

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

CASE TYPE: CIVIL

\_\_\_\_\_  
C.V.,

Court File No.: \_\_\_\_\_

Plaintiff,

vs.

**COMPLAINT**

Estate of Daunte Demetrius Wright, Sr.,

Defendant.  
\_\_\_\_\_

Plaintiff, C.V., for her Complaint against Defendant, states and alleges as follows:

**I. INTRODUCTION**

1. This action arises out of the attempted theft and physical assault of Plaintiff by Daunte Demetrius Wright, Sr. (hereafter, Wright) on December 1, 2019. In light of the high profile nature of the deceased person in this case, and in light of the fact Plaintiff is a crime victim, a young woman who wishes to keep her identity private, "C.V." is used to refer to her as a crime victim. Using her actual initials could aid those into determining her identity.

2. Wright had committed numerous crimes, it is reasonably believed, before and after December 1, 2019, at felony level.

3. The crime committed, by Wright against Plaintiff was serious in nature, involved a loaded firearm, and could have easily resulted in Plaintiff's death.

4. That Perp 2 was accidentally killed by a Brooklyn Center police officer on April 11, 2021.

**II. PARTIES**

5. That Plaintiff C.V. is an adult female who was at all times material herein, and still

is, a resident of Minneapolis, Minnesota, County of Hennepin.

6. That Decedent Wright, an adult male but now deceased, was at all times material herein a resident of Minneapolis, Minnesota, County of Hennepin.

### **III. VENUE AND JURISDICTION**

7. The State of Minnesota, County of Hennepin is the proper venue and jurisdiction for this action pursuant to Minn. Stat. § 542.09 (2011) as the Decedent Wright resided in Hennepin County, and the events which form the basis of this cause of action occurred in Hennepin County.

### **IV. FACTUAL BACKGROUND**

8. On November 30, 2019, Wright was a guest at the home of Plaintiff which was an apartment in Osseo, Minnesota.

9. Wright was a friend of a woman C.V. resided with at the time, C.V.'s roommate.

10. C.V. did not know Wright until that evening, and during the evening, Wright stated to C.V. that he was offended by men who abused women.

11. That due to inclement weather, Wright was not able to leave the apartment and was permitted to spend the night with a friend that he arrived with on the evening of 11/30/19.

12. That on the next day, 12/1/19, at approximately 10:30 a.m., within an earshot of Wright, C.V.'s roommate provided cash to C.V. for the purpose of paying rent.

13. At approximately 11:00 a.m., C.V., Wright, and Wright's friend were walking to the door of the apartment to exit the apartment. C.V.'s roommate was no longer present having left earlier. At that time, Wright blocked C.V.'s path to the door, pulled out a black handgun, pointed it at her, and demanded the money in her possession.

14. Wright said to C.V. at that time: "Give me the fucking money! I know you have it!"

15. C.V. had the rent-money cash tucked into her bra, and Wright placed his hand around

her neck and was choking her neck while attempting to pull the cash out from under her bra.

16. C.V. began screaming and Wright said: “Give me the money, and we will leave.” She refused.

17. Wright then began to choke C.V. a second time, and tried to take the money by reaching under her shirt and physically touching her breasts. Plaintiff was physically injured as a result of Wright’s criminal conduct, and these injuries were documented by the Osseo Police Department.

18. After this tortious conduct, Wright quickly left with his friend. C.V. was of the belief that the money had been taken. Miraculously, C.V. still had the cash.

19. C.V. promptly advised family of the crime and also contacted the Osseo Police Department immediately. Wright was subsequently charged by the prosecuting authority (Hennepin County Attorney’s Office) with second degree assault and attempted robbery, both felonies.

20. Wright subsequently lost his life in an unrelated high profile matter concerning a police officer named Kimberly Potter. As such, the charges against Wright were not fully litigated for his criminal conduct regarding C.V. before he passed away. The charges however were pending.

#### **V. COUNT ONE – ASSAULT & BATTERY**

21. Plaintiff restates and realleges paragraphs 1—20 above as fully set forth herein.

22. At the time and on the occasion described above, Wright did intentionally cause a harmful and offensive contact with Plaintiff, and Plaintiff did have a reasonable apprehension and fear of a harmful and offensive contact.

23. That said fear, apprehension, harmful, and offensive contact by Wright upon Plaintiff did cause Plaintiff to suffer physical, mental, and emotional injuries. It is reasonably believed

that the emotional distress and emotional injuries are permanent in nature.

24. That as a direct and proximate result of the intentional contact by Wright, Plaintiff has incurred personal injury, humiliation, embarrassment, and emotional distress all in an amount in excess of Fifty Thousand and no/100 dollars (\$50,000.00).

#### **VI. COUNT TWO: SEXUAL ASSAULT**

25. Plaintiff restates and realleges paragraphs 1-24 above as fully set forth herein.

26. That the conduct of Wright described herein constitutes sexual assault for which Plaintiff suffered personal injury, emotional distress, and other mental trauma. It is reasonably believed to be permanent in nature. As such, for this count alone, she seeks damages against Defendant in excess of Fifty Thousand and no/100 dollars (\$50,000.00).

#### **VII. COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

27. Plaintiff restates and realleges paragraphs 1-26 above as fully set forth herein.

28. That the conduct of Wright was extreme and outrageous and utterly intolerable in any civilized society and was intentionally and recklessly directed toward Plaintiff.

29. Wright knew or should have known that severe emotional distress and mental anguish was certain to result from his conduct.

30. That the conduct of Wright did cause Plaintiff to suffer severe emotional distress and grave mental anguish.

31. That as a direct and proximate result of the intentional contact by Wright, Plaintiff has incurred and will in the future incur permanent emotional distress, humiliation, embarrassment all in an amount in excess of Fifty Thousand and no/100 dollars (\$50,000.00).

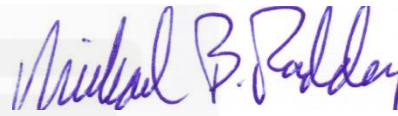
**WHEREFORE**, Plaintiff prays for the judgment in an amount in excess of Fifty Thousand and no/100 dollars (\$50,000.00) together with pre-judgment and post-judgment

interests, costs and disbursements incurred herein, attorney fees, and any such other relief as the Court deems just and equitable.

**PADDEN LAW FIRM, PLLC**

Dated: November 29, 2021

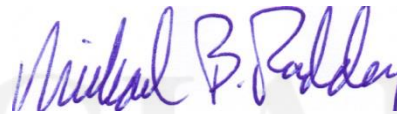
By: \_\_\_\_\_



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*Attorney for Plaintiff*

**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211, Subd. 2, to the party against whom the allegations in these pleadings are asserted.



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Michael B. Padden