Contact: Gloria Allred

(323) 653-6530

Email: gallred@amglaw.com

Today we filed a lawsuit in Los Angeles County Superior Court on behalf of Shantel Jackson against Floyd Mayweather, Jr. ("Mayweather").

Shantel met Mr. Mayweather in July 2006 when she was 21 years old. Before she met him, she had worked on and off as a model and actress and at other jobs since she was 15 years old. As a result of her work, she managed to buy her own house.

Shantel met Mr. Mayweather when she was working at a hostess in Atlanta Georgia. He approached her.

After numerous phone calls and dates, Shantel and Mayweather developed an intimate relationship. Before long, Mayweather prevailed upon Shantel to move to Las Vegas and cohabit with him in his residence there.

Mr. Mayweather wanted Ms. Jackson to make herself available to him virtually at all times. At his direction, she turned down job offers that came her way, and worked very infrequently during her relationship with Mayweather.

Shantel fell deeply in love with Mr. Mayweather and at one point she and Mr. Mayweather became engaged.

Ms. Jackson stood by Mayweather through a criminal proceeding, which resulted in the imposition of a three-month jail term upon him for domestic violence against another woman. She visited him during his incarceration.

Our lawsuit alleges that shortly after Mayweather's release from jail in August of 2012, he and Ms. Jackson had an argument. The lawsuit further alleges that during the argument, he assaulted her. Approximately one week later, Mayweather asked Ms. Jackson for her forgiveness and promised that he would never assault her again.

Difficulties continued to exist in the relationship between Ms. Jackson and Mr. Mayweather. In February 2013, Ms. Jackson told Mr. Mayweather that she would leave him unless he agreed to attend counseling with her regarding their

relationship. Mr. Mayweather promised to do so, but did not attend any counseling sessions.

During the first week of April of 2013, Ms. Jackson decided to end her relationship with Mayweather and to return to Los Angeles for a fresh start.

After Ms. Jackson moved to California, Mr. Mayweather went to great lengths to try to get her back. Ms. Jackson was ultimately persuaded to try again to see if their relationship could work. She moved back to Las Vegas on or about April 19, 2013, traveling on a private jet sent by Mr. Mayweather for her. She took some of her possessions with her. Most of her possessions remained in California.

Soon after she returned to Las Vegas, it became clear that Mayweather had not turned over a new leaf. Our lawsuit alleges that within a few days after the plaintiff's return to Las Vegas, the arguments began anew, and Ms. Jackson told Mayweather that she would leave him. The lawsuit alleges that Mr. Meyweather assaulted her and took her jewelry away from her.

Ms. Jackson was terrified for her safety, and humiliated by Mayweather's conduct.

For a period of time after Ms. Jackson's personal property was taken, Mr. Mayweather kept her virtually a prisoner in his home. He maintained surveillance. She could only leave the house if she was accompanied by one of his employees.

In June of 2013, Mr. Mayweather was out of town and Ms. Jackson used that opportunity to leave Las Vegas and move back to California.

Mr. Mayweather continued to attempt to woo Ms. Jackson back. He told her that he was willing to change his ways and expressed a willingness to go into counseling for the benefit of their relationship. He sent a private jet to pick her up and take her to watch his fight in September 2013 and showered her with expensive gifts, including Hermes handbags.

In November of 2013, Ms. Jackson became pregnant by Mayweather. Mr. Mayweather was aware that she was pregnant but she did not share that information with her family and only one friend knew that she was pregnant.

In December of 2013, a sonogram revealed that Ms. Jackson was carrying twins that Mayweather had fathered, and she told him the news. He asked for a copy of the sonogram, which she sent to him. She had no idea that he would turn that image into a device to inflict emotional torture upon her.

Mayweather insisted that the plaintiff move to Las Vegas. Ms. Jackson wanted to remain in Los Angeles. When Ms. Jackson refused to move, Ms. Jackson alleges that Mayweather became verbally abusive, stating "I took you out of the 'hood. I should have left your ass there."

In January of 2014, Ms. Jackson's pregnancy terminated and Mr. Mayweather was so informed.

In February and March of 2014, Mr. Mayweather continued to try to get Ms. Jackson to come back to him.

On April 12, 2014, the plaintiff attended a basketball game in the company of a famous performer professionally known as "Nelly." She posted a photo of the two of them on her social media.

Mayweather was infuriated. He wanted her to take down the photo of her and Nelly.

Our lawsuit alleges Mayweather threatened Ms. Jackson that if she did not take the image down of her with Nelly that he would post "naked photos" of her on social media. Mayweather had apparently taken some photos of the plaintiff asleep when she was undressed. The plaintiff never consented to the taking of such photographs.

Ms. Jackson resolved not to go through life being bullied and dominated by Mayweather, and refused to take down the photo of her and Nelly and also refused to reconcile with Mayweather.

On May 1, 2014, Mayweather in retaliation for Ms. Jackson's continued refusals to comply with his demands as set forth above, decided to give her the ultimate humiliation. That day, knowing that his social media following was huge and devoted, Mayweather posted the following on his Facebook and Instagram accounts: "the real reason me and Shantel Christine Jackson @MissJackson broke up was because she got an abortion, and I'm totally against killing babies. She

killed our twin babies. #ShantelJackson #FloydMayweather #TheMoneyTeam#TMT."

To increase the plaintiff's anguish and humiliation, Mayweather also posted a copy of the sonogram of the twin fetuses that Ms. Jackson had been carrying, as well as a summary medical report regarding the pregnancy. As intended by Mayweather, the media outlet TMZ picked up his postings and republished the sonogram and medical report. Other media outlets then jumped on the bandwagon, resulting in millions seeing the highly public humiliation of the plaintiff.

Not satisfied with the humiliation of publicly branding the plaintiff a murderer, Mayweather then used media broadcasts to disclose other private information about the plaintiff and to disseminate false statements about the plaintiff.

As Mayweather intended, his postings caused a frenzy of public reaction. Members of the public called the plaintiff a "baby killer" "ho" (slang for whore) and the like. Unknown individuals asked the plaintiff "Why did you kill Floyd's babies?"

Ms. Jackson's family found out about the pregnancy and termination of that pregnancy through the media, which compounded her anguish.

As a result, of Mr. Mayweather's outrageous actions against Shantel we filed a lawsuit today against him alleging

- 1. INVASION OF PRIVACY PUBLIC DISCLOSURE OF PRIVATE FACTS
- 2. INVASION OF PRIVACY FALSE LIGHT PORTRAYAL
- 3. CONVERSION
- 4. REPLEVIN
- 5. BATTERY
- 6. ASSAULT
- 7. DEFAMATION

## 8. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

## 9. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

## 10. CIVIL HARASSMENT

## 11. FALSE IMPRISONMENT

We are seeking general, compensatory and punitive damages against Mr. Mayweather in an amount according to proof of trial. In addition, we are seeking an injunction against him prohibiting him from molesting, attacking, striking, stalking, threatening, sexually assaulting, battering, harassing or telephoning Shantel, destroying her personal property or coming within a specified distance of her.

No woman should be forced to suffer extremely abusive, outrageous and harmful conduct, similar to what Mr. Mayweather inflicted on Shantel.

The fact that Mr. Mayweather Jr. is rich, famous and powerful and has fans worldwide does not entitle him to abuse the woman whom he said he loved and who loved him. He has no right to invade her privacy, reveal private medical facts to the world, such as that she was pregnant with twins and make public statements to the world about why he believed the pregnancy ended.

No man, rich or poor, has the right to assault women, take their property, invade their privacy, threaten them, carry out their threats, hurt and humiliate them, and defame them.

Floyd Mayweather Jr. may make his living inflicting pain on others in the boxing ring but he has no right to force Shantel to endure the pain that he inflicted on her outside of the boxing ring.

She had a right to resist his efforts to control her and she had a right to end her relationship with him without being threatened, humiliated, retaliated against and harmed.

We will seek to hold Mr. Mayweather legally accountable in a court of law for his many acts of misconduct targeted at Shantel and we expect to prevail.

It takes an enormous amount of courage for Shantel to stand up to Mr. Mayweather after what Shantel has been forced to suffer in her seven-year relationship with Mr. Mayweather. She and I both hope that as a result of this lawsuit that Mr. Mayweather will understand that women deserve to be treated with respect and dignity and as equal partners in romantic relationships.

Gloria Allred Attorney at Law Representing Shantel Jackson September 4, 2014