



**C-0848-26-G**

The touring operation of a musical institution of this stature involves extensive logistics, staff, and support personnel. Crew members travel in close quarters, work long hours, and depend upon supervisors for assignments, compensation, and continued employment. Within that structure, authority is centralized and hierarchical.

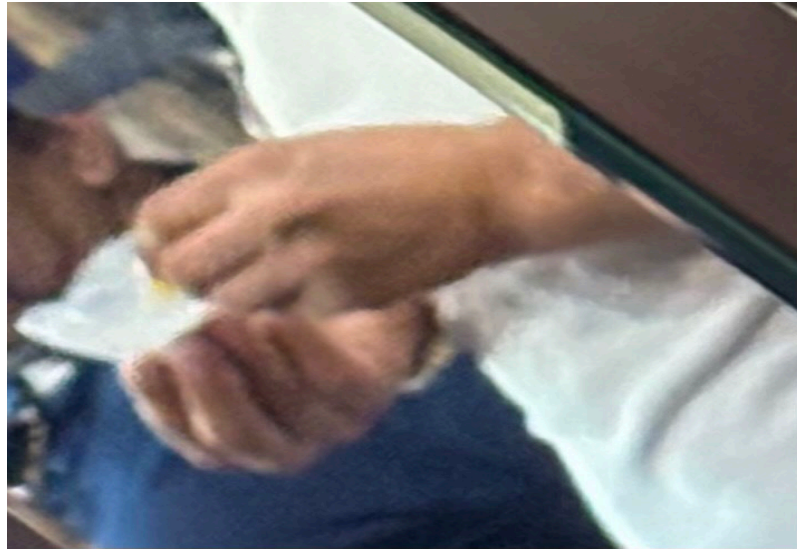
Plaintiff John Doe #1 is a professional photographer and videographer residing in McAllen, Texas. In or about September 2024, Plaintiff was recruited to work for the Band's touring operation. He was hired by Defendant Ramón Ayala, Jr., who exercised direct managerial authority over crew members, including control over assignments and compensation.

By virtue of his position and familial relationship to the Band's founder, Defendant Ayala, Jr. wielded substantial authority. Crew members reasonably understood that their livelihood depended upon remaining in his favor. Ayala, Jr. repeatedly abused this authority, and the other Defendants knew it but did nothing about it.

During Plaintiff's employment, Defendant Ayala, Jr. engaged in a troubling and dangerous pattern of escalating sexualized misconduct and assaultive behavior in the workplace.

Defendant Ayala Jr. regularly consumed cocaine and abused alcohol while on tour and while aboard the tour bus. On one occasion, Defendant Ayala Jr. threw a white powdery substance, believed to be cocaine, in Plaintiff's direction. The substance landed on Plaintiff's clothing. Plaintiff and other crew members also observed Defendant Ayala Jr. ingesting cocaine and engaging in erratic behavior while under its influence.

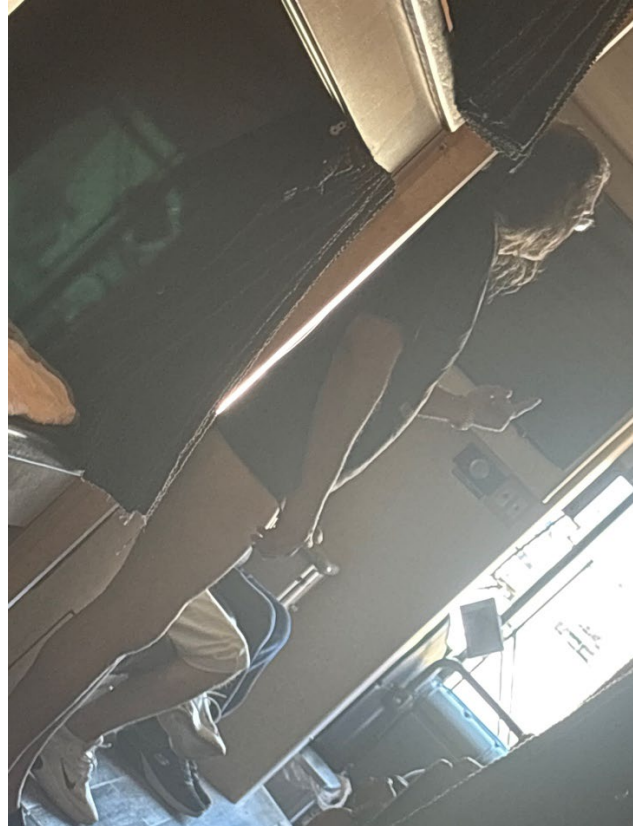
**C-0848-26-G**



Picture of Defendant Ayala, Jr. holding a baggie with a white substance.

Defendant Ayala Jr. frequently engaged in sexually explicit conduct in the presence of crew members. He routinely exposed his genitals aboard the tour bus and in other work-related settings. He frequently walked about in a state of undress and performed sexually suggestive acts toward subordinates. On at least one occasion at a public restaurant, Defendant Ayala Jr. pulled down his pants and engaged in obscene conduct in view of crew members.

**C-0848-26-G**



Defendant Ayala, Jr. in various stages of undress aboard the Defendant tour bus.

**C-0848-26-G**

Defendant Ayala Jr. also engaged in conduct designed to demean and humiliate Plaintiff and others in connection with compensation. On multiple occasions, Defendant Ayala, Jr. licked individual dollar bills and then threw them toward Plaintiff while Plaintiff was awaiting payment for services rendered. The conduct was intentional, degrading, and occurred in the presence of others.

In the confined workspace of the tour bus, Defendant Ayala Jr. engaged in unwanted physical contact with Plaintiff and others. On one occasion, he deliberately and roughly touched Plaintiff's buttocks without consent. On another occasion, Defendant Ayala Jr. again made non-consensual contact with Plaintiff's anal area while walking through the bus.

These frequent acts were deliberate, sexual in nature, and unwelcome.

On or about August 2025, after returning to Hidalgo County from an out-of-state performance, Plaintiff and other crew members were seated on the tour bus awaiting payment for services rendered. Without warning and without consent, Defendant Ayala Jr. physically grabbed Plaintiff's legs, restrained him, forcibly removed Plaintiff's footwear, and engaged in sexually offensive physical contact with Plaintiff's foot and lower body. Specifically, he held Plaintiff down and sucked Plaintiff's toes. Defendant did this act in a sexual manner, and did it by force, not only to gratify himself, but to degrade the Plaintiff.

Plaintiff attempted to pull away but was physically overpowered. Several co-workers witnessed the assault. Plaintiff exited the bus in shock and humiliation. Witnesses acknowledged the seriousness of the incident and cautioned Plaintiff regarding Ayala Jr.'s behavior, implicitly recognizing both the gravity of the assault and Ayala Jr.'s unchecked authority within the organization.

**C-0848-26-G**

The incidents occurred in a confined workspace environment where Plaintiff was economically dependent upon those present for compensation and continued employment. The power imbalance was clear and undeniable.

When Plaintiff later confronted Defendant Ayala Jr. regarding the incidents, Defendant Ayala Jr. dismissed the conduct as “horseplay” and instructed Plaintiff to “get over it.” Following Plaintiff’s objection to the assaults, Defendant Ayala Jr. altered Plaintiff’s travel arrangements. Whereas Plaintiff previously traveled aboard the tour bus with the crew, Defendant Ayala Jr. required Plaintiff to return in a separate passenger van rather than with the rest of the team.

This separation was not operationally necessary. It was imposed after Plaintiff expressed discomfort with Defendant Ayala Jr.’s conduct and functioned to isolate Plaintiff from the crew and reinforce Defendant Ayala Jr.’s authority. The decision to segregate Plaintiff from the primary touring group altered the conditions of Plaintiff’s employment and further contributed to the hostile work environment.

The conduct described herein was not accidental, playful, or misunderstood. It was intentional, sexual, non-consensual physical contact carried out by a supervisory authority against a subordinate employee.

Despite knowledge of Defendant Ayala Jr.’s ongoing behavior – including substance abuse, repeated and frequent sexualized public misconduct, and inappropriate physical contact with crew members – Defendants failed to intervene, supervise, discipline, or remove him from authority.

Given the prominence and public stature of the touring operation, the seriousness of this conduct extends beyond a private workplace dispute. The individuals involved represent a globally recognized enterprise whose operations are subject to public scrutiny and media attention.

**C-0848-26-G**

As a direct and proximate result of the assaults, Plaintiff has suffered humiliation, emotional distress, anxiety, and disruption to his professional and personal life.

Defendants knew or should have known of Ayala Jr.'s propensity to engage in inappropriate physical conduct yet failed to intervene, supervise, or remove him from a position of authority. In doing so, they created and maintained conditions that made this assault foreseeable.

**II. DISCOVERY PLAN**

Plaintiff intends to conduct discovery under Level 2 of the Texas Rules of Civil Procedure.

**III. PARTIES**

Plaintiff John Doe #1 is an individual residing in Hidalgo County, Texas.

Defendant Ramón Ayala is an individual residing in Texas. Defendant may be served at his place of residence, 727 Tejano Drive, Hidalgo, Texas 78557 or wherever he may be found.

Defendant Ramón Ayala, Jr. is an individual residing in Texas. Defendant may be served at his place of residence, 709 Ramon Ayala Dr. Hidalgo, TX 78557 or wherever he may be found.

Defendant Liram, L.L.C. d/b/a *Ramón Ayala y Sus Bravos del Norte* is a domestic limited liability company located and doing business in the State of Texas. It may be served with process through its registered agent for service of process, Anthony Juarez III, 2315 Civitan Drive, Corpus Christi, Texas 78417. Defendant Ramón Ayala is President of Liram, L.L.C. and leader of the Band. Defendant Ramón Ayala, Jr. is a corporate officer and vice principal of Defendant Liram, L.L.C.

**IV. VENUE AND JURISDICTION**

Venue and jurisdiction are proper. The relief requested is within the minimal jurisdictional limits of this Court. Pursuant to the Texas Civil Practice and Remedies Code, venue is proper in Hidalgo County, Texas because all or a substantial part of the events giving rise to the claims occurred in Hidalgo County, and Defendants conduct business in Hidalgo County.

**C-0848-26-G**

**V. CAUSES OF ACTION**

**A. ASSAULT and SEXUAL ASSAULT**

Plaintiff re-alleges each and every preceding allegation as if fully set forth herein.

Defendant Ayala Jr. intentionally and knowingly made offensive and non-consensual physical contact with Plaintiff. Defendant Ayala Jr. assaulted Plaintiff by touching his buttocks, and by touching his anus. Defendant Ayala Jr. physically restrained Plaintiff, grabbed his leg, removed his footwear without consent, and engaged in sexually inappropriate physical contact with Plaintiff's foot and lower body.

Such conduct constituted an intentional, offensive, and unlawful touching. The contact was sexual in nature, occurred without consent, and would be regarded by a reasonable person as highly offensive and violative of personal dignity.

Under Texas law, a person commits assault if he intentionally or knowingly causes physical contact with another when he knows or should reasonably believe the other will regard the contact as offensive or provocative. These offensive touchings were sexual in nature. Defendant Ayala Jr.'s conduct meets and exceeds the standard for assault and sexual assault.

As a direct and proximate result of the assault, Plaintiff suffered physical discomfort, shock, humiliation, and significant mental anguish.

Defendants are vicariously liable for Ayala Jr.'s conduct because he was acting within the course and scope of his employment, while exercising supervisory authority, and under authority conferred upon him by Defendants. Ayala Jr. performed such acts in his capacity as a vice principal, at the work place, which again imputes the liability for his acts to the other Defendants.

**B. NEGLIGENCE AND GROSS NEGLIGENCE**

Plaintiff incorporates all previous paragraphs and pleads in the alternative.

**C-0848-26-G**

While Plaintiff alleges that Ayala Jr.'s conduct was intentional, such conduct also constituted negligence and gross negligence while acting in the course and scope of his employment.

Ayala Jr. owed Plaintiff a duty to exercise ordinary care and to refrain from harmful or offensive physical contact. He breached that duty by:

- a. Physically restraining Plaintiff;
- b. Removing Plaintiff's footwear without consent;
- c. Engaging in unwanted and sexually inappropriate physical contact; and
- d. Failing to respect Plaintiff's bodily autonomy and personal safety.

Such conduct proximately caused Plaintiff's injuries.

Ayala Jr.'s conduct, when viewed objectively, involved an extreme degree of risk considering the probability and magnitude of harm from sexualized physical contact in a workplace setting. Ayala Jr. had actual, subjective awareness of that risk yet proceeded in conscious indifference to Plaintiff's rights and safety. Such conduct constitutes gross negligence and malice.

Accordingly, Plaintiff seeks exemplary damages as permitted by law.

**C. NEGLIGENCE and GROSS NEGLIGENCE OF LIRAM, L.L.C AND RAMON AYALA**

In addition to vicarious liability, Defendants Liram, L.L.C. and Ramón Ayala are independently liable for their own negligence.

These Defendants owed Plaintiff a duty to use reasonable care in supervising individuals placed in positions of authority and control. Liram breached that duty by, among other acts and omissions:

**C-0848-26-G**

- a. Negligent hiring;
- b. Negligent retention;
- c. Failing to adequately supervise Ayala Jr.;
- d. Failing to implement safeguards to prevent inappropriate physical conduct;
- e. Failing to have adequate policies and procedures in place;
- f. Failing to investigate prior complaints or warning signs;
- g. Failing to take corrective action despite knowledge of inappropriate conduct; and
- h. Hiring, retaining, and placing Ayala Jr. in a position of authority despite foreseeable risk of harm to employees.

Each of these failures, individually and collectively, were a proximate cause of Plaintiff's injuries.

Defendants' conduct, when viewed objectively from its standpoint, involved an extreme degree of risk given the authority placed in Ayala Jr. and the foreseeable risk of abuse of that authority. Liram had actual or constructive awareness of the risk but proceeded with conscious indifference. Such conduct constitutes gross negligence.

**D. RATIFICATION**

Defendants ratified Ayala Jr.'s conduct by failing to discipline him, failing to remove him from authority, and continuing to retain him after learning of his inappropriate physical conduct.

An employer who, with knowledge of an employee's wrongful acts, retains that employee in a supervisory role and fails to take corrective action, ratifies the misconduct and is liable for resulting harm.

**VI. DAMAGES**

As a direct and proximate result of Defendants' conduct, Plaintiff has suffered:

**C-0848-26-G**

- a. Physical pain and discomfort;
- b. Past and future mental anguish;
- c. Emotional distress and humiliation;
- d. Loss of peace of mind;
- e. Reasonable and necessary counseling and related expenses; and
- f. All such other damages that will be shown at trial.

Plaintiff seeks recovery of actual damages and exemplary damages as permitted by law.

**VII. NOTICE OF INTENT TO USE DISCOVERY AT TRIAL**

Pursuant to Texas Rule of Civil Procedure 193.7, Plaintiff hereby gives notice that he intends to use all discovery instruments produced in this case at trial. Such discovery instruments include, but are not limited to, all documents Defendants will produce, or have produced, in response to Plaintiff's written discovery requests.

**VIII. REQUEST FOR JURY TRIAL**

Plaintiff respectfully demands a jury trial and hereby tenders the appropriate fee.

**IX. PRESERVATION OF EVIDENCE**

Plaintiff hereby requests and demands that Defendants preserve and maintain all evidence pertaining to any claim or defense related to the incident made the basis of this lawsuit, including but not limited to communications, electronic data, mapping data, and location data.

**X. PRAYER**

By reason of all the above and foregoing, Plaintiff is entitled to recover from Defendants the damages set forth in this Petition, within the jurisdictional limits of this Court. As required by Rule 47, Plaintiff seeks damages consistent with Tex. R. Civ. Proc. 47(c)(3), because that, as set forth above, Plaintiff also seeks punitive damages. Plaintiff also seeks pre-and post-judgment

**C-0848-26-G**

interest at the maximum legal rate, costs of court, punitive damages, and any other relief to which Plaintiff may be justly entitled.

Respectfully submitted,

**THE BUZBEE LAW FIRM**

By: /s/ TONY BUZBEE

Anthony G. Buzbee

State Bar No. 24001820

Crystal Del Toro

State Bar No. 24090070

JPMorgan Chase Tower

600 Travis Street, Suite 7500

Houston, Texas 77002

Tel: (713) 223-5393

Fax: (713) 223-5909

Email: [tbuzbee@txattorneys.com](mailto:tbuzbee@txattorneys.com)

Email: [cdeltoro@txattorneys.com](mailto:cdeltoro@txattorneys.com)

[www.txattorneys.com](http://www.txattorneys.com)

**ATTORNEYS FOR PLAINTIFF**

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Anthony Buzbee on behalf of Anthony Buzbee  
Bar No. 24001820  
efiling@txattorneys.com  
Envelope ID: 111324071  
Filing Code Description: Petition  
Filing Description:  
Status as of 2/17/2026 10:34 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Zsa Lewis		zlewis@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT
Laura Knirk		lknirk@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT
Crystal Del Toro		cdeltoro@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT
Leticia De La Cruz		ledelacruz@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT
Anthony Buzbee		tbuzbee@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT
The Buzbee Law Firm -		efiling@txattorneys.com	2/17/2026 8:02:35 AM	NOT SENT