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FILED  
 Superior Court of California  
 County of Los Angeles

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7 Attorneys for Plaintiffs  
 8 Taj Jackson, TJ Jackson and Taryll Jackson

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## SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BC 6 2 8 5 1 0

11 TAJ JACKSON, TJ JACKSON and  
 12 TARYLL JACKSON,

Case No.

COMPLAINT FOR LIBEL

Plaintiffs,

v.

14 RADAR ONLINE LLC and DOES 1  
 15 through 20,

Defendants.

Plaintiffs complain as follows:

Introduction:

21 This case is about the scurrilous and wrongful conduct of Radar Online, a  
 22 publication owned and controlled by American Media, the publisher of supermarket  
 23 tabloids that, along with Radar, make money for their owner by publishing  
 24 embarrassing and hurtful gossip about famous people. In this instance, the victims  
 25 of Radar's false "reporting" were the deceased superstar, Michael Jackson, and his  
 26 nephews, the members of the band "3T," who are the plaintiffs in this case. Now  
 27 that Michael Jackson can no longer defend himself or sue for libel, Radar has tried  
 28 to profit by launching a vicious and unrelenting attack on him based on claims that,

45492-00002/2641462.1

COMPLAINT FOR LIBEL

GREENBERG GLUSKER FIELDS CLAMAN  
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07/27/2016

CIT/CASE: BC628510  
 LEH/DEF#: 310

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1 years ago, he was guilty of sexual abuse, even though, at the time, he was found  
2 "not guilty" of that very charge. Radar represents its "reports" as "new" and based  
3 on official "Detective Reports." Not only have those Detective Reports been  
4 available to the public for many years, Radar has misrepresented what the Reports  
5 say.

6 Not willing to limit its claims of criminal misconduct to Michael Jackson  
7 himself, Radar has falsely accused plaintiffs of salacious misconduct and of being  
8 accessories to Michael Jackson's supposed crimes. Radar's assertions about  
9 plaintiffs' are unsupported by any facts and are provably false and defamatory.

10 **Factual Allegations:**

11 1. Plaintiffs are residents of Los Angeles County. They are nephews of  
12 the late Michael Jackson and are the members of the popular band "3T."

13 2. Plaintiffs are informed and believe and, on that ground, allege that  
14 Radar Online LLC ("Radar") is a Delaware Limited Liability Company doing  
15 substantial business in California. Radar is owned by American Media, Inc., the  
16 publisher of supermarket tabloids, such as "The National Enquirer" and "The  
17 Globe." Radar and its tabloid siblings make money for American Media by  
18 embarrassing and humiliating famous people with false, lurid and sensational  
19 gossip about their private lives. These "stories" typically purport to be based on  
20 unidentified "sources," who, in most such instances, are individuals paid by  
21 American Media to provide the appearance of "support" for their stories. Such  
22 bogus and hurtful stories are typically accompanied by blaring headlines designed  
23 to create the false impression that the stories themselves are even more shocking  
24 and sensational than they really are. The facts alleged below are an example of  
25 these shameful and tortious practices.

26 3. The true names and capacities of defendants named herein as Does 1  
27 through 20 are unknown to plaintiffs who therefore sue said defendants by such  
28 fictitious names. Plaintiffs will ask leave of this court to amend this complaint to



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1 show their true names and capacities when the same have been ascertained.

2 Plaintiffs are informed and believe, and, on that ground, allege, that Does 1  
3 through 20 were responsible, in some manner, for defendant's acts and misconduct  
4 hereinafter alleged, for which they are liable to plaintiffs.

5 4. Michael Jackson died seven years ago on June 25, 2009. Eleven years  
6 ago, during 2005, a Santa Barbara jury found him not guilty of sexual abuse.  
7 Nevertheless, eleven years after Michael Jackson was cleared of such charges and  
8 seven years after his death, Radar has launched a vicious and relentless personal  
9 attack on the deceased and defenseless superstar. That attack, appearing in Radar's  
10 issues from June 23 to 28, was designed to make money for Radar's owner based  
11 on accusations of criminal behavior by Michael Jackson that supposedly occurred  
12 many years ago. Not content with its strident attacks on Michael Jackson, Radar's  
13 online publications of June 23 and 24, 2016 ("Radar's Libelous Stories") set out to  
14 enliven their stories by attacking plaintiffs, who are his nephews, with a number of  
15 false and defamatory assertions.

16 5. Many members of the public and numerous readers of Radar are aware  
17 that plaintiffs are Michael Jackson's nephews and that they are the members of the  
18 well known and successful band "3T." Radar's Libelous Stories falsely attributed  
19 disgraceful and even criminal conduct to Michael Jackson's "nephews." Yet, the  
20 **only "nephews"** of Michael Jackson known to the public and the only "nephews"  
21 identified in Radar's Libelous Stories are, as Radar expressly stated in the very  
22 beginning of its Libelous Stories, **"Michael Jackson's nephews who were in the**  
23 **band 3T."** And, Michael Jackson's "nephews who were in the band 3T" are  
24 widely known to be plaintiffs. Accordingly, numerous readers of Radar and  
25 members of the public will have reasonably understood all of Radar's references to  
26 the salacious, deplorable and criminal conduct of "Michael Jackson's nephews" not  
27 merely to include plaintiffs, because they are his "nephews," but to attribute  
28



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specifically to plaintiffs all of the disgraceful and criminal conduct that Radar's Libelous Stories attribute, directly or indirectly, to Michael Jackson's "nephews."

6. Radar's Libelous Stories included the following false and defamatory statements which numerous readers of Radar and members of the public will have reasonably believed are about plaintiffs:

a. While slyly asserting that Michael Jackson "has always taken a special interest in his nephews" and that he even admitted that uncles do molest nephews, Radar stated that Michael Jackson sexually abused young boys, implied that this included his "nephews," but added that "the family" (which, of course, includes plaintiffs) resisted any inquiry into that criminal conduct. And, after specifically referring to plaintiffs as **"Michael Jackson's nephews, who were in the band 3T"** and making other references to Michael Jackson's "nephews," and to the possibility that he sexually molested them, Radar reported that Michael Jackson **"bought them"** a "brand new car" to **"shut them up"** about his claimed criminal conduct. Radar's readers would have reasonably construed **"them"** in Radar's sentence as another reference to Michael Jackson's nephews and thus to plaintiffs. And Radar also reported that this "relative," whom Radar's readers would also have reasonably understood, from the context, to be a nephew and thus one of plaintiffs, **was "spirited off to an island"** to buy his silence, after which he **refused to tell police anything "bad" about Michael Jackson**. Radar also claimed that "the family" (which, again, includes plaintiffs) actively resisted efforts by detectives to discover Michael Jackson's claimed sexual abuse of minors.

Each such statement by Radar referring to Michael Jackson's "nephews" or to "them" or to a "relative" who was the "individual" given the island trip, or referring to "the family" will have been reasonably understood by Radar readers and numerous members of the public to include and refer to plaintiffs, who are, of course, "relatives" and the **only** nephews or relatives of Michael Jackson identified in Radar's Libelous Stories and the **only** such nephews known to the public. Thus,



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1 Radar's readers and others would reasonably have understood Radar's Libelous  
2 Stories as asserting that **Michael Jackson's "nephews, who were in the band**  
3 **3T," were bribed by him to conceal his criminal behavior from the authorities.**  
4 In doing so, Radar falsely accused plaintiffs of committing a felony by participating  
5 in the concealment of criminal activity on the part of Michael Jackson and of being  
6 bribed to do so.

7 Indeed, that is exactly how readers all over the world actually and reasonably  
8 understood Radar's Libelous Stories. And, foreseeably, that is how the  
9 international media reasonably understood Radar's Libelous Stories and what they  
10 expressly reported to their readers in immediately republishing Radar's Libelous  
11 Stories. As more fully alleged in paragraph 7 below, based on Radar's Libelous  
12 Stories, the international media reported to the public that "**Michael Jackson**  
13 **molested his own nephews . . . and silenced them with threats and gifts**" and  
14 that the "**relative**" who was "**spirited off to an island**" and then refused to say  
15 things that were "**bad**" about Michael Jackson was **also one of his nephews.**

16 Radar's statements were entirely false and defamatory. In fact, although  
17 plaintiffs are Michael Jackson's "**nephews**," "**relatives**" and members of his  
18 "**family**," none of them was ever sexually abused by Michael Jackson or ever had  
19 any sort of sexual contact with him. Nor did Michael Jackson ever attempt to have  
20 any such contact with any of them. None of plaintiffs ever, in any way, resisted any  
21 effort by detectives to inquire about Michael Jackson's supposed criminal conduct.  
22 None of plaintiffs ever did anything to conceal any criminal conduct of Michael  
23 Jackson and none of them was ever spirited off to any island or was ever bought a  
24 brand new car "to shut them up" about Michael Jackson's claimed criminal  
25 conduct, or were otherwise rewarded to conceal or resist answering questions about  
26 such conduct or not to tell the absolute truth about such conduct. And plaintiffs  
27 never resisted inquiry into such conduct or were never reluctant to answer questions  
28 or tell the truth about such conduct. Nor were they ever punished or threatened



1 with punishment for answering such questions or talking about the subject of  
2 Michael Jackson's supposed criminal conduct.

3 b. Radar also stated that **"Michael even used sexy photos of his**  
4 **own nephews, who were in the band 3T, in their underwear to excite young**  
5 **boys,"** young boys who Radar claims Michael Jackson sexually abused. And Radar  
6 stated falsely that an official "Detectives' Report" asserted, as a fact, that Michael  
7 Jackson engaged in that specific criminal conduct.

8 Countless members of the public and readers of Radar will have reasonably  
9 understood from Radar's Libelous Stories that plaintiffs aided and abetted Michael  
10 Jackson's criminal conduct, in that the supposed use of plaintiffs' photos for this  
11 illicit and criminal purpose was with the knowledge and assent of plaintiffs in  
12 whom Michael Jackson took "special interest" and who are identified as the  
13 members of "the band 3T." Many Radar readers and members of the public will  
14 have reasonably understood from this that plaintiffs knowingly allowed themselves  
15 to be photographed in salacious, lascivious poses and that they knew or should have  
16 known that their photos would be, or at least could be, used "to excite young boys"  
17 and that they knew, assumed or should have known that their own uncle could and  
18 probably would use the photos for criminal purposes. Indeed, from a literal reading  
19 of Radar's sentence, many Radar readers will have reasonably understood that  
20 **plaintiffs were "in their underwear to excite young boys."**

21 Radar's statements were entirely false and defamatory. In fact, there is no  
22 evidence that Michael Jackson ever used photos of any of plaintiffs to excite young  
23 boys or for any other illicit and criminal purpose. No official "Detectives' Report"  
24 ever stated, as Radar falsely reported, that he did, in fact, use plaintiffs' photos "to  
25 excite young boys," and plaintiffs did not consider the photos salacious or improper  
26 and have never had the slightest indication or reason to believe that Michael  
27 Jackson was using or that he or anyone else would, could or ever might use their  
28 photos to excite young boys. Indeed, plaintiffs are convinced that Michael Jackson



1 never did any such thing. And, certainly, plaintiffs never appeared **"in their**  
2 **underwear to excite young boys."**

3 In fact, the photos that Radar repeatedly describe as "sexy" and revealing,  
4 suggesting to readers that they are salacious and improper, were part of a  
5 professional photo shoot for a compact disc cover, a customary process in the  
6 record business, which, in this case, was attended by numerous people. Shooting  
7 the photos was a perfectly proper business function and had nothing to do with  
8 Michael Jackson supposedly luring young boys, as claimed by Radar.

9 And, characteristically, Radar used bold and lurid headlines to enhance the  
10 false impressions it deliberately created. For example, Radar's attacks on Michael  
11 Jackson and his nephews were accompanied by headlines such as "NEW  
12 PHOTOS . . . SHOW DEPTHS OF DEPRAVITY," headlines which many Radar  
13 readers would reasonably have understood as referring to the so-called "sexy" and  
14 revealing photos of plaintiffs "in their underwear to excite young boys" to which  
15 Radar's Libelous Stories referred and, as such, create the false impression in the  
16 minds of Radar's readers that plaintiffs joined their uncle in the "DEPTHS OF  
17 DEPRAVITY."

18 c. Radar's Libelous Stories also accuse "members of Michael  
19 Jackson's family" of betraying him and of saying that he had a supposed fondness  
20 for "pre-pubescent boys" and that he "exposed" some family members "to his sick  
21 fetishes."

22 Plaintiffs, being the only "nephews" of Michael Jackson identified in Radar's  
23 Libelous Stories, are, of course, members of Michael Jackson's "family" and, with  
24 the exception of his mother, plaintiffs are the **only** members of Michael Jackson's  
25 "family" specifically identified in Radar's Libelous Stories.

26 Many of Radar's readers and members of the public will have reasonably  
27 understood those false stories about "members of Michael Jackson's family" not  
28 only as including plaintiffs, but as specifically referring to them and will reasonably



1 believe that plaintiffs have now been openly and outrageously disloyal to their  
2 uncle, even claiming, for example, that he "exposed" them to "sick fetishes."

3 Radar's stories were false and defamatory. In fact, none of plaintiffs have  
4 ever betrayed Michael Jackson or ever referred to a liking on his part for pre-  
5 pubescent boys or ever made any similar statement about Michael Jackson. Nor  
6 were any of plaintiffs ever "exposed" to any "sick fetishes" by Michael Jackson or  
7 ever claimed that any such thing ever occurred. None of these things ever  
8 happened.

9 At all times, plaintiffs have firmly believed that Michael Jackson was  
10 innocent of the charges made against him. They have never said or done anything  
11 to indicate otherwise.

12 7. As was certainly foreseeable to Radar when it published its libelous  
13 stories, its false and defamatory assertions about plaintiffs were immediately picked  
14 up and repeated by media all over the world, vastly increasing the damages incurred  
15 by plaintiffs. The international media, like Radar's readers, reasonably understood  
16 Radar's Libelous Stories about trips and gifts to "shut them up" referred to trips and  
17 gifts to silence Michael Jackson's "nephews." For example, on June 24, 2016, just  
18 hours after the first publication of Radar's Libelous Stories, the New York Post,  
19 reasonably construing Radar's Libelous Stories, falsely reported to its vast  
20 readership that "Investigators were convinced that **Michael Jackson preyed on his**  
21 **own nephews**" and then "**silenced them with gifts and threats,**" and, the next day,  
22 reported that it was **one of Jackson's "nephews"** who was "**spirited off to an**  
23 **island**" and who was unwilling to talk "**bad**" about Jackson. And, in England, on  
24 June 27, 2016, The Sun, reasonably construing Radar's Libelous Stories, reported  
25 to its multitude of readers that "**Michael Jackson molested his own nephews . . .**  
26 **then silenced them with threats and gifts.**" Plaintiffs are the only nephews  
27 identified or identifiable in Radar's Libelous Stories from which the worldwide  
28 media copied and republished Radar's false assertions. And, plaintiffs are the only



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1 nephews of Michael Jackson known in New York, London and many other places  
2 to the many readers of such derivative reports in other publications. Those readers  
3 would reasonably have understood these worldwide reports published, or caused to  
4 be published by Radar, to refer to plaintiffs and to assert that plaintiffs concealed  
5 criminal conduct by Michael Jackson in return for bribes, which attributed to  
6 plaintiffs commission of a serious crime.

7 8. On July 5, 2016, plaintiffs served on Radar a demand for correction of  
8 its libelous stories about plaintiffs, giving Radar an opportunity to lessen the  
9 damages it had caused. A copy of plaintiffs' demand is attached as Exhibit "A"  
10 hereto and incorporated by reference herein. On July 7, 2016, Radar replied,  
11 refusing to correct any of its libelous assertions about plaintiffs, thereby  
12 aggravating its wrongful conduct.

13 9. As a direct and proximate result of the publication of Radar's Libelous  
14 Stories, each of plaintiffs has been damaged personally and professionally in a sum  
15 which plaintiffs believe exceeds the sum of \$35 million, for total damages in excess  
16 of \$100 million.

17 10. In publishing Radar's Libelous Stories, Radar was aware that its  
18 defamatory assertions, which the public will understand to include and refer to  
19 plaintiffs, were, in fact, not true of plaintiffs or any of them. Radar's conduct  
20 alleged hereinabove was fraudulent, oppressive and malicious, calling, in addition,  
21 for an award of exemplary damages in an amount sufficient to punish Radar and its  
22 owners and to deter them from publishing such vicious, false and defamatory  
23 "reports."

24 WHEREFORE, plaintiffs pray judgment as follows:

- 25 1. For \$100 million and such other and further sums as shall be found;
- 26 2. For exemplary damages in such amount as shall be found; and




1 3. For costs of suit and such other and further relief as the court shall  
2 determine.

3  
4 DATED: July 27, 2016

GREENBERG GLUSKER FIELDS  
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6  
7 By:

  
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