

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

NOEMIA MONIQUE CARVALHO)
PERPETUO, INDIVIDUALLY AND AS)
ADMINISTRATOR OF THE ESTATE OF)
GABRIELLA CARVALHO PERPETUO,)
)
Plaintiff,)
vs.)
)
DARRON ALEXANDER LEE, JR.,)
)
Defendants.)

NO. 26C260

DIVISION

JURY DEMANDED

FILED IN OFFICE
2026 FEB 12 AM 10:23
LARRY L. HENRY, CLERK
BY: [Signature] DC

WRONGFUL DEATH COMPLAINT

1. The plaintiff, Noemia Monique Carvalho, individually and as duly appointed Administrator of the Estate of Gabriella Carvalho Perpetuo, is a resident of Broward County, Florida.

2. The defendant, Darron Alexander Lee, Jr. ("Defendant"), is a resident of Hamilton County, Tennessee. He can be served with process c/o Tim Davis, Hamilton County Jail, 7609 Standifer Gap Road, Chattanooga, TN 37421.

3. The acts and omissions giving rise to this cause of action occurred in Hamilton County, Tennessee. Therefore, this Court has proper venue and jurisdiction of this cause of action.

4. On or about February 5, 2026, Defendant intentionally, unlawfully, maliciously, and violently attacked and assaulted Decedent, Gabriella Carvalho Perpetuo.

5. As a result of Defendant's intentional assault, Decedent sustained severe bodily injuries, including but not limited to: blunt force trauma to the head resulting in a severe brain injury; a fractured cervical spine/neck; multiple puncture and stab wound to the chest, abdomen, and leg; extensive abrasions and bruising to the left side of her face; and human bite marks found on the Decedent's body, consistent with a violent physical struggle and intentional assault.

6. Hamilton County Medical Examiner, Stephen Cogswell, determined that Gabriella Carvalho Perpetuo's cause of death was blunt force trauma, consistent with the injuries inflicted by Defendant.

7. As a direct and proximate result of Defendant's intentional and wrongful conduct, Decedent experienced conscious pre-death physical pain, suffering, and extreme mental anguish, including fear and awareness of impending death, prior to succumbing to her injuries.

8. Decedent's Estate incurred funeral, burial, and related expenses as a direct and proximate result of Defendant's conduct.

9. Plaintiff, Noemia Monique Carvalho Perpetuo, is the Administrator of the Estate and is the proper party to bring a claim for Gabriella Carvalho Perpetuo's pre-death pain and suffering and for recovery of funeral and related expenses.

10. Pursuant to T.C.A. § 20-5-106 and applicable Tennessee wrongful death statutes, Defendant is liable to plaintiff for all damages recoverable under law, including but not limited to the pre-death pain and suffering of Gabriella Carvalho Perpetuo and her funeral expenses.

11. Noemia Monique Carvalho Perpetuo as surviving parent is the proper party to bring a claim for the wrongful death of Gabriella Carvalho Perpetuo and to recover the full value of the Decedent's life including loss of love, companionship, society, and services.

12. Defendant's conduct was intentional, malicious, reckless, willful, and exhibited a conscious disregard for human life, including the infliction of multiple forms of traumatic injury and bite wounds, thereby justifying an award of punitive damages.

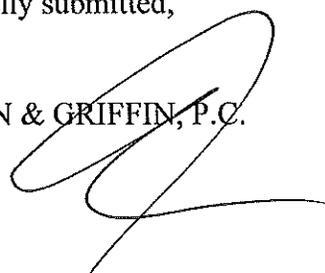
13. As a direct and proximate result of Defendant's egregious conduct, Plaintiff seeks punitive damages in an amount sufficient to punish Defendant and to deter similar conduct in the future.

WHEREFORE, plaintiff prays that she have a trial on all issues and judgment against defendant as follows:

- (a) That plaintiff recover the full value of the life of the decedent;
- (b) That plaintiff recover for the decedent's pre-death mental and physical pain and suffering, funeral expenses and related expenses;
- (c) The plaintiff recover on behalf of her daughter compensatory damages in the amount of \$25,000,000;
- (d) The plaintiff recover on behalf of her daughter punitive damages in an amount of no less than \$25,000,000;
- (e) That the court order an injunction, preventing the Defendant from monetizing in any way, shape or form the tragic events surrounding the Plaintiff's death;
- (f) That plaintiff recover such other and further relief as is just and proper; and
- (g) That all issues be tried before a jury.

Respectfully submitted,

WARREN & GRIFFIN, P.C.

BY: 

C. Mark Warren, BPR#: 013992
Mark H. Warren, BPR#: 041831
Attorney for Plaintiff
1305 Carter Street
Chattanooga, Tennessee 37402
(423) 265-4878
cmark@warrenandgriffin.com
hank@warrenandgriffin.com