

Vrabeck Adams & Company, Inc.
Ariel Mitchel, Esq.



April 20, 2022

Mr. Tremaine Neverson AKA "Trey Songz"
Via US Mail

RE: FOXWOODS CASINO & BARCARDI LTD Present TREY SONGZ
"Titties in the Open"

Megan Johnson vs. Tremaine Neverson AKA ("Trey Songz"), Foxwoods Casino Resort, Bacardi USA, Inc. and does 1-20.

Sexual Battery/Assault
Negligence/Gross Negligence
Intentional Infliction of Emotional Distress/ Negligent Infliction of Emotional Distress

Dear Mr. Neverson:

We have been retained by Megan Johnson as litigation counsel to pursue all legal remedies against you, Foxwoods Resort Casino and Bacardi USA Inc. in the above referenced matter. On August 25, 2013, at 5:22 pm, you sexually assaulted and battered Ms. Johnson, with a reckless disregard for her safety, while she attended a function at the Mashantucket Pequot Tribal Nation's Foxwoods Resort Casino.

I am sure that this letter does not come as a surprise to you. One woman may have been mistaken, but it is unlikely the 12+ women that have made complaints against you, including our four clients, were also mistaken. Ms. Johnson is certainly not mistaken. Perhaps the enclosed video will refresh your recollection and illustrate the certainty of your negligent and reckless behavior.

On that day, Ms. Johnson attended "Foxwoods Liquid Sundays with Trey Songz." Ms. Johnson and several work associates had VIP passes and entered the Bacardi Grey Goose Vodka tent to chat with other guests. And while plenty of Grey Goose drinks and shots were flowing, Ms. Johnson barely drank and could have NEVER expected a random act of violence.

Ms. Johnson's friend set up to take a picture, and you happened to be behind her. Rather than a picture, Ms. Johnson's friend took a video. That video shows you coming up behind Ms. Johnson, ripping her bikini top from her chest-grabbing and then exposing her bare breast. Ms. Johnson immediately pulled her top back on preparing herself for another assault, that you surely delivered. As if on cue, and with intended premeditation, you further terrorized and humiliated Ms. Johnson with your degrading chant, "Titties in The Open" "Titties in The Open." Which you chanted FOUR TIMES as if it were the chorus to one of your songs.

Shocked and confused, Ms. Johnson remained quiet during the rest of the event, as several of her co-workers tried to console her. Ms. Johnson specifically remembers holding her arm over her chest longer than necessary out of fear you would randomly assault her from behind again. At her hotel that evening, Ms. Johnson spent extra time in the shower feeling ashamed and embarrassed. Her mind raced with anxiety as she dreaded seeing her co-workers. Your disgraceful assault combined with the extreme anxiety you caused Ms. Johnson caused her memory of the sexual assault to become "frozen in time." A mental state which is tragically all too common with victims of who undergo sexual trauma after an attack like the one you intentionally inflicted on Ms. Johnson.

In December 2021, after reading about your Las Vegas arrest, Ms. Johnson had for the first time recalled the incident and realized she too had been sexually assaulted by your reckless and negligent hands. Specific details of the assault flooded her memory shortly thereafter. In fact, she was recently able to identify one of your security personnel from a photograph. (The same security person was identified by two of our other clients as the individual who violently assaulted them at your direction.) He is known as "Big Bully."

Since the assault, Ms. Johnson has engaged in self harm, suffered severe emotional distress, including fear, anxiety, humiliation, depression, and other physical injuries, and damages (both economic and noneconomic). Her injuries are substantial, continuing, and permanent.

We know a lengthy, public litigation would encourage other victims, and witnesses, to come forward in support of Ms. Johnson's claims. Ms. Johnson has instructed me to explore all reasonable settlement offers that exceed \$5 million dollars. In the event you or your attorneys fail to contact Ms. Ariel Mitchell or me by May 5, 2022, to discuss an acceptable resolution, I will assume that you do not intend to settle this matter and will proceed with litigation.

VRABECK ADAMS & COMPANY, INC.

/s/ George Vrabeck

George Vrabeck, Esq.
[REDACTED]

CC:
Ariel Mitchell, Esq.
[REDACTED]