupid to stay in a relationship with Brian.” Birnbaum confirmed the story  
4 was printing and she would reach out to Graden for comment.  
5

6  
7 81. Birnbaum called Carrington and his publicist, revealing that Gene Maddaus  
8 had taken over the story and sold the evidence to Larry Stein and Brian  
9 Graden, as Stein is close friends with Maddaus.  
10

11 82. After multiple reporters learned of Graden’s proclivity for pedophilia,  
12 Carrington and his publicist received death threats from Larry Stein and Brian  
13 Graden. When Graden lied to reporters about his relationship with Carrington,  
14 one reporter confronted him with evidence: photos, texts, and emails.  
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20 **VI. Protections Afforded by the Americans with Disabilities Act**  
21 **(ADA) and subsequent Amendments Act (ADAAA) Title II of the**  
22 **ADAAA, explain that anyone:**

23 83. “[W]ho, with or without reasonable modifications to rules, policies, or  
24 practices, the removal of architectural, communication, or transportation  
25 barriers, or the provision of auxiliary aids and services, meets the essential  
26 eligibility requirements for the receipt of services or the participation in  
27 programs or activities provided by a public entity” must, as a matter of law, be  
28

1 provided with those services. 42 U.S.C. § 12131(2). Case law further  
2 evidence that:  
3

4 84. “To prevail on a claim for violation of Title II of the ADA, the Plaintiff  
5 must show (1) that she is a qualified individual with a disability; (2) that she  
6 was either excluded from participation in or denied the benefits of some  
7 public entity's services, programs, or activities, or was otherwise discriminated  
8 against by the public entity; and (3) that such exclusion, denial of benefits or  
9 discrimination was by reason of the Plaintiff's disability.” *Douris v.*  
10 *Dougherty*, 192 F. Supp. 2d 358, 368 (E.D. Pa. 2002).  
11  
12

13  
14 85. Plaintiff Carrington has met all of the above requirements, establishing a  
15 prima facie case under the Americans with Disabilities Act, and subsequent  
16 Amendments (“ADA”). When Plaintiff Carrington was called to answer the  
17 perjury charge, initiated by Judge Valerie Caproni, he submitted his personal  
18 medical information under seal. These documents established that he is a  
19 person with a disability. Plaintiff submitted such, with a request to be  
20 permitted to appear by zoom in New York, from California, due to the  
21 Covid-19 pandemic, and its growing cases. He was denied this benefit, and  
22 ultimately punished for such actions. The sum of these actions has resulted in  
23 a deprivation of Plaintiff Carrington’s liberty, as he ended up pleading guilty  
24 under duress, described in detail below.  
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86. As mandated by *L.C. v. Olmstead*, 138 F.3d 1485 (11th Cir. 1998):

1 [T]he states' need to maintain a range of facilities for the care and treatment  
2 of individuals with diverse mental disabilities must be recognized. In  
3 determining whether a state can successfully assert a "fundamental  
4 alteration" defense (i.e., claim that providing community-based services to  
5 an individual would fundamentally alter the state's service-delivery system),  
6 courts must consider not only the cost of providing community-based care  
7 to the litigants, but also the state's obligation to mete out services to others  
8 with mental disabilities in an equitable manner.

8 87. Although Plaintiff Carrington did not directly make a request for  
9 accommodations, that was the plain meaning of his actions when asking to  
10 appear remotely for a hearing regarding the perjury charge. Under the ADA, a  
11 formal request to the court was not required, as there are no magic words to  
12 making a reasonable request. As each courthouse has an ADA coordinator, it  
13 was the duty of the judge to recognize an ADA request was being made, and  
14 to contact the court administration.

15 88. In *University of Alabama v. Garrett*, 531 U.S. 356, 363 (2001), the  
16 Supreme Court reaffirmed that Section 5 of the Fourteenth Amendment grants  
17 Congress the power to abrogate the States' Eleventh Amendment immunity to  
18 private damage suits. California followed the same in *Dare v. California*, 191  
19 F.3d 1167 (1999), cert. denied, 121 S. Ct. 1187 (2001). Title II governs all the  
20 operations of a State, which plainly encompasses state conduct subject to a  
21 number of other constitutional limitations embodied in the First, Fourth, Fifth,  
22 Sixth, Seventh, and Eighth Amendments and incorporated and applied to the  
23 States through the Fourteenth Amendment. Those rights include the right to  
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1 vote, to access the courts, to petition officials for redress of grievances, to  
2 receive due process from law enforcement officials, and to be confined where  
3 conditions are humane. To the extent that Title II enforces the Fourteenth  
4 Amendment by remedying and preventing government conduct that burdens  
5 these constitutional provisions and discriminates against persons with  
6 disabilities in their exercise of these rights, Congress did not need to identify  
7 irrational government action in order to identify and address unconstitutional  
8 government action. See *Popovich v. Cuyahoga County Court of Common*  
9 *Pleas*, 276 F.3d 808, 813-814 (6th Cir. 2002) (en banc); *id.* at 820 (Moore, J.,  
10 concurring) (“The fact that Title II implicates constitutional violations in areas  
11 ranging from education to voting also suggests that heightened judicial  
12 scrutiny under both the Due Process and Equal Protection Clauses is  
13 appropriate.”)

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20 89. Title II requires “reasonable modifications” in public services. 42 U.S.C.  
21 12131(2). That requirement, however, is carefully tailored to the unique  
22 features of disability discrimination that Congress found persisted in public  
23 services in two ways. First, given the history of segregation and isolation and  
24 the resulting entrenched stereotypes, fear, prejudices, and ignorance about  
25 persons with disabilities, Congress reasonably determined that a simple ban  
26 on discrimination would be insufficient to erase the stain of discrimination.  
27 Cf. *Green v. County Sch. Bd.*, 391 U.S. 430, 437-438 (1968) (after  
28

1 unconstitutional segregation, government is “charged with the affirmative  
2 duty to take whatever steps might be necessary” to eliminate discrimination  
3 “root and branch”). Therefore, Title II affirmatively promotes the integration  
4 of individuals with disabilities – both in order to remedy past unconstitutional  
5 conduct and to prevent future discrimination.  
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7

8 90. Since the inception of the ADA, there have been several advancements that  
9 have made litigation more accessible for disabled litigants, such as Plaintiff  
10 Carrington. One such case showed that the standard used to be strictly a  
11 physical one to access the courts, now is thought to also obligate all public  
12 entities, including court systems, to facilitate equal participatory and  
13 testimonial access. *See In re: Ruby McDonough*, 457 Mass. 512. (2010).  
14 Although this case is not binding in California, it is persuasive and through  
15 *Dare v. California*, 191 F.3d 1167 (1999), cert. denied, 121 S. Ct. 1187 (2001),  
16 California is following the spirit of the ADA and further developments.  
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21 91. Plaintiff Carrington was denied a request for an accommodation to appear  
22 remotely during the height of the Covid-19 outbreak, which was denied by  
23 Judge Caproni, a colleague of Judge Failla. As Judge Caproni made the ruling  
24 to deny Carrington’s reasonable accommodation to have access to this public  
25 system, she effectively waived her eleventh immunity, giving rise to this suit.  
26 Plaintiff Carrington is merely attempting to rectify the discrimination and  
27 violations of his various rights as he has described herein. The ADA provides  
28

1 a clear path to remedy such injustice and creates an even playing field for all  
2 litigants to have participatory access to the courts.  
3

4 **VII. NEGLIGENT DISREGARD FOR A SUBPOENA DURING AN**  
5 **ACTIVE COURT CASE**

6  
7 92. During the NY Case (Exhibit One), both Google and GoDaddy had  
8 information regarding the Plaintiff in that case. Under the direction of the  
9 court, that confidential information was only supposed to be supplied to the  
10 FTI for review, by Google and Godaddy. However, both entities provided the  
11 information to Paramount Pictures and Viacom's (Paramount Global)  
12 attorneys. As a result, the Plaintiff suffered, irreparable damages by the release  
13 of the information, which was later used against the Plaintiff in the NY Case,  
14 in Variety and The Hollywood Reporter and by the federal prosecutor over the  
15 perjury case, who used the exact same data and false claims made by  
16 Paramount Global and Paramount Pictures' attorney Larry Stein, in order to  
17 indict Carrington with criminal charges. Due to the nature of the subpoena  
18 regarding said information, Google and GoDaddy both owed a duty to the  
19 Plaintiff to only release it to the FTI. They breached that duty, and were the de  
20 facto and only cause of the breach which led to the Plaintiff's damages.  
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27 **VIII. DEFAMATION PER SE BY THE USE OF THE ILLEGALLY**  
28 **RELEASED INFORMATION AS WELL AS PUBLIC SLURS**  
**AIMED AT THE PLAINTIFF'S CHARACTER**

1 93. Having full knowledge of how the damaging statements were received,  
2 National Amusements, Inc., Paramount Pictures, Paramount Global, Variety,  
3 and the Hollywood Reporter willingly published information about false sexual  
4 abuse claims, false evidence claims, Carrington's raw data, Carrington's  
5 unjustified arrest, and other damaging information on the Plaintiff with the sole  
6 purpose of destroying Carrington. The publication of this information has  
7 caused massive amounts of mental distress, as well as damage to his  
8 professional reputation! Furthermore, representatives for the Defendants, as  
9 seen below, called the Plaintiff a "Nigger." (California case, Complaint pg. 8,  
10 ¶10) The use of this word in such a derogatory manner not only dehumanizes  
11 the Plaintiff but is Defamation per se by likening Plaintiff to someone who is  
12 less than other human beings.

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18 **Graden Lawyer Stein: "Niggers never win in a courtroom"**

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21 94. Rovier Carrington's abusers certainly appear to be racially motivated, at  
22 least to some degree. For example, after a hearing in the California TRO matter,  
23 Defendant Brian Graden's attorney Larry Stein confronted Carrington outside  
24 the courthouse in the presence of witnesses, called him a "stupid fucking  
25 Nigger" and told him, "Niggers never win in a courtroom." While Judge Failla  
26 herself has not issued any statements that overtly indicate racial animus towards  
27 Carrington, insofar as Judge Failla disregarded the entire Federal Rules of Civil  
28

1 Procedure in denying all procedure to Carrington, further inquiry into Judge  
2 Failla’s motivations – racial or otherwise - seems entirely appropriate.  
3

4 **IX. Defense to Formation of a Contract with the Government through**  
5 **a Plea in a Criminal Proceeding**  
6

7 95. The first attempt to regulate plea bargaining came in 1946, when Congress  
8 promulgated Federal Rule of Criminal Procedure 11. At the time, Rule 11  
9 simply stated that a judge should not accept a guilty plea “without first  
10 determining that the plea is made voluntarily with understanding of the nature  
11 of the charge.” In 1966, the Supreme Court amended Rule 11 to prohibit a judge  
12 from accepting a guilty plea “without first addressing the defendant personally  
13 and determining the plea is made voluntarily with understanding of the nature  
14 of the charge and the consequences of the plea.” FED. R. CRIM. P. 11 (1946)  
15 (amended 1966). Despite the Supreme Court’s amendment to Rule 11, the Court  
16 itself noted that it was not until its 1971 opinion in *Santobello v. New York*, 404  
17 U.S. 257 (1971), “that lingering doubts about the legitimacy of the practice  
18 were finally dispelled.  
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24 96. The 1987 Supreme Court case *Ricketts v. Adamson*, 483 U.S. 1, 107 S. Ct.  
25 2680 (1987) highlighted the fact that there have never been rules of  
26 construction created for plea agreements, but it did not define the extent to  
27 which commercial contract law informs plea-bargaining law. Nonetheless,  
28 subsequent precedent, including Supreme Court precedent, makes clear that

1 defendants entering into plea agreements should be treated at least as well as  
2 parties entering into commercial contracts. It also established that the terms of  
3 such agreements may be breached by a party. *Id.* at 5-6.  
4

5 97. In a dissenting opinion joined by Justices Marshall, Blackmun, and Stevens,  
6 Justice Brennan began by noting that the entire case hinged on whether  
7 Adamson breached the plea agreement.  
8

9 98. He then used the following language:  
10

11 This Court has yet to address in any comprehensive way the rules  
12 of construction appropriate for disputes involving plea  
13 agreements. Nevertheless, it seems clear that the law of  
14 commercial contract may in some cases prove useful as an  
15 analogy or point of departure in construing a plea agreement, or in  
16 framing the terms of the debate. It is also clear, however, that  
17 commercial contract law can do no more than this, because plea  
18 agreements are constitutional contracts. The values that underlie  
19 commercial contract law, and that govern the relations between  
20 economic actors, are not coextensive with those that underlie the  
21 Due Process Clause, and that govern relations between criminal  
22 defendants and the State. Unlike some commercial contracts, plea  
23 agreements must be construed in light of the rights and obligations  
24 created by the Constitution.  
25

26 99. Justice Brennan determined that the majority's opinion finding  
27 Adamson in breach was especially problematic because, "far from being  
28 a commercial actor, Adamson is an individual whose 'contractual'  
relation with the State is governed by the Constitution." Therefore,  
"[t]he determination of Adamson's rights and responsibilities under the  
plea agreement is controlled by the principles of fundamental fairness

1 imposed by the Due Process Clause.” As a result, granting “one party—  
2 here, the State—the unilateral and exclusive right to define the meaning  
3 of a plea agreement is patently unfair.” *Id.* at 21.

4  
5 100. Plaintiff Carrington pled guilty to a charge of perjury while under  
6 duress, as he only received such charge after attempting to exercise his  
7 First Amendment Right to Redress the Government for Grievances,  
8 which mirrors the concepts raised in *Ricketts* above. He withdrew the  
9 California Suit after his life was threatened by Judge Failla and her co-  
10 defendants. Carrington was afraid for his life due to the Covid-19  
11 pandemic. He was put in this position for speaking his truth and facing  
12 his sexual abusers: Brad Grey, Brian Graden, Sumner Redstone, Harvey  
13 Weinstein and Larry Stein, his former employers and counsel, who were  
14 named employees and an owner of the above captioned Defendants  
15 and/or the above captioned Defendants themselves. It was these actions  
16 of these parties cumulatively between the initial abuse, and the later  
17 fraud surrounding the investigation with FTI to cover up such abuse,  
18 that resulted in Plaintiff Carrington’s Constitutional violations and his  
19 guilty plea being entered into under duress.

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27 101. The *Ricketts* dissent continued to explain that under this theory of  
28 plea agreements as constitutional contracts, the Due Process Clause  
requires that pleading defendants be treated at least as well as parties to

1 other contracts, and specifically government contracts. At a minimum,  
2 this means that every contract defense and rule of construction that  
3 applies in the civil contract law context should apply to the extent that it  
4 would assist pleading criminal defendants. Again, in the abstract, this  
5 proposal should not be too controversial, given that courts across the  
6 country have found that plea agreements are governed or strongly  
7 influenced by contract law, with defendants also afforded the additional  
8 protection of the Due Process Clause. *Id.* at text accompanying notes 57  
9 - 58.

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14 102. In *Kirke La Shelle Co. v. Paul Armstrong Co.*, 188 N.E. 163 (N.Y.  
15 1933), it was established that, “in every contract there is an implied  
16 covenant that neither party shall do anything which will have the effect  
17 of destroying or injuring the right of the other party to receive the fruits  
18 of the contract, which means that in every contract there exists an  
19 implied covenant of good faith and fair dealing. *Id.* at 168. Moreover,  
20 section 205 of the Second Restatement of Contracts, which applies to  
21 non-Uniform Commercial Code contracts for goods, provides that,  
22 “[e]very contract imposes upon each party a duty of good faith and fair  
23 dealing in its performance and its enforcement.” Both the Court of  
24 Federal Claims, which hears disputes over government contracts, and  
25 the United States Court of Appeals for the Federal Circuit, which  
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1 reviews those decisions on appeal, have found that the implied covenant  
2 of good faith and fair dealing applies to all government contracts. *See*  
3 *Nat'l Austl. Bank v. United States*, 452 F.3d 1321, 1324 (Fed. Cir.  
4 2006).

5  
6  
7 103. Clearly, Plaintiff Carrington was not offered such good faith and  
8 fair dealing required at the formation of the contract in question: the  
9 plea. In fact, he felt that he had no choice, as there was unequal  
10 bargaining power. Judge Failla had decided to pursue such a charge  
11 after she was named as a Defendant in the California Suit. She ordered  
12 that if the California Case was not dismissed with prejudice by  
13 February 22, 2021, Carrington would be jailed on contempt and his  
14 counsel would be fined \$500 per day until dismissed. (Attached as  
15 Exhibit 2 is a true and correct copy of an Order issued February 9, 2021  
16 by Judge Failla detailing Carrington's surrender to US Marshals on  
17 February 22, 2021.) Carrington's health made imprisonment a death  
18 threat due to Covid-19. Under such duress, Carrington instructed his  
19 counsel to dismiss the California Case with prejudice, which he did on  
20 February 17, 2021, and reported the dismissal to Judge Failla.  
21 (Attached as Exhibit 3 is a true and correct copy of an email from  
22 Carrington to the California Case judge on February 17, 2021  
23 explaining his reasons for the dismissal.)  
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1 104. On or about September 30, 2022, the federal prosecutor over the  
2 perjury case against Carrington approached him while alone and  
3 revealed that he had been assigned the case as he had been in an  
4 intimate relationship with Graden. He informed Carrington that due to  
5 the collegiate relationship between Judges Failla and Caproni, none of  
6 Carrington's evidence of innocence would ever be admitted in the  
7 criminal trial. At that time, he offered Carrington a plea bargain of 15  
8 months incarceration in exchange for a guilty plea, rather than five  
9 years prison time if he took the case to trial. Carrington's defense  
10 counsel later advised him to take the plea because she knew that all his  
11 exculpatory evidence would be suppressed due to the harm it would  
12 cause to Judge Failla. Carrington therefore read a false statement of  
13 admission, as directed by the prosecutor, to the court and plead guilty.

#### 20 **X. Injuries**

21 105. Cumulatively Plaintiff Carrington suffered a succession of events, to  
22 which deprived him of Constitutional rights, protections as a qualifying  
23 litigant under the ADA, and moreover placed him in duress while entering a  
24 plea for the resulting false perjury charge. He was denied the Right to  
25 Redress his government and bring his grievances against his sexual abusers.  
26 Plaintiff Carrington faced public ridicule, slander, and liable in the media and  
27 at the hands of the above-captioned Defendants. Most importantly, on July  
28

1 10, 2023, Plaintiff Carrington will be sentenced for said plea, and be deprived  
2 of his liberty for merely exercising his rights against his sexual abusers while  
3 a neutral investigative third-party approved in the New York Suit cleared him  
4 of any wrongdoing.  
5


6  
7  
8 **XI. Relief**

9 106. Plaintiff Carrington prays this Honorable Court grant his petition, and  
10 award him the following relief:  
11

- 12 1. An award of \$250 Million as to National Amusements, Inc.;
- 13 2. An award of \$250 Million as to Paramount Studios;
- 14 3. An award of \$250 Million as to Paramount Global;
- 15 4. An award of \$150 Million as to Google;
- 16 5. \$150 Million as to GoDaddy;
- 17 6. \$100 Million as to Variety;
- 18 7. \$100 Million as to The Hollywood Reporter;
- 19 8. Declaratory judgment rendering the New York Suit Protective Order null and  
20  
21  
22 void.  
23  
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25  
26 Respectfully submitted,

27  
28 DATED: July 6, 2023

  
\_\_\_\_\_  
G. Scott Sobel  
Attorney for Rovier Carrington

**Certification**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discover; and (4) the complaint otherwise complies with the requirements of Rule 11.

DATED: July 6, 2023

  
\_\_\_\_\_  
Rovier Carrington

**EXHIBIT 1**

**EXHIBIT 1**

**EXHIBIT 1**

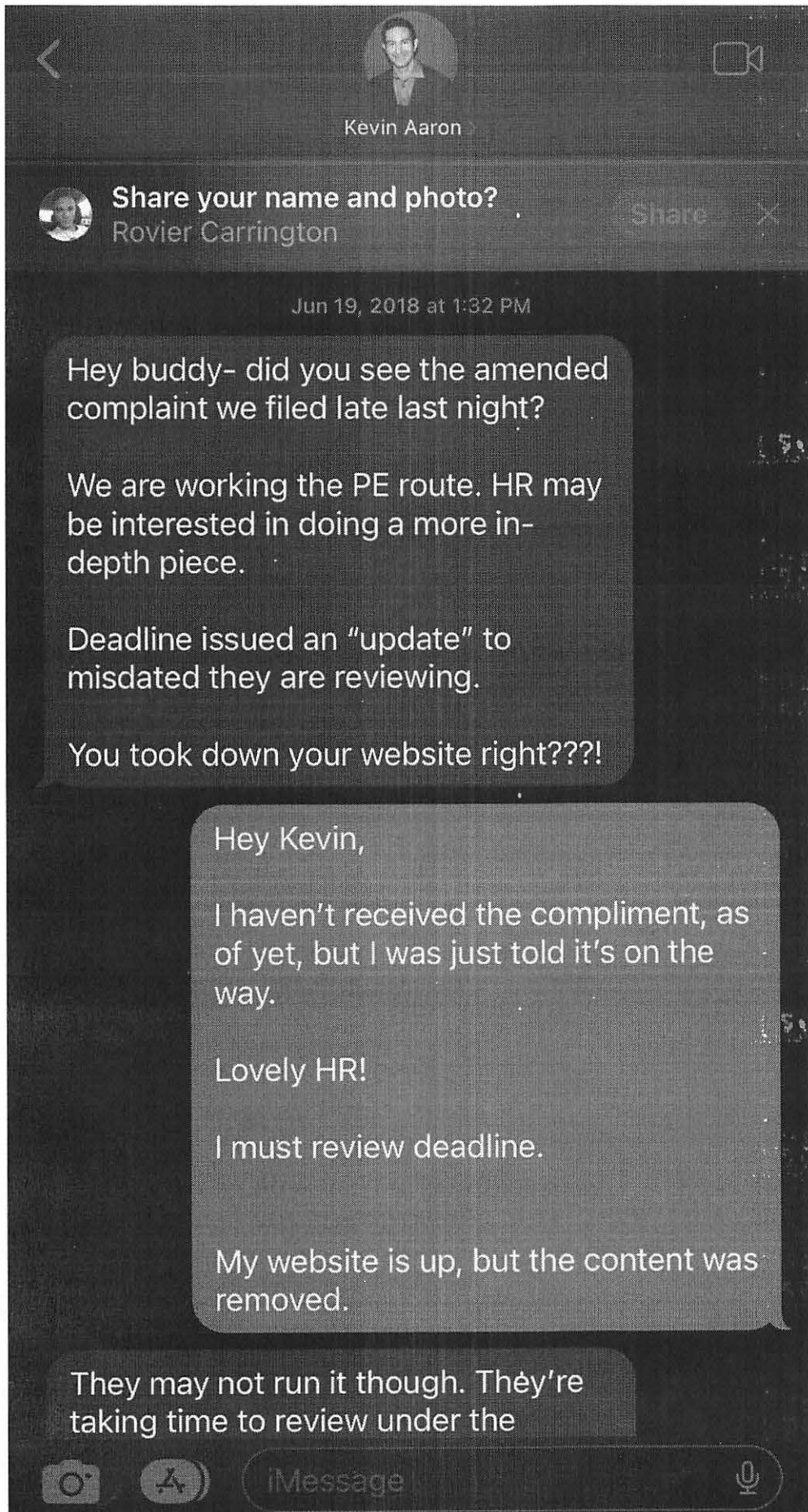
**EXHIBIT 1**

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**EXHIBIT 1**



**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**

**U.S. District Court**

**Southern District of New York**

**Notice of Electronic Filing**

The following transaction was entered on 2/9/2021 at 8:51 AM EST and filed on 2/8/2021

**Case Name:** Carrington v. Graden et al

**Case Number:** 1:18-cv-04609-KPF

**Filer:**

**WARNING: CASE CLOSED on 10/11/2019**

**Document Number:** 214

**Docket Text:**

ORDER: Accordingly, it is hereby ORDERED that Plaintiff Rovier Carrington, having been found of civil contempt on February 4, 2021, by this Court, is sanctioned to arrest and confinement until he complies fully with the Court's September 11, 2020 and December 23, 2020 Orders. Plaintiff shall surrender his person to the custody of the U.S. Marshals at the below address on or before February 22, 2021: U.S. Marshals Service for the Central District of California, Roybal Federal Building, 255 East Temple Street, Los Angeles, California, 90012. On the date of Plaintiff's surrender, he is to arrive at the above address before 12:00 p.m., and is to inform the security checkpoint officials of his self-surrender. If Plaintiff does not self-surrender on or before February 22, 2021, the U.S. Marshals shall use reasonable force necessary to apprehend Plaintiff, including forcible entry of any residence or domicile believed to be associated with

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

RC

From: Ravier Carrington >

To: VAP\_chambers@cacd.uscourts.gov >

Cc: Christine\_Chung@cacd.uscourts.gov >

February 17, 2021 at 10:24 AM

## **Carrington v Weinstein; Case 2:20-cv-09825**

I, Ravier Carrington am writing this letter while under distress. I am being threatened and harassed into dismissing this lawsuit with prejudice by request of Judge Katherine Polk Failla, who is a defendant in this case. Judge Failla has held me in contempt and wishes to place me in jail on February 22, 2021 for having filed this lawsuit against her and the other defendants. Judge Failla placed an injunction against me a year after dismissing the prior case, which she resided over. The injunction was granted to prevent herself and the other defendants from facing a judgment in this courtroom regarding the fraud upon the court Judge Failla and the opposing counsel purposely and jointly committed in order to destroy my sexual abuse claims. I am innocent in the matter. There's proof the defendants committed fraud in the prior case, which Judge Failla helped cover up. I refuse to be placed in jail when I have never committed a crime. I desired justice for my sexual abuse claims against defendants, Sumner Redstone, Harvey Weinstein, Brad Grey, Brian Graden and the opposing leading defense attorney Larry Stein. I also desired justice against all opposing counsel and judge Failla for their shared fraud upon the court in the prior case.

I'm aware this letter will possibly go unseen, and I'm