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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

14 ALEXA NIKOLAS,

15 Plaintiff,

16 v.

17 MICHAEL MILOSH; and DOES 1–20,

18 Defendants.

Case No. **21STCV31419**

**COMPLAINT FOR DAMAGES for:**

- 1) Sexual Battery
- 2) Gender Violence (Cal. Civ. Code, § 52.4)
- 3) Intentional Infliction of Emotional Distress
- 4) Violation of California Tom Bane Civil Rights Act (Cal. Civ. Code, §§ 52, *et seq.*)

Filed Pursuant to Code of Civil Procedure  
Section 340.1, as Amended by Assembly  
Bill 218

**[Jury Trial Demanded]**

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1 Plaintiff Alexa Nikolas (“Plaintiff” or “Nikolas”) brings this action against Defendant  
2 Michael Milosh (“Milosh”), and DOES 1–20 (together, “Defendants”), and based on information  
3 and belief alleges as follows:

4 **INTRODUCTION**

5 This case is about a libertine musician who preyed on the innocence of a minor fan to  
6 manipulate and coerce her into succumbing to his repeated sexual assaults of her, and the  
7 corporate institutions that enabled the abuse. Defendant Milosh utilized his power of authority  
8 and seniority over Plaintiff, as well as years of sexual grooming of Plaintiff as a minor child, to  
9 manipulate her into trusting him. Upon gaining her trust, Defendant Milosh terrorized,  
10 sodomized, and abused Plaintiff as a part of his continuous conduct aimed at satisfying his  
11 prurient and economic desires. Meanwhile, the record labels, management companies, and other  
12 corporate entities enabled Milosh by supporting him financially and ratifying his misconduct  
13 despite knowledge that Plaintiff was a minor and continuing to suffer abuse even after the age of  
14 majority. Plaintiff brings this action to seek justice for the years of emotional, sexual,  
15 psychological, and financial torture she suffered at the hands of Defendant Milosh.

16 **PARTIES**

17 1. Plaintiff is an adult female residing in Los Angeles, within the State of California.  
18 At all times relevant to this Complaint, Plaintiff was residing in Los Angeles County,  
19 California. Plaintiff was born on April 4, 1992, and brings this Complaint pursuant to Code of  
20 Civil Procedure Section 340.1, as amended by Assembly Bill 218, for the child assault she  
21 suffered at the hands of Defendants.

22 2. On information and belief, Defendant Milosh is an individual residing in Los  
23 Angeles, California. At all times mentioned herein, Defendant Milosh was a singer-songwriter.

24 3. The true names and capacities, whether individual, corporate, partnership,  
25 associate, or otherwise, of Defendants DOES 1–20, inclusive, are unknown to Plaintiff.  
26 Accordingly, Plaintiff sues DOES 1–20 by such fictitious names pursuant to section 474 of the  
27 California Code of Civil Procedure. Plaintiff will seek leave to amend this Complaint to allege  
28 their true names and capacities when they are ascertained. Plaintiff is informed and believes and

1 thereon alleges that DOES 1–20 are legally responsible in some manner for the events,  
2 happenings, and/or tortious and unlawful conduct that caused the injuries and damages alleged in  
3 this Complaint.

4 4. On information and belief, at all times material hereto, Defendants were the agents,  
5 representatives, servants, employees, partners, and/or joint venturers of each and every other  
6 Defendant and were acting within the course and scope of said alternative capacity, identity,  
7 agency, representation and/or employment and were within the scope of their authority, whether  
8 actual or apparent. Each of the Defendants is responsible in some manner for one or more of the  
9 events and happenings described herein. Each Defendant approved and/or ratified the conduct of  
10 each other Defendant. Consequently, each Defendant is jointly and severally liable to Plaintiff for  
11 the damages sustained as a proximate result of his, her, or its conduct. Each of the Defendants  
12 proximately caused the injuries and damages alleged.

13 5. Whenever reference is made to “Defendants” in this Complaint, such allegation  
14 shall be deemed to mean the acts of Defendants acting individually, jointly, and/or severally.

#### 15 **GENERAL FACTUAL ALLEGATIONS**

16 6. Nikolas began acting at just two years old. Born on April 4, 1992, Nikolas spent  
17 many of her childhood years acting. At 12 years old, Nikolas was cast as “Nicole” in the  
18 Nickelodeon series Zoey 101. At 16, she was cast in the television movie remake of Children of  
19 the Corn. As a child spending much of her time working, and before the heavy influence of social  
20 media, Nikolas was naïve to the ideas of grooming, sexual abuse, and manipulation in the  
21 entertainment industry.

22 7. In 2008, while filming Children of the Corn, Nikolas heard music performed by  
23 Defendant Milosh for the first time. She was introduced to his music through her then guardian at  
24 the time, who served as her chaperone while filming. Innocently, she reached out to Milosh via his  
25 Myspace page, complimenting his music, and commenting that she would like to see him perform  
26 the next time he was in Los Angeles. She intended only to find some new music and was curious  
27 as to whether he was performing live since she did not see an upcoming schedule on his Myspace.  
28

1           8.       Although Nikolas did not expect any response as he was so much older, almost  
2 immediately, Milosh responded to her Myspace message, and asked for her phone number, to  
3 which she complied. Only a few minutes later, he called her and they spoke on the phone for over  
4 an hour. At the time, Nikolas was 16 years old and Milosh was 33.

5 **I.       *Milosh Begins Grooming and Sexually Assaulting Nikolas.***

6           9.       From their very first interaction, Milosh was flirtatious with Nikolas, despite  
7 knowing she was only 16 years old. Milosh told Nikolas that he had seen her profile on  
8 IMDB.com, which displayed her work as an actress and also showed her age. When Nikolas sent  
9 Milosh a photograph of herself on the set of Children of the Corn, dressed as a 14-year old  
10 pregnant Amish girl, Milosh responded that he was attracted to the photo of her as a pregnant girl.

11          10.       For almost two years, Nikolas and Milosh conversed via phone, text message, and  
12 Skype video chat. Despite their 17 year age difference, and the fact that Nikolas was still a minor,  
13 the conversations were flirtatious and sexual in nature. Milosh began grooming Nikolas by  
14 making her feel comfortable with him, encouraging her to open up to him, and to reveal herself to  
15 him against her initial instincts. Upon gaining her trust, Milosh used his status in the industry,  
16 authority, seniority, fame, and her trust to sexually assault Nikolas. As a minor lacking experience  
17 with sexuality, Nikolas could not realize the acts of assault as they were occurring and instead,  
18 trusted Milosh, and followed his lead.

19          11.       While Nikolas was still a minor child, Milosh escalated his prurient pursuit of her  
20 by repeatedly asking to see her in person, take photographs of her, and requesting she send explicit  
21 photographs of herself to him. Nikolas specifically recalls being uncomfortable with the flattery  
22 and requests at times, but she felt unsure of how to act due to her age and innocence. On several  
23 occasions, in her naivety, upon Milosh's explicit requests, Nikolas sent him sexual photographs in  
24 lace underwear revealing her buttocks.

25          12.       Milosh became increasingly flirtatious with Nikolas, and over their Skype video  
26 calls, asked Nikolas to undress for him. Once again, relying on Milosh's authority and trust,  
27 Nikolas acquiesced, undressing herself and revealing her naked body to him numerous times.  
28 Nikolas was only 16 and 17 years old at the time while Milosh was 33 and 34. Nikolas recalls in

1 those moments, as she displayed her naked body for Milosh, feeling uncomfortable but also scared  
2 to disappoint him.

3 13. Persistently, Milosh attempted to coordinate meeting with Nikolas on numerous  
4 occasions despite the fact that she was still a minor. Nikolas believed that Milosh intended to  
5 meet with her to engage in sexual acts. In March 2009, Milosh emailed his passport information  
6 to Nikolas attempting to coordinate their meeting. He followed up several times and even asked  
7 Nikolas to fly to New York to meet in person.

8 14. In around April 2009, upon requesting and receiving one of the explicit  
9 photographs from Nikolas, Milosh responded, “[u]m, all I can say is oh my. This is very hot, very  
10 hot. We have to meet pronto.” Nikolas had turned 17 years old only two weeks before.

11 15. Milosh repeatedly requested to take photographs of Nikolas, boasting about his  
12 artistic abilities photographing naked women. In connection with these requests, Milosh sent  
13 photographs of a naked woman, age unknown, to Nikolas as an example of the types of  
14 photographs he wanted to take, with a subject line of “still looking for more shots.” Nikolas was  
15 17 years old at the time Milosh sent her these photographs. Nikolas knew and understood that  
16 Milosh was requesting to take naked photos of her, even though she was still a minor.

17 16. Throughout 2008 and 2009, Milosh was recording his third album, “iii,” through  
18 the record labels !K7 and Plug Research. In May 2009, Milosh asked to stay with Nikolas in her  
19 home in Los Angeles where she lived with her mother, and invited her to come see his show at the  
20 Silverlake Lounge, promoted and facilitated by his record label, Plug Research. Nikolas had just  
21 turned 17.

22 17. On information and belief, Plug Research knew or should have known that Milosh  
23 was attempting to stay with an underage fan to promote his album and perform the shows they  
24 coordinated, facilitated, and promoted. Plug Research, as the record label for Milosh, had  
25 knowledge of the lyrics to Milosh’s music, his vision for his music and artistic endeavors, and his  
26 tendencies to seek courtship with underage fans.

27 18. Defendant Milosh coerced Plaintiff by: (1) using his seniority and authority to  
28 emotionally manipulate Plaintiff; (2) sexually grooming her to trust him, satisfy his prurient

1 desires, and concede to him; and (3) encouraging Plaintiff to become emotionally dependent upon  
2 him, and thus further exerting his control over her.

3 **II. *Milosh Continues His Course and Conduct of Sexually Assaulting Nikolas.***

4 19. After two years of this emotional manipulation, grooming, and sexual assaults,  
5 Nikolas finally agreed to meet Milosh in person for the first time. By this time, Milosh groomed  
6 and coerced Nikolas to believe she was in love, that he loved her, and that they had a genuine  
7 connection and consensual relationship. Although she had just turned 18, she was still acting  
8 under the spell and manipulation of Milosh continuing from his years of grooming and abusing her  
9 as a minor.

10 20. At this first meeting, Nikolas expressly recalls her intent to take any physical steps  
11 slowly. However, using the grooming, emotional manipulation, and control over her that he  
12 garnished during Nikolas' adolescence, Milosh began pressuring Nikolas to take off her clothes.  
13 Milosh supplied Nikolas with excessive alcohol to easily manipulate her and continued to  
14 encourage Nikolas to undress. Nikolas initially told him no, but succumbing to his power over  
15 her, eventually complied upon his insistence. After Nikolas took off her clothing, Milosh  
16 immediately began digitally penetrating Nikolas in her anus. Nikolas asked Milosh to stop, but he  
17 refused. Nikolas told Milosh the penetration hurt, but he ignored her. The pain was so severe, it  
18 caused Nikolas to well up with tears. Milosh deliberately ignored Nikolas's explicit non-consent  
19 and simply assured Nikolas that she would enjoy the experience eventually.

20 21. Nikolas recalls feeling unsafe and overwhelmed with fear. After Milosh fell asleep,  
21 she snuck onto his laptop and emailed her friends telling them that she wanted to go home and was  
22 scared. However, she also felt scared of how Milosh would react if she left. Nikolas was scared  
23 to disappoint him and misled by the years of grooming, complied with Milosh's desires. Based on  
24 the years of grooming, Nikolas ignored her own pain, discomfort, and instincts because she was  
25 conditioned to believe what Milosh told her, to respond in accordance with how he directed her,  
26 and to acquiesce to his desires. Despite her fears, and under duress of manipulation, Nikolas  
27 stayed with Milosh for two weeks, most of the time under the influence of alcohol.

28

1           22.     Over the next two weeks, Milosh turned every sexual situation into one wherein he  
2 routinely crossed boundaries and forced anal penetration upon Nikolas. Each time he penetrated  
3 her anus with his fingers despite her saying “no” over and over again, with tears streaming down  
4 her face from the pain. Eventually, Milosh forced his penis inside her anus after Nikolas again  
5 explicitly told him “no.” Nikolas soon realized it did not matter what she said because Milosh was  
6 in control and would do what he pleased. Each time Nikolas saw Milosh over the next year, he  
7 would force anal penetration upon her.

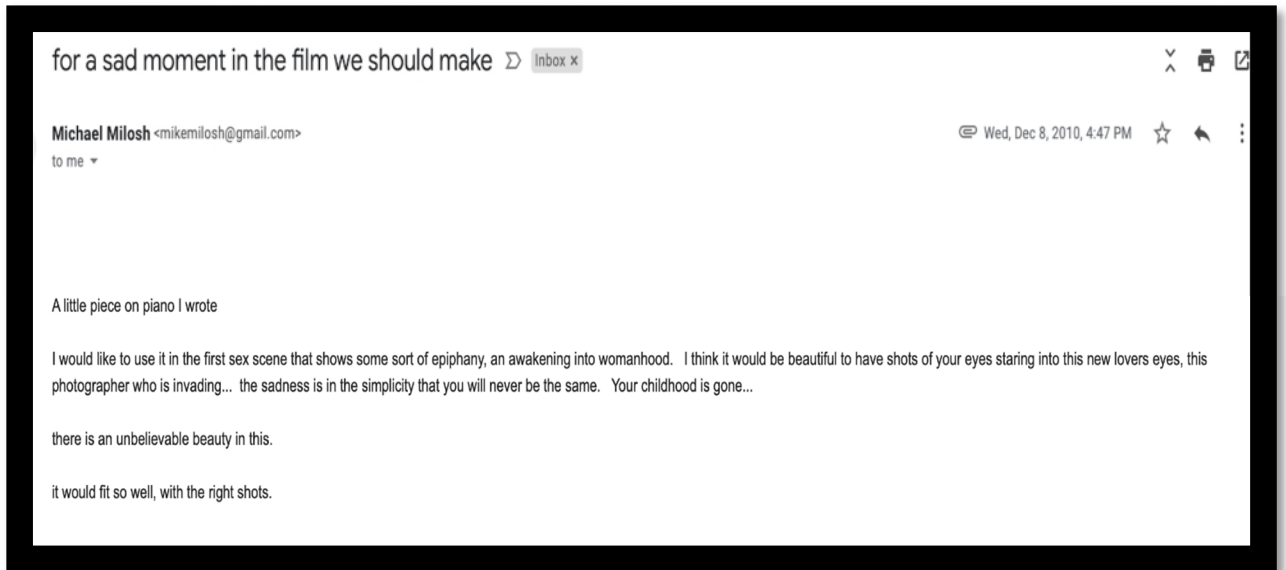
8           23.     The psychological intimidation and control which allowed Milosh to take  
9 advantage of Nikolas as a minor did not magically disappear on the date of her 18<sup>th</sup> birthday.  
10 Indeed, it continued into adulthood, until Nikolas could escape the toxic relationship and Milosh’s  
11 control to enable her to realize the wrongfulness of Milosh’s conduct and the harm she suffered as  
12 a result.

13           24.     Milosh routinely supplied Nikolas with excessive amounts of alcohol. Milosh had  
14 a pattern and practice of buying several six-packs of beer, encouraging Nikolas to consume the  
15 alcohol in excess, while he slowly sipped only a few beers. At the time, Milosh was in his mid-  
16 30’s while Nikolas was not old enough to purchase alcohol herself. Once Nikolas was sufficiently  
17 intoxicated with alcohol and under the influence of years of grooming, Milosh used his power and  
18 authority to subject Nikolas to countless acts of sexual abuse. For instance, in 2010 or 2011,  
19 Milosh coerced Nikolas to allow him to record them having sex with both video and audio while  
20 she was heavily intoxicated. Milosh then used this audio throughout his entire album “Jetlag,”  
21 several years later. In fact, a portion of this audio was used in the song “Don’t Call It,” where  
22 Nikolas was saying “no” in response to Milosh anally penetrating her. At the end of the song,  
23 Milosh included sounds of Nikolas in pain during forced anal penetration. Milosh used this audio  
24 for his own personal gain without Nikolas’s valid consent.

25           25.     On information and belief, Milosh recorded several women in a similar manner and  
26 later used these recordings in his songs without their knowledge or consent.

27           26.     In December 2010, Milosh emailed Nikolas a piece of music he had written entitled  
28 “for a sad moment in the film we should make.” In this email, Milosh described his “vision” for

1 the song, which included Nikolas, during the first “sex scene,” having an epiphany that her  
2 “childhood was gone.” Milosh tells Nikolas that he finds “unbelievable beauty” in the idea that  
3 her childhood is gone through this sex scene, her awakening into womanhood, and the sadness that  
4 she would never be the same. Milosh based this film and “vision” on actual interactions with  
5 Nikolas.



16 27. On March 9, 2011, Milosh emailed Nikolas with a subject line of “I will do.” The  
17 email recited the sexual acts Milosh wished to perpetrate upon Nikolas, including anal penetration  
18 and doing what he wanted with her. The email concludes with the lines “I want to eat, I want to  
19 smell you, I want to kill.” Nikolas was only 18 at the time the email was sent, while Milosh was  
20 35 years old.

21 28. At all times herein, Milosh knew that Nikolas was a minor when he pursued her,  
22 encouraged her to undress, had sexually explicit communications with her, sent her nude  
23 photographs of women while requesting to take nude photographs of Nikolas and groomed her for  
24 sexual abuse. Indeed, in a 2011 correspondence with Nikolas, Milosh admits that their  
25 “relationship” began when she was only 16 years old.

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1 **III. *Milosh Escalates His Manipulation, Control, and Sexual Abuse of His Groomed***  
2 ***Victim, and Involves Industry Professionals***

3 29. In December 2010, Milosh convinced Nikolas to purchase him an \$800 plane ticket  
4 to visit her in Los Angeles. Under the guise of a romantic visit, Milosh's true intentions were to  
5 advance his own career at Nikolas' expense. While visiting Nikolas in January 2011, Milosh  
6 coordinated a number of business meetings, recording sessions, and even filmed a music video for  
7 his music. In addition, Milosh utilized this time to further intoxicate, groom, manipulate and  
8 sexually abuse Nikolas.

9 30. From their very first physical interaction, Milosh was routinely violent with  
10 Nikolas during sexual encounters. As the years went on, he continued this violence during sexual  
11 intercourse and would slap her face, hit her, and on one occasion, even tightened a belt around her  
12 neck. Nikolas did not want or consent to such violence.

13 31. Furthermore, over 90% of the sexual encounters involved Milosh crossing the  
14 boundaries into anal penetration. Nikolas routinely refused Milosh's attempts at anal penetration,  
15 but Milosh insisted. What Milosh represented to the world as a loving relationship with mutual  
16 affection and respect, was in reality a hierarchy of control, coercion, pain, and manipulation.

17 32. Beginning in 2011, Milosh brought Nikolas to numerous business meetings  
18 regarding the formation of Rhye as both a trophy and as his ride. In 2011, Nikolas met with  
19 Milosh and the owners of the record label Innovative Leisure, Jamie Strong and Nate Nelson,  
20 regarding potentially contracting with Rhye. During this meeting, Milosh explained to Strong and  
21 Nelson, in detail, how he met Nikolas, their courtship, his pursuit of her as a minor, and explicit  
22 details of their lives. As of the date of this meeting, Innovative Leisure, through Strong and  
23 Nelson, had knowledge of the childhood sexual assault Milosh perpetrated upon Nikolas and his  
24 continuing course of conduct of assault, control, and abuse. Strong and Nelson knew or should  
25 have known at that time that Nikolas had sexually assaulted by Milosh when she was a minor, was  
26 unaware of the wrongfulness of Milosh's conduct, and that the conduct continued past her  
27 reaching the age of majority.

28

1           33.     Despite such knowledge, Innovative Leisure chose to sign Milosh and his band  
2 Rhye to their record label and advanced Milosh money to commence their business relationship.

3           34.     In late 2011, Milosh asked to move in with Nikolas, again using her as his financial  
4 support and sexual conquest. Through much of the sham relationship, Milosh encouraged Nikolas  
5 to consume alcohol which lowered her inhibitions and allowed him to take further control over  
6 her.

7           35.     In late 2011 or early 2012, Rhye hired BIZ3 to manage and handle public relations  
8 for the band. BIZ3 facilitated the sale of Rhye’s copyrights and/or licensing from Innovative  
9 Leisure to Polydor and Loma Vista. Polydor and Loma Vista purchased the rights to produce,  
10 distribute, promote and/or copyright Rhye’s first album, “Woman.” Milosh told Nikolas that the  
11 name of the album was in reference to watching Nikolas “turn into a woman.”

12          36.     Milosh composed a song about Alexa soon after her trip to Berlin in June 2010, and  
13 eventually released it on the album “Woman,” titled “Major Minor Love.” The lyrics of the song  
14 included the repetition of the words “I’m so bad, I’m so bad,” as well as “I’ll be the pain (across  
15 your face), In so much pain.” This song references Nikolas repeatedly in pain during intercourse  
16 and coerced anal penetration.

17          37.     During the course of generating his business relationships, Milosh flaunted Nikolas  
18 to the record labels, bringing her to meetings, attempting to create leverage with her presence, and  
19 describing the start of their fraudulent relationship, when Nikolas was a minor, to each one.  
20 Milosh paraded Nikolas to the record labels as a trophy or conquest, while admitting to each label  
21 and/or industry professional that he began his pursuit of a sexual “relationship” with Nikolas when  
22 she was a minor. Each of the record labels and managers knew and understood of the childhood  
23 sexual assault Milosh perpetrated upon Nikolas, and the continuing manipulation and control  
24 Milosh exerted over Nikolas. Despite such knowledge, Polydor, Loma Vista and BIZ3 supported,  
25 enabled, and encouraged Milosh by supporting him financially, promoting his music and  
26 popularity, and earning him additional leverage and control over Nikolas.

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1 **IV. *Milosh Convinces Nikolas to Marry Him to Obtain Immigration Status***

2 38. In early 2012, Milosh proposed marriage to Nikolas. Unbeknownst to Nikolas,  
3 Milosh, a Canadian citizen, was in desperate need of an artist visa before his upcoming tour to  
4 promote the release of his newest album. If Milosh was unable to obtain this visa, he would lose  
5 out on a million dollar record deal. His record labels, Polydor and Loma Vista, were equally  
6 aware of Milosh’s visa issue and refused to pay for or facilitate his artist visa. Instead, they relied  
7 on Milosh to obtain his artist visa through marriage, by manipulating Nikolas, the product of his  
8 childhood grooming, to marry him. Milosh, using his power and authority over her, convinced  
9 Nikolas to marry him on short notice, at the courthouse.

10 39. Nikolas, only 19 years old at the time and deeply consumed by the emotional  
11 hypnosis she was under as a result of years of his grooming, agreed to marry Milosh, take a break  
12 from her own career, and support Milosh for his upcoming tour. This decision allowed Milosh to  
13 further exert influence and control over Nikolas, by forcing her to rely on him financially,  
14 ensuring he knew of her whereabouts at any moment, thereby pulling her deeper into his  
15 psychological manipulation. The years of childhood sexual assault and grooming prevented  
16 Nikolas from realizing the emotional trauma, damage, and control bestowed upon her.

17 40. While on tour, the record labels, managers, and public relations professionals were  
18 aware or should have been aware of the childhood sexual assault by Milosh upon Nikolas, and  
19 were witness to their interactions first-hand. On information and belief, the record labels,  
20 management companies, and public relations professionals knew or should have known of the  
21 ongoing and continuing abuse of Nikolas by Milosh.

22 41. Throughout the entirety of their sham relationship, Nikolas acted under the control,  
23 manipulation, and power of Milosh. Milosh controlled Nikolas by maintaining only one set of  
24 keys to their shared living space to ensure he knew of Nikolas’ whereabouts at all times, sharing  
25 one vehicle to ensure he had control over Nikolas’ transportation, isolating her from friends and  
26 family, repeatedly degrading friends and family, particularly those who questioned their  
27 “relationship” or his intentions, supplying Nikolas with copious amounts of alcohol to exert  
28

1 further control over her actions, threatening to cut her off financially, and demanding she  
2 acquiesce to his sexual desires, despite her non-consent.

3 42. The industry professionals, including record labels, managers, and public relations  
4 professionals, knew or should have known that the sham relationship between Nikolas and Milosh  
5 was founded upon childhood sexual assault and continued as a result of the psychological  
6 manipulation. Despite such knowledge, the record labels and managers fostered a pervasive and  
7 hostile environment wherein Milosh could continue the manipulation, psychological control, and  
8 physical and sexual abuse upon Nikolas, with utter disregard to her safety and rights.

9 43. In 2013, Milosh released his fourth solo album “Jetlag” under the record label  
10 Deadly Records, owned and operated by Milosh alone. Milosh used recordings of Nikolas during  
11 sex throughout the album, including a specific recording of her saying “no” in response to his  
12 attempt to anally penetrate her. At the album release party, Milosh displayed his photographic  
13 “art” to the guests which consisted of huge photographs of Nikolas, completely naked. These  
14 photographs were not modest in nature, but rather, displayed Nikolas’ young naked body for all to  
15 see. Nikolas did not consent to the use of naked photographs of herself to be used in public in this  
16 manner.

17 44. During the party, Milosh proudly told attendees of the party that they were listening  
18 to Nikolas during coerced anal sex throughout his entire album. Not surprisingly, Milosh did not  
19 disclose to his guests that he obtained these recordings when Nikolas was highly intoxicated and  
20 incapable of refusing. Nikolas’ own mother left the party in disgust.

21 45. Individuals from Innovative Leisure, Polydor, BIZ3, Loma Vista, and KCRW  
22 Public Radio were in attendance at this party, with prior knowledge of the foundation of the  
23 deceitful relationship which was rooted in childhood sexual assault. On information and belief,  
24 these industry professionals lauded Milosh in his “art” with reckless disregard to the severe  
25 psychological damage suffered by Nikolas.

26 46. Milosh had a reputation for flaunting naked photographs of Nikolas for others to  
27 see. In the recording studio, he framed and hung two large, almost life-sized photographs of  
28 Nikolas wearing only Hello Kitty underwear and her bare breasts exposed. These photographs

1 were taken in Berlin when she had turned 18 only two months before. The photographs hung in  
2 the recording studio where they were displayed for band members, record labels, band managers,  
3 and all to see. Nikolas felt uncomfortable with the photographs, particularly since she visited the  
4 recording studio often, knew others felt uncomfortable with the photographs, and pleaded with  
5 Milosh to remove them. Rather than respect her wishes, Milosh found it humorous that the other  
6 band members and industry professionals could see her naked. It was yet another instance of  
7 control, manipulation, and torment imposed by Milosh upon Nikolas.

8 ***V. Nikolas Attempts to Leave the Marriage, Only to Be Further Manipulated by Milosh and***  
9 ***his Management Company, Red Light Management***

10 47. In 2014, Nikolas expressed her desire to leave the fraudulent marriage. In order to  
11 secure his citizenship and right to work in the United States, Milosh needed the marriage to last at  
12 least three years, until March 2015. Milosh never mentioned this requirement to Nikolas before,  
13 during or after the marriage, but it became clear that he was unwilling to allow her to escape.

14 48. By this point in time, Milosh controlled all the finances as Nikolas left her own  
15 acting career to support him. She was left powerless, under his authority and control, and due to  
16 the years of psychological abuse and manipulation, lacked the emotional ability to leave the  
17 marriage.

18 49. Milosh treated Nikolas like his property, something he owned and could control,  
19 versus a human being. When a friend of Nikolas' appeared to be interested in Nikolas  
20 romantically, Milosh lashed out, drafting an email threatening the friend with Nikolas' own well-  
21 being, stating, "...you should have thought a little longer on the position it puts her in. ... I pay for  
22 everything, I pay her rent, I pay her car payments, I buy her food. If I do come to the conclusion  
23 that she was encouraging your feelings do you think my response to her is going to be super laid  
24 back and cool? If this breaks up, this little play you are making, how do you think this is really  
25 going to play out for her...?"

26 you should have thought a little longer on the position it puts her in. It also has some serious implications for her and her life and  
27 this is something I think you should have considered. I pay for everything, I pay her rent, I pay her car payments, I buy her  
28 food. If I do come to the conclusion that she was encouraging your feelings do you think my response to her is going to be  
super laid back and cool? If this breaks us up, this little play you are making, how do you think this is really going to play out for  
her...? Do you think she can afford to live in L.A. like she is? You should have taken more care before writing this email to

1           50.     In approximately 2015, Milosh contracted with Red Light Management (“Red  
2 Light”) as his management company. Red Light became heavily involved in Milosh and Nikolas’  
3 lives, in addition to supporting and enabling Milosh in his manipulation and control over Nikolas.  
4 On information and belief, Red Light had concern regarding Nikolas’ ownership rights in Rhye  
5 and/or their music and/or assets as his legal wife. These rights were significant to the continuation  
6 of Milosh and his music career. On information and belief, Red Light sought to preserve their  
7 investment despite actual and/or constructive knowledge that Milosh sexually assaulted Nikolas as  
8 a minor and of the ongoing tortious conduct by Milosh upon Nikolas.

9           51.     In 2015, Milosh, yet again, escalated his physical abuse of Nikolas. On one  
10 occasion, Nikolas began experiencing a panic attack and in response, Milosh charged at Nikolas,  
11 picked her up, threw her on the couch, pressed his forearm into her throat to the point where she  
12 could not breathe and continually screamed “shut the fuck up, shut the fuck up, shut the fuck up.”

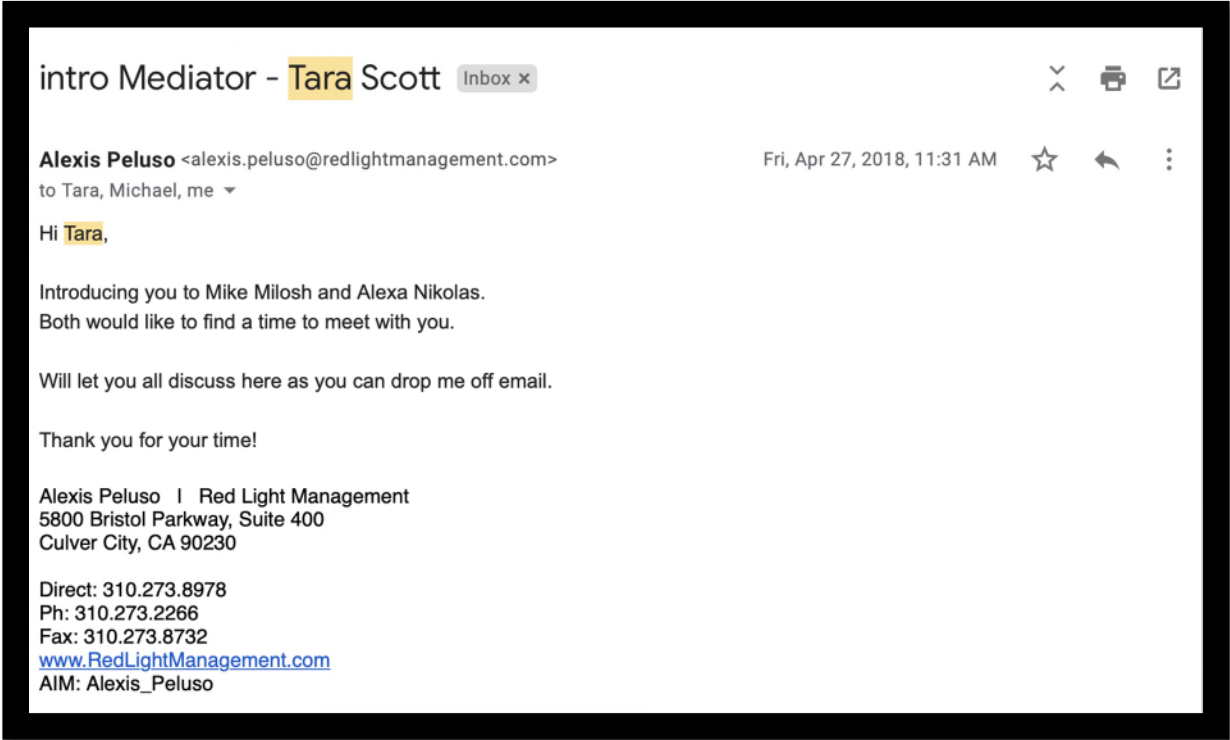
13           52.     Nikolas finally summoned the courage to escape the fraudulent, toxic marriage,  
14 when her therapist encouraged her to bring Milosh into one of her counseling sessions and the  
15 therapist told Milosh that Nikolas wanted a divorce.

16           53.     After Nikolas’ therapist told Milosh that Nikolas intended to commence divorce  
17 proceedings, Nikolas was prohibited from speaking directly to Milosh and was only permitted to  
18 speak through Milosh’s management company, Red Light. On information and belief, Red Light  
19 utilized its power, authority, and influence in the industry to control the divorce proceedings to  
20 protect Milosh to the detriment of Nikolas. Red Light cultivated a culture of abuse, control, and  
21 manipulation, thereby emboldening Milosh in his continuous and tortious abuse of Nikolas. On  
22 information and belief Red Light ratified Milosh’s misconduct, silenced Nikolas, and protected  
23 their investment to their own financial gain.

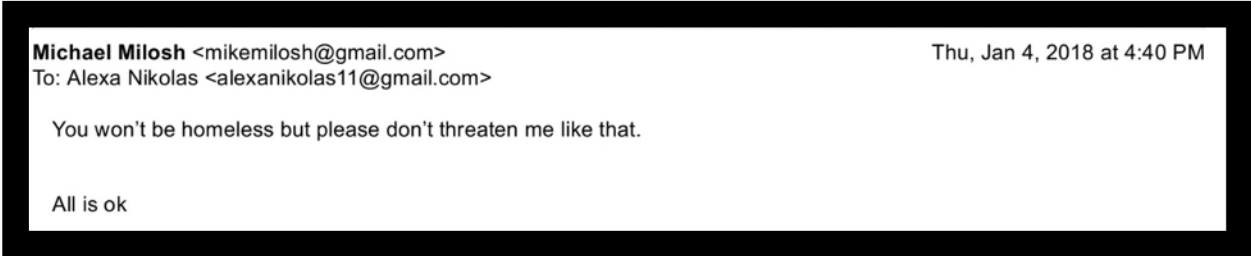
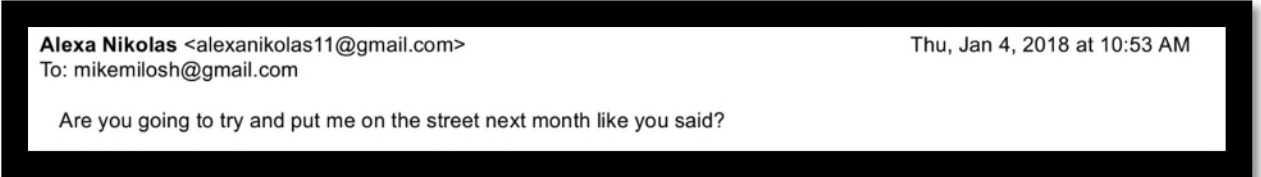
24           54.     In addition to controlling all communication between Nikolas and Milosh, Red  
25 Light controlled the finances, forcing Nikolas to go through Red Light to pay rent and veterinarian  
26 bills. Red Light delivered divorce papers to Nikolas directly, and perhaps the most questionably,  
27 Red Light was solely responsible for choosing a “mediator” to handle the divorce proceedings.

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55. When Nikolas expressed her desire to hire an attorney, Milosh threatened to put her on the streets with nothing. Every time Nikolas suggested they hire attorneys, Milosh lashed out, accusing her of “threatening” him solely by suggesting they use experienced attorneys rather than Red Light’s hand-picked “mediator.”



56. As the victim of deep psychological manipulation continuing from years of grooming and childhood sexual abuse, Nikolas was unable to realize the harm caused and wrongfulness of her abuser’s conduct until she was able to escape the toxic relationship.

1           57.       During the abuse, Milosh continued to exert control over Nikolas, which he had  
2 established during the grooming process while Nikolas was a minor. Milosh continued his course  
3 and conduct of abuse from the inception of their acquaintance, and maintained control over  
4 Nikolas by: (1) sexually assaulting her; (2) forcing anal sex upon her even after she refused; (3)  
5 isolating her from friends; (4) requiring her to be with him at all times; (5) maintaining one car  
6 and only one set of house keys so he knew of her whereabouts; (6) persuading her to put her career  
7 on hold and give up her potential for financial independence; (7) controlling the finances; (8)  
8 convincing her that she was mentally unstable any time she questioned the “relationship” or his  
9 intentions; and (9) delaying the divorce proceedings.

10           58.       Plaintiff did not, and/or was unable to, give free or voluntary consent to the sexual  
11 acts perpetrated against her by Milosh, because: (1) she was a minor child at the time of the  
12 assaults; (2) the sexual assaults that continued into her adulthood were a direct result, and a mere  
13 continuation, of Milosh’s course and conduct of grooming, manipulating, and abusing the then-  
14 underage Nikolas; and (3) Milosh exercised his status in the industry, authority, seniority, fame,  
15 and her trust over Nikolas, utilizing Nikolas’s mental and emotional state, and Nikolas’s young  
16 age, which did not allow Nikolas to freely or meaningfully consent to his sexual and physical  
17 abuse of her.

18           59.       The sexual acts perpetrated upon Nikolas by Milosh constitute child sexual assault  
19 as defined by California Code of Civil Procedure Section 340.1, as modified by Assembly  
20 Bill 218, and were a violation of the California Penal Code, including, but not limited to, Penal  
21 Code Sections 311.4(b), and 647.6.

22           60.       On information and belief, certain industry professionals and other entities assisted  
23 and supported Milosh and his predatory behavior, causing further psychological and emotional  
24 damage to Nikolas. The industry professionals, including but not limited to Plug Research,  
25 Innovative Leisure, Polydor, Loma Vista, and Red Light, knew of the sexual assaults perpetrated  
26 upon Nikolas as a child, yet supported him financially, empowered him in the industry, promoted  
27 his music, career, fame, and increased his power over Nikolas. Each of the foregoing industry  
28 professionals, at one time or another, controlled Milosh, with the ability to oversee his actions,



1 ensure he acted in accordance with each company's respective standards, if any, and had the  
2 ability to terminate their relationship with and financial support of Milosh.

3 61. In addition, Red Light enabled Milosh's abuse of Nikolas by supporting his actions,  
4 controlling Nikolas' finances and ability to provide for herself, by coercing her to use their hand-  
5 picked mediator, and controlling communication between Nikolas and Milosh.

6 62. On information and belief, the electronic music industry is saturated with stories  
7 like Nikolas. The industry promotes, encourages, and fosters an environment where sexual assault  
8 is an acceptable norm. Artists and those in power use their fame, fortune, authority, and leverage  
9 within the industry to prey upon innocent fans who find themselves in cycles of psychological,  
10 physical, and sexual abuse. Record labels, management companies, and public relations  
11 professionals either turn a blind eye to, or in some cases, participate and encourage, these assaults  
12 in an attempt to keep their investments safe and to the utter demise and destruction of others. The  
13 perpetuation of this cyclical abuse is not the result of a single actor, rather, it has become an  
14 industry standard and an ongoing effort to silence victims of sexual assault.

15 **FIRST CAUSE OF ACTION**

16 **SEXUAL BATTERY**

17 **(Against Defendant Milosh)**

18 63. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent  
19 paragraphs of this Complaint as if fully set forth herein.

20 64. During Plaintiff's time as a minor, Defendant Milosh intentionally, recklessly, and  
21 wantonly made sexual advances, solicitations, requests, and demands for sexual compliance of a  
22 hostile nature based on Plaintiff's gender that were unwelcome, pervasive, and severe. Defendant  
23 Milosh's sexual assaults, committed in spite of his knowledge that Plaintiff was a minor child at  
24 the time, included but were not limited to: (1) making sexually inappropriate comments to  
25 Plaintiff; (2) requesting Plaintiff to expose herself to Defendant Milosh; (3) requesting Plaintiff to  
26 send explicit photos of herself; (4) soliciting to meet with Plaintiff to satisfy his sexual desires;  
27 and (5) sharing nude photographs of other women to Plaintiff.

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1           65. Defendant Milosh's sexual assaults of Plaintiff upon her reaching the age of  
2 majority were a continued form of conduct stemming from his prurient transgressions against  
3 Plaintiff as a minor, and included, but were not limited to: (1) digitally penetrating her anus in  
4 spite of her non-consent; and (2) forcing Plaintiff to have non-consensual anal sex. The sexual  
5 abuse and psychological harm was part of a course of conduct that began in Nikolas' childhood  
6 and continued beyond her reaching the age of majority.

7           66. Defendant Milosh did the aforementioned acts with the intent to cause a harmful or  
8 offensive contact with an intimate part of Plaintiff's person and would offend a reasonable sense  
9 of personal dignity. Further, said acts did cause a harmful or offensive contact with an intimate  
10 part of Plaintiff's person that would offend a reasonable sense of personal dignity.

11           67. Plaintiff did not, and/or was unable to, give free or voluntary consent to the sexual  
12 assaults perpetrated against her by Milosh, because: (1) she was a minor child at the time of the  
13 assaults; (2) the sexual assaults that continued into her adulthood were a direct result, and a mere  
14 continuation, of Milosh's course and conduct of grooming, manipulating, and abusing the then-  
15 underage Nikolas; and (3) Milosh exercised his status in the industry, authority, seniority, fame,  
16 and her trust over Nikolas, utilizing Nikolas's mental and emotion state, and Nikolas's young age,  
17 which did not allow Nikolas to meaningfully consent to his sexual and physical abuse of her.

18           68. As a result of the above-described conduct, Plaintiff has suffered economic injury,  
19 all to Plaintiff's general, special, and consequential damage in an amount to be proven at trial, but  
20 in no event less than the minimum jurisdictional amount of this Court.

21           69. As a result of the above-described conduct, Plaintiff has suffered and continues to  
22 suffer emotional distress, physical manifestations of emotional distress, and was prevented and  
23 will continue to be prevented from performing daily activities and obtaining the full enjoyment of  
24 life.

25           70. In subjecting Plaintiff to the wrongful treatment alleged herein, Defendant Milosh  
26 acted willfully and maliciously with the intent to harm Plaintiff and in conscious disregard for  
27 Plaintiff's rights so as to constitute malice and oppression under Civil Code section 3294.  
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1 Plaintiff is therefore entitled to the recovery of punitive damages in a sum to be shown according  
2 to proof at trial.

3 **SECOND CAUSE OF ACTION**

4 **GENDER VIOLENCE**

5 *(Cal. Civ. Code, § 52.4)*

6 **(Against Defendant Milosh)**

7 71. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent  
8 paragraphs of this Complaint as if fully set forth herein.

9 72. California Civil Code section 52.4 provides a plaintiff with a private cause of  
10 action for damages against any person who subjects another to “Gender Violence.” Gender  
11 Violence constitutes gender discrimination through either: (1) at least one act: (a) that would  
12 constitute a criminal offense under state law that has as an element the use, attempted use, or  
13 threatened use of physical force against the person or property of another, and (b) that was  
14 committed at least in part based on the gender of the victim; or (2) a physical intrusion or physical  
15 invasion of a sexual nature under coercive conditions.

16 73. During Plaintiff’s time as a minor, Defendant Milosh committed gender violence in  
17 violation of section 52.4 by intentionally, recklessly, and wantonly making sexual advances,  
18 solicitations, requests, and demands for sexual compliance of a hostile nature based on Plaintiff’s  
19 gender that were unwelcome, pervasive, and severe. Defendant Milosh’s sexual assaults,  
20 committed in spite of his knowledge that Plaintiff was a minor child at the time, included but were  
21 not limited to: (1) making sexually inappropriate comments to Plaintiff; (2) requesting Plaintiff to  
22 expose herself to Defendant Milosh; (3) requesting Plaintiff to send explicit photos of herself;  
23 (4) soliciting to meet with Plaintiff to satisfy his sexual desires; and (5) sharing nude photographs  
24 of other women to Plaintiff.

25 74. Additionally, Defendant Milosh committed gender violence in violation of section  
26 52.4 because his sexual abuse of Plaintiff upon her reaching the age of majority was a continued  
27 form of conduct stemming from his prurient transgressions against Plaintiff as a minor, and  
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1 included, but were not limited to: (1) digitally penetrating her anus in spite of her non-consent; and  
2 (2) forcing Plaintiff to have non-consensual anal sex.

3 75. As a result of the above-described conduct, Plaintiff has suffered economic injury,  
4 all to Plaintiff's general, special, and consequential damage in an amount to be proven at trial, but  
5 in no event less than the minimum jurisdictional amount of this Court.

6 76. As a result of the above-described conduct, Plaintiff has suffered and continues to  
7 suffer emotional distress, physical manifestations of emotional distress, and was prevented and  
8 will continue to be prevented from performing daily activities and obtaining the full enjoyment of  
9 life, all in an amount exceeding the jurisdictional minimum of the Superior Court according to  
10 proof at trial.

11 77. Defendant Milosh engaged in the conduct described herein with malice,  
12 oppression, and fraud. Defendant Milosh intended to cause injury to Plaintiff or otherwise  
13 engaged in the described despicable conduct with a willful and conscious disregard for the rights  
14 or safety of Plaintiff. Defendant Milosh engaged in despicable conduct that subjected Plaintiff to  
15 cruel and unjust hardship in disregard of her rights.

16 78. Pursuant to section 52.4 of the California Civil Code, Plaintiff seeks actual  
17 damages, compensatory damages, attorneys' fees and costs, and all other appropriate relief.  
18 Plaintiff also seeks punitive damages against Defendant Milosh.

19 **THIRD CAUSE OF ACTION**

20 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

21 **(Against Defendant Milosh)**

22 79. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent  
23 paragraphs of this Complaint as if fully set forth herein.

24 80. Defendant Milosh intended his behavior and knew or should have known that  
25 emotional distress would likely result.

26 81. Defendant Milosh's conduct violates Penal Code 311.4(c), wherein he knowingly  
27 promoted, persuaded, and induced Nikolas to undress for him while she was a minor. This, as well  
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1 as the lewd photographs he insisted she send him, constitute obscene matters as defined by Penal  
2 Code 311.4.

3 82. Defendant Milosh's conduct as alleged throughout this complaint was outrageous.

4 83. Defendant Milosh's conduct exceeded all bounds of decency and is odious and  
5 utterly intolerable in a civilized society.

6 84. Defendant Milosh's conduct caused emotional distress in the minor Plaintiff and  
7 this emotional distress was and continues to be severe.

8 85. As a result of the above-described conduct, Plaintiff has suffered and continues to  
9 suffer emotional distress, physical manifestations of emotional distress, was prevented and will  
10 continue to be prevented from performing daily activities and obtaining the full enjoyment of life,  
11 and/or has incurred and and/or will continue to incur expenses for medical and psychological  
12 treatment, therapy, and counseling.

13 **FOURTH CAUSE OF ACTION**

14 **VIOLATION OF CALIFORNIA TOM BANE CIVIL RIGHTS ACT**

15 *(Cal. Civ. Code, §§ 52, et seq.)*

16 **(Against Defendant Milosh)**

17 86. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent  
18 paragraphs of this Complaint as if fully set forth herein.

19 87. The Tom Bane Civil Rights Act (codified at Cal. Civ. Code, §§ 52, *et seq.*)  
20 prohibits any person from interfering with another person's exercise or enjoyment of any  
21 constitutional or statutory rights through an actual or attempted threat, intimidation, or coercion of  
22 that person. (See, *Civ. Code*, § 52.1.)

23 88. Defendant Milosh violated the Tom Bane Civil Rights Act by coercing Plaintiff out  
24 of the exercise and enjoyment of her statutory right to be free from bodily harm, and sexual  
25 violence, and to be treated equally and without discrimination based on her gender. Defendant  
26 Milosh's coercion of Plaintiff included: (1) using his fame, status in the industry, seniority, and  
27 authority to emotionally manipulate Plaintiff; (2) sexually grooming her to trust him, satisfy his  
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1 prurient desires, concede to him; and (3) encouraging Plaintiff to fall in love with him, and  
2 become emotionally dependent upon him, thus further exerting his control over her.

3 89. Defendant Milosh utilized these coercive tactics to sexually assault Plaintiff.  
4 Defendant Milosh's sexual assaults, committed in spite of his knowledge that Plaintiff was a  
5 minor child at the time, included but were not limited to: (1) making sexually inappropriate  
6 comments to Plaintiff; (2) requesting Plaintiff to expose herself to Defendant Milosh;  
7 (3) requesting Plaintiff to send explicit photos of herself; (4) soliciting to meet with Plaintiff to  
8 satisfy his sexual desires; and (5) sharing nude photographs of other women to Plaintiff.

9 90. Defendant Milosh's sexual assaults of Plaintiff upon her reaching the age of  
10 majority were a continued form of conduct stemming from his prurient transgressions against  
11 Plaintiff as a minor, and included, but were not limited to: (1) digitally penetrating her anus in  
12 spite of her non-consent; and (2) forcing Plaintiff to have non-consensual anal sex.

13 91. As a result of the above-described conduct, Plaintiff has suffered economic injury,  
14 all to Plaintiff's general, special, and consequential damage in an amount to be proven at trial, but  
15 in no event less than the minimum jurisdictional amount of this Court.

16 92. As a result of the above-described conduct, Plaintiff has suffered and continues to  
17 suffer emotional distress, physical manifestations of emotional distress, was prevented and will  
18 continue to be prevented from performing daily activities and obtaining the full enjoyment of life,  
19 all in an amount exceeding the jurisdictional minimum of the Superior Court according to proof at  
20 trial.

21 93. Defendant Milosh engaged in the conduct described herein with malice,  
22 oppression, and fraud. Defendant Milosh intended to cause injury to Plaintiff or otherwise  
23 engaged in the described despicable conduct with a willful and conscious disregard for the rights  
24 or safety of Plaintiff. Defendant Milosh engaged in despicable conduct that subjected Plaintiff to  
25 cruel and unjust hardship in disregard of her rights.

26 94. Pursuant to sections 52 and 52.1 of California Civil Code, Plaintiff seeks actual  
27 damages (special and general damages), treble actual damages, and attorneys' fees and costs.  
28 Plaintiff also seeks punitive damages against Defendant Milosh.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for the following relief against all Defendants:

1. For past, present, and future general damages in an amount to be determined at trial;
2. For past, present, and future special damages, including but not limited to past, present and future lost earnings, economic damages, and others in an amount to be determined at trial;
3. For treble damages pursuant to Civil Code sections 52 and 52.1;
4. Any appropriate statutory damages;
5. For cost of suit;
6. For interest as allowed by law;
7. For any appropriate punitive or exemplary damages as to Defendant Milosh;
8. For attorney’s fees pursuant to Code of Civil Procedure section 1021.5 and Civil Code section 52.1, and 52.4, or otherwise as allowable by law; and
9. For such other and further relief as the Court may deem proper.

DATED: August 25, 2021

GREENBERG GROSS LLP

By: 

Deborah S. Mallgrave  
Brian L. Williams  
Jemma E. Dunn  
GREENBERG GROSS LLP

Karen B. Menzies  
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*Attorneys for Plaintiff Alexa Nikolas*

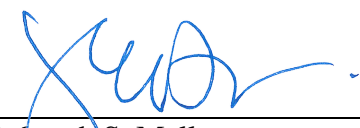
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**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury in this action for any and all claims so triable.

DATED: August 25 2021

GREENBERG GROSS LLP

By: 

Deborah S. Mallgrave  
Brian L. Williams  
Jemma E. Dunn  
GREENBERG GROSS LLP

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