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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT COURT of CALIFORNIA

10 NICKO "ROMEO" LACOSTE, dba THE) Case No.:
11 CALIFORNIA DREAM TATTOO,)
12 Plaintiff,) COMPLAINT FOR DAMAGES FOR
13 vs.) TORTIOUS INTERFERENCE WITH
14 DANIEL "KEEMSTAR" KEEM, dba) CONTRACTUAL RELATIONS AND
15 DRAMAALERT) INTERFERENCE WITH PROSPECTIVE
16) ECONOMIC ADVANTAGE
17) REQUEST FOR INJUNCTIVE RELIEF
18) DEMAND FOR A JURY TRIAL
19 Defendant

20 **Jurisdiction**

21 1. This court has jurisdiction under 28 U.S.C. § 1332 because there is diversity of
22 citizenship and an amount in controversy greater than \$75,000.

23 **Venue**

24 2. Venue is proper pursuant to 28 U.S.C. § 1331 because a substantial part of the events
25 or omissions giving rise to the claim occurred in the district, and a substantial part of property
26 that is the subject of the action is situated is located in this district.

27 **Parties**

- 28 3. Plaintiff, Nicko "Romeo" Lacoste, is a citizen of California and resides at
4. Plaintiff's place of business, The California Dream Tattoo, is located
5. Defendant, Daniel "Keemstar" Keem, is a citizen of New York and resides at

1 19. Defendant used this video in his efforts to destroy Defendant's business and
2 reputation.

3 20. Defendant has stated multiple times that "[Plaintiff] is finished," "[Plaintiff's] career
4 is finished," and "[Plaintiff] belongs in a cage."

5 21. Defendant has a demonstrable history for making accusations, notably other
6 accusations of pedophilia, which he is unable to substantiate, yet recklessly and maliciously
7 continues to make such accusations.

8 22. The accusations made against Plaintiff have caused substantial damage to Plaintiff's
9 business.

10 23. Plaintiff's business is a service-based industry, and the damage caused to his
11 business is from an aggregate loss of a mass of individual clients.

12 24. Defendant was acutely aware of the nature of Plaintiff's business and the potential
13 impact of his statements.

14 25. Plaintiff and his business lost contract opportunities as a direct result of the
15 controversy that Defendant created to surround Plaintiff.

16 26. Plaintiff lost business as a result of employees deciding to pursue alternative places of
17 employment, causing greater harm to the earning capacity of the business.

18 27. Plaintiff's loss of business directly correlates to the origination of the videos that
19 Defendant created and publicized.

20 **Count I**

21 Interference With Prospective Economic Advantage

22 28. Plaintiff realleges paragraphs 1 through 27.

23 29. Plaintiff believes and alleges that Defendant's conduct, as alleged above, disrupted
24 Plaintiff's prospective economic advantage in obtaining his previously consistent stream of
25 clients and revenue.

26 30. As a direct, proximate, and foreseeable result of defendants' wrongful conduct, as
27 alleged above Plaintiff has suffered damages in an amount to be proven at trial. Plaintiff will
28

1 seek leave of Court to amend this Complaint to set forth the exact amount of damages when they
2 have been ascertained.

3 31. Plaintiff believes and alleges that, by their unjustified and unprivileged conduct, as
4 alleged above, Defendant intended to disrupt Plaintiff's prospective economic advantage.

5 32. As a direct, proximate, and foreseeable result of defendants' wrongful conduct, as
6 alleged above Plaintiff has suffered damages in an amount to be proven at trial, and which
7 Plaintiff is informed and believes exceeds the amount in controversy threshold for federal
8 diversity jurisdiction.

9 33. As a direct, proximate, and foreseeable result of Defendants' wrongful conduct, as
10 alleged above, Plaintiff has suffered damages in an amount to be proven at trial, and which
11 Plaintiff is informed and believes exceeds the amount in controversy threshold for classification
12 as a federal diversity jurisdiction case, Plaintiff will seek leave of Court to amend this Complaint
13 to set forth the exact amount of damages when they have been ascertained.

14 34. Plaintiff believes and alleges that Defendant has acted with malice, and has
15 deliberately caused and intended to cause great economic harm to Plaintiff with full knowledge
16 of the wrongfulness of his conduct. Plaintiff further believes and alleges that Defendant conduct
17 as alleged above was despicable, was carried on by Defendant with a willful and conscious
18 disregard of Plaintiff's rights, and subjected Plaintiff to unjust hardship. Therefore, Plaintiff
19 should be awarded punitive and exemplary damages sufficient to punish Defendant for engaging
20 in this conduct and to deter similar conduct on their part in the future.

21 35. Plaintiff believes and alleges that Defendant's illegal acts as described above are a
22 serious and continuing threat to Plaintiff's reputation, goodwill, and financial health. If
23 Defendant is allowed to continue his wrongful acts, Plaintiff will suffer further immediate and
24 irreparable injury, loss, and damage. Plaintiff is further informed and believes, and based
25 thereon alleges that, in the absence of preliminary and permanent injunctions as prayed for
26 below Defendant will continue to violate Plaintiff's rights by engaging in the conduct alleged
27 above.

1 **Count II**

2 Interference With Contractual Relations

3 36. Plaintiff realleges paragraphs 1 through 35.

4 37. Plaintiff believes and alleges that, at all times relevant herein, Defendant was aware
5 of and had knowledge of Plaintiff's contractual relationships with promoters, agencies, and
6 social media platforms, operating on local, national, and international stages.

7 38. Plaintiff believes and alleges that, by his unjustified and unprivileged conduct, as
8 alleged above, Defendant intended to disrupt the contractual relationships between Plaintiff and
9 such entities.

10 39. Plaintiff believes and alleges that Defendant's conduct, as alleged above, disrupted
11 the contractual relationships between Plaintiff and such entities.

12 40. As a direct, proximate, and foreseeable result of Defendant's wrongful conduct, as
13 alleged above, Plaintiff has suffered damages in an amount to be proven at trial, and which
14 Plaintiff is informed and believes exceeds the amount in controversy threshold for classification
15 as a federal diversity jurisdiction case, Plaintiff will seek leave of Court to amend this Complaint
16 to set forth the exact amount of damages when they have been ascertained.

17 41. Plaintiff believes and alleges that Defendant has acted with malice and has
18 deliberately caused and have intended to cause great economic harm to Plaintiff with full
19 knowledge of the wrongfulness of his conduct. Plaintiff further believes and alleges that
20 Defendant's conduct as alleged above was despicable, was carried on by Defendant with a willful
21 and conscious disregard of Plaintiff's rights, and subjected Plaintiff to unjust hardship.
22 Therefore, Plaintiff should be awarded punitive and exemplary damages sufficient to punish
23 Defendant for engaging in this conduct and to deter similar conduct on their part in the future.

24 42. Plaintiff believes and alleges that Defendant illegal acts as described above are a
25 serious and continuing threat to Plaintiff's reputation, business relations, and financial health. If
26 Defendant is allowed to continue his wrongful acts, Plaintiff will suffer further immediate and
27 irreparable injury, loss, and damage. Plaintiff further believes that, in the absence of a
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1 temporary restraining order and preliminary and permanent injunctions as prayed for below,
2 Defendant will continue to violate Plaintiff's rights by engaging in the conduct alleged above.

3 **Request for Relief**

4 WHEREFORE, the Plaintiff requests:

5 43. As to the first and second causes of action, for compensatory damages, including
6 general and special damages, according to proof, in the amount of \$3,500,000.00.

7 44. As to the first and second causes of action, temporary injunctive relief, pending this
8 litigation, barring Defendant from making further public statements regarding the accusations
9 he has previously made and regarding this litigation itself.

10 45. As to the first and second causes of action, preliminary and permanent injunctive
11 relief, barring Defendant and his agents, employees, assigns, and representatives, from, directly
12 or indirectly, making further public statements, social media posts, etc., regarding the
13 accusations he has previously made and regarding this litigation itself.

14 46. As to the first and second causes of action, for punitive and exemplary damages,
15 according to proof at trial.

16 47. As to the first and second causes of action, for prejudgment interest at the maximum
17 legal rate;

18 48. For costs of suit incurred herein;

19 49. For attorney's fees as permitted by law; and

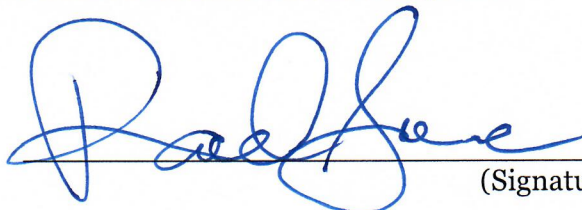
20 50. Any further relief which the Court may deem appropriate.

21 **Demand for Jury Trial**

22 51. Plaintiff hereby requests a jury trial on all issues raised in this complaint.

23
24 3/10/2020

25 (Dated)

23
24 

25 (Signature)

26
27 By: Raoul J. Severo

28 (Attorney for Plaintiff)