

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X
JOHN DOE**AMENDED
COMPLAINT**

Plaintiff,

-against-

Index No. 70331/2021E

LANCE TAYLOR
 AKA AFRIKA BAMBAATAA
 AKA AFRIKA BAMBAATAA AASIM
 AKA KEVIN DONOVAN
 AKA AASIM BAMBAATAA BEY
 AKA BAMBAATAA KHAYAN AASIM
 AKA CHIEF DRAGONFLY; ZULU NATION,
 UNIVERSAL ZULU NATION and
 XYZ Corp.

Defendants
-----X

Plaintiff JOHN DOE by his attorneys Tanner & Ortega, LLP, complaining of the
 Defendants, respectfully alleges, upon information and belief and states as follows:

NATURE OF THE ACTION

1. This is an action brought pursuant to the New York Child Victims Act ("CVA"), C.P.L.R. § 214-g. The CVA opened a historic one-year one-time window for victims and survivors of childhood sexual abuse in the State of New York to pursue lapsed claims. Prior to the passage of the CVA, each Plaintiff's claims were time barred the day they turned 22 years old.
2. From 1991, when the Plaintiff was merely 12 years old, to 1995, the Plaintiff was repeatedly sexually abused and sex trafficked at the hands of the Defendant LANCE TAYLOR.

3. As a result of the passage of the CVA, Plaintiff for the first time in his life can now pursue restorative justice. Plaintiff brings suit to vindicate his rights.

PARTIES

4. Plaintiff JOHN DOE is an individual residing County of Bronx, State of New York.
5. Upon information and belief, Defendant LANCE TAYLOR's known aliases include: AFRIKA BAMBAATAA, AFRIKA BAMBAATAA AASIM, KEVIN DONOVAN, AASIM BAMBAATAA BEY, BAMBAATAA KHAYAN AASIM, and CHIEF DRAGONFLY.
6. Upon information and belief, Defendant LANCE TAYLOR resides at 1145 Tuxedo Square, Teaneck, New Jersey 07666.
7. Upon information and belief, Defendant Zulu Nation is an organization which promotes cultural, musical (Hip Hop) awareness.
8. Upon information and belief, Defendant Universal Zulu Nation is an organization which promotes cultural, musical (Hip Hop) awareness.
9. Upon information and belief, Defendant XYZ Corp. is an additional entity whose true identity is not yet known to Plaintiff, which owned or operated by, affiliated with, owned and/or managed by or for the benefit of one or more other Defendants, or any combination of any or all of them.

JURISDICTION AND VENUE

10. This Court has personal jurisdiction over the claims asserted herein pursuant to C.P.L.R. §§ 301 and 302 (2), in that the Plaintiff resides in New York.

11. This court has jurisdiction to hear these claims as a result of the passage of the New York State Child's Victims Act passed in February 2019. As a result of the passage of this Act, the Statute of Limitations for Plaintiff's claims has been altered allowed him to file the instant Complaint.
12. This Court has jurisdiction over this action because the amount of damages Plaintiff seeks exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.
13. Venue for this action is proper in the County of Bronx pursuant to C.P.L.R. § 503 (a) because a substantial part of the events and omissions giving rise to the claim occurred in Bronx County.

FACTUAL BACKGROUND: SEXUAL ABUSE OF PLAINTIFF

14. At all relevant times, Plaintiff resided at Bronx River Houses, public housing provided by the New York City Housing Authority (hereinafter "BRH").
15. At all relevant times, Defendant LANCE TAYLOR (Taylor) resided at Bronx River Houses public housing provided by the New York City Housing Authority (hereinafter "BRH").
16. At all times relevant, Defendants Zulu Nation, Universal Zulu Nation and XYZ Corp., were headquartered inside Defendant TAYLOR's Apartment located at BRH.
17. Upon information and belief and at all relevant times, Defendant TAYLOR, was a well-known disc jockey, rapper, songwriter, music producer, who is universally considered the "father of hip hop music."

18. Upon information and belief, Defendant TAYLOR was the founder of Zulu Nation, Universal Zulu Nation and XYZ Corp. international hip hop awareness organizations.
19. Upon information and belief and at all relevant times, Defendant's apartment within BRH was known as the Zulu Nation headquarters.
20. Upon information and belief and at all relevant times, Defendant's apartment within BRH was known as the Universal Zulu Nation headquarters.
21. Upon information and belief and at all relevant times, Defendant's apartment within BRH was known as the XYX Corp. headquarters.
22. Upon information and belief, Plaintiff met Defendant TAYLOR in 1991.
23. Upon information and belief, Plaintiff was 12 years old when he met Defendant TAYLOR.
24. Upon information and belief, shortly after meeting Defendant TAYLOR, Plaintiff became a card-carrying member of Defendant Zulu Nation and began attending Zulu Nation meetings at the BRH Community Center.
25. Upon information and belief, shortly after meeting Defendant TAYLOR, Plaintiff became a card-carrying member of Defendant Universal Zulu Nation and began attending Universal Zulu Nation meetings at the BRH Community Center.
26. Upon information and belief, shortly after meeting Defendant TAYLOR, Plaintiff became a card-carrying member of Defendant XYZ Corp. and began attending XYZ Corp. meetings at the BRH Community Center.
27. Upon information and belief, Plaintiff became a part of Defendant's TAYLOR's security team.

28. Upon information and belief, shortly after Plaintiff met Defendant TAYLOR, Plaintiff began to volunteer performing administrative work inside Defendant TAYLOR's apt. which was known as the ZULU NATION headquarters.
29. Upon information and belief, shortly after Plaintiff met Defendant TAYLOR, Plaintiff began to volunteer performing administrative work inside Defendant TAYLOR's apt. which was known as the UNIVERSAL ZULU NATION headquarters.
30. Upon information and belief, shortly after Plaintiff met Defendant TAYLOR, Plaintiff began to volunteer performing administrative work inside Defendant TAYLOR's apt. which was known as the XYZ Corp. headquarters.
31. Upon information and belief, Defendant TAYLOR would invite Plaintiff to his apartment known as ZULU NATION's headquarters several times a week and encouraged Plaintiff to exercise at the gym located within Defendant TAYLOR's apartment.
32. Upon information and belief and at all relevant times, Defendant TAYLOR would comment about Plaintiff's muscular body and would touch Plaintiff on the shoulders, biceps and torso while Plaintiff was exercising at Defendant's gym.
33. Upon information and belief and at all relevant times, Defendant TAYLOR eventually began to inappropriately touch Plaintiff in his private areas while Plaintiff was in Defendant TAYLOR's apt.
34. Upon information and belief and at all relevant times, Defendant TAYLOR eventually encouraged Plaintiff to watch pornographic videos while in Defendant TAYLOR's apartment and would also encourage Plaintiff to masturbating in the presence of Defendant TAYLOR while watching pornographic videos in Defendant TAYLOR's apartment. Eventually, Defendant TAYLOR began masturbating in the presence of Plaintiff.

35. Upon information and belief, the sexual abuse at the hands of Defendant TAYLOR progressed to mutual masturbation.
36. Upon information and belief, during Plaintiff's visits to Defendant TAYLOR's apartment, Defendant TAYLOR's sexual abuse of Plaintiff progressed to sodomy.
37. Upon information and belief, Plaintiff became a victim of sex trafficking as Defendant TAYLOR would transport Plaintiff to other locations and offer Plaintiff for sex to other adult men. During said encounters Defendant TAYLOR would watch as Plaintiff was sodomized by other adult men.
38. Upon information and belief, the aforementioned events and actions took place between 1991 and 1995.
39. As a direct result of the Defendant TAYLOR's criminal conduct described herein, Plaintiff suffered physical injury, severe and permanent emotional distress, mental anguish, depression and embarrassment. Plaintiff was prevented from obtaining the full enjoyment of life and has been unable to keep a steady job. As a result, Plaintiff has incurred loss of income and/or loss of earning capacity.
40. Upon information and belief, Plaintiff only informed his mother of the aforementioned events while in his 30s.

FIRST CAUSE OF ACTION:
ASSAULT AGAINST DEFENDANT TAYLOR

41. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 40 inclusively, with the same force and effect as if hereinafter set forth at length.
42. From 1991 to 1995, Plaintiff was invited to Defendant's apartment, located in the BRH, where he was repeatedly subjected to sexual abuse consisting of mutual masturbation and sodomy. During the same time period, Plaintiff was transported by

Defendant TAYLOR, to other locations and offered for sex to other adult men in exchange for money.

43. Defendant TAYLOR's, intentional sexual assault of Plaintiff was for his own sexual gratification and without regard for the Plaintiff's well-being.
44. Defendant TAYLOR, performed the aforementioned actions for his own sexual gratification and without Plaintiff's consent.
45. Defendant TAYLOR's, outrageous and criminal behavior against Plaintiff, when Plaintiff was a minor resulted in the apprehension of harm and unwanted physical contact by Defendant TAYLOR.
46. Defendant TAYLOR's sexual abuse of Plaintiff violated NYPL Sect. 130.55-130.65.
47. Defendant TAYLOR, sexually assaulted Plaintiff while he was a minor, when Defendant TAYLOR forced Plaintiff to participate in mutual masturbation and sodomy, causing Plaintiff to fear for his safety and reasonable apprehension.
48. As a direct and proximate cause of the Defendant TAYLOR's sexual assault of the Plaintiff, Plaintiff sustained severe and serious emotional distress and depression.
49. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

SECOND CAUSE OF ACTION:
CIVIL BATTERY AGAINST DEFENDANT TAYLOR

50. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 49 inclusively, with the same force and effect as if hereinafter set forth at length.
51. Defendant TAYLOR repeatedly committed a battery against Plaintiff between 1991 to 1995, by intentionally sodomizing, forcing mutual masturbation, and sex

trafficking Plaintiff to other adult men who sexually assaulted Plaintiff in the presence of Defendant TAYLOR. .

52. Defendant TAYLOR's, outrageous behavior evinced the intent to cause harmful and offensive bodily contact to Plaintiff and did cause harmful and offensive bodily contact to Plaintiff.

53. Defendant TAYLOR's, intentional and sexual battery of Plaintiff was for his own sexual gratification without regard for Plaintiff's well-being and was intended to cause permanent harm to Plaintiff.

54. Defendant TAYLOR, performed the aforementioned actions for his own sexual gratification and without Plaintiff's consent.

55. As a result of the foregoing, Plaintiff sustained severe and permanent emotional distress, mental anguish, and depression.

56. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

THIRD CAUSE OF ACTION:
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
AGAINST DEFENDANT TAYLOR

57. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 56 inclusively, with the same force and effect as if hereinafter set forth at length.

58. Defendant TAYLOR, engaged in extreme, criminal and outrageous conduct when he transported the minor Plaintiff to the locations where adult men sexually assaulted Plaintiff in the presence of Defendant TAYLOR for the sole purpose of offering the Plaintiff to perform sexual acts in exchange for money.

59. Such conduct exceeds what is tolerated in a civilized society and has gone beyond all reasonable bounds of decency, thereby indicating Defendant's utter disregard for the consequences of his actions.
60. Defendant TAYLOR, knew that his extreme, criminal and outrageous conduct would give multiple adult men the ability to sexually assault the minor Plaintiff, which would in turn inflict severe emotional and psychological distress on Plaintiff.
61. As a direct and proximate cause of Defendant TAYLOR's extreme, criminal and outrageous conduct, Plaintiff suffered from severe and permanent emotional and psychological distress, including depression, and mental anguish.
62. By reason of the foregoing, Defendant TAYLOR, is liable for compensatory and punitive damages.

FOURTH CAUSE OF ACTION:
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
AGAINST DEFENDANT TAYLOR

63. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 62 inclusively, with the same force and effect as if hereinafter set forth at length.
64. Defendant TAYLOR, breached his duty to exercise reasonable care when he escorted the minor Plaintiff to the apartments belonging to adult men for the sole purpose of offering the Plaintiff to perform sexual acts in exchange for money.
65. It is foreseeable that sex trafficking an individual, especially a minor, would result in the infliction of severe emotional and psychological distress. Thus, Defendant

TAYLOR, knew or should have known that his negligent conduct would result in the infliction of severe emotional and psychological distress.

66. As a direct and proximate cause of Defendant TAYLOR's negligent conduct, Plaintiff suffered from severe and permanent emotional and psychological distress, including depression, and mental anguish.

67. By reason of the foregoing, Defendant TAYLOR, is liable for compensatory and punitive damages.

FIFTH CAUSE OF ACTION:
GROSS NEGLIGENCE AGAINST DEFENDANT TAYLOR

68. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 67 inclusively, with the same force and effect as if hereinafter set forth at length.

69. Defendant TAYLOR evinced extreme indifference to Plaintiff's health, safety, and rights by breaching his duty to exercise reasonable care when he transported the minor Plaintiff to the apartments belonging to adult men for the sole purpose of offering the Plaintiff to perform sexual acts in exchange for money.

70. Thus, Defendant TAYLOR, knew or should have known that his willful and malicious conduct would cause foreseeable harm to Plaintiff, a minor child.

71. As a direct and proximate cause of Defendant's gross negligent conduct, Plaintiff suffered from severe and permanent emotional and psychological distress, including depression, and mental anguish. By reason of the foregoing, Defendant TAYLOR, is liable for compensatory and punitive damages.

SIXTH CAUSE OF ACTION:
NEGLIGENCE AGAINST DEFENDANTS
ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP.

72. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 71 inclusively, with the same force and effect as if hereinafter set forth at length.
73. Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp. had a duty to take reasonable steps to protect Plaintiff, who was a minor child at the time, from foreseeable harm when he was in their care, custody, and control.
74. During the time that Defendant TAYLOR was working for and serving as Founder of Defs. ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp., Defs. ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp. had a duty to take reasonable steps to prevent Defendant TAYLOR from using the tasks, premises, and instrumentalities of his position with Defs. ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp to target, groom, and sexually abuse children, including Plaintiff.
75. At all relevant times, Defs. ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp. had a duty to prevent the sexual abuse of Plaintiff at the hands of Def. TAYLOR.
76. Defs. ZULU NATION, UNIVERSAL ZULU NATION & XYZ Corp. breached the foregoing duties by failing to use reasonable care to protect Plaintiff from sexual abuse, which allowed and enabled Def. TAYLOR to groom and to sexually abuse Plaintiff.
77. As a direct and proximate result of the acts and omissions of each Defendant, Plaintiff suffered and will continue to suffer physically, emotionally, and otherwise.

SEVENTH CAUSE OF ACTION:
INTENTIONAL & NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
AGAINST DEFENDANTS ZULU NATION, UNIVERSAL ZULU NATION
& XYZ CORP.

78. Plaintiff repeats, reiterates, and realleges each and every allegation contained in those paragraphs of the complaint marked and designated 1 through 77 inclusively, with the same force and effect as if hereinafter set forth at length.

79. In committing the acts described above, Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. acted intentionally and/or recklessly in deliberate disregard of the high degree of probability of the emotional distress that plaintiff would suffer.

80. In addition, Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. is directly liable based on its own reckless, extreme, and outrageous conduct by providing Defendant TAYLOR with access to children, including Plaintiff, despite knowing that he would likely use their position to groom and to sexually abuse them, including Plaintiff. Their misconduct was so shocking and outrageous that it exceeds the reasonable bounds of decency as measured by what the average member of the community would tolerate and demonstrates an utter disregard by them of the consequences that would follow.

81. Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. engaged in reckless, extreme, and outrageous conduct by representing to Plaintiff and his family that Defendant TAYLOR was safe and trustworthy, despite the fact that Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. knew or should have known that Defendant TAYLOR was using his position in ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. to groom and to sexually abuse children including the minor Plaintiff. Their misconduct was so shocking and outrageous that it exceeds the reasonable bounds of decency as measured by what the average member of the community would tolerate and demonstrates an utter disregard by them of the consequences that would follow. As a result of this reckless, extreme, and outrageous conduct, Defendant TAYLOR used his position with ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. to gain access to Plaintiff and to sexually abuse him.

82. Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. knew that the foregoing reckless, extreme, and outrageous conduct would inflict severe emotional and psychological distress, including personal physical injury, on others, and Plaintiff did in fact suffer severe emotional and psychological distress and personal physical injury as a result, including severe mental anguish, humiliation and emotional and physical distress.

83. The conduct of Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. was intentional and outrageous as it pertains to the oversight, knowledge and/or acquiescence of the sexual abuse of Plaintiff and other children by Def. TAYLOR and while within the scope of his employment with Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP. and the services he provided to Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP.

84. As a direct and proximate result of the negligent, intentional, and outrageous actions of Defendants ZULU NATION, UNIVERSAL ZULU NATION & XYZ CORP., Plaintiff suffered and will continue to suffer physically, emotionally, and otherwise.

85. Per C.P.L.R. § 1603, the foregoing causes of action are exempt from the operation of C.P.L.R. § 1601 by reason of one or more of the exemptions provided under C.P.L.R. § 1602, including, but not limited to, C.P.L.R. §§ 1602(2), 1602(7).

WHEREFORE, the Plaintiff, JOHN DOE, demands judgment against all Defendants in an amount exceeding the jurisdictional limits of all lower courts of the State of New York, on the FIRST, SECOND, THIRD, FOURTH, FIFTH, SIXTH and SEVENTH Causes of actions for

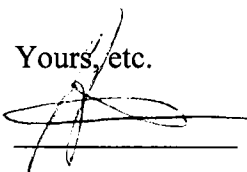
- a. Compensatory damages in an amount to be determined by a jury;
- b. Punitive damages in an amount to be determined by a jury;
- c. Costs, interest and attorney's fees;

d. Such other and further relief as this court may deem just and proper, including injunctive and declaratory relief of Action, together with interest, costs, and disbursements of this action.

JURY DEMAND

Plaintiff demands a trial on all issues so triable.

Dated: New York, New York
August 9, 2021

Yours, etc.


TANNER & ORTEGA
Attorneys for Plaintiff
299 Broadway, 17th Floor
New York, New York 10007
(212) 962-1333

VERIFICATION

STATE OF NEW YORK }
 }ss.:
COUNTY OF NEW YORK }

I, the undersigned, an attorney admitted to practice in the courts of New York State, state that I am the attorney for the Plaintiff in the within action: I have read the foregoing AMENDED COMPLAINT and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by the Plaintiff is because the Plaintiff reside outside the county in which this office is located. The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

Conversations with the plaintiff and information in our file.

I affirm that the foregoing statements are true, under the penalties of perjury.

Dated: New York, New York
August 9, 2021



HUGO ORTEGA, ESQ.