

1 MARTIN D. SINGER (BAR NO. 78166)  
2 LYNDA B. GOLDMAN (BAR NO. 119765)  
3 LAVELY & SINGER  
4 PROFESSIONAL CORPORATION  
5 2049 Century Park East, Suite 2400  
6 Los Angeles, California 90067-2906  
7 Tel.: (310) 556-3501  
8 Fax: (310) 556-3615  
9 Email: mdsinger@lavelysinger.com  
10 lgoldman@lavelysinger.com

11 Attorneys for Plaintiff ARSENIO HALL

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ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

MAY 05 2016  
Sherri R. Carter, Executive Officer/Clerk  
By Donita Fowler, Deputy

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 FOR THE COUNTY OF LOS ANGELES - WEST DISTRICT

14 ARSENIO HALL, an individual, )  
15 Plaintiff, )  
16 v. )  
17 SINEAD O'CONNOR, an individual; and )  
18 DOES 1 through 10, inclusive, )  
19 Defendants. )

20 CASE NO. SC125799  
21 COMPLAINT FOR LIBEL

22 DEMAND FOR JURY TRIAL

23 CASE MANAGEMENT CONFERENCE  
24 AUG 23 2016 Dept. M  
25 Date 8:30am

26 Plaintiff Arsenio Hall ("Plaintiff" or "Hall") hereby alleges as follows:

27 WHAT THIS CASE IS ABOUT

28 1. Desperate, attention-seeker Sinead O'Connor has maliciously published  
outlandish defamatory lies about comedian Arsenio Hall, falsely accusing him of supplying  
illegal "hard drugs" "over the decades" to the recently deceased musical artist, Prince, and of  
spiking her with drugs once years ago. The malicious statements made by O'Connor are  
absolutely false, and O'Connor's heinous accusations that Hall engaged in this criminal conduct  
are despicable, fabricated lies.

2. O'Connor is now known perhaps as much for her bizarre, unhinged internet rants  
as for her music. This time, she targeted Hall with wild and false accusations that he had been  
Prince's drug supplier for decades and had somehow been responsible for Prince's death.

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1 However, O'Connor knew that there was no truth whatsoever to the vicious lies she spewed  
2 about Hall on her Facebook page, and that she had concocted them and had no basis to believe  
3 that they were true. Among other things, O'Connor has repeatedly admitted that she actually  
4 detested Prince during his life, that she had a feud with Prince, and that she once had a violent  
5 fistfight with Prince and spat on him repeatedly after she told Prince "to go f\*\*k himself."  
6 Significantly, O'Connor has also publicly acknowledged that she actually met Prince only "a  
7 couple of times" after he wrote the song that made her famous, so she would have no basis to  
8 have personal knowledge of anyone who may have allegedly provided Prince with illegal "hard  
9 drugs" "over the decades" and certainly no factual basis whatsoever to believe that Hall had done  
10 so. In fact, he had not.

11 3. Hall has only had minimal contact with O'Connor, and last had contact with her  
12 approximately 25 years ago. The truth is that Hall never supplied illegal drugs to Prince, and he  
13 never "spiked" O'Connor with drugs. However, ever since O'Connor posed her malicious and  
14 reckless lies about Hall on her "OFFICIAL Facebook page" (where they have been commented  
15 on and forwarded thousands of times), her brazen lies have spread like wildfire across the media  
16 throughout the United States and the world, causing substantial harm to Hall's reputation.

17 4. Hall will not stand idly by while O'Connor attempts to get attention for herself by  
18 recklessly spreading malicious, vile lies that he engaged in egregious criminal conduct which  
19 falsely links Hall to Prince's death, and Hall is therefore bringing this libel action to clear his  
20 name and to set the record straight.

### 21 THE PARTIES

22 5. Plaintiff Arsenio Hall is an accomplished comedian and actor, and at all times  
23 relevant hereto has been, a resident of the County of Los Angeles, State of California.

24 6. Plaintiff is informed and believes and based thereon alleges that Defendant Sinéad  
25 O'Connor ("O'Connor" or "Defendant") is, and at all times relevant hereto was, an Irish citizen.  
26 Plaintiff further alleges on information and belief that O'Connor throughout her career has  
27 traveled on multiple occasions to the County of Los Angeles and the State of California. Plaintiff  
28 further alleges on information and belief that Defendant O'Connor purposefully and specifically

1 targeted Plaintiff, known to reside and work in Los Angeles, California, and purposefully  
2 directed her wrongful acts alleged herein toward Plaintiff in Los Angeles, California. Plaintiff  
3 further alleges on information and belief that in engaging in the conduct alleged herein,  
4 Defendant O'Connor engaged in tortious conduct which has had an effect in the County of Los  
5 Angeles and in the State of California.

6 7. Plaintiff is informed and believes and based thereon alleges that pursuant to  
7 California Code of Civil Procedure § 474, the fictitiously named Defendants sued herein as Does  
8 1 through 10, inclusive, and each of them, were in some manner responsible or legally liable for  
9 the actions, events, transactions and circumstances alleged herein. The true names and capacities  
10 of such fictitiously named Defendants whether individual, corporate, associate or otherwise are  
11 presently unknown to Plaintiff and Plaintiff will seek leave of Court to amend this Complaint to  
12 assert the true names and capacities of such fictitiously named Defendants when the same have  
13 been ascertained. For convenience, all Defendants shall sometimes be collectively referred to  
14 herein as "Defendants," and each reference to a named Defendant herein shall also refer to the  
15 Doe Defendants, and each of them.

16 8. Plaintiff is informed and believes and based thereon alleges that at all material  
17 times each Defendant was and is the agent, employee, partner, joint venturer, co-conspirator,  
18 owner, principal and employer of each of the remaining Defendants and at all times herein  
19 mentioned was acting within the course and scope of that agency, employment, partnership,  
20 conspiracy, ownership or joint venture. Plaintiff is further informed and believes and based  
21 thereon alleges that the acts and conduct of each Defendant alleged herein were known to, and  
22 authorized or ratified by, the officers, directors, and managing agents of each other Defendant.

### 23 O'CONNOR'S DEFAMATORY LIES ABOUT HALL

24 9. Commencing on or about May 2, 2016, O'Connor recklessly and maliciously  
25 posted a statement on her "OFFICIAL Facebook page" claiming that "long time hard drug user"  
26 Prince "got his drugs over the decades" from Hall, and that Hall had supposedly "spiked" her  
27 "years ago" (the "Defamatory Lies"). The Defamatory Lies are absolutely false, fabricated and  
28 fictional.

1           10.     O'Connor is well known for her media antics and for seeking attention through  
2 inflammatory Facebook posts and other attention-grabbing media tactics, such as her recent  
3 shocking proclamation that all of Prince's unreleased musical recordings ought to be "cremated"  
4 and destroyed. Once O'Connor's Defamatory Lies about Hall were published on her Facebook  
5 page, they were rapidly disseminated by mainstream and gossip media circling the globe, as  
6 O'Connor undoubtedly intended. As a consequence of O'Connor's vile Defamatory Lies, fans of  
7 the iconic musical artist Prince were wrongly led to believe that Hall engaged in criminal conduct  
8 as Prince's decades-long drug supplier and that he supposedly somehow responsible for Prince's  
9 death. This is extraordinarily damaging to Hall's reputation.

10           11.     O'Connor published her Defamatory Lies recklessly and maliciously, knowing  
11 that they were false, or without having any reasonable basis whatsoever to believe that they were  
12 true. O'Connor has repeatedly stated in the media that she met Prince only a few times and that  
13 she actually "detested" Prince (notwithstanding that Prince wrote her biggest hit song), and that  
14 she told Prince "to go f\*\*\* himself," had a violent "fistfight" with Prince and exchanged blows  
15 with him, and that she "spat on him quite a bit." Given O'Connor's admitted animosity toward  
16 Prince during his lifetime, and her admitted highly infrequent and unfriendly contact with him,  
17 O'Connor was obviously not in a position to have any personal knowledge about who, if anyone,  
18 might have allegedly supplied Prince with illegal drugs "over the decades." Yet, she recklessly  
19 and maliciously spread the brazen lie that Hall engaged in illegal criminal conduct by supposedly  
20 acting as Prince's drug supplier, knowing that was false or without having any reasonable basis  
21 whatsoever to believe that it was true. Similarly, either with actual knowledge of falsity or  
22 without any reasonable basis to believe that it was true, she falsely accused Hall of engaging in  
23 criminal conduct by "spiking" her with drugs years ago.

24           12.     O'Connor's malicious internet publication of brazen lies falsely accusing Hall of  
25 engaging in serious criminal conduct by supposedly supplying Prince with hard drugs over the  
26 decades, and of "spiking" her, resulted in her Defamatory Lies becoming widespread and  
27 ubiquitous. Within 48 hours after O'Connor initially posted her Defamatory Lies about Hall on  
28 her Facebook page, they had more than 5,000 Facebook "Likes," more than 3,000 Facebook

1 “Shares,” and more than 2,400 Facebook “Comments.” Making matters worse, the Defamatory  
2 Lies were read not only by readers of O’Connor’s Facebook page, but by countless people who  
3 read the innumerable print and internet media reports about her false Facebook post.

4 13. By publishing the Defamatory Lies on her Facebook page, Plaintiff alleges on  
5 information and belief that O’Connor intended that they would be read, and were read,  
6 throughout the City and County of Los Angeles and the State of California, where Plaintiff lives  
7 and works, as well as throughout the world.

8 14. Among other things, the Defamatory Lies falsely assert that Plaintiff engaged in  
9 illegal criminal conduct, and the Defamatory Lies are libelous on their face and clearly expose  
10 Plaintiff to hatred, contempt, ridicule and obloquy and/or cause Plaintiff to shunned or avoided  
11 and have a tendency to injure Plaintiff in his occupation.

12 15. The false Defamatory Lies are reasonably susceptible of a defamatory meaning on  
13 their face in that they falsely assert that Plaintiff engaged in criminal conduct, and the  
14 Defamatory Lies have a direct tendency to injure Plaintiff with respect to his professional  
15 reputation, character and business. Plaintiff is informed and believes and based thereon alleges  
16 that the Defamatory Lies were written and published by O’Connor with actual malice with  
17 knowledge that they were false, or with a reckless disregard for the truth.

18 16. Plaintiff is informed and believes and based thereon alleges that O’Connor  
19 intentionally portrayed Plaintiff in this manner knowing that the depiction was false, or without  
20 any reasonable grounds for believing it to be true.

21 17. The Defamatory Lie disseminated by O’Connor were unprivileged and were  
22 intended by O’Connor to directly injure Plaintiff with respect to his professional reputation,  
23 character, trade and business. Plaintiff is informed and believes and based thereon alleges that  
24 Defendant knew or recklessly disregarded the fact that the Defamatory Lies would likely damage  
25 Plaintiff’s reputation.

26 18. As a direct and proximate result of the above described conduct by O’Connor,  
27 Plaintiff has suffered general and special damages in an amount not presently known, but  
28 believed to be not less than Five Million Dollars (\$5,000,000). Although the full nature, extent

1 and amount of these damages are currently unknown, the Complaint will be amended at or before  
2 trial to insert such information if such amendment is deemed necessary by the Court.

3 19. Plaintiff is informed and believes and based thereon alleges that the aforesaid acts  
4 of O'Connor were done intentionally or with a conscious disregard of Plaintiff's rights and with  
5 an intent to vex, injure or annoy Plaintiff such as to constitute oppression, fraud or malice, thus  
6 entitling Plaintiff to exemplary and punitive damages in an amount appropriate to punish or set  
7 an example of O'Connor, and to deter such conduct in the future which amount will be proved a  
8 trial. Plaintiff is informed and believes and based thereon alleges that the officers, directors or  
9 managing agents of Defendants, and each of them, authorized, directed and/or ratified the  
10 wrongful acts of Defendants and consequently are liable to Plaintiff.

11 **WHEREFORE**, Plaintiff prays for judgment against O'Connor as follows:

12 1. For compensatory damages according to proof at the time of trial in an amount not  
13 less than Five Million Dollars (\$5,000,000), together with interest thereon at the maximum legal  
14 rate;

15 2. For punitive damages pursuant to Civil Code Section 3294 in an amount  
16 appropriate to punish and set an example of Defendants, and each of them, and to deter such  
17 conduct in the future, the exact amount of such punitive damages subject to proof at the time of  
18 trial;

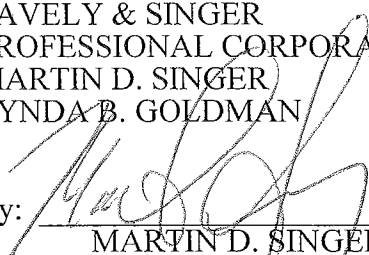
19 3. For all costs of suit and reasonable attorneys' fees incurred herein by Plaintiffs as  
20 may be provided by law;

21 4. For interest as may be provided by law; and

22 5. For such other and further relief as the Court deems just and appropriate.

23  
24 DATE: May 5, 2016

LAVELY & SINGER  
PROFESSIONAL CORPORATION  
MARTIN D. SINGER  
LYNDA B. GOLDMAN

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27 By:   
MARTIN D. SINGER  
28 Attorneys for Plaintiff ARSENIO HALL

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**JURY DEMAND**

Plaintiff Arsenio Hall hereby demands trial by jury.

DATE: May 5, 2016

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LYNDA B. GOLDMAN

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MARTIN D. SINGER  
Attorneys for Plaintiff ARSENIO HALL