

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.:

SOPHIE E. HALL,

Plaintiff,

v.

TYREEK HILL,

Defendants.

_____ /

COMPLAINT

COMES NOW, the Plaintiff, SOPHIE E. HALL, by and through the undersigned counsel, and hereby sues the Defendant, TYREEK HILL, and in support thereof alleges as follows:

INTRODUCTION

Tyreek Hill, a National Football League (“NFL”) Super Star, perennial Pro Bowler, First Team All-Pro and world class athlete nicknamed the “Cheetah” for his incredible combination of strength and speed, makes his living humiliating and outperforming his competition on the football field. Unfortunately, after getting “humiliated” in front of friends and family when he was knocked backwards during a friendly football lesson by his friend Sophie Hall, Tyreek became enraged, and forcefully and purposefully shoved Ms. Hall, severely fracturing her leg, requiring surgery with orthopedic reconstruction and hardware implantation. Ms. Hall now brings this action to recover compensatory and punitive damages for the significant harm that Mr. Hill caused by his intentional and reckless misconduct.

PARTIES

1. At all times material hereto, the Plaintiff, SOPHIE E. HALL, was and is an individual residing in Pasco County, Florida and is *sui juris*.

2. At all times material hereto, the Defendant, TYREEK HILL, was an individual residing in Broward County, Florida.

JURISDICTION AND VENUE

3. This is an action for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs.

4. At all times material hereto, the Defendant, TYREEK HILL, owned, operated, controlled, possessed, and/or maintained the residence at 16755 Berkshire Court Southwest Ranches, FL 33331.

5. Venue is proper in Broward County as the incident occurred therein, the property in question is located in Broward County, and because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in Broward County.

GENERAL ALLEGATIONS

As and for general allegations

As to all Counts

A. Defendant Hill solicits Ms. Hall through Social Media

6. Plaintiff, SOPHIE E. HALL, is a model, actress and social media influencer with an online following of over two million people across multiple social media platforms including Instagram, X (Twitter), YouTube, TikTok and Facebook.

7. Defendant TYREEK HILL, is an NFL player who currently plays Wide Receiver for the Miami Dolphins.

8. On or about May 24, 2023, Ms. Hall purchased a ticket for her ten (10) year old son to attend the “Tyreek Hill Football Camp” located at Boca Raton High School on June 17, 2023.

9. Ms. Hall never had any contact with, or ever spoke to the Defendant Hill, at any time up to and through this date.

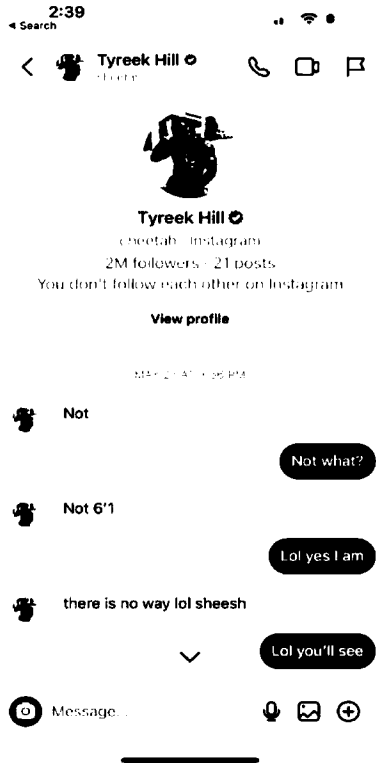
10. On May 25, 2023 – the day after Ms. Hall registered her child to attend Hill’s Day camp – Defendant Hill solicited Ms. Hall via direct message (DM) on Instagram.

11. Ms. Hall, a British born and American based celebrity fashion model, actress, and social media influencer, was sought out by the Defendant Hill, who wanted to meet up and get to know her.

12. First, Defendant Hill, in a flirtatious and playful manner wrote to Ms. Hall that she was not 6’1 tall. In response, Ms. Hall stated that she was in fact that tall and that he would see since she “literally just paid” for her son to attend his camp and that Defendant Hill was now suddenly “here” on her social media DM.

13. Defendant Hill replied that he would then see her “towering over everyone” at his camp.

14. Defendant Hill also made sure to let her know that he has been known to be a “good stepdad”:



15. Defendant Hill and Ms. Hall continued their direct messaging through Instagram, when Hill asked Ms. Hall to “come a day early so me and mom can hang” prior to the youth football camp.

16. Subsequently, Defendant Hill gave Ms. Hall his cell number so she could reach out to him directly.

17. After Ms. Hall’s son attended Hill’s football camp, he asked Ms. Hall to come back and visit him at his house.

B. Hill reconnects with Ms. Hall at his Southwest Ranches Mansion

18. Prior to June 28, 2023, the Defendant, TYREEK HILL, reached out to the Plaintiff, SOPHIE E. HALL, and invited her to come visit and stay with him at his Southwest Ranches Mansion located at 16755 Berkshire Court.

19. Defendant, TYREEK HILL, purchased flight and travel arrangements for Ms. Hall to come and spend several days with him at his home.

20. Defendant Hill's Southwest Ranches Mansion is a 7-million-dollar estate that sits on over two acres of land and includes a 10-person in-pool spa, putting green, campfire, NBA regulation basketball court and a tremendous turf field as shown in the below photos:





21. On the morning of June 28, 2023, upon Ms. Hall's arrival in south Florida, Defendant Hill had a driver pick her up from the airport and escort her to his home.

22. When Ms. Hall finally arrived, Defendant Hill had to step out for several hours, so Ms. Hall spent time with his mother and sister until he could return.

23. Later that afternoon, Defendant Hill returned home and went to his backyard to conduct football training with his trainer on his turf field as Ms. Hall stood off to the side and observed him.



24. It was shortly after this training session, when Defendant Hill invited Ms. Hall to participate in offensive line drills with him.

25. Defendant Hill told her that “since her 10-year-old son played offensive lineman – she should practice that position as well.”

26. Ms. Hall, without knowing or understanding how to play football, followed Mr. Hill’s instructions.

27. On their very first “play”, Defendant Hill asked Ms. Hall to stand in a defensive line stance while he stood opposite her in an offensive lineman stance, “hiked” the ball to the quarterback, and told her to rush him as if she wanted to chase the quarterback.

28. Ms. Hall did as instructed and on contact with the Defendant, caused Hill to be pushed backwards, garnering laughter from the witnesses present at the time, including the Defendant’s mother, sister, friend, and trainer.

29. Apparently embarrassed by his loss of stability as a result of contact by a woman during the “football play”, Mr. Hill’s attitude changed and he became angry.

30. Defendant Hill set up a second play; this time positioning Ms. Hall in an offensive line stance and told her to “hike” the football to the quarterback as he played a defensive rusher. As the play began, a small puppy came out of nowhere, which disrupted the play.

31. Defendant Hill set up a third play, positioning Ms. Hall in an offensive line stance as he played a defensive rusher again. As the ball was hiked to the quarterback, Defendant Hill rushed through, as Ms. Hall held her own against Mr. Hill.

32. However, Defendant Hill did not stop, as he set up a fourth play. Ms. Hall was again staged in an offensive line stance as Defendant Hill played a defensive pass rusher.

33. Ms. Hall did as instructed, at which time Defendant Hill charged into her violently and with great force, resulting in significant and serious injuries.



34. The crushing force was so great that she sustained a right leg fracture, necessitating surgery with metal hardware implantation.





35. Defendant Hill's aggression towards Ms. Hall is consistent with his history of violent and aggressive behavior towards women.

C. Hill downplayed the severity of Ms. Hall's injury and failed to get her any medical attention.

36. After the play had ended, Ms. Hall was in excruciating pain and was unable to get up or walk around.

37. Defendant Hill, with his superior knowledge of sports-related injuries, downplayed Ms. Hall's injury, simply told her to rest and offered her a bed to lay down and ice her leg.



38. Defendant Hill allowed Ms. Hall to stay at his home until he was able to secure travel arrangements for her to get back home a couple of days later.

39. For the majority of Ms. Hall's stay, she lay in pain and agony. Ms. Hall also ordered a knee brace to help stabilize her leg so she could move around.

40. Nonetheless, Defendant Hill continued to downplay the severity of her injury and failed to get her any medical attention or treatment at any time.

41. On or about July 1, 2023, upon Ms. Hall's return home, she was seen by an Orthopedist. Upon examination and radiology testing, Ms. Hall was diagnosed with a right leg fracture.

42. Ms. Hall continues to follow and treat with her Orthopedic specialists and attends weekly physical therapy sessions. Nonetheless, Ms. Hall continues to have persistent pain and weakness in her lower extremities.

COUNT I
BATTERY

43. The Plaintiff repeats and realleges each and every allegation contained in Paragraphs one (1) through forty two (42) as if they were fully set forth herein, and further alleges:

44. On or about June 28, 2023, while lawfully on TYREEK HILL's property, described herein, the Plaintiff, SOPHIE E. HALL was willfully and maliciously attacked by Defendant TYREEK HILL.

45. The Defendant, TYREEK HILL intentionally and violently struck the Plaintiff SOPHIE E. HALL, with the intent to cause a harmful and offensive contact to Plaintiff.

46. The Plaintiff, SOPHIE E. HALL, suffered harmful and offensive contact as a result of Defendant TYREEK HILL's conduct, which was never consented to by the Plaintiff.

47. Such willful conduct by Defendant, TYREEK HILL, showed malice, wantonness, moral turpitude, reckless indifference to the rights of others and that entire want of care which would raise the presumption of conscious indifference to the consequences of Defendant's actions.

48. As a direct and proximate result of the Defendant, TYREEK HILL'S intentional act, wanton and willful misconduct, the Plaintiff, SOPHIE E. HALL, suffered permanent bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of medical care and treatment, loss of earnings, and the loss of ability to earn money. These losses are either permanent or continuing, and Plaintiff will suffer said losses in the future.

WHEREFORE, the Plaintiff, SOPHIE E. HALL, demands judgment against the Defendant, TYREEK HILL, for damages, costs, interest, and any other such relief this Court may deem appropriate.

COUNT II
ASSAULT

49. The Plaintiff repeats and realleges each and every allegation contained in Paragraphs one (1) through forty two (42) as if they were fully set forth herein, and further alleges:

50. On or about June 28, 2023, the Defendant, TYREEK HILL, placed the Plaintiff, SOPHIE E. Hall, in apprehension of harmful contact, and such assault was not ever consented to by the Plaintiff, SOPHIE E. HALL.

51. Defendant's intentional and unlawful actions caused Plaintiff to fear that her bodily health and integrity were in imminent peril.

52. At the time that Defendant caused Plaintiff to feel frightened, Defendant, as evidenced by the subsequent striking of Plaintiff's person, had the apparent ability to effectuate his threats to cause Plaintiff bodily harm.

53. Such willful conduct by Defendant showed malice, wantonness, moral turpitude, reckless indifference to the rights of others and that entire want of care which would raise the presumption of conscious indifference to the consequences of Defendant's actions.

54. As a direct and proximate result of the intentional and/or wanton and willful misconduct of Defendant, Plaintiff feared that her bodily health and integrity were in imminent peril.

55. As a direct and proximate result of the Defendant TYREEK HILL'S inappropriate acts, the Plaintiff SOPHIE E. HALL suffered permanent bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of medical care and treatment, loss of earnings, and the loss of ability to earn money. These losses are either permanent or continuing, and Plaintiff will suffer said losses in the future.

WHEREFORE, the Plaintiff, SOPHIE E. HALL, demands judgment against the Defendant, TYREEK HILL, for damages, costs, interest, and any other such relief this Court may deem appropriate.

COUNT III
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

56. The Plaintiff repeats and realleges each and every allegation contained in Paragraphs one (1) through forty two (42) as if they were fully set forth herein, and further alleges:

57. As described in the incorporated paragraphs, Defendant TYREEK HILL'S conduct of assaulting, battering, harassing, disparaging, and humiliating Plaintiff was intentional, reckless, and Defendant knew or should have known that emotional distress would likely result.

58. Defendant's actions of striking, and/or threatening Plaintiff's person with physical violence went beyond all reasonable bounds of decency and Defendant's actions are to be regarded as outrageous, odious and utterly intolerable in civilized community.

59. Defendant knew or should have known that his actions of threatening to strike, attacking, and pushing Plaintiff's person and his actual striking and/or pushing and/or attacking of Plaintiff's person with his hands would cause Plaintiff to suffer severe emotional distress.

60. The Defendant's conduct described in the incorporated paragraphs directly and proximately caused Plaintiff severe emotional distress.

61. As a direct and proximate result of the Defendant TYREEK HILL'S inappropriate acts described in the incorporated paragraphs, the Plaintiff SOPHIE E. HALL suffered permanent bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of medical care and treatment, loss of earnings, and the loss of ability to earn money. These losses are either permanent or continuing, and Plaintiff will suffer said losses in the future.

WHEREFORE, the Plaintiff, SOPHIE E. HALL, demands judgment against the Defendant, TYREEK HILL, for damages, costs, interest, and any other such relief this Court may deem appropriate.

COUNT IV
NEGLIGENCE

62. The Plaintiff repeats and realleges each and every allegation contained in Paragraphs one (1) through forty two (42) as if they were fully set forth herein, and further alleges:

63. Defendant, TYREEK HILL, at all times material hereto, had a duty to act and use reasonable care when he engaged in sports related activities with Plaintiff, SOPHIE E. HALL.

64. As described in the incorporated paragraphs, Defendant TYREEK HILL breached said duty owed to Plaintiff, SOPHIE E. HALL when he maliciously and violently attacked Plaintiff. Said acts and conduct of the Defendant, TYREEK HILL was a deviation from his duty to act and use reasonable care when he engaged in sports related activities with Plaintiff, SOPHIE E. HALL under the same or similar circumstances, and he was thereby negligent, careless and in violation of the duty that he owed to the Plaintiff herein.

65. The Defendant's conduct described in the incorporated paragraphs directly and proximately caused Plaintiff permanent bodily injury and resulting pain and suffering.

66. As a direct and proximate result of the Defendant TYREEK HILL'S inappropriate acts and Negligence described in the incorporated paragraphs, the Plaintiff SOPHIE E. HALL suffered permanent bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expenses of medical care and treatment, loss of earnings, and the loss of ability to earn money. These losses are either permanent or continuing, and Plaintiff will suffer said losses in the future.

WHEREFORE, the Plaintiff, SOPHIE E. HALL, demands judgment against the Defendant, TYREEK HILL, for damages, costs, interest, and any other such relief this Court may deem appropriate.

DEMAND FOR JURY TRIAL

Plaintiff in the above styled cause hereby demands a trial by jury of all of the issues triable by right in this action.

DATED this 23rd day of February, 2024.

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