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Attorneys for Plaintiff Jane Doe

CASE NO: A-25-917246-C
Department 11

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF CLARK

JANE DOE, an individual,

Plaintiff,

v.

SHANNON SHARPE, an individual,

Defendant.

Case No.

Dept. No.

ORIGINAL COMPLAINT AND JURY DEMAND

Plaintiff Jane Doe complains of Defendant Shannon Sharpe, and for cause of action, would respectfully show this Honorable Court the following:

I. INTRODUCTION

A woman can say "yes" to consensual sexual relations with a man ninety-nine times, but when she says "no" even once, that "no" means no. Defendant Shannon Sharpe, a man who is accustomed to getting what he wants, completely fails to understand this basic concept. After many months of manipulating and controlling Plaintiff—a woman more than thirty years younger than he—and repeatedly threatening to brutally choke and violently slap her, Sharpe refused to accept the answer no and raped Plaintiff, despite her sobbing and repeated screams of "no."

Defendant Shannon Sharpe is a fifty-six-year-old former NFL superstar. He claims to be one of the most successful sports media personalities in the country. Plaintiff is a young woman in her early twenties. In 2023, Plaintiff was working out at a gym in Los Angeles, California, when Sharpe approached her for the first time. Previously, Doe had noticed Sharpe watching her during her workouts. At this time, Doe was just nineteen-years-old. At the time she did not know who he was, only that he was another older man oggling her at the gym. Doe could tell Sharpe was much older than her; she found him physically intimidating. Eventually, he introduced himself. At his determined insistence, she gave him her number.

Over the next couple of weeks, Sharpe incessantly pursued Plaintiff. He constantly approached her at the gym and attempted to contact her frequently with phone calls and text messages asking to meet up, unwilling to take no for an answer. Eventually, Plaintiff gave in and agreed to meet with Sharpe outside of the gym. However, before doing so, Sharpe demanded that Doe sign a nondisclosure agreement, or NDA—something Plaintiff found a bit concerning. She wondered why Sharpe was so insistent on her signing an NDA. She refused. Despite his repeated efforts to get her to sign, she refused time and again. Eventually, he dropped the issue and invited her to his house.

What followed was the beginning of a rocky consensual relationship that lasted nearly two years. The relationship was very unequal—Sharpe is more than thirty years older, is

considerably wealthier, is physically much larger, and exponentially stronger. Sharpe is famous and has power.

Plaintiff and Sharpe saw each other on his terms, and on his schedule, as often as four times a week. Over time, Plaintiff began to see Sharpe's true nature. She found him to be dishonest about his whereabouts. He would lie about seeing other women, while insisting to her that she and he were exclusive. He often manipulated her, at times being sweet and loving to get what he wanted, and at others times being angry and aggressive to achieve his goals. She discovered over time that Sharpe was extremely emotional and possessed an uncontrollable temper. He displayed the characteristics of a true narcissist. He wielded his power, his influence, and his celebrity to control Plaintiff and get exactly what he wanted, whenever he wanted it, all the while jealously guarding what he considered his for himself.

By October 2024 Sharpe's behavior had grown progressively worse, beyond anything Plaintiff had experienced with him before. At this point, he was insistent upon recording their sexual activities, sometimes without her knowledge. Sharpe was also sharing the videos with others, without her permission or knowledge. Sharpe would repeatedly tell Doe that he wanted to do to her things that would "make no other man want her." By this point, Sharpe was no longer able to credibly maintain that the relationship was exclusive. (He had at this point "accidentally," or purposely to advance his career, went live on Instagram while having sex with another woman.) Sharpe flew into fits of anger when Plaintiff noted his infidelity to their relationship, or called him out about his extraneous activities. What had once been manipulation, control, and intimidation now became something far more dangerous and sinister. Sharpe even figured out how to get into Doe's apartment complex without her permission. Sharpe made it clear that what Doe wanted was of no moment, that Sharpe would get what he wanted, when he wanted it. In October 2024, Shannon Sharpe violently sexually assaulted and anally raped Plaintiff two different times in Las Vegas, Nevada, blatantly ignoring her requests for him to stop. He did it again in January.

Plaintiff left Nevada to temporarily escape Defendant Shannon Sharpe. She now seeks justice through this action and other means. Plaintiff seeks compensatory and punitive damages in this matter in excess of $50 million.

II. PARTIES

Plaintiff Jane Doe is an individual residing in Clark County, Nevada.

Defendant Shannon Sharpe is an individual residing in Clark County, Nevada. He may be served at his residence at 2760 Tioga Pines Circle, Las Vegas, Nevada 89117 or wherever he may be found.

III. JURISDICTION AND VENUE

Both Defendant and the Plaintiff reside here. The relief requested is within the minimum jurisdictional limits of this Court. Pursuant to Nevada law, venue is proper in Clark County, Nevada. This is the county where Defendant resides, and the acts, events, transactions, and omissions that form the basis of this lawsuit occurred, in whole or in part, in Clark County, Nevada.

IV. FACTUAL ALLEGATIONS RELATED TO ALL CLAIMS

A. Defendant Shannon Sharpe

Defendant Shannon Sharpe is a former NFL superstar and a well-known sports media personality. After a fourteen-season career in the NFL, he is considered by some to be one of the greatest tight ends of all time. He is a three-time Super Bowl champion and was recently inducted into the NFL Hall of Fame.

Upon retirement, Sharpe transitioned into sports broadcasting, quickly achieving success in the industry. Sharpe spent several years at CBS Sports before moving to Fox, where over a decade he built a reputation for his strong opinions and hot takes. In 2023, Sharpe joined ESPN, where he remains employed today. In addition to working at ESPN's *First Take*, Sharpe hosts his own widely followed podcast, interviewing high-profile athletes, entertainers, and public figures. Sharpe claims he made as much as $6 million dollars from one episode of his podcast, and is alleged to be signing a multi-million-dollar deal with The Volume media group.

Sharpe's legacy extends beyond the field and media, and in one glaring area, it is not good. Sharpe has a documented history of abusing and mistreating women. As an example, he is currently a defendant in a lawsuit before the Supreme Court of New York,[1] facing claims from a woman of intentional infliction of emotional distress, among other allegations. Many of the factual allegations in the New York case are eerily similar to his actions toward Plaintiff here.

According to the New York lawsuit, Sharpe forcefully subdued the plaintiff in that case, forcing her to her knees and subjecting her to non-consensual oral sex, despite her repeated

[1] *Michele Evans v. Shannon Sharpe,* No. 2023-100087 (Supreme Court of the State of New York, County of New York, filed January, 27, 2023.)

protests. When she resisted, he persisted. He would not take no for an answer. According to the New York lawsuit, the plaintiff therein feared for her safety, just as Plaintiff fears for her safety now. The New York lawsuit further alleges that Sharpe escalated to non-consensual vaginal penetration, all while telling her that he would "make it so no other man would want [her]." These words were apparently not a one-time thing. Plaintiff herein, too, has heard Sharpe say those exact words to her.

In September 2024, Sharpe livestreamed himself "on accident" having sex with a woman. Upon information and belief, he did so on purpose to seek media exposure and to attract social media "views" and attention. To livestream himself, he would have had to deliberately "swipe right" on Instagram to activate the live feed. Sharpe claims it was accidental, however discreetly recording sex—without his partner's knowledge—is something he is known to do; he did so with the Plaintiff herein.

Plaintiff discovered that Sharpe had been secretly recording their sexual encounters without her consent. When she confronted him, he summarily dismissed her concerns, claiming the videos were for his own personal use. That, too, was a lie. Upon information and belief, Sharpe on multiple occasions shared the recordings with his friends and associates. At one point, he even forced Plaintiff to have sex with him while FaceTiming one of his childhood friends named "Bucket". Whenever Plaintiff would get up the courage to object to Sharpe's outrageous conduct—which was not often—he would aggressively and angrily "put her back in her place."

Shannon Sharpe isn't just a sports icon—he's something far worse. He is a flawed, narcissistic individual who has spent years using his fame, power, and influence to manipulate, control, subjugate and violate women. With this suit, Plaintiff intends to put an end to this egregious conduct.

B. January 2023: The Beginning of a Consensual—But Deeply Manipulative—Relationship.

Sharpe first met Plaintiff at a Los Angeles gym in early 2023. Sharpe would deliberately watch Doe in such a way to make sure she knew he was watching her.

One day, as Plaintiff finished a set and turned around, she found Sharpe standing inches behind her. Sharpe told her he had noticed her at the gym and wondered why she had not introduced herself. This was the first time they spoke. Plaintiff at the time who had just turned twenty years-old, was caught off guard, and was face to face with a fifty-four-year-old man she had never met. Plaintiff did not know at the time who Shannon Sharpe was. She did not know what to say nor how to feel about his advances.

During their first conversation, Sharpe proposed a challenge: a competition to see who could "lean out" faster. The prize? If Plaintiff won, he would "buy her fake tits." Plaintiff was stunned. The implication that she needed or wanted such a thing was wildly inappropriate. Hearing it from a stranger more than thirty years her senior made it even more disturbing.

Throughout their subsequent encounters at the gym, Sharpe made sure Plaintiff understood who he was; a celebrity and TV personality.

Over the following weeks, Sharpe made himself unavoidable. He was at the gym when she was. He constantly called and texted demanding she come to his Beverly Glen mansion. Plaintiff repeatedly declined and made-up excuses to make her seem too busy to see him. But he would not stop—Sharpe would not be deterred.

Eventually, Plaintiff gave in. But before she could meet him outside of the gym, Sharpe made another demand—she had to sign a non-disclosure agreement, an "NDA." He refused to explain why and would not let her see a copy of the proposed agreement. He simply insisted she sign one. Plaintiff refused. After multiple attempts, when he realized she would not cooperate, he finally dropped the issue.

C. Revealed From the Start: The Violent, Aggressive, And Controlling Nature of Shannon Sharpe.

The first night Plaintiff went to Sharpe's house, the experience was unlike anything she has dealt with before—disturbing, unsettling, and given his subsequent conduct, very illuminating.

When Plaintiff arrived at his house, Sharpe opened the door to his Beverly Glen mansion without a word. No greeting. No acknowledgment. No small talk. Without so much as looking

at Plaintiff, he simply turned away from her after opening the door and walked upstairs. Plaintiff hesitated but followed as she did not know what else to do or where else to go.

When they reached the bedroom, Sharpe pointed to the bed before disappearing into the bathroom and shutting the door behind him. He still had not said a word. Plaintiff sat on the bed, waiting, unsure of what to expect or if she should leave. Roughly five minutes later, he finally emerged, but still, he said nothing. Instead, he turned off all the lights and laid down on his bed.

Plaintiff, uncomfortable and unsure of what to do, lay down as well. For roughly ten minutes, there was nothing but silence. Then, without warning, Sharpe placed his hands on Plaintiff's neck from behind, pressed his erect penis against her body, and said his first words of the night. "I knew from the first time I saw you that I was going to fuck you." Doe and Sharpe then engaged in oral sex. As they did so, Doe at some point realized Sharpe was using his phone. He was apparently recording her. Plaintiff could see that he was trying to be discreet, but it was obvious what he was doing. She said nothing, scared to confront him for what he might do or say. When it ended, he rolled over and went to sleep. At some point later during the night, Sharpe woke up, grabbed Plaintiff by her vagina, and began having sex with her.

The next morning, Sharpe woke at roughly 4 AM to shoot a media segment for sports television. He woke Plaintiff as well and told her she needed to leave—but he informed her that she had to be back by 9:00 PM, exactly.

The following night, Plaintiff arrived at Sharpe's house at approximately 9:05 PM—just five minutes past the time he had demanded. The moment he opened the door, Plaintiff experienced his rage for the first time. Sharpe immediately launched into a verbal assault. He screamed at Plaintiff, berating her for what felt like hours. He accused her of disrespecting him, wasting his time, and warned that if she wanted to be with "The Shannon Sharpe," she would have to learn obedience. Plaintiff was terrified and feared for her physical safety. Still enraged, Sharpe turned off the lights, grabbed her neck, and—just like the night before—began having sexual intercourse with her. This cycle of control, fear, and submission became routine. Yelling at her, controlling her, forcibly grabbing her by the neck when he got upset, saying he was going to "kill her," and asserting dominance became the norm.

Over the next year and a half, Plaintiff saw Sharpe at his house as often as four times a week. Sharpe continued to treat her like an object. He continued to control her—not just physically, but emotionally and psychologically. He demanded complete control over her time and body, expecting her to be at his house on his schedule, at his command, whenever he called.

The verbal abuse never stopped. He would berate and degrade Plaintiff, just as he had from the beginning. One time specifically, he was yelling at her while there a was a firearm visible in his room. Terrified for her safety, Plaintiff tried sharing her location with friends from her iPhone—just in case. But Sharpe saw her doing this. The moment he realized what she was doing, he grabbed her by the neck and told her "If you ever do that again, I will fucking kill you."

D. Summer 2024: Sharpe's Control Turns Abusive. The Relationship Becomes Fearful and Non-Consensual.

Sharpe's aggression and rage continued to escalate to the point that Plaintiff's friends began to fear for her safety. For example, when Plaintiff was with her friends, they could hear Sharpe yelling at her over the phone, and would ask her if she was safe and if she was okay.

In the summer of 2024, Plaintiff and Sharpe each moved to Las Vegas for their own reasons. Sharpe liked to say that the Plaintiff followed him to Vegas, but that too is a lie. Once in Vegas, Sharpe again insisted that Plaintiff sign an NDA. She refused and again, he persisted. But after enough resistance, he let it go and continued seeing her multiple times a week. His behavior did not change—he remained erratic, controlling, and verbally abusive—all while telling Plaintiff that he was committed to a sexually exclusive relationship with her.

Then, in September 2024, Sharpe humiliated Plaintiff. He livestreamed himself having sex with another woman on Instagram—for over 1.1 million followers to see. He later made jest of the incident on his podcast "Club Shay Shay" and show "Night Cap." But for Plaintiff, it was anything but funny. He had repeatedly assured her they were in an exclusive relationship (albeit unhealthy and abusive). This was a lie that not only hurt her emotionally—it made her fear for her sexual health and the risk of sexually transmitted disease.

At that point, Plaintiff began to pull away from Sharpe. She stopped answering his phone calls and stopped telling him where she was when he would demand to know.

Plaintiff's feeble attempts at freedom and independence further upset Sharpe. He began flooding her phone with calls, demanding to know where she was. He called relentlessly, multiple times per hour. The harassment became so unbearable Plaintiff frequently began leaving Nevada determined to cut off communication, resist his efforts to control her, and attempt to reclaim some control of her life. It took courage for Plaintiff to make this effort. She remained terrified even though she was thousands of miles away.

Sharpe simply would not accept independence or freedom for Plaintiff. In October 2024, just after Plaintiff returned from Europe, Sharpe's behavior became more angry, aggressive, and now, violent.

E. October 6, 2024: Sharpe Sexually Assaults and Rapes Plaintiff, and Threatens, "I'm going to make it so no man will want you again."

On October 6, 2024, Plaintiff was working out at a Nevada gym, following her usual routine. As she worked out, she saw Sharpe aggressively approaching her. She could tell by his look and the way he moved quickly towards her that he was furious for having been ignored. As soon as he got close, he told her, "Sit the fuck down or I'm going to kill you."

Plaintiff refused. "I don't want to talk to you. You cheated on me." His response was dismissive and controlling as usual. "You don't have a choice."

Sharpe demanded that they talk in private. Again, Plaintiff told him no. She made it clear: she did not want to talk to him, be alone with him, or want him coming to her home. But Sharpe didn't care. He never took no for an answer. Sharpe forced Plaintiff, under threat, to get into his car, and go to her house.

Once Sharpe was inside her apartment, Plaintiff tried to keep the conversation in the living room, but Sharpe refused. He demanded they go to the bedroom. She said no. He didn't listen, nor did he care. Once inside the bedroom, Sharpe grabbed her from behind and forcibly positioned her to perform oral sex. He held her in place and then forced her to begin performing. He became even angrier and said, "You've disrespected me so much. I'm going to punish this asshole. I'm going to make it so no man will want you again."

Plaintiff at this point was crying and sobbing. Tears streamed down her face as Sharpe

repositioned her and took her from behind and inserted his penis into her anus. As he forcibly anally raped her, he said, "Turn around and look at me." Sharpe grabbed her head, forcing her to look at him as she sobbed. He said at that point: *"Look at this. Look at my arm. I've got chills. That's how good this is."*

Shannon Sharpe forced himself on the Plaintiff and raped her, despite her sobbing in agony as it happened. He told her, in the moment as she was crying, that the experience was so good it was giving him chills. Sharpe's behavior demonstrates that he believed Plaintiff to be his personal property, possessed and owned by him. He also believed that the laws did not apply to him, that he could take what he wanted, and that no one could or would stop him. He was and is wrong.

F. January, 2025: Sharpe Sexually Assaults and Rapes Plaintiff, Ignoring Her Screams and Refusing to Wear a Condom.

On January 2, 2025, Sharpe told Plaintiff he wanted to see her. Sharpe persisted and reminded Plaintiff that he had a combined Christmas and birthday gift to give to her, as he previously promised her a gift. She ultimately allowed him to come over to her apartment. She regrets that decision.

Once inside her apartment, Sharpe began undressing. Plaintiff firmly stated—multiple times—that they would not have sex without protection, demanding that he wear a condom. She knew that in the past he refused to ever use condoms, and believed that her demand would stop him from having sex with her. But although he refused to use a condom, he still insisted on sex. She tried to resist him. She screamed. She had already expressed concerns for her safety, knowing that he had been involved with other women, increasing the risk of transmitting a disease. The more she begged, Sharpe became more aggressive and made it clear, he would not wear a condom and he was going to have his way with her.

Sharpe grabbed her—pulling her around and positioning her to perform oral sex, which lasted for roughly two minutes. Then, Sharpe repositioned her and roughly forced himself inside her. Plaintiff never stopped demanding and begging that he stop or put on a condom; Sharpe ignored her.

As soon as he penetrated her, Plaintiff screamed and sobbed. Her cries for help did nothing to stop Sharpe.

The assault lasted roughly 10 minutes, ending only when Sharpe ejaculated inside her. Plaintiff cried and begged repeatedly for him to stop. Plaintiff left Nevada after the assault.

Plaintiff brings these causes of action in this Honorable Court to recover damages as outlined below. It is imperative that Shannon Sharpe and those like him are held accountable for their actions to prevent them from engaging in further sexual assault and sodomy and harming future victims.

V. FIRST CLAIM FOR RELIEF

A. ASSAULT, SEXUAL ASSAULT, BATTERY, & SEXUAL BATTERY

Plaintiff hereby incorporates each of the foregoing paragraphs as if fully set forth herein.

As alleged herein, Defendant Sharpe willfully and unlawfully used threats and physical force on Plaintiff.

In using willful and unlawful force on Plaintiff, Defendant Sharpe intended to cause a harmful or offensive contact.

The threats were intended to control Plaintiff. The harmful and offensive contact intended by Defendant Sharpe in fact occurred.

The threats, as well as the harmful and offensive contact by Defendant Sharpe caused Plaintiff to suffer harm.

Sharpe's conduct proximately caused injury to Plaintiff. Plaintiff has sustained and will sustain pain and suffering, psychological and emotional distress, mental anguish, embarrassment, and humiliation.

Accordingly, Plaintiff is entitled to recovery against Defendant for the damages proximately caused by Defendant's conduct in an amount to be determined at trial.

VI. SECOND CLAIM FOR RELIEF

B. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiff re-alleges each aforementioned allegation as if fully incorporated below.

Sharpe engaged in conduct that is extreme and outrageous so as to exceed the bounds of decency in a civilized society. Namely, he caused Plaintiff to experience mental suffering by causing her to worry about her safety and well-being. Time and time again, he reinforced that fear with verbal threats.

Sharpe engaged in this conduct intentionally, knowingly, and willfully.

Sharpe's conduct proximately caused injury to Plaintiff. Plaintiff has sustained and will sustain pain and suffering, psychological and emotional distress, mental anguish, embarrassment, and humiliation.

Accordingly, Plaintiff is entitled to recovery against Defendant for the damages proximately caused by Defendant's conduct in an amount to be determined at trial.

Thus, in addition to actual damages, Plaintiff seeks punitive damages, and such damages are not subject to capping.

VII. DEMAND FOR JURY TRIAL

Plaintiff herein demands a jury trial and tenders all appropriate fees with this Complaint.

VII. PRAYER FOR RELEIF

WHEREFORE, Plaintiff reserving the right to amend the Complaint prior to or during the trial of this matter, prays judgment against Defendant as follows:

1. General damages in the sum in excess of $10,000,000;
2. Special damages in the sum in excess of $10,000,000;
3. Punitive damages in a sum in excess of $20,000,000;
4. Statutory penalties in a sum in excess of $10,000,000;
5. Declaration of rights as set forth above;
6. Attorneys' fees and cost of litigation;
7. Interest at the statutory rate;
8. Such other and further relief the court deems reasonable under the premises.

[Signature on Following Page]

DATED: April 20, 2025

Respectfully submitted,

DELAHUNTY & EDELMAN LLP

By: */s/ Micah Nash*

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