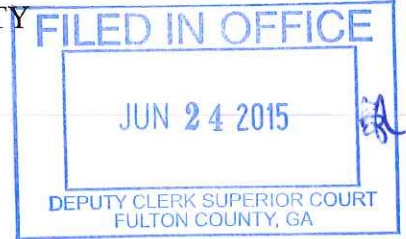


IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA



BEDELIA C HARGROVE, )  
as conservator and next friend for )  
BOBBI KRISTINA BROWN, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
NICHOLAS GORDON, )  
 )  
Defendant. )

Civil Action File

No.: 2015CV262460

**JURY TRIAL DEMANDED**

**COMPLAINT**

Bedelia C Hargrove, Plaintiff, files this Complaint as conservator and next friend for Bobbi Kristina Brown, respectfully showing the Court as follows:

**PARTIES**

1. Plaintiff Bedelia C Hargrove is the court-appointed conservator for Bobbi Kristina Brown (“Brown”), a legally incompetent adult resident of the State of Georgia.
2. Defendant Nicholas Gordon (“Defendant”) is an adult resident of Fulton County, State of Georgia.

**JURISDICTION AND VENUE**

3. As a resident of Fulton County, Georgia, Defendant is subject to the jurisdiction and venue of this Court.
4. Defendant’s tortious conduct caused, among other things, substantial bodily harm to Brown in Fulton County, Georgia. Accordingly, jurisdiction and venue are also proper pursuant to, among other things, the provisions of O.C.G.A. § 9-10-91 (2) and Ga. Const. Art. VI, §2, ¶6.

## FACTUAL BACKGROUND

5. Brown is an unmarried, incapacitated adult female currently under medical care for brain injury she sustained on January 31, 2015.
6. Defendant has held himself out as having several different relationships with Brown at various times. Prior to 2012, Defendant held himself out to be Brown's surrogate "brother." Then, after 2012, when Brown inherited a substantial sum, Defendant assumed the position of Brown's boyfriend. On or around January 9, 2014, Defendant perpetuated the fraud that he had married Brown, though in fact he never did so.
7. The misrepresentation that Defendant was Brown's "husband" was used to control Brown and limit with whom she could interact. For example, Defendant often answered Brown's personal cell phone, would not allow her to make appointments without his approval, and manipulated her bank relationship so that he could access her money. This was all part of a scheme to benefit from her wealth.
8. In fact, Defendant acted on this scheme by routinely transferring a large portion of Brown's funds into an account controlled solely by him, without the consent or authorization of Brown.
9. Defendant then began questioning Brown's access to trust assets and threatening one of the trustees with guns and other violent weapons. On April 14, 2014, this Court issued a restraining and/or protective order against Defendant for violation of O.C.G.A. § 16-5-90 relating to his stalking of this trustee. (See Civil Action File No., 2014CV243982).
10. Defendant also began to commit domestic violence on Brown, including punching her in the face, knocking out a front tooth, and dragging her upstairs by her hair.
11. Just prior to January 31, 2015, Brown had confided to someone that Defendant was not

the man she thought he was and set up a time on January 31, 2015 to meet with this person to further discuss this revelation.

12. Brown, however, never made it to the meeting. Instead, on the morning of January 31, 2015, Brown became embroiled in a loud argument with Defendant at her townhome. The loud argument ended and Brown was later found unresponsive and unconscious, face down in a bathtub, with her mouth swollen and another tooth knocked out.
13. Medical personnel were able to revive Brown, though she was soon placed into a medically-induced coma for her medical welfare. She has since been diagnosed with global and irreversible brain damage.
14. Even after Brown's hospitalization, and while she was in a coma, Defendant accessed Brown's bank account(s) and stole in excess of \$11,000.00 from Brown's bank account(s).

### COUNT ONE

#### (ASSAULT)

15. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.
16. When Defendant physically abused and attacked Brown, Defendant acted with the intent to cause Brown apprehension of a violent injury.
17. As a direct and proximate result of Defendant's conduct, Brown has suffered life threatening bodily harm and damages, in an amount to be proven at trial.
18. Based on the foregoing wrongful conduct by Defendant, which was knowing, willful, intentional, reckless and/or grossly negligent, Plaintiff is entitled to an award of punitive damages in the amount of at least ten million dollars (\$10,000,000.00).

**COUNT TWO**

**(BATTERY)**

19. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.
20. As a result of Defendant's violent physical abuse, Defendant intentionally engaged in and caused unwanted, harmful and offensive bodily contact to Brown.
21. Brown has suffered substantial physical bodily harm, including loss of teeth, pain and suffering, and trauma that has required medical treatment as a direct consequence of Defendant's physical abuse.
22. As a direct and proximate result of Defendant's conduct, Brown has suffered and continues to suffer significant bodily injury and damages in an amount to be proven at trial.
23. Based on the foregoing wrongful conduct by Defendant, which was knowing, willful, intentional, reckless and/or grossly negligent, Plaintiff is entitled to an award of punitive damages in the amount of at least ten million dollars (\$10,000,000.00).

**COUNT THREE**

**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

24. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.
25. Defendant committed domestic abuse against Brown without provocation and/or justification, which resulted in substantial physical bodily injury.
26. Brown suffered extreme visible life altering bodily harm as a result of Defendant's outrageous, unwanted, harmful and offensive contact.

27. As a direct result of Defendant's extreme and outrageous assault upon her, Brown suffered severe emotional distress and damages to be proven at trial.
28. Based upon Defendant's knowing, willful, intentional, malicious, reckless and/or grossly negligent conduct, Brown is entitled to an award of punitive damages in the amount of at least ten million dollars (\$10,000,000.00).

**COUNT FOUR**

**(CONVERSION)**

29. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.
30. While Brown was in a medically-induced coma, Defendant intentionally and without consent or authorization transferred money from Brown's bank account(s) to his own bank account.
31. Defendant was obligated to return Brown's financial assets and personal property ("assets"). Due to Defendant's assault and battery of Brown, she is physically unable to demand the return of her assets. However, family and/or friends of Brown have otherwise put Defendant on notice of their recent discovery of the converted assets.
32. Defendant has failed to return Brown's assets.
33. Defendant's refusal to return Brown's assets in his possession is an exercise of wrongful dominion or control over Brown's assets and is detrimental to Brown's rights as the owner.
34. As a direct and proximate result of Defendant's conversion, Brown has suffered damages. The full extent of Defendant's conversion will be confirmed through the discovery process, and the amount to be determined at trial.

35. Based on the foregoing wrongful conduct by Defendant, which was knowing, willful, intentional, malicious, reckless and/or grossly negligent, Plaintiff is entitled to an award of punitive damages in the amount of at least ten million dollars (\$10,000,000.00).

**COUNT FIVE**

**(QUANTUM MERUIT/UNJUST ENRICHMENT)**

36. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.

37. Defendant has been unjustly enriched by his theft of Brown's personal property and trust assets from her bank account. Defendant has financially benefitted to the detriment of Brown, and will continue to further unlawfully reap financial benefit, from the value and use of Brown's personal property and trust assets.

38. Without justification, Defendant has been unjustly enriched, and Brown has been damaged, the full extent of which will be confirmed through the discovery process, and the amount to be determined at trial.

**COUNT SIX**

**(ATTORNEYS' FEES - O.C.G.A. § 13-6-11)**

39. Plaintiff incorporates by reference paragraphs 1 through 14 of her Complaint as if fully stated herein verbatim.

40. Defendant has been, *inter alia*, stubbornly litigious, acted in bad faith, and has put Plaintiff and/or Brown to unnecessary trouble and expense.

41. Plaintiff is entitled to recover from Defendant expenses of litigation, including reasonable attorneys' fees, pursuant to O.C.G.A. § 13-6-11, in an amount to be proven at trial.

**COUNT SEVEN**

**(PUNITIVE DAMAGES)**

42. Plaintiff incorporates by reference paragraphs 1 through 41 of her Complaint as if fully stated herein verbatim.
43. Defendant's conduct, referenced above, constitutes the intentional disregard of the rights of Brown, thereby justifying the imposition of punitive damages, in an amount to be determined by the enlightened conscience of the jury.
44. Defendant's conduct, referenced above, was undertaken with the specific intention of causing Brown physical harm, thereby eliminating the applicability of any statutory limitation upon the amount of punitive damages in an amount to be further determined by the enlightened conscience of a jury of her peers.

**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands that this matter be tried by a jury of twelve (12) competent and impartial persons.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting the following relief:

- (a) Entering judgment in favor of Plaintiff and against Defendant on all counts of this Complaint, including but not limited to for actual and/or compensatory damages for all past and present injury, as well as all past, present, and future pain and suffering in an amount to be proven at trial;
- (b) Entering judgment against Defendant for his unlawful conversion of Brown's assets and property;

- (c) Entering judgment in favor of Plaintiff and against Defendant for all costs and expenses incurred in connection with this lawsuit;
- (d) Injunctive relief, first temporary and then, permanent, compelling the return of financial assets and personal property;
- (e) Pre- and post- judgment interest on all sums awarded to the maximum extent allowed by law;
- (f) An award of punitive damages in an amount to be determined by the enlightened conscience of a jury; and
- (g) Awarding Plaintiff such other and further relief as this Court deems just and proper.

This 24th day of June, 2015.



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Mark G. Trigg  
triggm@gtlaw.com  
Ga. Bar No. 716295  
David W. Long-Daniels  
long-danielsd@gtlaw.com  
Ga. Bar No. 141916  
Thomas J. Mazziotti  
mazziottit@gtlaw.com  
Georgia Bar No. 479893  
C. Whitfield Caughman  
caughmanw@gtlaw.com  
Ga. Bar No. 109147  
Rebecca H. Silk  
silkr@gtlaw.com  
Ga. Bar No. 194673

GREENBERG TRAUERIG, LLP  
3333 Piedmont Road  
Suite 2500  
Atlanta, Georgia 30305  
Phone: (678) 553-2100  
Facsimile: (678) 553-2212