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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

MAURICE SHAKUR P/K/A MOPREME
SHAKUR, AS ADMINISTRATOR OF THE
ESTATE OF MUTULU SHAKUR,

Plaintiff,

vs.

DUANE KEITH "KEEFE D" DAVIS, and
DOES 1 to 100,

Defendant.

Case No.: **26STCV13564**

COMPLAINT FOR DAMAGES:

1. WRONGFUL DEATH

1 Plaintiff Maurice Shakur, p/k/a “Mopreme” Shakur, also known as “Little Mutulu Shakur”
2 as a child (“Mopreme”), as Administrator of the Estate of Mutulu Shakur (“Plaintiff”), for his
3 Complaint against Defendants Duane Keith Davis, a/k/a “Keefe D” (“Keefe D”) and John Does 1-
4 100, collectively, (“Defendants”), hereby alleges as follows:

5 **NATURE OF THE ACTION**

6 1. On September 7, 1996, Tupac Amaru Shakur (“Tupac”), widely considered to be
7 one of the greatest rap artists of all time, was shot in a drive-by shooting in Las Vegas, Nevada by
8 a gunman in a white Cadillac. Tupac died six days later at the young age of 25. For nearly three
9 decades, no individuals had been held civilly or criminally accountable for a brutal murder whose
10 effects remain palpable to this day. Witnesses were unwilling to cooperate with the police.
11 Investigations immediately following Tupac’s murder ran dry. Even a multi-agency task force,
12 commissioned several years later to investigate the murders of both Tupac and rapper Christopher
13 Wallace (“the Notorious B.I.G.” or “Biggie”), made no arrests.
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15 2. In the absence of any successful investigations or a single prosecution, conspiracy
16 theories flourished for decades. Some speculated that Biggie, Tupac’s perceived rival, was
17 responsible, while others theorized that Marion Knight, Jr. (“Suge Knight”), former CEO of Death
18 Row Records, was involved. The theories were countless but similar in that, no matter the alleged
19 perpetrator, many suggested that Tupac’s murder was gang related: Tupac was murdered by
20 members of the South Side Crips after an altercation at the MGM Grand Hotel earlier that evening
21 between Orlando “Baby Lane” Anderson, a South Side Crip, and several members of Death Row
22 Records, including Tupac. Importantly, none of these theories, no matter how widespread, were
23 supported by concrete evidence.
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25 3. Nearly 30 years after Tupac’s death, in 2023, the first—and only—arrest was made.
26 Related grand jury transcripts and a subsequent Netflix documentary have since revealed the
27 existence of a broader, more complex conspiracy to murder Tupac that involved much more than
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1 mere retaliation for a prior altercation. Despite this additional information, however, the truth
2 remains elusive. Many individuals who were involved have long since passed way, while others
3 have been hard to identify. Yet, one thing is certain: there remain individuals who were involved
4 in Tupac's murder who, for 30 years, have not been held accountable for their crimes. This action
5 seeks to change that and to recover damages for the wrongful death of Tupac on behalf of the Estate
6 of Mutulu Shakur, Tupac's late stepfather and parent.

8 **THE PARTIES AND RELATED INDIVIDUALS**

9 4. Tupac Amaru Shakur was widely regarded as one of the greatest and most influential
10 rappers of all time. Over the course of his career, he sold more than 75 million records worldwide.
11 His body of work—including the albums *2Pacalypse Now*, *Thug Life Vol. I*, *Me Against the World*,
12 and *All Eyez on Me*—addressed themes of poverty, systemic racism, and inner-city life with a
13 directness and emotional depth that resonated across generations, cultures, and socio-economic
14 classes. Tupac was just 25 years old when he died on September 13, 1996.

15 5. Afeni Shakur ("Afeni") was Tupac's mother. In 1997, Afeni filed a wrongful death
16 action against Orlando Anderson and others for the death of her son in the Superior Court of the
17 State of California, County of Los Angeles, Central District. *Afeni Shakur v. Orlando Anderson*,
18 *et al.*, (Super. Ct. Los Angeles County, 1997 No. BC177861). On March 3, 1999, the Superior
19 Court dismissed the action without prejudice.

20 6. Mutulu Shakur ("Mutulu") was Tupac's stepfather. Mutulu married Tupac's
21 mother, Afeni, when Tupac was approximately 4 years old. Mutulu was involved in Tupac's life
22 from the time Tupac was approximately one year old, and functioned as Tupac's father in all
23 material respects from that point forward. Under California Probate Code Section 6453, a
24 stepparent qualifies as a "parent" for purposes of intestate succession where the parent holds him
25 or herself out as the parent of the child. Cal. Prob. Code § 6453; *see also Estate of Martino*, 96 Cal.
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1 App. 5th 596, 601 (2023). Mutulu’s relationship with Tupac began in Tupac’s infancy and
2 continued, without interruption, until Tupac’s death. As Mutulu stated: “I’ve been with Tupac from
3 the time, from 1 years old. And I’m his friend, his comrade.” Tupac Facts, *Mutulu Shakur Interview*
4 *[Tupac’s Stepfather]*, YouTube (June 9, 2023), at 02:30–03:40.¹ Mutulu treated Tupac as his own
5 son, held him out to the world as such, and raised him alongside Afeni in the context of their shared
6 involvement in the Black Liberation movement. Tupac’s biological father, William “Billy”
7 Garland, acknowledged Mutulu’s role in Tupac’s upbringing, stating that Mutulu “was there for my
8 son when I wasn’t.” The Art of Dialogue, *I Respect 2Pac’s Stepfather Mutulu Shakur*, YouTube
9 (June 9, 2023), at 03:05–03:41.²

11 7. During Tupac’s childhood, Mutulu and Afeni worked in community programs in the
12 South Bronx. Afeni worked at Bronx Legal Services, providing legal services for tenants facing
13 displacement and substandard housing. Mutulu worked at Lincoln Detox, an anti-drug program.
14 Tupac was raised in this environment of community activism and witnessed the struggles of
15 ordinary people firsthand. As Mutulu described: “He learned a lot from the people ... he hung
16 around with struggle people. People were struggling for things. He listened to the meetings, he
17 was at all the meetings ... he was a part of that struggle as a young child as he developed.” Tupac
18 Facts, *Mutulu Shakur Interview [Tupac’s Stepfather]*, at 02:30–03:40. Mutulu further stated that
19 Tupac “experienced what people experienced” growing up, including periods without adequate
20 food, heat, or stable housing. *Id.* This shared experience formed the foundation of the father-son
21 bond between Mutulu and Tupac.

24 8. Tupac publicly acknowledged Mutulu as his father by adopting Mutulu’s last name,
25 “Shakur.” Tupac also referenced Mutulu in his music. And while Mutulu was incarcerated, Tupac
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28 ¹ Available at <https://www.youtube.com/watch?v=cWpRtf5I8Ao>.

² Available at https://www.youtube.com/watch?v=_FodTUb8TSs.

1 advocated publicly and passionately for his release from federal custody which further demonstrates
2 the depth of their relationship.



13 Photo of Mutulu and Tupac together when Tupac was a child



26 Photo of Tupac and Mutulu on stage in 1993

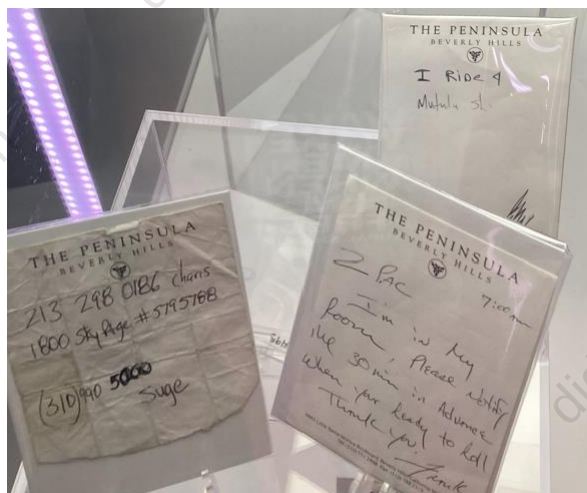


Photo of Tupac's handwriting on a hotel notepad during his stay at The Peninsula hotel in 1995. Tupac was writing a song about Mutulu.

9. Tupac also supported his father financially. Tupac's business records show that he regularly provided Mutulu with money during his incarceration. Indeed, records demonstrate that Mutulu was financially dependent on Tupac prior to his murder. There is no evidence that Tupac provided similar financial support to his biological father. This further confirms that Tupac viewed Mutulu, not Garland, as his father.

10. Afeni had two children: Tupac and Sekyiwa Shakur ("Sekyiwa"). Under California's intestate succession laws, Afeni and Mutulu had the right to inherit all of Tupac's estate. Cal. Prob. Code §§ 6402, 6453. A California court ruled that Tupac's biological father was not entitled to any of Tupac's estate. *The Estate of Tupac A. Shakur, Deceased*, (Super. Ct. Los Angeles County, 1996 No. BP042683). As Afeni and Mutulu had the right to inherit Tupac's estate, they also had standing to bring a wrongful death suit on his behalf. Cal. Code Civ. Proc. § 377.60.

11. Mutulu died on July 7, 2023 in the City of Los Angeles, Los Angeles County, California. Afeni died on May 2, 2016 in Sausalito, Marin County, California. Upon their deaths, their right to assert a cause of action for the wrongful death of Tupac survived pursuant to

1 California's survival statute. Cal. Prob. Code § 377.20. The Estate of Mutulu Shakur may therefore
2 bring a wrongful death action under Section 377.60.

3 12. On October 11, 2023, the Superior Court of California for the County of Los Angeles
4 issued a Letter of Administration appointing Mopreme, Tupac's step-brother and Mutulu's eldest
5 child, as the Administrator of the Estate of Mutulu.

6 13. Defendant Duane Keith Davis, also known as Keefe D ("Keefe D"), was a senior
7 member and "shot caller" of the South Side Compton Crips, a subset of the Crips street gang based
8 in the south side of Compton, California. On September 7, 1996, Keefe D was in the white Cadillac
9 alongside the gunman who shot Tupac. On September 29, 2023, a Clark County grand jury indicted
10 Keefe D for first-degree murder. Keefe D is the only individual who has been criminally charged
11 in connection with Tupac's murder.
12

13 14. Defendants John Does 1 to 100 are individuals whose true identities, and whose
14 specific roles in the conspiracy to murder Tupac, are not presently known to Plaintiff with sufficient
15 certainty to permit identification in this Complaint. While the investigation and public record have
16 revealed the names of certain individuals who may have participated in or facilitated the murder,
17 the specific nature and extent of each individual's involvement—and the identities of additional
18 individuals who may have participated in planning, financing, directing, or carrying out the
19 conspiracy—remain unknown. To date, Plaintiff has been unable to confirm, through independent
20 investigation, the precise roles of specific individuals or to distinguish among potential defendants
21 with the certainty required to name them in this Complaint. Plaintiff identifies these defendants by
22 fictitious names pursuant to California Code of Civil Procedure § 474, and will amend this
23 Complaint to state the true names and capacities of the Doe Defendants when the same have been
24 ascertained through discovery.
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1 v. *Upjohn Co.* (1999) 21 Cal.4th 383, 397. A plaintiff has reason to discover a cause of action when
2 he or she has reason to at least suspect a factual basis for its elements. *Fox v. Ethicon Endo-Surgery,*
3 *Inc.* (2005) 35 Cal.4th 797, 803. The discovery rule applies to wrongful death actions. *See generally*
4 *Norgart, supra*, 21 Cal.4th 383. Relatedly, under California law, the applicable statute of limitations
5 is tolled when a defendant's fraud or concealment prevents a plaintiff from discovering a cause of
6 action. *Bernson v. Browning-Ferris Industries* (1994) 7 Cal.4th 926, 931. The law does not permit
7 a defendant to profit from wrongdoing that hindered an otherwise diligent plaintiff from filing a
8 timely claim. *Id.*

10 22. For nearly three decades following the shooting of Tupac on September 7, 1996, the
11 identities of the individuals who planned, financed, directed, and carried out his murder were not
12 known to Plaintiff and could not have been discovered through the exercise of reasonable diligence.

14 23. Immediately following Tupac's death, the Las Vegas Metropolitan Police
15 Department ("LVMPD") opened a criminal investigation. LVMPD claimed the investigation stalled
16 due to witness non-cooperation and a lack of physical evidence. By the late 1990s, LVMPD
17 homicide investigators considered the case cold.

18 24. In 1997, Afeni Shakur, Tupac's mother, filed a wrongful death action against Orlando
19 Anderson and others in Los Angeles Superior Court. *Afeni Shakur v. Orlando Anderson, et al.*,
20 (Super. Ct. Los Angeles County, 1997 No. BC177861) That action was dismissed without prejudice
21 on March 3, 1999. Anderson was murdered in May 1998 in an allegedly unrelated incident. The
22 1997 action was based on the then-prevailing theory that Anderson was the triggerman acting in
23 retaliation for a personal altercation with Tupac. That action did not—and could not—have
24 identified the broader conspiracy alleged herein, including the involvement of individuals who
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1 financed, directed, and coordinated the murder. As such, the theory of liability in this case is
2 fundamentally different from the theory underlying Afeni's 1997 lawsuit.

3 25. In or around 2006, the Los Angeles Police Department ("LAPD") created a joint task
4 force to investigate the murder of Christopher Wallace. During the course of that investigation, the
5 task force obtained information regarding Tupac's shooting. In 2010, the task force was disbanded
6 without making any arrests. And its investigation files were not made available to the public or to
7 Tupac's family, and remain unavailable to this day. In or around 2024, members of Tupac's family
8 contacted former LAPD detective Greg Kading, who led the task force, and requested access to his
9 case files.
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11 26. In addition, the individuals responsible for Tupac's murder and those who financed,
12 directed, and coordinated it, engaged in a deliberate and sustained pattern of concealment and denial
13 spanning nearly three decades, which prevented Plaintiff from discovering the factual basis for the
14 claims alleged herein. Those who have been identified as potentially involved, have denied it.
15 Witnesses refused to come forward or cooperate. And law enforcement failed to make any arrests
16 for nearly 30 years in connection with Tupac's murder.
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18 27. On September 29, 2023, the LVMPD arrested Keefe D and charged him with the
19 murder of Tupac—the first arrest in connection with the killing in 27 years. In or around October
20 2023, portions of the grand jury transcripts from Keefe D's criminal proceeding were obtained and
21 reported on by various media outlets. Those transcripts revealed, for the first time in a public and
22 credible forum, the substance of Keefe D's 2008 proffer session with the LAPD and the FBI—
23 including statements regarding the involvement of individuals beyond those present in the white
24 Cadillac used during the shooting.
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26 28. But the prosecution's focus in the Keefe D criminal case was exceedingly narrow.
27 During pretrial proceedings, the Clark County District Attorney's Office (the "CCDA") relied
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1 heavily on the investigative files compiled by Greg Kading (the “Kading files”) to oppose Keefe D’s
2 bail application, citing them as evidence that Keefe D posed a threat to the community. On
3 information and belief, those files suggest a broader network of individuals involved in Tupac’s
4 killing. Yet, in a subsequent hearing, and in response to defense counsel’s complaint that the
5 prosecution was relying on Kading’s files while simultaneously withholding them from discovery,
6 the prosecutors changed course. The CCDA now argued that the Kading files were not subject to
7 disclosure because *they did not intend to rely on them in their case in chief*. This representation
8 made clear that the State of Nevada had no intention of investigating or prosecuting the broader
9 conspiracy.
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11 29. The CCDA clarified its position during a call with the Shakur family on or about May
12 24, 2024. During that call, representatives of the CCDA confirmed that the office did not intend to
13 charge any additional defendants. The CCDA remained open to charging new defendants based on
14 new evidence, but the limited scope of their case was all too familiar to the Shakur family—another
15 investigation whose fact-finders were unable or unwilling to pursue charges against the broader
16 network of individuals who financed, directed, and coordinated Tupac’s murder.
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18 30. As a result, Tupac’s family—including the Plaintiff in this action—had little means
19 to uncover the full scope of the conspiracy that led to Tupac’s untimely death. But they tried. The
20 Shakur family attempted their own investigation which, as described below, failed to produce any
21 viable leads.
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23 31. In the wake of Keefe D’s arrest, in or around October 2024, news outlets reported
24 that Tupac’s family retained Quinn Emanuel Urquhart & Sullivan, LLP to investigate the facts
25 surrounding Tupac’s murder and to evaluate potential civil claims. Clearly, the family sought
26 accountability for Tupac’s death. Unfortunately, their efforts yielded no credible, actionable
27 information sufficient to identify the full scope of the conspiracy alleged herein. Even after retaining
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1 counsel, significant questions remained unanswered. The identities and roles of individuals beyond
2 those present in the white Cadillac on September 7, 1996—including individuals who financed,
3 directed, and coordinated the murder—were not ascertainable from the grand jury transcripts alone.

4 32. On December 2, 2025, Netflix released a documentary titled *Sean Combs: The*
5 *Reckoning*, which contained first-person accounts from individuals close to Combs during the
6 relevant period. Those accounts provided additional facts not previously available to the public or
7 Tupac's family, including facts bearing on the planning, financing, and motivation behind the
8 murder.
9

10 33. While the grand jury transcripts and the Netflix documentary have been useful in
11 providing crucial details about Tupac's death, neither identifies with certainty all those involved.
12 And, at no point prior to their release, could Plaintiff have known, or reasonably discovered, the
13 factual bases for the claims alleged in this Complaint. Despite their efforts, Plaintiff remains unable
14 to identify the Doe Defendants and their respective roles in Tupac's murder.
15

16 34. Accordingly, this action was filed within two years of the date on which Plaintiff first
17 discovered, or reasonably could have discovered, the factual basis for the claims alleged herein, and
18 is timely under California Code of Civil Procedure § 335.1 as tolled by the delayed discovery rule
19 and equitable tolling.
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21 35. To the extent the statute of limitations accrued longer than 2 years ago, the repeated
22 denials by potentially responsible parties and lack of cooperation from witnesses to the crime,
23 collectively amount to fraudulent concealment, and together with law enforcement's inability to
24 identify suspects for nearly 30 years, warrant equitable tolling of the applicable statute of limitations,
25 making this claim timely.

26 36. Keefe D himself engaged in deliberate acts of concealment designed to prevent the
27 discovery of his involvement in Tupac's murder. Immediately following the shooting, Keefe D
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1 instructed his nephew, Orlando Anderson, not to “tell anybody what happened! Not even your
2 mama!” Grand Jury Tr., *State v. Keith Duane Davis*, Vol. 6, at 68 (2023). Keefe D also convened
3 a meeting of his crew and directed them to manage the aftermath of the killing, further ensuring that
4 the circumstances of Tupac’s murder would remain hidden. *Id.* at 68-69. Keefe D’s concealment
5 was not limited to the immediate aftermath; for decades, he provided inconsistent accounts of the
6 shooting, shifting blame and obfuscating the roles of the participants. Even Keefe D’s 2008 proffer,
7 in which he provided a more detailed account, was subject to a confidentiality agreement and its
8 contents were not made available to the public or to Tupac’s family for decades. And immediately
9 following his arrest, Keefe D disavowed any involvement in Tupac’s murder and retracted his
10 previous public statements to the contrary. Moreover, Doe Defendants engaged in a parallel pattern
11 of concealment and denial spanning nearly three decades, as alleged herein. Together, these acts of
12 concealment by the very defendants against whom this action is brought prevented Plaintiff from
13 discovering the factual basis for the claims alleged herein and warrant equitable estoppel and
14 equitable tolling of the applicable statute of limitations. *Bernson*, 7 Cal. 4th at 931.

17 **FACTUAL ALLEGATIONS**

18 37. As set forth above, Tupac was one of the most celebrated and influential recording
19 artists of his generation. To this day, he is widely regarded as one of the greatest rappers of all
20 time, with over 75 million records sold worldwide. Tupac was heralded for his raw, emotionally
21 charged lyrics and unmatched ability to blend personal vulnerability with searing social
22 commentary. His music was not merely entertainment—it was a mirror held up to American
23 society, unflinching and deeply human.

24 38. In or around late 1990, Tupac signed a recording contract as a solo artist with
25 Interscope Records. In 1991 and 1993, Tupac released the albums *2Pacalypse Now* and *Strictly 4*
26 *My N.I.G.G.A.Z.*, respectively. Tupac’s first two albums were highly successful and established
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1 him as one of the foremost rappers of his time.

2 39. In 1991, Marion Knight, Jr. (“Suge Knight”), Andre Romell Young (“Dr. Dre”), and
3 Tracy Lynn Curry (“The D.O.C.”) founded Death Row Records in Los Angeles with financing from
4 Michael Harris (“Harry O”). Suge Knight was the company’s Chief Executive Officer.

5 40. Though Death Row was founded in 1991, it did not distribute any music until the
6 end of 1992, when Dr. Dre’s *The Chronic* was released. Upon information and belief, the success
7 of *The Chronic* established Death Row in the music industry.

8 41. In 1993, Sean Combs was fired from the New York-based record label Uptown
9 Records, where he previously served as a talent director. Combs left Uptown Records with rap
10 artist, Biggie, to start his own record label.

11 42. The same year, Combs and Kirk Burrowes (“Burrowes”) founded Bad Boy Records
12 in New York City with Biggie as its first signed artist.

13 43. By the time Combs founded Bad Boy Records, Death Row Records was already
14 well-known. The label had a roster of artists, including its co-founder, Dr. Dre, and Calvin Broadus
15 (“Snoop Dogg”), who released *Doggystyle* in 1993, another massively successful album. As such,
16 Death Row Records was an established name when Bad Boy Records was in its infancy.

17 44. During this period, Tupac was signed to Interscope. His music was so successful
18 that in 1994 Tupac secured a deal to form his own label, Out da Gutta Records, which was
19 distributed by Interscope. Tupac subsequently released *Thug Life: Vol. 1* and *Me Against the World*,
20 to massive acclaim. Both remain two of the most influential hip hop albums of all time.

21 45. Combs took notice of Tupac’s success and, according to Burrowes, began to dissect
22 Tupac’s music to determine what was behind Tupac’s—and other West Coast rappers’—success.
23 Combs hoped to replicate what he learned on the East Coast. *Sean Combs: The Reckoning*, Episode
24 1 (Netflix 2025).

1 46. Prior to the now-infamous East Coast-West Coast rap rivalry between Bad Boy
2 Records and Death Row Records, Biggie and Tupac were friends. Indeed, Biggie sent a demo of
3 his breakthrough album, *Ready to Die*, to Tupac before it was released. Tupac and his cousin,
4 William Lesane, purportedly listened to the record on repeat. *Sean Combs: The Reckoning*,
5 Episode 1 (Netflix 2025). Biggie invited Tupac to his album release party and Tupac insisted on
6 attending, as he was very excited for Biggie's rising career.

8 47. In the midst of Tupac's continued success, on information and belief, Combs
9 expressed interest in working with Tupac and offered to sign him to Bad Boy Records. *Sean*
10 *Combs: The Reckoning*, Episode 2 (Netflix 2025). Tupac declined.

11 ***The East Coast-West Coast Rap Rivalry***

12 48. On November 30, 1994, Tupac was shot and injured under suspicious circumstances.
13 Tupac was in New York City recording a song with Ronald R. Bowser ("DJ Ron G"), in New York.
14 Soon after, an agent associated with Uptown Records, Combs' old record label, paged Tupac and
15 requested that he record a song with Tyrone Shawn Wilkins ("Little Shawn") at Quad Recording
16 Studios. Tupac agreed to the session for a fee to help pay for legal expenses related to pending
17 criminal charges. While on his way to Quad Studios, the agent repeatedly paged Tupac asking
18 where he was and if he was coming. Biggie was already there with James Lloyd ("Lil Cease").
19 *Sean Combs: The Reckoning*, Episode 2 (Netflix 2025). Upon information and belief, Lil Cease
20 noticed Tupac's car approaching Quad Studios, informed Biggie, and said he would meet Tupac
21 out front to escort him upstairs. *Id.* When Lil Cease exited the elevator in the lobby, he was
22 confronted by several armed men who demanded that he get back on the elevator. *Id.* Moments
23 later, as Tupac approached the studio's entrance, those men shot him multiple times and stole his
24 gold jewelry.

1 49. Tupac publicly stated that he believed Combs was behind the shooting.

2 50. Tupac was convicted of sexual abuse in New York City on December 1, 1994, the
3 day after he was shot, and subsequently sentenced to 4.5 years in prison.

4 51. Tupac could not afford bail pending appeal. Despite two of Tupac's albums
5 charting, Interscope declined to advance the funds against his royalties or against an extension of
6 his recording contract. But Suge Knight offered to finance Tupac's appeal and post bail on one
7 condition: Tupac would have to agree to sign a three-album deal with Death Row Records. Tupac
8 agreed. He was released from prison in 1995 on a \$1.4 million appellate bond posted by Suge
9 Knight. It was later revealed that Interscope gave Death Row and Suge Knight the money to post
10 the bond.
11

12 52. Less than three months after the November 30, 1994 shooting, in February 1995,
13 Biggie released the song "Who Shot Ya?" Some of the lyrics include:
14

15 Who shot ya? Separate the weak from the obsolete
16 Hard to creep them Brooklyn streets
17 ...
18 Niggas know; the lyrical molesting is taking place
19 Fucking with B.I.G., it ain't safe
20 ...
21 And I'm Crooklyn's finest (Crooklyn's finest)
22 You rewind this, Bad Boy's behind this (Bad Boy's behind this)

23 53. To many, these lyrics suggested that Biggie—and Bad Boy Records more broadly—
24 were behind the November 30, 1994 shooting.

25 54. The rivalry between Death Row Records and Bad Boy Records was on public
26 display on August 3, 1995 at the Source Awards in New York City. Death Row Records received
27 the award for Soundtrack of the Year and, during his acceptance speech, Suge Knight famously
28 stated the following:

Any artist out there that want to be an artist and want to stay a star, and don't want
to have to worry about the executive producer trying to be all in the videos ... All
on the records ... dancing, come to Death Row!

1 55. Suge Knight’s statements, in particular, those concerning an “executive producer
2 trying to be all in the videos . . . all on the records . . . dancing” were clearly meant to insult Combs
3 who, at the time, featured prominently—often dancing—in music videos released by his recording
4 artists and distinguish Death Row Records as a more hardcore, authentic hip hop music label.

5 56. Combs confronted Suge Knight about the insult during an afterparty at “The Tunnel”
6 a popular, since-closed, nightclub in New York City. By all accounts, the exchange between the
7 two men was “heated.”

8 57. Seven weeks later, on September 23, 1995, Jai Hassan-Jamal Robles (“Big Jake”)—
9 a Death Row Records bodyguard—was shot and killed outside the Platinum House nightclub in
10 Atlanta, Georgia during another heated exchange between Suge Knight and Combs. During the
11 argument, a man appeared with a pistol, shot Big Jake, and fled the scene. Big Jake died several
12 days later from injuries sustained during the shooting. Upon information and belief, Suge Knight
13 informed others, including Reginald Wright Jr. (“Wright”), a former Compton police officer and
14 head of security for Death Row Records, that he believed Combs was responsible for Big Jake’s
15 death, further escalating the feud between the two popular record labels.

16 58. Around 1995, rumors circulated that Tupac had an affair with Biggie’s wife, Faith
17 Evans. A January 1996 *New York Times Magazine* article “Does a Sugar Bear Bite?” published
18 comments from Tupac and Suge Knight suggesting the rumors were true.

19 59. In June 1996, Tupac released the song “Hit ‘Em Up.” The lyrics included:

20 (Sucker-ass) I ain’t got no motherfuckin’ friends
21 That’s why I fucked yo’ bitch, you fat motherfucker (Take money)

22 60. These lyrics, clearly directed at Biggie, strongly suggested that the rumors about the
23 relationship between Tupac and Evans were true.

24 61. Individuals close to Combs have recently confirmed that Combs was incensed by
25 the continued rise of Death Row Records and, more specifically, the success of “Hit ‘Em Up.”
26

1 ***Street Gangs and The Hip-Hop Industry***

2 62. By the early 1990s, factions of the rival Crips and Bloods street gangs had
3 strongholds across Compton, California.

4 63. A group of individuals who mostly attended Centennial High School and lived on
5 or around Piru Street in Compton, considered themselves to be members of the West Side Pirus
6 (the “Pirus” or “Mob Piru”) set of the Bloods. The Piru set of the Bloods primarily controlled the
7 north side of Compton.
8

9 64. The gang commonly referred to as the “Crips” started in South Central L.A. in the
10 1970s. A group of them moved from South Central into Compton, claiming various territories
11 throughout Compton’s south side, dubbing themselves the South Side Compton Crips (“South Side
12 Crips”).
13

14 65. The Bloods and the Crips have historically been rivals, their violent clashes leaving
15 devastation in their wake. The Pirus and the South Side Crips continued this bloody tradition.

16 66. Suge Knight grew up on Compton’s north side and was affiliated with the Pirus,
17 often relying on Piru members to provide security for Death Row artists and other record label
18 associates.

19 67. Keefe D, Orlando “Baby Lane” Anderson (Keefe D’s nephew), and Deandre “Big
20 Dre” Smith, were all members of the South Side Crips during the relevant time period.
21

22 68. Eric “Von Zip” Martin, a close associate of Combs, was a well-known gangster and
23 prolific drug dealer in Harlem, New York with ties to Keefe D and the South Side Crips.

24 69. Upon information and belief, shortly after Suge Knight’s comments at the Source
25 Awards in August 1995, Zip traveled to California and met with Keefe D. While the two were
26 together, Zip received a phone call from Combs who asked to speak with Keefe D. Combs
27 reportedly asked Keefe D if the South Side Crips could provide protection for Bad Boy artists
28

1 during an upcoming BET Tour scheduled to take place in Anaheim, California. Keefe D agreed to
2 do so in exchange for tickets to the concert for members of his crew.

3 70. From then on, the South Side Crips provided protection to Bad Boy artists when
4 they travelled to California. And as a senior member of the South Side Crips, Keefe D managed
5 the relationship between the gang and Bad Boy Records. Wright, Death Row Records' head of
6 security, observed South Side Crips members in large numbers at events with Bad Boy Records,
7 and specifically identified Keefe D as being present with Bad Boy Record's entourage.

9 71. At the Soul Train Awards in Los Angeles at the Shrine Auditorium on March 29,
10 1996, Death Row Records brought approximately 50-60 associates, including about 8-10 artists and
11 numerous members of the Pirus. Bad Boy Records and its entourage were also present, including
12 Keefe D and other members of the South Side Crips. A confrontation occurred between the Death
13 Row Records and Bad Boy Records entourages in the parking lot during which a firearm was
14 brandished. Tupac was among the most vocal during this altercation.

16 72. In or around the summer of 1996, Orlando Anderson was involved in a fight with a
17 Death Row associate at the Lakewood Mall in Los Angeles. Trevon Lane ("Lane"), one of Tupac's
18 bodyguards, was at the mall with several Piru gang members. Lane was wearing a diamond-
19 encrusted necklace gifted to him by Suge Knight, indicating his affiliation with Death Row Records.
20 Suge Knight reportedly gifted similar necklaces to other members of the Pirus. In response, South
21 Side Crips placed a bounty on individuals wearing these chains. Members of the South Side Crips
22 confronted Lane at the mall, fought him, and attempted to steal his chain. Anderson was among
23 the South Side Crips members involved in this incident. Suge Knight, Tupac, and Wright learned
24 of the fight and the South Side Crips' alleged involvement.

26 ***The Murder of Tupac Shakur***

27 73. On September 7, 1996, the MGM Grand Hotel in Las Vegas, Nevada hosted a
28

1 boxing match between Mike Tyson and Bruce Seldon.

2 74. Members of the South Side Crips, including Keefe D, Anderson, and Smith, were in
3 attendance.

4 75. Tupac, Suge Knight, and several other Death Row associates, including Lane and
5 members of the Pirus, were also present. After the fight, Lane identified Anderson in the lobby of
6 the MGM Grand as one of the individuals involved in the Lakewood Mall incident. Tupac, Suge
7 Knight, Lane, and others confronted Anderson in the lobby resulting in a widely-publicized (and
8 recorded) brawl.

9
10 76. After the fight, Tupac and his entourage regrouped at the nearby Luxor Hotel, where
11 he and others affiliated with Death Row Records were staying. The group planned to attend a
12 charity concert for a youth boxing program at Club 662, which Suge Knight owned. Tupac and the
13 Outlawz, a rap group Tupac founded, were scheduled to perform during the event.

14
15 77. Upon information and belief, members of the South Side Crips were aware of the
16 event and Tupac's scheduled performance. After the fight, Keefe D and others armed themselves,
17 traveled to the Club 662 parking lot in three vehicles with three to four people in each, and waited
18 for over an hour. Keefe D concealed in his vehicle a black .40-caliber Glock semi-automatic pistol
19 that he received from Eric "Von Zip" Martin. After waiting for over an hour without seeing Suge
20 Knight or Tupac, Anderson, Keefe D, and their associates left Club 662.

21
22 78. Upon information and belief, Tupac, Suge Knight, and others got into several cars
23 and began driving to Club 662. Suge Knight and Tupac were in the first vehicle, Suge Knight's
24 black 1996 BMW 750 (the "BMW"). Suge Knight drove with Tupac in the front passenger seat.

25 79. Tupac's security guard, Frank Alexander, and his childhood friends (and members
26 of the Outlawz), Malcolm Greenidge ("E.D.I. Mean"), Katari Cox ("Kastro"), and Yafeu Fula
27 ("Yaki Kaddafi") were in the car immediately behind the BMW.



Photo taken by Leonard Jefferson moments before the shooting

80. At approximately 11:00 PM, Suge Knight and Tupac were stopped by local police for not properly displaying their license plate. As the convoy made its way down Las Vegas Boulevard toward Club 662, the Strip was congested with post-fight traffic. Leonard Jefferson who was casually acquainted with Tupac, recognized Tupac and Suge Knight in the BMW while stopped at a red light near Harmon Avenue. Jefferson briefly spoke with Tupac, who invited him to follow the group to Club 662. Jefferson then grabbed a camera from his center console and snapped a photograph of Tupac seated in the passenger seat of the BMW. That photograph is the last known image of Tupac alive. A short time later, Tupac and Suge Knight spoke to two women driving a Chrysler Sebring at a red light at the intersection of East Flamingo Road and Koval Lane and, upon information and belief, invited the women to join them at Club 662.

81. Soon after that brief encounter, and after leaving Club 662, the white Cadillac with Keefe D and others inside crossed paths with Tupac's group. Upon information and belief, the occupants of the white Cadillac included: (1) Terrance "Bubble Up" Brown, the driver; (2) Keefe D, in the front passenger seat; (3) Orlando Anderson in the right rear passenger seat; and (4) Deandre Smith in the rear driver's side seat. Grand Jury Tr. Vol. 1 at 54-56. Upon information and belief, the Cadillac's rear driver's side window lowered and an individual inside opened fire, emptying five shots into Suge Knight's BMW.

1 82. Tupac was shot four times: in the right chest, right thigh, and right hand. Suge
2 Knight suffered only minor injuries to his head.

3 83. Tupac was taken to the University Medical Center of Southern Nevada immediately
4 after the shooting and admitted to the Regional Trauma Center. Surgeons removed Tupac's right
5 lung in an attempt to stop the internal bleeding.

6 84. No amount of surgical intervention, however, could save Tupac's life. Six days
7 later, on September 13, 1996, Tupac died from his injuries.

8 85. After the shooting, Keefe D reportedly told Anderson not to "tell anybody what
9 happened! Not even your mama." He also called a meeting of his crew and "told the youngsters to
10 handle the young niggas from the rival neighborhood. We, the older dudes, would deal with the
11 big motherfuckers." This led to what has been called the 10-day war between Mob Piru and the
12 South Side Crips, during which approximately 10 people were killed.

13 86. Six months after Tupac's death, his former rap rival, Biggie, was murdered in a
14 drive-by shooting in Los Angeles, California.

15
16
17 ***Answers Concerning Tupac's Death Remain Elusive***

18 87. For nearly thirty years, the truth surrounding Tupac's death has been difficult to
19 ascertain. Numerous state and federal law enforcement agencies have, at various points,
20 investigated his murder. But for decades, no charges were ever brought. In the intervening years,
21 witnesses and suspects were killed. Some of those still living previously provided inconsistent
22 accounts—or no accounts at all.

23 88. During the immediate aftermath of the shooting, the LVMPD opened a criminal
24 investigation.

25 89. Though Suge Knight was sitting next to Tupac when he was shot, he reportedly told
26 investigators he "heard something, but saw nothing."
27
28

1 90. In or around September 12, 1996, the Los Angeles County Sheriff's Department
2 purportedly informed LVMPD that an informant identified Anderson as the trigger man.

3 91. In or around October 1996, the Compton Police Department raided 39 locations in
4 connection with the shooting, including the residences of Deandrae Smith, Terrance Brown, Keefe
5 D, and Orlando Anderson. Compton PD Detective Ladd testified that "we arrested many, many of
6 them." Grand Jury Tr. Vol. 4 at 41. Upon information and belief, Anderson was questioned by the
7 Compton Police Department at that time, though he was never arrested or charged with Tupac's
8 murder.
9

10 92. Law enforcement considered Yafeu Fula to be a viable witness, potentially capable
11 of identifying Tupac's assailants because he was traveling in the car directly behind Tupac's when
12 the shooting took place. Unfortunately, Fula was fatally shot in an apartment building in New
13 Jersey in November 1996 before he was ever interviewed.
14

15 93. By the late 1990s, the investigation was at a standstill and members of the LVMPD
16 considered the case cold. LVMPD claimed witnesses were unwilling to cooperate. New evidence
17 was scarce. Indeed, LVMPD homicide Sgt. Kevin Manning was quoted by the Las Vegas Sun as
18 saying Tupac's murder "may never be solved."
19

20 94. In May 1998, Anderson—then considered to be the primary suspect—was murdered
21 in an allegedly unrelated gang shooting in Compton.

22 95. Former LAPD detective Russel Poole's investigation into the murder of Biggie, as
23 reported by the *Los Angeles Times*, revealed connections between the LAPD and Death Row
24 Records. In 2002, Voletta Wallace (Biggie's mother), Faith Evans, and others filed suit against the
25 LAPD, Chief Bernard Parks, and the City of Los Angeles for wrongful death and civil rights
26 violations in connection with the failed investigation into Biggie's murder.
27

28 96. In or around July 2006, and in response to Wallace's and Evan's wrongful death

1 suit, the LAPD created a joint task force to re-investigate Biggie's murder. That task force included
2 detectives from the LAPD and agents from the Drug Enforcement Agency and FBI. Greg Kading
3 was appointed to lead the task force. After officers on the task force determined that the deaths of
4 Biggie and Tupac were related, they broadened its focus to include Tupac's murder as well. When
5 Mrs. Wallace's lawsuit was dismissed in 2010, the task force was disbanded. No arrests were made.
6

7 97. The decades following Tupac's murder saw an endless stream of conspiracy
8 theories. Some suggested that Biggie called for Tupac's death and that his own murder was an act
9 of retaliation. Related theories suggest that Combs commissioned Tupac's murder. Others claimed
10 that Tupac was planning to leave Death Row Records to start his own label, and Suge Knight
11 orchestrated the killing in response. Still others theorized that Suge Knight's ex-wife, Sharitha
12 Golden and his former head of security, Reginald Wright Jr.,³ conspired to kill Suge Knight and
13 Tupac was caught in the crossfire. And most distressingly, some have popularized the theory that
14 Tupac is still alive.
15

16 98. None of these theories, however, were asserted by a single credible source or
17 independently corroborated. Where fingers were pointed, denial followed. Mrs. Wallace denied
18 Biggie's involvement in Tupac's death. Combs has repeatedly professed to knowing nothing about
19 Tupac's murder and has claimed that accusations he commissioned the murder were "pure fiction."
20 Suge Knight strongly denied theories that he had Tupac killed. Wright, too, has denied any
21 involvement in Tupac's murder, calling that day one of the "worst days in [his] life."
22

23 99. Unsurprisingly, Tupac's family was unable to start a meaningful investigation, let
24 alone discover the true identities of the perpetrators. But for the first time in nearly 30 years, threads
25 are starting to come together.
26

27
28 ³ Before his death, Tupac fired Wright as a member of Death Row's security team.

1 100. On September 29, 2023, Keefe D was arrested and indicted for Tupac's murder.

2 101. On or around June 25, 2024, during pretrial proceedings, the CCDA relied heavily
3 on the investigative files compiled by Greg Kading during his work on the task force to oppose
4 Keefe D's bail application, citing them as evidence that Keefe D posed a threat to the community.

5 102. In a subsequent hearing on or around July 23, 2024, Keefe D's defense counsel
6 complained that the prosecution was relying on Kading's files but withholding them from
7 discovery. In response, the prosecution argued that the Kading files were not subject to disclosure
8 because the prosecution did not intend to use them as evidence during their case in chief.

9 103. In or around October 2023, grand jury transcripts from Keefe D's criminal case (the
10 "Transcripts") were made public. The Transcripts confirmed a number of details surrounding
11 Tupac's murder, though numerous questions remained unanswered.

12 104. The Transcripts confirm that in 2008, while the task force was still operational,
13 Keefe D sat for a proffer session with the LAPD and the FBI. The proffer session was subject to a
14 confidentiality agreement and the full contents of Keefe D's statements were not previously made
15 public.

16 105. Following the release of the Transcripts, members of Tupac's family made
17 significant efforts to conduct their own investigation into Tupac's murder before filing this lawsuit.
18 The family sought to speak to individuals who were close with Suge Knight, Mob Piru, Keefe D,
19 the South Side Crips, and Bad Boy Records, including various recording artists who they believed
20 possessed valuable information about individuals involved in Tupac's murder. Their efforts were
21 unsuccessful. Most of the individuals the family contacted were unwilling to even confirm whether
22 they had knowledge about the events surrounding Tupac's death. And of those who did agree to
23 speak, most only provided secondhand accounts of what happened, not credible, actionable
24 information. Upon information and belief, those believed to possess credible information declined
25
26
27
28

1 to speak to Plaintiff in anticipation of the release of Netflix’s documentary, *Sean Combs: The*
2 *Reckoning*.

3 106. Tupac’s family also contacted Greg Kading in or around 2024. Though Kading was
4 retired from the LAPD, members of Tupac’s family understood that he retained copies of his case
5 files related to his work on the Task Force, which were also in the hands of the CCDA. The family
6 requested access to those files. Kading declined.

7
8 107. On or about May 24, 2024, counsel for Tupac’s family had a call with representatives
9 of the CCDA to discuss developments in the Keefe D criminal trial. During that call, CCDA
10 representatives confirmed that the office had no plans to bring additional criminal charges against
11 anyone else in connection with Tupac’s murder. Though prosecutors stated that they would consider
12 naming additional defendants if new information were discovered, they confirmed that Keefe D was
13 their only viable target.

14
15 108. Things began to change on December 2, 2025, when Netflix released its
16 documentary, *Sean Combs: The Reckoning*, created and produced by Curtis Jackson (“50 Cent”)
17 and Alex Stapleton (the “Netflix Documentary”). That documentary revealed, for the first time,
18 information from individuals close to Combs during the 1990s that was not previously available to
19 Tupac’s family.

20 109. The Netflix Documentary and the Transcripts⁴ collectively revealed evidence
21

22
23 ⁴ In 2019, Keefe D self-published a book entitled *Compton Street Legend: Notorious Keefe D’s*
24 *Street-Level Accounts of Tupac and Biggie Murders, Death Row Origins, Suge Knight, Puffy Combs,*
25 *and Crooked Cops*. Some of the information revealed in the grand jury transcripts was discussed in
26 Keefe D’s books. And at least one witness read portions of Keefe D’s book into the record during
27 his grand jury testimony. In the absence of any arrests by law enforcement, the stories contained in
28 Keefe D’s book read as a cash grab written by an unreliable witness and notorious criminal, rather
than a confession. After all, the police went decades without a single arrest and no law enforcement
agency brought charges against him—at least until three years ago. And after his arrest, Keefe D
retracted many of the statements he made in the book, including Combs’ involvement in Tupac’s
murder.

1 suggesting Keefe D and Combs' involvement in Tupac's murder and that others were involved as
2 well.

3 110. For example, the Transcripts turned a prevailing theory—that Orlando Anderson
4 was the triggerman—on its head.

5 (a) Since 1995, Anderson had been widely considered as the primary
6 suspect in Tupac's murder. He got into an altercation with Tupac earlier on the
7 evening of Tupac's shooting. The Los Angeles Sheriff's Department identified
8 him as the triggerman based on information from an informant. And an LAPD
9 detective identified Anderson as the primary suspect following his detention
and questioning in connection with the LAPD's gang unit raid in October of
that year.

10 (b) But for the first time in decades, a contradictory story was told to the
11 grand jury. Devonta "Dirt Rock" Lee, a former member of the South Side
12 Crips, testified under oath that he had known Deandre "Big Dre" Smith since
13 childhood. Grand Jury Tr. Vol. 1, at 22–23. Lee and Smith were roommates
14 in Hawthorne at the time of Tupac's murder. *Id.* at 49. After the shooting,
15 Smith told Lee what had happened. *Id.* According to Lee, Keefe D passed the
16 firearm to Anderson in the back seat, giving Anderson the chance to "redeem
17 himself" for the MGM beating. *Id.* at 56. But Anderson "didn't have a clear
18 shot" because Smith, who Lee described as "six-six" and "370, 400" pounds,
19 was seated on the driver's side of the back seat, directly next to the window
20 facing the BMW. *Id.* at 57. Lee testified: "you're not going to be able to lean
over a big guy like that and get [a shot] ... because shells would have been
popping all in Big Dre's face and all kind of stuff. He can't bend down or
anything, he's too big." *Id.* Smith then took the gun and fired the shots. *Id.* at
57–58. When asked directly, Lee confirmed: "Dre told you he did the
shooting?" "He did the shooting." *Id.* at 58. Lee further testified that Smith
did not seek credit for the shooting, allowing Anderson to maintain his
reputation in the gang. *Id.* at 62.

21 111. The Netflix Documentary contained interviews from high level executives within
22 Bad Boy that lent credibility to a theory that had been repeatedly denied: Combs was involved in
23 Tupac's murder.

24 (a) According to Burrowes, in early September 1996, Combs requested that
25 they rent cars to drive from New York to Las Vegas and hire drivers to go to
26 the Tyson-Seldon match. *Sean Combs: The Reckoning*, Episode 2 (Netflix
27 2025). Burrowes arranged for the car rentals and hired drivers from Harlem.
Id. Burrowes has notebooks recording the car rentals. *Id.*

28 (b) Following the success of Tupac's single, "Hit 'Em Up," Combs was
purportedly nervous. In or around the summer of 1996 Combs took a trip to

1 California with Zip. At Combs' request, Keefe D met with him and Zip at
2 Greenblatt's Deli on the Sunset Strip in California. During that meeting, Combs
3 told Keefe D that he had "a couple of problems I need to be handled. Big CEO
4 [Suge Knight] and Pac." Keefe D confirmed he and his crew were up to the
5 task, telling Combs he could "make it happen." Keefe D told his crew: "The
6 nigga Puffy want us to take care of Big CEO [Suge Knight] and Tupac. I bet
7 the nigga would give us a million dollars for those niggas' heads." Grand Jury
8 Tr. Vol. 1, 44-46. Upon information and belief, Combs agreed to pay that
9 amount.

10 (c) On September 8, 1996, Keefe D reportedly returned to Los Angeles
11 where he met with Zip. *Sean Combs: The Reckoning*, Episode 2 (Netflix 2025).
12 During that meeting, Combs called Zip and asked "was that us" in reference to
13 Tupac's killing. *Id.* Keefe D confirmed that it was. Zip later reportedly
14 received a \$500,000 payment, which was supposed to be forwarded to Keefe D
15 for killing Tupac. *Id.* Though Keefe D requested \$1,000,000, Combs was only
16 willing to pay half because Suge Knight survived the shooting. Keefe D
17 purportedly never received the \$500,000 payment from Zip. *Id.*

18 (d) During an episode of the Netflix Documentary, Burrowes—the co-
19 founder of Bad Boy Records—said the following: "I think that Sean, now, in
20 my mature mind, had a lot to do with the death of Tupac." *Sean Combs: The*
21 *Reckoning*, Episode 1 (Netflix 2025).

22 112. Despite having access to—at least—Keefe D's statements, various law enforcement
23 officials have claimed they did not consider Combs a suspect.

24 113. In 1999, Combs released the song "Muscle Game." Some of the lyrics state:

25 Fuck with me, I'll drop a million dollars on your head
26 Erase you and your whole family, beeyatch
27 Come on – now that's muscle

28 114. At the time, the lyrics of "Muscle Game" were just lines in a rap song. In the wake
of the release of the Transcripts and the Netflix Documentary, they seem to have new meaning: an
admission that Combs was involved in the murder of Tupac.

COUNT I

(Wrongful Death in Violation of California Code of Civil Procedure Section 377.60)

115. Plaintiff realleges and incorporates by reference each of the foregoing paragraphs as
if fully set forth herein.

116. This cause of action arises under the laws of the State of California, including

1 California Code of Civil Procedure Sections 377.20 and 377.60.

2 117. Under California Code of Civil Procedure Section 377.60(a), a cause of action for
3 wrongful death may be asserted by “the person[], including the surviving spouse or domestic
4 partner, who would be entitled to the property of the decedent by intestate succession” where there
5 is no surviving issue of the decedent.
6

7 118. Tupac died intestate on September 13, 1996. He had no surviving spouse, domestic
8 partner, or children.

9 119. Under California Probate Code Sections 6402 and 6453, Tupac’s parents—Afeni
10 Shakur and Mutulu Shakur—were entitled to Tupac’s estate by intestate succession. The Superior
11 Court of California, County of Los Angeles, confirmed that Tupac’s biological father, Will “Billy”
12 Garland, was not entitled to any portion of Tupac’s estate. *In re Estate of Tupac A. Shakur*, No.
13 BP042683. As set forth in paragraphs 6 through 9 above, Mutulu satisfied the requirements of
14 Probate Code Section 6453 as Tupac’s parent by virtue of a relationship that began during Tupac’s
15 minority, continued throughout their joint lifetimes, and was characterized by Mutulu’s assumption
16 of full parental responsibilities, Tupac’s public acknowledgment of Mutulu as his father, and Tupac’s
17 ongoing financial support of Mutulu.
18

19 120. Afeni died on May 2, 2016. Mutulu died on July 7, 2023. Upon their deaths, the
20 right to assert a wrongful death cause of action survived to their respective estates pursuant to
21 California Code of Civil Procedure Section 377.20(a).
22

23 121. On October 11, 2023, the Superior Court of California, County of Los Angeles,
24 issued Letters of Administration appointing Maurice Shakur, p/k/a Mopreme Shakur as
25 Administrator of the Estate of Mutulu Shakur.

26 **Wrongful Acts**

27 122. Keefe D and Does 1 through 100 committed intentional wrongful acts that directly
28

1 and proximately caused the death of Tupac. Specifically, Defendants planned, coordinated,
2 financed, directed, and/or executed the shooting of Tupac on September 7, 1996, in Las Vegas,
3 Nevada.

4 123. The murder of Tupac was carried out in furtherance of a conspiracy among
5 Defendants. The elements of that conspiracy are as follows:
6

7 (a) **Agreement.** On information and belief, in or around late 1995 through the
8 summer of 1996, one or more of the Doe Defendants agreed with Keefe D, members of the South
9 Side Compton Crips, and/or other individuals to murder Tupac in exchange for monetary
10 compensation. That agreement was reached during one or more meetings, including but not limited
11 to a meeting at Greenblatt's Deli on the Sunset Strip in Los Angeles, California, at which the terms
12 of compensation were discussed and confirmed.
13

14 (b) **Overt Acts.** In furtherance of the conspiracy, Defendants committed overt
15 acts including, but not limited to: (i) soliciting the murder of Tupac; (ii) offering and promising
16 monetary compensation for the killings; (iii) arranging transportation to Las Vegas, Nevada, for
17 individuals involved in carrying out the murder; (iv) providing the firearm used in the shooting; (v)
18 conducting surveillance of Tupac's location and movements on the evening of September 7, 1996;
19 (vi) carrying out the drive-by shooting of Tupac at the intersection of East Flamingo Road and Koval
20 Lane in Las Vegas, Nevada; and (vii) making payment, or promising payment, following Tupac's
21 death.
22

23 (c) **Resulting Death.** As a direct and proximate result of Defendants' conspiracy
24 and overt acts in furtherance thereof, Tupac was shot four times on September 7, 1996. He died of
25 his injuries on September 13, 1996.

26 **Damages**

27 124. As a direct and proximate cause of Defendants' wrongful acts, Afeni Shakur and
28

1 Mutulu Shakur suffered the following categories of damages, the precise amounts of which will be
2 stated according to proof pursuant to California Code of Civil Procedure Section 425.10:

3 (a) Pecuniary loss resulting from the deprivation of financial support, assistance,
4 benefits, gifts, and household services that Tupac provided to his parents during his lifetime,
5 including the regular financial payments Tupac made to Afeni and Mutulu as documented in his
6 business records;

7
8 (b) Loss of love, companionship, comfort, care, assistance, protection, affection,
9 society, and moral support; and

10 (c) Medical and hospital expenses incurred in connection with the treatment of
11 injuries sustained by Tupac prior to his death.

12
13 125. Defendants' conduct was willful, malicious, and oppressive within the meaning of
14 California Civil Code Section 3294, entitling Plaintiff to an award of punitive damages in an amount
15 sufficient to punish Defendants and deter similar conduct in the future.

16
17 **PRAYER FOR RELIEF**

18 Wherefore, Plaintiff respectfully requests that this Court grant the following relief:

- 19 a. Find that Defendants' conduct violates California Code of Civil Procedure Section
20 377.60.
- 21 b. Find further that Defendants' conduct was the intended and foreseeable result or
22 consequence of Defendants' scheme.
- 23 c. For award of general damages resulting from the loss of love, affection, society,
24 service, relationship, comfort, care, support, expectations of future support and
25 counseling, solace and mental support, as well as other benefits and assistance
26 according to proof;
- 27
28 d. For an award of special damages including being deprived of the financial support

1 and assistance of Tupac Shakur, according to proof;

2 e. For hospital, medical, professional, and incidental expenses, according to proof;

3 f. For loss of earnings and property, according to proof;

4 g. For punitive damages against all defendants, according to proof;

5 h. For pre and post-judgment interest, according to proof.

6 i. For costs of suit incurred herein; and

7 j. That the Court award Plaintiff such other and further relief as the Court deems just
8 and proper.
9

10
11 Dated: April 28, 2026

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