

STATE OF INDIANA)	IN THE MARION SUPERIOR COURT
)	
COUNTY OF MARION)	CAUSE NO.
LECRETA JOHNSON, as Special)	
Administrator of the Estate of Chanti Dixon,)	
)	
Plaintiff,)	
)	
vs.)	
)	
UBER TECHNOLOGIES, INC. and)	
FRANCISCO VALADEZ, individually and)	
as employee of UBER TECHNOLOGIES, INC.)	
)	
Defendants.)	

COMPLAINT FOR DAMAGES AND JURY TRIAL DEMAND

Plaintiff, by counsel, Terrance Kinnard, respectfully states the following:

1. Plaintiff sues Defendants for damages stemming from Defendants’ actions and inactions leading to the brutal murder of Chanti Dixon.

Parties

2. Plaintiff Lecreta Johnson (“Johnson”) is an individual who resides in Marion County, Indiana.

3. Johnson has been duly appointed as Special Administrator of the Estate of Chanti Dixon, by order of the Marion Superior Court (Indiana), Cause Number: 49D08-2409-ES-042691.

4. Uber Technologies, Inc. (“Uber”) is a corporation organized and existing under the laws of the state of Delaware, and was at all times relevant doing business within the state of Indiana, count of Indiana.

5. Francisco Valadez (“Valadez”) is a natural person, who is currently housed at the Marion County, Indiana Adult Detention Center.

Factual Allegations

6. Uber operates a Transportation Network Company and uses digital networks to connect riders with drivers for prearranged transportation service through a mobile smartphone application.

7. The Uber application (“Uber App”) and the Uber Service have no value without drivers like Valadez to respond to riders’ requests for transportation.

8. Drivers such as Valadez who respond to ride requests generated by the Uber App are essential to the Uber service business.

9. Riders using the Uber App to book rides are considered customers of the Uber service, not customers of the drivers.

10. At all times relevant herein, Uber offered the Uber service in Marion County, Indiana.

11. At all times relevant herein, Uber and Valadez were united in the joint prosecution of a common purpose for profit with a community interest in the object thereof (deriving financial gain from making drivers, such as Valadez, available via the Uber App to transport riders for a fee to be divided among Defendants) with equal rights to direct and control each other with respect thereto; therefore, Uber and Valadez were engaged in a joint venture or joint enterprise in operating the Uber Service.

12. Uber and Valadez generate revenue by setting fares for each location where they operate the Uber service, paying drivers approximately 75-80% of fares collected, and keeping the balance.

13. Upon information and belief, the Uber service has the right to control and exercise control over drivers, including Valadez, in its provision of transportation services pursuant to the Uber App and over the manner in which those services are done.

14. At all times relevant herein, Valadez was an employee and/or agent of Uber, and the

Uber service and was acting within the course and scope of his employment and/or agency.

15. On or about September 8, 2024, Chanti Dixon (“Dixon”) used the Uber App to order the Uber service.

16. Uber assigned the request to Valadez who accepted the ride request and proceeded to pick up Dixon from her place of employment.

17. After Valadez picked up Dixon from the westside of Indianapolis, he transported her to a check cashing business in the 3800 block of East Washington Street.

18. According to Uber records, Dixon then requested to be driven from the check cashing location to her home located at 1941 Earhart Street on Indianapolis’s southeast side.

19. However, Dixon never arrived at her home.

20. Dixon’s family reported her missing on September 9, 2025 and family members retrieved Dixon’s Apple Watch from her home in an attempt to track Dixon’s cellphone using the “find my phone” feature on the watch.

21. The Apple Watch was able to determine the GPS location of Dixon’s phone, which was indicating the presence of the phone in the wooded area north of Dixon’s apartment home.

22. Using this technique, Dixon’s family was able to locate Dixon’s body in the wooded area north of 1941 Earhart Street, Indianapolis, Indiana.

23. Valadez later confessed to law enforcement that he sexually assaulted Dixon while she was alive and then murdered her by gunshots to Dixon’s head.

24. After Valadez raped, murdered, and left Dixon in the wooded area, he fled the scene.

25. However, a short time later, Valadez returned to Dixon’s body where he committed a second sexual assault upon Dixon’s dead body.

26. Dixon left behind two (2) minor children.

COUNT I – CIVIL ASSAULT -- VALADEZ

27. Plaintiff incorporates each of the foregoing paragraphs as if fully rewritten.

28. By raping and murdering Dixon, Valadez committed a civil assault upon Dixon, as Valadez acted with intent to cause harmful or offensive contact and such contact with Dixon did, in fact, take place.

29. Valadez’s offensive and/or harmful contact with Dixon cause Dixon’s estate to suffer financial, mental, and emotional damages, and such damages are expected to continue into the future.

30. Some of Valadez’s conduct was willful, wanton, dangerous, irresponsible, and outrageous.

31. As a direct and proximate result of Valadez’s civil assault, the Plaintiff has suffered, and will continue to suffer, mental anguish, loss of enjoyment of life, wrongful death, counseling expenses, and other past, present, and future damages.

WHEREFORE, Plaintiff having set forth her claim against Defendant, respectfully prays to the Court as follows:

- a. That Plaintiff have and recover against said Defendant actual damages;
- b. That Plaintiff have and recover against said Defendant consequential damages;
- c. That punitive damages be imposed in an amount sufficient to deter similar conduct in the future; and
- d. The costs of this action.

COUNT II – RESPONDEAT SUPERIOR -- UBER

32. Plaintiff incorporates each of the foregoing paragraphs as if fully rewritten.

33. At all times relevant, Valadez was an employee and/or agent of Uber and was entrusted

with Dixon's safe passage to her destination within the scope of Valadez's employment and/or agency.

34. Valadez's offensive acts naturally and predictably arise from the employment context due to the position of authority and responsibility Uber entrusted to Valadez.

35. As a direct and proximate result of the outrageous acts and inactions by Uber, through its employee and/or agent, Valadez, Plaintiff sustained damages.

WHEREFORE, Plaintiff having set forth her claim against Defendant, respectfully prays to the Court as follows:

- a. That Plaintiff have and recover against said Defendant actual damages;
- b. That Plaintiff have and recover against said Defendant consequential damages;
- c. That punitive damages be imposed in an amount sufficient to deter similar conduct in the future; and
- d. The costs of this action.

COUNT III – NEGLIGENT SUPERVISION, TRAINING, RETENTION -- UBER

36. Plaintiff incorporates each of the foregoing paragraphs as if fully rewritten.

37. Uber has the right to hire, retain, and supervise employees and management for the operation and profit of its business.

38. Uber is liable for damages caused to Plaintiff as a result of Valadez's tortuous and unlawful conduct, which resulted from Uber's failure to exercise reasonable care in the hiring, training, and supervision and retention of Valadez.

WHEREFORE, Plaintiff having set forth her claim against Defendant, respectfully prays to the Court as follows:

- a. That Plaintiff have and recover against said Defendant actual damages;

- b. That Plaintiff have and recover against said Defendant consequential damages;
- c. That punitive damages be imposed in an amount sufficient to deter similar conduct in the future; and
- d. The costs of this action.

COUNT IV – WRONGFUL DEATH – BOTH DEFENDANTS

39. Plaintiff incorporates each of the foregoing paragraphs as if fully rewritten.

40. Defendants and each of them owed Dixon a duty of reasonable/due care as well as statutory duties to not cause harm to Dixon.

41. As a direct result of the actionable conduct of Defendant Valadez, Dixon met her untimely death.

42. Plaintiff and the statutory beneficiaries of Dixon’s estate (the minor children) have experienced great mental anguish, suffering, grief, sorrow, bereavement, and loss of society, advice, companionship, protection, and pecuniary benefit from Dixon’s death.

WHEREFORE, Plaintiff having set forth her claim against Defendants, respectfully prays to the Court as follows:

- a. That Plaintiff have and recover against said Defendant actual damages;
- b. That Plaintiff have and recover against said Defendant consequential damages;
- c. That punitive damages be imposed in an amount sufficient to deter similar conduct in the future; and
- d. The costs of this action.

COUNT V – SURVIVAL ACTION– BOTH DEFENDANTS

43. Plaintiff incorporates each of the foregoing paragraphs as if fully rewritten.

44. Dixon, during the course of the times set forth in this Complaint, suffered injury and

damages caused by the actionable conduct of Defendants, which include but are not limited to the following:

- a. Conscious pain and suffering; and
- b. Mental and emotional distress;

45. Dixon's cause of action for injuries and damages survives her death and pass to her Estate.

46. By reason of and in consequence to the aforesaid negligence, carelessness, recklessness, willfulness, and wantonness of the Defendants, Dixon was raped, assaulted, and murdered.

WHEREFORE, Plaintiff having set forth her claim against Defendants, respectfully prays to the Court as follows:

- a. That Plaintiff have and recover against said Defendant actual damages;
- b. That Plaintiff have and recover against said Defendant consequential damages;
- c. That punitive damages be imposed in an amount sufficient to deter similar conduct in the future; and
- d. The costs of this action.

Respectfully submitted,

/s/ Terrance Kinnard
Terrance Kinnard, #22224-49
Attorney for Plaintiff

JURY DEMANDED

Plaintiff hereby demands a trial by jury on all issues so triable.

/s/ Terrance Kinnard
Terrance Kinnard, #22224-49
Attorney for Plaintiff

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