

SUPREME COURT OF THE STATE OF NEW YORK
 COUNTY OF NEW YORK

ANONYMOUS,

Plaintiff,

v.

GEORGE SOROS, SCHULTE ROTH & ZABEL LLP,
 WILLIAM D. ZABEL, THE ESTATE OF HOWARD
 O. GODNICK, A/K/A HOWARD GODNICK,
 DECEASED, MARGUERITE GARDINER,
 VICTORIA CORDER, HARRY S. DAVIS, LAVELY
 & SINGER, MARTY SINGER, ANDREW
 BRETTLER, MICHAEL J. ROBERTS, KYLE
 DUBENSKY, WILLIAM S. BESLOW, AIMEE M.
 MADDALENA, THE TRUSTEES OF COLUMBIA
 UNIVERSITY IN THE CITY OF NEW YORK,
 COLUMBIA UNIVERSITY IN THE CITY OF NEW
 YORK, MARY E. MULLIGAN, FRIEDMAN
 KAPLAN SEILER ADELMAN & ROBBINS LLP,
 NYP HOLDINGS, INC., EMILY SMITH, DAILY
 NEWS ENTERPRISES LLC, BARBARA ROSS, THE
 FORWARD ASSOCIATION, INC., FREE BEACON
 LLC, MICHAEL KUSHNER, JAVIER SOLANO, THE
 NEW YORK AND PRESBYTERIAN HOSPITAL
 (NYP)

Defendants.

Index No.: 152536/2025

AMENDED COMPLAINT

**PLAINTIFF DEMANDS A
 TRIAL BY JURY**

Plaintiff ANONYMOUS (“Plaintiff”) hereby alleges and avers of the Defendants GEORGE SOROS, SCHULTE ROTH & ZABEL LLP, WILLIAM D. ZABEL, THE ESTATE OF HOWARD O. GODNICK, A/K/A HOWARD GODNICK, DECEASED, MARGUERITE GARDINER, VICTORIA CORDER, HARRY S. DAVIS, LAVELY & SINGER, MARTY SINGER, ANDREW BRETTLER, MICHAEL J. ROBERTS, KYLE DUBENSKY, WILLIAM S. BESLOW, AIMEE M. MADDALENA, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, MARY E. MULLIGAN, FRIEDMAN KAPLAN SEILER ADELMAN & ROBBINS LLP, NYP

HOLDINGS, INC., EMILY SMITH, DAILY NEWS ENTERPRISES LLC, BARBARA ROSS, THE FORWARD ASSOCIATION, INC., MICHAEL KUSHNER, JAVIER SOLANO THE NEW YORK AND PRESBYTERIAN HOSPITAL (NYP) (collectively “Defendants”), alleges upon information and belief as to all other matters as follows.

INTRODUCTION

1. Plaintiff brings this action under New York’s Gender-Based Violence (GBV) Clawback Law, which revives time-barred claims for gender-based violence, as well as asserting claims for intentional infliction of emotional distress, conspiracy to commit fraud and blackmail, defamation, libel, prima facie tort, tortious interference with contract, economic sabotage, civil RICO violations, aiding and abetting harassment, and aiding and abetting retaliation. These claims arise from Defendants’ egregious and coordinated campaign of gender-based violence, exploitation, and retaliation against the Plaintiff, which has caused her profound and lasting harm.

2. The GBV Clawback Law, effective November 24, 2022, provides survivors of gender-based violence with a critical opportunity to seek justice for claims that would otherwise be time-barred, provided such claims are filed by February 28, 2025. Given the severity and ongoing nature of the harm inflicted upon the Plaintiff, as well as Defendants’ deliberate efforts to obstruct her access to justice, all applicable tolling doctrines—including equitable tolling, the continuing violation doctrine, and the discovery rule—should be applied to ensure the validity of these claims. These doctrines are particularly warranted here, as Defendants’ actions were designed to conceal their misconduct and prolong the Plaintiff’s suffering.

3. This case involves a pattern of reprehensible conduct by Defendants, including but not limited to: the exploitation of the rape suffered by the Plaintiff, the orchestration of a retaliatory lawsuit, the use of sexual blackmail, the perpetuation of harmful gender stereotypes,

and the dissemination of false and defamatory statements. These actions were part of a broader scheme to silence the Plaintiff, destroy her reputation, and inflict maximum emotional, psychological, and economic harm. Defendants' conduct constitutes a gross abuse of power and a blatant violation of the Plaintiff's fundamental rights.

4. The gravity of Defendants' actions cannot be overstated. Their conduct reflects a systemic pattern of gender-based animus and a callous disregard for the dignity and rights of women. The Plaintiff seeks justice for the profound harm she has endured and accountability for Defendants' egregious violations of the law.

JURISDICTION AND VENUE

5. Venue is proper in the County of New York pursuant to Civil Practice Law and Rules ("CPLR") § 503(a) due to a substantial part of the events giving rise to the claims occurred in New York County.

6. This Court has personal jurisdiction pursuant to Civil Practice Law and Rules CPLR § 301 because all named defendants were either located in New York at all relevant times or currently reside in New York.

PARTIES

7. **Plaintiff** is an individual and a survivor of gender-based violence, harassment, and systemic abuse perpetrated by Defendants.

8. **Defendant George Soros ("Soros")** is a billionaire investor and philanthropist who engaged in gender-based violence, harassment, and conspiratorial actions against Plaintiff.

9. **Defendant Schulte Roth & Zabel LLP ("Schulte Roth")** is a law firm that represents Soros and participated in the conspiracy against Plaintiff.

10. **Defendant William D. Zabel (“Zabel”)** is a partner and founder at Schulte Roth & Zabel LLP, who represented Soros and actively engineered abusive and retaliatory legal tactics designed to intimidate, harass, and silence Plaintiff. Zabel exploited and weaponized the legal system to destroy Plaintiff’s reputation, credibility, and mental well-being. His actions furthered a campaign of gender-based violence and retaliation.

11. **Defendant Gary Stein (“Stein”)** is a partner at Schulte Roth & Zabel LLP who represented Soros and supported Zabel’s actions. Stein was aware of the conspiracy to retaliate against and silence Plaintiff. His actions were part of a deliberate and systematic effort to obstruct justice and perpetuate the abuse of Plaintiff.

12. **Defendant The Estate of Howard O. Godnick, a/k/a Howard Godnick, Deceased (“Godnick”)**, was a partner at Schulte Roth & Zabel LLP who, while representing Soros, actively participated in supporting Zabel and the conspiracy to retaliate against and silence Plaintiff.

13. **Defendant Marguerite Gardiner (“Gardiner”)** is an attorney at Schulte Roth & Zabel LLP who, while representing Soros, actively worked to support Zabel and was fully aware of the conspiracy to retaliate against and silence Plaintiff. Her actions were part of a deliberate and systematic effort to obstruct justice and perpetuate the abuse of Plaintiff.

14. **Defendant Victoria Corder (“Corder”)** is an attorney at Schulte Roth & Zabel LLP who, while representing Soros, actively worked to support Zabel and was fully aware of the conspiracy to retaliate against and silence Plaintiff. Her actions were part of a deliberate and systematic effort to obstruct justice and perpetuate the abuse of Plaintiff.

15. **Defendant Harry S. Davis (“Davis”)** is a partner and General Counsel at Schulte Roth & Zabel LLP who, while representing the Schulte Parties, knowingly and intentionally

misrepresented the facts surrounding Plaintiff's prior litigation, falsely accused her of engaging in frivolous claims and extortion, and threatened her with malicious prosecution, abuse of process, and sanctions. Davis's actions were part of a deliberate and systemic effort to silence Plaintiff, obstruct her access to justice, and perpetuate the gender-based violence and harassment she endured.

16. **Defendant Lavelly & Singer P.C. ("Lavelly & Singer")** is a law firm based in California. Lavelly & Singer facilitated the conspiracy to blackmail and intimidate Plaintiff, including orchestrating false media narratives, coordinating with other Defendants to discredit her, and representing Soros in legal proceedings aimed at silencing Plaintiff.

17. **Defendant Marty Singer ("Singer")** is an attorney at Lavelly & Singer. Singer physically assaulted Plaintiff during legal proceedings and participated in defamatory campaigns against her.

18. **Defendant Andrew Brettler ("Brettler")** is an attorney at Lavelly & Singer. Brettler participated in the conspiracy to blackmail and intimidate Plaintiff by assisting in the publication of defamatory statements, coordinating with other Defendants to pressure Plaintiff into settling her lawsuit under duress, and representing Soros in legal proceedings aimed at silencing Plaintiff.

19. **Defendant Michael J. Roberts ("Roberts")** is an attorney who conspired with Zabel and other Defendants to engage in legal retaliation against Plaintiff, including the filing of a fraudulent personal injury lawsuit.

20. **Defendant Kyle Dubensky ("Dubensky")** is a former Columbia University student who raped Plaintiff and later filed a personal injury lawsuit against her.

21. **Defendant William S. Beslow (“Beslow”)** is an attorney at The Law Office of William S. Beslow who previously represented Plaintiff. Beslow refused to allow Plaintiff to access her legal documents, filed guardianship petitions against Plaintiff, and participated in the conspiracy to silence and discredit her.

22. **Defendant Aimee M. Maddalena (“Maddalena”)** is an attorney at The Law Office of William S. Beslow who was aware of and aided in the conspiracy against Plaintiff.

23. **Defendant The Trustees of Columbia University in the City of New York and Defendant Columbia University in the City of New York (“Columbia University”)** are entities responsible for the administration and governance of Columbia University, where Plaintiff was raped by Dubensky.

24. **Defendant Mary E. Mulligan (“Mulligan”)** is a partner at Friedman Kaplan Seiler Adelman & Robbins LLP, who represented Columbia University during the relevant time period. Mulligan facilitated the release of sensitive and confidential materials, including photographs and interviews, to Roberts and Zabel, knowing that such materials would be used to harass, intimidate, and retaliate against Plaintiff. Mulligan’s actions violated her ethical and legal obligations as an attorney and contributed to the Defendants’ campaign of gender-based violence and harassment.

25. **Defendant Friedman Kaplan Seiler Adelman & Robbins LLP (“Friedman Kaplan”)** is the law firm where Mulligan is employed. Friedman Kaplan acted on behalf of Columbia University to facilitate the release of sensitive materials and enable the Defendants’ campaign of retaliation and harassment against Plaintiff.

26. **Defendant NYP Holdings, Inc. (“NYP Holdings”)** is a publishing company alleged to have published false and defamatory statements about Plaintiff as part of a broader campaign to discredit and silence her.

27. **Defendant Emily Smith (“Smith”)** is a journalist employed by the New York Post. Smith authored a defamatory article about Plaintiff, which falsely accused her of fabricating claims of rape and perpetuated harmful stereotypes about women.

28. **Defendant Daily News Enterprises LLC (“Daily News Enterprises”)** is the owner of the New York Daily News. Daily News Enterprises is alleged to have published false and defamatory statements about Plaintiff as part of a broader campaign to discredit and silence her.

29. **Defendant Barbara Ross (“Ross”)** is a journalist employed by the New York Daily News. Ross authored a defamatory article about Plaintiff, which falsely accused Plaintiff of violent behavior and omitted the word “allegedly” or other qualifying language.

30. **Defendant The Forward Association, Inc. (“The Forward”)** is a non-profit organization that republished the original defamatory article published by the New York Post.

31. **Defendant Free Beacon LLC (“Free Beacon”)** is a media organization that published defamatory statements about Plaintiff as part of the broader campaign to discredit and silence her.

32. **Defendant Michael Kushner (“Kushner”)** is an attorney who, at one point, represented Plaintiff but later participated in the conspiracy against her, including by withholding critical information and collaborating with other Defendants to undermine her case.

33. **Defendant Javier Solano (“Solano”)** is an attorney who, at one point, represented Plaintiff but later participated in the conspiracy against her, including by withholding critical information and collaborating with other Defendants to undermine her case.

34. **Defendant The New York and Presbyterian Hospital (NYP Hospital)** is a hospital located in NYC.

JURISDICTION AND VENUE

35. This Court has jurisdiction over this matter pursuant to New York State law, including but not limited to the Gender-Based Violence Clawback Law and common law tort claims.

36. Venue is proper in the County of New York pursuant to CPLR § 503(a) because a substantial part of the events giving rise to the claims occurred in New York County.

FACTUAL ALLEGATIONS

A. 2008 Gala and Sexual Assault

37. In 2009, Plaintiff attended the **Person of the Year Awards Gala Dinner**, an annual event organized by the Brazilian-American Chamber of Commerce, in New York City with Defendant George Soros. During the event, Plaintiff requested an introduction to Mr. Gabrielli, then-president of Petrobras, to discuss a potential business opportunity. Soros refused Plaintiff’s request, stating that she should “know her place as a woman.” A true and correct copy of a photograph taken at the event is annexed hereto as **Exhibit A**.

38. Following the gala, Plaintiff and Soros returned to Bedford, New York. Plaintiff, emotionally distressed, took prescribed sleeping pills.

39. While Plaintiff was unconscious due to the medication, Soros raped her by engaging in non-consensual, unprotected sexual intercourse.

40. Plaintiff was unable to consent due to her incapacitated state, constituting rape under New York Penal Law § 130.35(2). This event caused long-term psychological and emotional trauma, which Plaintiff continues to suffer from to this day.

B. Labor Day Weekend 2009: Gender-Based Discrimination at the Hamptons Event

41. In 2009, during Labor Day weekend, Plaintiff accompanied Defendant Soros to an event in the Hamptons hosted by “Jane Doe” and “John Doe”. The event included a cocktail party, followed by a VIP dinner attended by Nouriel Roubini, Laetitia Garriott de Cayeux, Shauna Graham, John Paulson and his then-wife Jenny Paulson, and a couple from South Africa. A true and correct copy of a photograph taken that night is annexed hereto as **Exhibit B**.

42. During the dinner, the hosts conducted a round of questions directed at the attendees. The seating arrangement was organized in couples, with each man seated directly beside a woman, alternating around the table in a man-woman sequence. Despite this balanced arrangement, the host initiated a round of questions directed exclusively at the male attendees, beginning with the man seated immediately to his left. The host then proceeded around the table in a clockwise manner, methodically addressing each male participant while entirely bypassing every woman present.

43. During a bathroom break, Plaintiff and another female attendee, the wife of a South African billionaire, shared their mutual frustration over the blatant disregard of the for women’s voices.

44. The hostess of the event overheard this conversation. Upon returning to the table, the host began including the women in the discussion.

45. Following the event, Soros was visibly upset with Plaintiff and confronted her, stating, “Why can’t you be quiet? As a woman, you should know your place. You were there as

my companion. You think you're so smart, you're just a woman. You have to be quiet when I take you places." An argument ensued, during which Plaintiff attempted to challenge the absurdity of the sexist situation that occurred during dinner, where the hosts only sought the opinions of the men at the table, disregarding the women. In response, Soros retorted, "You are not equal to a man." Soros' words and actions reinforced a pattern of gender-based discrimination and emotional abuse, seeking to silence and diminish Plaintiff based on her gender.

C. 2011: Initial Lawsuit Against Soros

46. On August 10, 2011, Plaintiff filed a lawsuit against Defendant Soros for Intentional Infliction of Emotional Distress (IIED), estoppel, assault and battery, and other claims. Soros moved to dismiss this lawsuit. A true and correct copy of this lawsuit is annexed hereto as **Exhibit C**.

47. On January 25, 2013, Plaintiff prevailed in defeating Soros's motion to dismiss as the Honorable Debra A. James of the Supreme Court of the State of New York, New York County, denied Soros's motion almost in its entirety, upholding Plaintiff's claims for intentional infliction of emotional distress, negligent infliction of emotional distress, prima facie tort, promissory estoppel, and assault and battery. A true and correct copy of the January 25, 2013 decision is annexed hereto as **Exhibit D**.

D. 2012: Rape at Columbia University and Retaliation

48. In 2012, while the Plaintiff's lawsuit was ongoing, Plaintiff was brutally raped by Defendant Kyle Dubensky, a fellow Columbia University student. The Plaintiff was found unconscious and undressed in a campus elevator. A rape kit confirmed that Plaintiff had been sexually assaulted.

49. At the time of the assault, Plaintiff was overwhelmed by emotional distress and external pressures, including fear of retaliation and public scrutiny. Despite the overwhelming evidence of the crime, she chose not to pursue legal action against Dubensky. This decision was influenced by the pervasive societal stigma and systemic barriers that often silence survivors of gender-based violence, particularly women.

50. In the Affidavit in Support of [the] Motion for Relief Pursuant to CPLR § 5704(a) (the “Affidavit”), Pg. 11, ¶¶ 12-13, Mr. William Beslow, stated under oath the following:

Rape is a terrible, terrible crime. Society, police, and the law respect the sensibilities of victims of rape. Typically, rape victims do not want their identities disseminated to the public. [] The AIP believes that on December 31, 2012, she was the victim of a rape: to wit, an act of sexual intercourse forced upon her by a male person with whom she had had a dating relationship. Because the incident took place at a Columbia University dormitory, Columbia University security and New York City Police were involved in investigating the incident. Principally to protect her privacy, the AIP wished not to pursue the incident. She declined to cooperate with an ensuing Columbia University investigation and declined to file a criminal complaint. Consequently, Columbia's investigation exonerated the man, and criminal charges were not made against the man.

A true and correct copy of this affidavit is annexed hereto as **Exhibit E**.

51. In a reprehensible display of gender-based animus, Soros’s legal team, including Defendant Zabel, weaponized the Plaintiff’s rape during settlement negotiations. They engaged in sexual blackmail and coercion, exploiting the trauma of her assault to intimidate, silence, and force Plaintiff to settle the dispute with Soros. This conduct not only re-victimized Plaintiff, but also demonstrated a blatant disregard for her dignity and rights as a survivor of gender-based violence.

52. Mr. Beslow under oath stated the following:

During the course of his deposition in Action No. 1, William Zabel testified that the man had contacted him about the incident and asked him to represent him. Mr. Zabel declined to do so, but he recommended the man to Michael J. Roberts, Esq., an attorney known to Mr. Zabel (and a personal friend of several of Mr. Zabel's partners) and to whom Mr. Zabel had previously referred several cases. Mr. Zabel promised Mr. Roberts that in the event he represented the man and received no compensation for his services (since Mr. Roberts would be working on a 'contingency basis' and the AIP, who would be the defendant, had no assets), Mr. Zabel's law firm would refer additional cases to Mr. Roberts in the future to compensate Mr. Roberts for the time that he would be spending on the litigation. [] Against this factual backdrop, the man commenced Action No. 2 on March 18, 2013—the day preceding the preliminary conference in Action No. 1.

See Exhibit E, pg. 12, ¶ 14-15.

E. 2013: Retaliatory Lawsuit and Defamation

53. On March 18, 2013, in a calculated act of retaliation orchestrated by Defendant George Soros, Kyle Dubensky—represented by attorney Michael J. Roberts—filed a knowingly fraudulent personal injury lawsuit against Plaintiff, asserting fabricated claims of false arrest, false imprisonment, and defamation per se and other torts. These claims were entirely without basis. Plaintiff never publicly accused Dubensky of rape nor made any defamatory statements regarding the assault. Critically, the arrest referenced in the complaint was not initiated by Plaintiff, but rather by a Columbia University security guard who independently contacted the police after discovering Plaintiff unconscious, undressed, and in distress. The guard's report—not any statement or action by Plaintiff—triggered the law enforcement response. Dubensky and his counsel were fully aware of these facts, yet proceeded to file a complaint grounded in deliberate misrepresentations. The lawsuit was not brought in good faith, but as part of a coordinated effort to retaliate against Plaintiff for her prior legal claims and to undermine her

credibility through public litigation. A true and correct copy of the March 18, 2013 complaint is annexed hereto as **Exhibit F**.

54. The lawsuit was a deliberate attempt to destroy Plaintiff's reputation and credibility, furthering Defendant Mr. Soros's agenda to undermine her claims against him. Mr. Soros's representatives then leaked the lawsuit to the New York Post, along with false information claiming that the Plaintiff had falsely accused Dubensky of rape.

55. In the Affidavit, Mr. Beslow further states under oath the following:

As shown above, prior to commencement of Action No. 2, the New York Post published an online article about the anticipated commencement of Action No. 2. The article, Exhibit '1' to the Affirmation Requesting Order Authorizing Anonymous Caption dated March 7, 2014, a copy of which is attached as Exhibit '2' to the Documents, invaded the AIP's privacy in a horrific manner. It accused her of having made a false accusation of rape against the man. From the AIP's viewpoint, the article suggested that the man who had raped her was a victim and that she—who had been raped and who had decided to suppress the incident largely in order to spare her public embarrassment about an incredibly private matter—had engaged in tortious conduct.

See Exhibit E, pg. 12 – 13, ¶ 16.

56. On March 18, 2013, the New York Post published an article on its Page Six platform that falsely accused Plaintiff of fabricating allegations of rape against Dubensky. See PageSix.com Staff, Ugly new mess for Soros ex, PageSix.com, (March 18, 2013, 4:00 AM), <https://pagesix.com/2013/03/18/ugly-new-mess-for-soros-ex/>. The article described Plaintiff as a “Brazilian bombshell” and focused on her physical appearance, perpetuating harmful stereotypes about women and undermining her credibility. A true and correct copy of this article is annexed hereto as **Exhibit G**.

57. It is nothing short of preposterous—and a blatant display of gender-based animus—to portray a possible victim of rape as a “bombshell,” reducing her to a mere object of

physical appearance rather than acknowledging her as a human being who endured a traumatic violation of her bodily autonomy and dignity. This grotesque framing by Defendants and their media operatives was a deliberate attempt to distract from the substantive issues at hand, perpetuate harmful stereotypes about women, and discredit her as a survivor of gender-based violence.

58. In the same article, Defendant Michael J. Roberts, Dubensky's attorney, falsely stated "The [DA] was presented with the case and refused to file a complaint. In addition, Columbia University . . . declined to pursue the case and saw no reason to investigate further."

59. This statement was a deliberate misrepresentation of the facts. In truth, the District Attorney's Office and Columbia University did not pursue the case because Plaintiff never made any public accusations of rape against Dubensky and chose not to cooperate with the investigation to protect her privacy. Defendants knowingly misrepresented the reasons for the lack of prosecution to create the false impression that Plaintiff's claims were baseless, furthering their campaign of retaliation and defamation.

60. The Daily Mail and other publications subsequently republished the article. See Sara Malm, *George Soros' former Brazilian lover, 31, 'cried rape' against Columbia student after naked fight in elevator*, Daily Mail, (March 18, 2013, 10:38 AM) <https://www.dailymail.co.uk/news/article-2295192/Ex-girlfriend-suing-billionaire-George-Soros-sued-5million-falsely-accusing-student-rape.html>. This article repeated the false allegations and included additional defamatory statements, further damaging Plaintiff's reputation and causing her severe emotional distress. A true and correct copy of this article is annexed hereto as **Exhibit H**.

61. On March 28, 2013, The Forward published an article that repeated the false allegations, further damaging Plaintiff's reputation and causing her severe emotional distress. *See* Anne Cohen, George Soros' Ex Sued Again, The Forward, (March 28, 2013), <https://forward.com/schmooze/173893/george-soros-ex-sued-again>. A true and correct copy of this article is annexed hereto as **Exhibit I**.

62. In the Affidavit, Mr. Beslow further states under oath the following:

(1) the AIP's recent suicidal ideation on not fewer than three occasions; (2) the overwhelming emotional distress which the AIP has suffered as a consequence of the combined and cumulative efforts of defendants in Action No. 1 and plaintiff in Action No. 2[.]

See Exhibit E, pg. 3, ¶ 1(c).

63. The articles relied on biased and unverified sources, including statements from Roberts (Dubensky's attorney), who dismissed Plaintiff's account as "utter fiction." The articles also failed to provide a balanced or fair representation of the facts, instead portraying Plaintiff as an unreliable and manipulative individual.

64. The articles' portrayal of Plaintiff perpetuate harmful stereotypes about women, particularly survivors of sexual violence. By framing Plaintiff as a "Brazilian bombshell" and focusing on her physical appearance, the Defendants sought to reduce her credibility and distract from the substantive issues of her legal claims.

65. The false allegations that Plaintiff fabricated claims of rape reinforce harmful stereotypes that women lie about sexual assault. This narrative is part of a broader pattern of gender-based animus designed to discredit and silence Plaintiff.

66. The media leaks caused widespread reputational damage and subjected the Plaintiff to public humiliation and harassment. The coverage triggered severe emotional distress, including multiple episodes of suicidal ideation, as the Plaintiff struggled to cope with the trauma

of having her assault sensationalized and misrepresented. The psychological toll of these events was profound, with the Plaintiff experiencing more than three documented instances of suicidal ideation directly resulting from the Defendants' actions.

67. In the Affidavit, Mr. Beslow further states under oath the following:

During 2013 and 2014, defendants in Action No. 1—principally through their attorneys—leaked information and made statements to the press in an effort calculated to cause the AIP to suffer emotional distress. As shown in the Petition, their efforts have been very successful—for the distress has overwhelmed the AIP. Indeed, during the past few months, the AIP has expressed suicidal ideation, has taken anti-psychotic medication prescribed by her psychiatrist, has taken anti-depressant medication prescribed by her psychiatrist, has taken (and abused) sleep medication (Ambien) prescribed by her general physician, and has made . . .

See Exhibit E, pg. 9, ¶ 10.

F. Evidence of Coordination with Mr. Soros

68. The fact that Defendants leaked the lawsuit to the press, despite having no legitimate interest in doing so, demonstrates that they were acting not in their own interests, but on behalf of Mr. Soros. The leak served no purpose other than to further Mr. Soros's agenda of silencing and humiliating Plaintiff, as it provided no benefit to Dubensky or his counsel. This conduct underscores the Defendants' role as agents of Mr. Soros, carrying out his directives to retaliate against Plaintiff and inflict emotional harm.

69. In the Affidavit, Mr. Beslow further states under oath the following:

At 4:00 a.m. on Monday, March 18, 2013, the New York Post published an article that scandalized the AIP. According to the article, a Columbia University student intended to sue the AIP for \$5 Million on the principal ground that the AIP had falsely accused him of raping her. ('Action No. 2') . . . It seems self-evident that the leak of the prospective lawsuit—which was filed later that day—came from counsel for defendants in Action No. 1, since neither plaintiff in Action No. 2 nor his lawyer would benefit from a public denunciation of the AIP. Only the defendants in Action No. 1 would benefit. Leaving aside the mean-spiritedness of the leak of the

imminent commencement of Action No. 2 and the lack of merit in such action, the article crushed the AIP emotionally. Her overriding emotional pain and suffering emanating from this article is unabated.

See Exhibit E, pg. 9, ¶ 10a.

70. The Defendants' actions in leaking the lawsuit to the press and fabricating false allegations were not only mean-spirited but also part of a broader pattern of gender-based animus and retaliation. By weaponizing the media and the legal system, Defendants sought to silence Plaintiff, destroy her reputation, and re-victimize her as a survivor of sexual violence. This conduct exemplifies the Defendants' deliberate and systemic campaign to exploit Plaintiff's vulnerability, inflict emotional harm, and obstruct her pursuit of justice. The profound and lasting impact of these actions on Plaintiff's mental and emotional well-being cannot be overstated, as they were calculated to cause maximum distress and humiliation. This lawsuit, entirely devoid of merit, was part of a calculated scheme to destroy Plaintiff's reputation, undermine her credibility, and inflict maximum emotional and psychological harm.

71. The depth of this conspiracy is further evidenced by the sworn testimony of Mr. Zabel, (Soros's attorney), who admitted under oath during a deposition that he had arranged for Michael J. Roberts to represent Dubensky in the retaliatory lawsuit. Mr. Zabel acknowledged recommending Mr. Roberts, a personal friend of his law firm partners, and promised to refer additional cases to him as compensation for taking on the case.

72. In the Affidavit, Mr. Beslow further states under oath the following:

During the course of his deposition in Action No. 1, William Zabel testified that the man had contacted him about the incident and asked him to represent him. Mr. Zabel declined to do so, but he recommended the man to Michael J. Roberts, Esq., an attorney known to Mr. Zabel (and a personal friend of several of Mr. Zabel's partners) and to whom Mr. Zabel had previously referred several cases. Mr. Zabel promised Mr. Roberts that in the event he represented the man and received no compensation for his services

(since Mr. Roberts would be working on a 'contingency basis' and the AIP, who would be the defendant, had no assets), Mr. Zabel's law firm would refer additional cases to Mr. Roberts in the future to compensate Mr. Roberts for the time that he would be spending on the litigation. [] Against this factual backdrop, the man commenced Action No. 2 on March 18, 2013—the day preceding the preliminary conference in Action No. 1.

See Exhibit E, pg. 12, ¶ 14-15.

73. This quid pro quo arrangement underscores the Defendants' coordinated efforts to weaponize the legal system against the Plaintiff, further highlighting the gender-based animus that motivated their actions.

G. Sexual Blackmail and Coercion

74. In a calculated act of coercion, Defendant William Beslow—acting on behalf of George Soros and in coordination with other Defendants—explicitly threatened Plaintiff with total personal and reputational destruction if she refused to settle her legal claims. During a private meeting, Beslow presented Plaintiff with two deeply invasive and traumatizing items: a nude video of her, captured without consent, and a Title IX interview transcript in which Kyle Dubensky—her rapist—graphically described sexual acts. While brandishing these materials, Beslow stated, “Your life will be ruined,” if Plaintiff did not capitulate.

75. At the time of this threat, the retaliatory lawsuit filed by Dubensky was already public and receiving widespread media coverage. Defendants had already submitted filings that resulted in the grotesque public spectacle of Plaintiff's rape, casting her name and body into the media as an object of ridicule and disbelief. Defendants knew full well the devastation this had caused. Plaintiff had experienced multiple episodes of suicidal ideation directly linked to the humiliation, harassment, and trauma of seeing her rape reduced to public mockery. The threat was not abstract—it was a promise of continued violence. Beslow's warning was a direct message that if Plaintiff did not abandon her legal claims, Defendants would again weaponize

her body, her trauma, and her identity as a woman—through additional filings designed to provoke further media leaks and renewed public degradation. This conduct constitutes sexual coercion, psychological terrorism, and blackmail, and was executed with full knowledge of its prior effects and with the express intent to destroy Plaintiff’s will to seek justice.

H. Columbia University’s Complicity in Retaliation and Harm

76. Columbia University, through its Office of Judicial Affairs and Community Standards and its attorney, Defendant Mary E. Mulligan, had full knowledge that the lawsuit filed by Kyle Dubensky was retaliatory and factually unsupported. Columbia was aware that Plaintiff never accused Dubensky of rape and took no action to initiate police involvement. Rather, it was a Columbia-employed dormitory guard who independently contacted law enforcement after observing Plaintiff’s condition and Dubensky fleeing the scene. Despite this knowledge, Columbia failed to uphold its institutional obligations to protect Plaintiff as a student and a survivor of gender-based violence, instead participating in the campaign of retaliation that followed.

77. Under Title IX, Columbia had a non-discretionary legal duty to protect Plaintiff from retaliation and gender-based harassment. This included taking reasonable steps to prevent further harm, conducting an appropriate investigation, and refusing to enable third-party retaliation. Instead, Columbia prioritized institutional liability management over its obligations to safeguard its students, reflecting a systemic failure to comply with federal mandates.

78. Columbia’s role in this retaliatory scheme extended beyond inaction. Despite seeking a protective order in response to an overbroad subpoena served in connection with Dubensky’s lawsuit, Columbia ultimately complied with the subpoena and released highly sensitive records—including Title IX materials, personal correspondence, and video footage showing Plaintiff in a state of undress—despite knowing that the lawsuit was retaliatory and

based on false claims. Both Plaintiff and Dubensky were students at the time, and Columbia had actual knowledge of facts suggesting that the lawsuit was initiated for retaliatory purposes. Columbia had a clear duty under Title IX to investigate and intervene, but failed to act. This constitutes deliberate indifference to known Title IX violations and a knowing contribution to the emotional and reputational harm Plaintiff suffered.

79. Columbia's representation in response to the subpoena that it reserved the right to destroy video evidence after 90 days—including footage that could have exonerated Plaintiff—further underscores its intent to protect itself rather than the student victim. The university's release of these materials facilitated their use in blackmail and defamation and supported the Defendants' conspiracy to silence and retaliate against Plaintiff. These actions amount to a willful breach of Columbia's obligations under Title IX, FERPA, and its own ethical responsibilities.

I. The Subpoena and Columbia University's Willful Compliance

80. On July 26, 2013, Defendant Dubensky, through his attorney Michael J. Roberts, served Columbia University with a subpoena duces tecum (Index No. 152432/2013, NYSCEF Doc. No. 10), demanding the production of highly sensitive and private materials related to the incident between Plaintiff and Dubensky. The subpoena included the following outrageous and invasive requests:

1. Copies of any and all correspondence between Columbia University and Kyle Dubensky;
2. Copies of any and all correspondence between Columbia University and Adriana Ferreyr;
3. Copies of all reports, memoranda, writings, and records dealing with the incident that occurred on December 31, 2012, at 517 West 121st Street, Apt 208-S, New York, NY;
4. Copies of any electronic recordings or videos showing the incident at 517 West 121st Street on December 31, 2012;
5. Copies of any police records or Columbia University employee reports concerning the incident;

6. Copies of complete student records of Adriana Ferreyr; and
7. Any other reports, papers, documents, letters, or correspondence of any kind dealing with the incident.

81. The subpoena's requests were patently overbroad, invasive, and clearly intended to harass and humiliate Plaintiff. The scope of the subpoena—seeking nude videos, student files, and private interviews—constituted a blatant abuse of process and an attempt to retraumatize a survivor under the guise of discovery.

82. Rather than assert its authority to reject improper and abusive demands, Columbia complied with the subpoena and turned over highly sensitive materials. These materials were subsequently used in the retaliatory lawsuit and media attacks against Plaintiff. Columbia's compliance, despite knowledge of the lawsuit's illegitimacy, constituted willful participation in the retaliation and a violation of its Title IX duties.

J. Release of Videotapes Showing Plaintiff Naked

83. In a grotesque violation of Plaintiff's privacy and dignity, Columbia University, through its Office of Judicial Affairs and Community Standards and its attorney, Defendant Mary E. Mulligan, released videotapes showing Plaintiff naked.

84. Instead, Columbia University handed over these highly sensitive materials to Dubensky and his attorney, Michael J. Roberts. These videotapes were then weaponized against Plaintiff, used as part of a campaign of blackmail and intimidation.

K. Threats by Defendant William Beslow

85. Defendant William Beslow, Plaintiff's former attorney, used intimate images of Plaintiff—obtained through sealed court filings—to coerce her into accepting a settlement. He explicitly showed Plaintiff naked photographs of herself and warned that her life would be “ruined” if she refused the settlement. Beslow further read aloud a Title IX interview given by Dubensky in which he graphically described alleged sexual activity, doing so with the intent to

humiliate and emotionally destabilize Plaintiff. His actions were a calculated abuse of power and a direct attack on Plaintiff's autonomy and mental well-being.

L. Gender-Based Animus and Stereotyping

86. The Defendants' conduct collectively reflects clear gender-based animus as defined under New York's Gender-Motivated Violence Law. Their use of sexualized imagery and narratives to silence and intimidate Plaintiff relied on harmful stereotypes that uniquely target women, especially those who survive sexual violence. These actions constitute retaliation and systemic harassment rooted in misogyny and societal bias.

87. Columbia University's complicity in this campaign of harm demonstrates a blatant disregard for Plaintiff's rights and dignity as a woman and a survivor of gender-based violence. Columbia University reinforced the systemic inequalities that perpetuate gender-based violence and harassment. This conduct is not only a violation of Title IX but also a betrayal of the trust that students place in their university to safeguard their well-being.

M. Plaintiff's Last Recollection and the Guard's Actions

88. Plaintiff's last clear memory of the incident was the moment the elevator doors opened, after which she lost consciousness. A Columbia University security guard witnessed Dubensky fleeing and Plaintiff unconscious and unclothed. Upon information and belief, the guard—not Plaintiff—called 911. Columbia, through Defendant Mary E. Mulligan, was fully aware of these facts, yet continued to act as though Plaintiff had initiated police involvement, which she did not. Columbia, through Mulligan, was fully aware of these facts, and yet continued to act as though Plaintiff had initiated police involvement—which she did not.

89. Columbia never corrected this false narrative and failed to protect Plaintiff against the resulting retaliation. This failure to act was a breach of institutional responsibility and a knowing misrepresentation of the facts

N. Columbia's Access to Title IX Interviews

90. Columbia University had access to Plaintiff's confidential Title IX interview, in which she explicitly stated that she had no recollection of reporting the incident and did not accuse Kyle Dubensky of rape. Despite this, Columbia knowingly and recklessly disclosed that interview, along with other sensitive Title IX materials, to Dubensky's attorney in response to an overbroad subpoena. These records included not only Plaintiff's protected statements, but also a Title IX interview given by Dubensky, in which he described sexually explicit acts in vulgar and degrading terms. Columbia was fully aware of the retaliatory nature of the underlying lawsuit and the highly sensitive nature of the documents it was releasing.

91. The disclosure of these materials—particularly Dubensky's sexually explicit and vulgar narrative—was then weaponized by Defendants in furtherance of a coordinated retaliatory campaign of legal intimidation and public humiliation. These documents were used not to seek justice or resolution, but to re-victimize Plaintiff, discredit her in the eyes of the court and the public, and inflict further psychological and reputational harm. Columbia's decision to release these records, despite knowing the context and consequences, constitutes a gross violation of its obligations under Title IX, FERPA, and basic standards of institutional integrity.re-victimization.

O. Columbia University's Failure to Protect Plaintiff

92. Any reasonable person—let alone a prestigious institution like Columbia University—would recognize that disclosing such intimate and sensitive materials was grossly improper, particularly in the context of a fraudulent and retaliatory lawsuit. Columbia's release of such intimate materials, in the face of clear retaliatory motives, was neither accidental nor legally required—it was a deliberate act of betrayal. Rather than protect the survivor, Columbia empowered her harassers.

93. Columbia University's actions reflect a systemic failure to uphold its obligations under Title IX and other laws designed to protect individuals from gender-based violence and harassment. Instead of protecting Plaintiff, Columbia University actively assisted in the dissemination of materials that were used to blackmail and intimidate her. These actions represent a systemic breakdown in Columbia's duty under Title IX and a willful indifference to Plaintiff's emotional and physical safety.

P. Dubensky's Misconduct and Columbia's Inaction

94. By filing a fraudulent and retaliatory lawsuit against Plaintiff, Dubensky committed numerous criminal and civil violations, including perjury, false statements, abuse of process, conspiracy, extortion, blackmail, defamation, and invasion of privacy. Upon information and belief, Columbia University was aware of these violations and had a duty to protect Plaintiff from further harm. Instead, Columbia University failed to contact law enforcement or take any disciplinary action against Dubensky, despite overwhelming evidence of his misconduct.

Q. Columbia University's Liability for False Claims Asserted Against Plaintiff in Retaliatory Lawsuit

95. In the retaliatory lawsuit filed by Dubensky, Plaintiff was named as a defendant and accused of false arrest, malicious prosecution, and defamation—despite the fact that she never contacted law enforcement and made no accusations against Dubensky. The 911 call and resulting police report were initiated independently by a Columbia University security guard, based on what he personally witnessed. Columbia, not Plaintiff, was responsible for the guard's conduct. Columbia was fully aware of these facts and knew that the allegations against Plaintiff were false, yet it took no action to correct the record. Instead, Columbia allowed the retaliatory narrative to proceed, knowingly permitting its own inaction to be used against a student survivor in civil litigation. These events underscore Columbia's direct role in facilitating the defamation

and legal harassment of Plaintiff, as well as its failure to uphold its institutional responsibilities under Title IX and basic standards of due process.

R. Psychological Impact on Plaintiff

96. The realization that her university—an institution Plaintiff once trusted to protect her—had enabled a retaliatory campaign by disclosing intimate and sensitive materials was profoundly devastating. That devastation deepened when Plaintiff learned that Columbia not only complied with an abusive subpoena, but also represented that it reserved the right to destroy critical video evidence within an extremely short time frame—footage that could have exonerated her of the false allegations made in the retaliatory lawsuit. This institutional indifference, and the looming possibility that exculpatory evidence would be deliberately discarded, inflicted lasting psychological trauma. The betrayal Plaintiff felt upon learning that her own university prioritized institutional self-protection over her access to justice and truth was crushing. It stripped her of any sense of safety or trust in the processes meant to protect survivors of gender-based violence. The emotional toll of this betrayal continues to reverberate in Plaintiff's life and stands as a stark illustration of how institutional failures can magnify the harm inflicted by private actors.

S. 2013: Soros's Attorney Offers to Settle Dubensky's Fraudulent Lawsuit

97. In a shocking and unprecedented display of collusion, Defendant Marty Singer, an attorney representing George Soros, offered to settle the fraudulent lawsuit filed by Kyle Dubensky against Plaintiff. On November 29, 2013, Marty Singer sent an email to William Beslow (Plaintiff's attorney at the time) containing a settlement offer. He stated: "Mr. Soros will indemnify [ANONYMOUS] with respect to the Dubensky case and will pay additional sums in excess of the settlement amount provided for in paragraph 1 above to ensure that the Dubensky case is dismissed with prejudice against your client." A true and correct screen shot of part of the

email containing the settlement offer is attached as **Exhibit K**. In a subsequent email containing a settlement letter dated December 1, 2013, Singer explicitly stated that he would attempt to settle the Dubensky v. [ANONYMOUS] case under terms where Plaintiff would not admit any wrongdoing or pay any money. This offer, made by an attorney representing Soros in a completely unrelated matter, demonstrates a clear and undeniable connection between Soros and Dubensky's lawsuit. A true and correct copy of the email containing the settlement offer is attached as **Exhibit L**. The fact that Soros' attorney would consider intervening in a lawsuit that had no legal or factual connection to Soros' case against Plaintiff reveals the depth of the conspiracy against Plaintiff. This offer is further evidence that Dubensky's lawsuit was orchestrated by Soros and his legal team as part of a broader campaign of retaliation and harassment against Plaintiff. Dubensky's lawsuit was a fraudulent and retaliatory action designed to destroy Plaintiff's reputation and credibility, and Soros's willingness to facilitate its resolution underscores his complicity in this scheme and demonstrates a blatant disregard for Plaintiff's rights and dignity as a survivor of gender-based violence. Dubensky's lawsuit was profoundly damaging to Plaintiff psychologically, in large part due to her name and integrity being targeted by the media in connection with rape and other sexual allegations. By linking the settlement of his action to the settlement of the Dubensky lawsuit, Soros sought to exploit Plaintiff's vulnerability and coerce her into capitulating to his demands.

98. The Defendants' actions, including the threat of dissemination of revenge porn—a grotesque violation of Plaintiff's privacy and dignity—and the use of sexual shaming, public humiliation, and misogyny to degrade and intimidate her, demonstrate a deliberate campaign of harassment, defamation, and retaliation. Sexual shaming and misogyny reinforce harmful gender norms, perpetuate cycles of abuse, and inflict profound social and psychological harm. Under

New York law, this pattern of conduct meets the requisite animus to support a gender-based violence lawsuit, as it demonstrates a deliberate and systemic effort to target Plaintiff because of her gender and her status as a survivor of sexual violence.

T. 2015: Assault by Attorney Marty Singer and Fabricated Media Reports

99. In 2015, Defendant Marty Singer (Soros's attorney), physically assaulted Plaintiff. This assault occurred during a deposition related to Plaintiff's lawsuit against Soros. The following day, false and defamatory media reports were published, alleging that Plaintiff attacked Soros. These reports were part of a coordinated effort by Soros's operatives to discredit and silence Plaintiff, further perpetuating gender-based violence and harassment.

100. In the Affidavit, Mr. Beslow further states under oath the following:

On February 7, 2014, the New York Post and the Daily News published accounts of the AIP's behavior at the February 4, 2014 session of the Soros Deposition. During numerous conversations with the AIP prior to March 11, 2014, I made clear to the AIP that her opposition papers to defendants' pending, bad-faith motion for an order directing her to maintain any tapes made during such depositions should include a stinging rebuttal to defendants' account—including a detailed statement as to the verbal abuse and physical abuse she suffered at such deposition.

See Exhibit E, pg. 16, ¶ 23d.

101. On February 7, 2014, the New York Daily News published an article titled "George Soros' ex-girlfriend goes berserk during deposition and smacks the 83-year-old billionaire in the head: court papers," which falsely claimed that Plaintiff had assaulted Soros and his legal team. The article was based on fabricated court filings submitted by Marty Singer and other Soros operatives. Notably, the article did not include the word "allegedly" or any qualifying language to indicate that the events described were disputed or unverified. Instead, the journalist presented the false narrative as fact, despite being provided with evidence, including

emails, that the events described in the article were a complete fabrication. A true and correct copy of the articles that were published are attached as **Exhibit M, Exhibit N and Exhibit O.**

102. In an email sent on February 08, 2014, to Marty Singer and copied to William Beslow and Gary Stein, Mr. Beslow stated the following:

You violated numerous provisions of the New York Rules of Professional Conduct. You spoke directly with [ANONYMOUS], and you continued to do so after I asked you not to. Your words were inappropriate. Leaving aside your intention, purpose, or motive, you put her in a bear hug - thus initiating physical contact between [ANONYMOUS] and you. After she flailed away at you, and again - without reference to your intention, purpose, or motive - you re-initiated physical contact with [ANONYMOUS], forcefully grabbing her by the forearms and moving her towards the far end of the office. Among other things, I am sure you will admit to the above.

A true and correct copy of this email is attached as **Exhibit P.**

103. The false narrative propagated by the New York Daily News and other media outlets relied heavily on the harmful stereotype of women as overly emotional or irrational. By portraying Plaintiff as "berserk" and violent, the Defendants weaponized this stereotype to discredit her and undermine her credibility. This tactic is a common strategy used to dismiss women, particularly survivors of gender-based violence, by framing their reactions or experiences as products of emotional instability rather than legitimate responses to harm. The refusal of the New York Daily News and other media outlets to include the word "allegedly" or to correct the record, despite being provided with evidence of the true events, demonstrates a deliberate effort to perpetuate gender-based animus and to harm Plaintiff. This conduct is consistent with the Defendants' broader campaign to silence and discredit Plaintiff through public stereotyping, character disparagement, and the exposure of private details.

104. The publication of false and defamatory statements about Plaintiff, combined with the refusal to correct the record, constitutes an extreme and outrageous act of gender-based

harassment. This conduct was intended to cause (and did cause) severe emotional distress to Plaintiff, further exacerbating the harm she suffered as a result of the Defendants' actions.

105. The Defendants' actions, including the fabrication of court filings, the publication of false media reports, and the refusal to correct the record, are part of a coordinated campaign of gender-based violence and harassment. This campaign is designed to intimidate, discredit, and silence Plaintiff, preventing her from seeking justice for the harms she has endured. The Defendants' conduct reflects a clear pattern of gender-based animus, as it relies on harmful stereotypes about women and seeks to undermine Plaintiff's credibility based on her gender.

U. Media Coverage Perpetuating Gender-Based Stereotypes and Defamatory Portrayals of Plaintiff

106. Defendants New York Post, New York Daily News, The Forward, and the Washington Free Beacon have engaged in a sustained pattern of publishing articles that perpetuate gender-based stereotypes, animus, and defamatory portrayals of Plaintiff, Adriana Ferreyr. These publications have consistently depicted Plaintiff using language and narratives that trivialize her allegations, question her credibility, and reduce her to harmful gendered tropes, thereby causing significant reputational harm and emotional distress.

107. New York Post (including Page Six) New York Post – ***“George Soros ex Adriana Ferreyr still upset about reneged real estate”***, May 4, 2020 (Page Six, Cindy Adams) – URL: <https://nypost.com/2020/05/04/george-soros-ex-adriana-ferreyr-still-upset-about-reneged-real-estate/>. This gossip column belittles Ms. Ferreyr as a scorned woman who won't let go of a dismissed lawsuit. It claims she “continues to spread these allegations around” despite losing in court, concluding: “Hell hath no fury like an ex-ladyfriend scorned.” nypost.com Such language mocks her as an overly angry ex, undermining the seriousness of her assault allegations.

108. On or about April 20, 2025, the New York Post was contacted on multiple occasions with detailed and substantiated allegations set forth in this Complaint, including deposition testimony and corroborating evidence. Despite receiving this information, the publication chose to disregard the seriousness of Plaintiff's claims—specifically, her allegations of sexual assault and the subsequent retaliatory, fraudulent lawsuit orchestrated by a collusion of powerful attorneys. Instead, on May 4, 2020, the Post published an article titled "*George Soros ex Adriana Ferreyr still upset about reneged real estate,*" which ridiculed Plaintiff as a stereotypical "woman scorned" who could not move on from a dismissed legal dispute. The article concluded with the phrase: "***Hell hath no fury like an ex-ladyfriend scorned,***" a gendered and mocking expression that belittled Plaintiff's trauma and cast her as emotionally unstable and vindictive—thereby undermining the credibility of her claims and perpetuating the exact kind of gender-based animus that the Gender-Motivated Violence Act was designed to redress.

109. This language exemplifies the use of gendered stereotypes to trivialize Ms. Ferreyr's experiences and discredit her claims. By framing her as an irrational, vengeful woman, the publication perpetuates harmful tropes that have historically been used to silence and delegitimize women's voices, especially those speaking out against powerful men. Such portrayals not only inflict emotional distress but also contribute to a broader societal pattern of gender-based animus, where women's allegations are dismissed or ridiculed based on sexist assumptions.

110. The media's focus on Ms. Ferreyr's appearance and emotional reactions, rather than the substance of her claims, further reinforces these stereotypes. By emphasizing her looks and depicting her as hysterical or unstable, the publications shift attention away from the alleged

misconduct and instead question her credibility and motives. This approach not only undermines her pursuit of justice but also serves as a warning to other women about the potential public shaming they might face when coming forward with similar allegations.

111. Such media portrayals are not isolated incidents but part of a systemic issue where women's experiences, particularly those involving gender-based violence, are minimized or dismissed through the lens of misogyny and bias. By highlighting these patterns in your complaint, you underscore the additional barriers faced by women in seeking redress and the role of media in perpetuating gender-based violence and discrimination.

New York Post – “*‘Sour grapes’ of Soros ex: lawyer*”, May 2, 2012 (Dareh Gregorian)

– URL:<https://nypost.com/2012/05/02/our-grapes-of-soros-ex-lawyer/>.

112. Reporting on a court hearing, this piece parrots the billionaire’s lawyer in saying Ms. Ferreyr’s \$50 million suit was “just a case of sour grapes,” and even refers to Soros as her “mature man-toy”nypost.com. By suggesting her lawsuit is merely about “hurt feelings” and greed, the article trivializes her claims and implies she is suing out of spite rather than merit.

113. **New York Post** – “*George Soros sued by ex-girlfriend over real estate dispute*”, Aug. 11, 2011 (Emily Smith) – URL: <https://nypost.com/2011/08/11/george-soros-sued-by-ex-girlfriend-over-real-estate-dispute/>. This front-page story introduced Ms. Ferreyr with sensational, soap-opera language. It calls her a “beautiful Brazilian soap star [with] the lead role in her own daytime drama,” casting Soros as the villain who “broke her heart”nypost.com. The article emphasizes her looks with phrases like “the sultry actress” and describes her breakup as being “heartlessly dumped”nypost.com. It also highlights a quote from a Soros associate dismissing her case: “*This is about a lot of money and an apartment*”, portraying her as motivated by moneynypost.com.

114. **New York Post – “Soros’ jilted ex on their 5-year affair and his sudden change of heart”**, Aug. 13, 2011 (Emily Smith) – URL: <https://nypost.com/2011/08/13/soros-jilted-ex-on-their-5-year-affair-and-his-sudden-change-of-heart/>. In an “exclusive” interview piece, the Post repeatedly objectifies and demeans Ms. Ferreyr through gendered tropes. She is introduced as Soros’s “28-year-old bombshell Brazilian ex-lover” who shared “seamy details” of their relationship nypost.com. When quoting her distress, the article calls her a “spurned Latin lovely” who “wept” about Soros’s betrayal nypost.com. Later, as she recounts the alleged assault, the Post dubs her the “teary-eyed temptress” coming to terms with being ditched nypost.com. These terms – *bombshell*, *Latin lovely*, *temptress* – reduce Ms. Ferreyr to sexist stereotypes (exotic beauty, seductress) and imply her emotions are melodramatic.

115. **New York Post (Page Six) – “Soros offer to ex \$49M short”**, March 14, 2012 – URL: <https://pagesix.com/2012/03/14/soros-offer-to-ex-49m-short/>. Page Six reports that Soros tried to settle with Ms. Ferreyr for \$1 million, calling her Soros’s “Brazilian bombshell ex-lover” who “turned down the lump sum, insisting she is determined to sue... for \$50 million” pagesix.com. The piece notes Soros’s camp characterizes her as a gold-digger trying to “cash in on their five-year relationship,” which her own lawyer blasted as “false and extremely inflammatory and chauvinistic rhetoric” in court papers pagesix.com. By repeating phrases like Ferreyr’s “quest to cash in” on Soros’s wealth pagesix.com, the article reinforces a narrative that she is a greedy “gold digger” rather than a genuine victim.

116. **New York Post – “New life for Soros ex’s \$50M suit”**, Jan. 26, 2013 (Julia Marsh) – URL: <https://nypost.com/2013/01/26/new-life-for-soros-exs-50m-suit/>. When Ms. Ferreyr won a court ruling to proceed with most of her claims, the Post still framed the story in flippant, soap-opera terms. It led with: “Expect a second season in a Brazilian soap-opera

beauty’s drama with her former squeeze, billionaire financier George Soros.”nypost.com The article refers to Ms. Ferreyr simply as “the beauty,” noting the judge upheld most of “the beauty’s claims” that Soros reneged on his promise and “then slapped her around when she complained”nypost.com. By describing her serious allegations of assault as part of a “*drama*” starring a “*beauty*,” the Post minimizes her trauma and centers on her looks.

117. **New York Daily News**- NY Daily News – (Title example: “*Soros’ ex erupts during deposition*”, Feb 2014). On February 7, 2014, the Daily News reported a courtroom outburst by Ms. Ferreyr during Soros’s deposition (article by Barbara Ross, link now archived). The coverage made a spectacle of her behavior, describing her as a “South American soap actress “who “clocked Soros in the head, knocked the glasses off his...lawyer..., cursed [Soros’s] other lawyer...and even screamed at her own attorney”newsbehavingbadly.com. The article quoted Ferreyr’s shouted insults at the 83-year-old Soros – ““A–h–le! You piece of s–t!” Ferreyr, 30, allegedly screamed at Soros” in a hallway encounternewsbehavingbadly.com. It detailed how she lunged at Soros and had to be restrained. By highlighting these profanities and chaotic actions, the Daily News portrayed Ms. Ferreyr as *hysterical* and out of control. The piece focused on her emotional frenzy in public court, rather than any context of her underlying claims, effectively humiliating her in the public eye as an unstable woman.

118. **The Forward** “*George Soros’ Ex Sued Again*”, March 28, 2013 (Anne Cohen) – URL:<https://forward.com/schmooze/173893/george-soros-ex-sued-again/>. This article recounts that even as Ms. Ferreyr was battling Soros in court, she faced a new lawsuit accusing her of wrongdoing. It reports that a Columbia student sued Ferreyr for defamation, claiming she “falsely accused him of raping her” forward.com. The Forward – citing a New York Post report – relays sensational details: Ferreyr allegedly “dug her nails into his arm, ran after him

naked into the elevator, and tried to strangle him”, then told campus security she had been assaulted forward.com. By publishing these allegations, the article depicts Ferreyr as vindictive and unhinged, willing to fabricate a sexual assault. The tone (“*Things are not going well for Adriana Ferreyr*” forward.com) is almost taunting. This coverage perpetuates a narrative that Ferreyr herself engaged in extreme, hysterical behavior and false claims, which is profoundly damaging to her credibility as a victim.

119. **The Forward** – “*George Soros Wins \$50M Suit Filed by Brazilian Gal Pal*”, April 1, 2014 (Forward, via Reuters) – URL: <https://forward.com/articles/195641/george-soros-wins-m-suit-filed-by-brazilian-gal/>. The Forward’s headline itself refers to Ms. Ferreyr as Soros’s “*Brazilian Gal Pal*,” a patronizing label that trivializes her as merely a casual girlfriend. The article (sourced from Reuters) notes that an appellate court dismissed most of Ferreyr’s claims. It then quotes Soros’s attorney declaring that Ferreyr’s remaining assault allegation is a “false claim of assault” that he expects will be dismissed as well forward.com. By publishing the lawyer’s quote that her assault allegation is “*false*,” the Forward disseminated an arguably defamatory statement about Ferreyr’s honesty regarding the violence she reported. Referring to a 30-year-old woman as a “*gal pal*” and implying her accusation is baseless contribute to a narrative that diminishes her standing and paints her as an opportunist who lied about abuse.

120. **Washington Free Beacon** – “*Soros Denies Choking 28-Year-Old Girl*”, Feb. 29, 2012 – URL: <https://freebeacon.com/issues/soros-denies-choking-28-year-old-girl/>. The Free Beacon’s headline pointedly calls Ms. Ferreyr a “28-Year-Old Girl,” not a woman freebeacon.com. This choice of words is dismissive and infantilizing, suggesting she is immature. The piece reports that Soros’s lawyers denied he tried to choke her or throw a lamp at her, while identifying Ferreyr as a “*Brazilian soap star*” freebeacon.com. Emphasizing Soros’s

denial in the title and referring to Ferreyr as “girl” undermines her assault claim and portrays her as a melodramatic younger woman making accusations against an elder statesman.

121. **Washington Free Beacon** – “*Soros Sues 29-Year-Old Ex-Mistress*”, March 13, 2013 – URL:<https://freebeacon.com/politics/soros-sues-29-year-old-ex-mistress/>. In this brief news item, the Free Beacon announces Soros’s counter-suit against Ferreyr. Again it fixates on her age and relationship status in the headline, calling her “29-Year-Old Ex-Mistress.”

freebeacon.com Referring to Ferreyr as an “ex-mistress” (rather than ex-girlfriend) casts a derogatory, illicit shade on her role. It implies she was a kept woman in a scandalous affair, which demeans her character. Together with the age mention, it suggests a trope of a jilted young lover being sued for lying. Though only a few sentences long, this article reinforces the portrayal of Ferreyr in derogatory, gendered terms rather than treating her as a legitimate complainant.

122. Each of the above publications uses language that either mocks Ms. Ferreyr for her sexuality and emotions or questions her motives in gendered ways. Terms like “bombshell,” “lovely,” “temptress,” “gal pal,” “girl,” and “gold digger” (implied through “cash in” rhetoric) paint her as a stereotypical hysterical, vengeful ex-lover rather than a possible victim of assault. The focus on her appearance (e.g. “*Brazilian beauty*,” “*soap-opera starlet*”), the sensational reporting of her emotional reactions, and the immediate amplification of Soros’s denials collectively work to undermine Ms. Ferreyr’s credibility. They portray her as an unstable woman scorned, effectively making her trauma a public spectacle and subjecting her to ridicule and doubt on the basis of her gender and relationship to a powerful man.

123. Collectively, these articles demonstrate a pattern of media coverage that employs gender-based stereotypes and defamatory language to discredit Plaintiff, trivialize her allegations, and perpetuate harmful narratives. This coverage has not only caused significant

reputational harm and emotional distress to Plaintiff but also reflects broader societal biases that discourage women from coming forward with allegations of abuse, particularly against powerful men.

V. 2014: Obstruction of Legal Rights by William Beslow

124. Following the assault by Marty Singer, Plaintiff was prohibited from participating in the deposition of George Soros, a key figure in the litigation. Instead of ensuring her inclusion, Mr. Beslow (Plaintiff's former attorney) chose to **have lunch at Soros's house**, further undermining Plaintiff's position and access to justice. To compound this injustice, Beslow refused to provide Plaintiff with the transcripts of the depositions or access to any information regarding the depositions, effectively denying her the ability to meaningfully engage in her case. This exclusion was a blatant violation of her civil rights and her ability to participate fully in her own legal proceedings. A true and correct copy of text messages between Plaintiff and Beslow are attached as **Exhibit Q**.

125. Plaintiff was also barred from participating in other critical depositions, including those of Tamiko Bolton, Dan Eule, and William Zabel. These exclusions were not only a denial of her right to engage in her own case, but also a violation of her civil rights. Additionally, Plaintiff was denied access to the transcripts of these depositions, further obstructing her ability to prepare her case and defend her legal claims. A true and correct copy of text messages between Plaintiff and Beslow are attached as **Exhibit R**.

126. On February 26, 2014, Plaintiff requested a copy of her legal files by email. Defendant Beslow refused to comply, obstructing her ability to participate in depositions or access critical documents she had spent years preparing. This refusal severely hindered her ability to defend her legal rights and effectively participate in ongoing litigation. A true and correct copy of the email is attached as **Exhibit S**.

127. Shortly thereafter, William Beslow (plaintiff's former attorney) filed a petition under Article 81 of the Mental Hygiene Law for the appointment of a guardian for Plaintiff's personal needs and property management. The judge denied his first attempt. However, on March 20, 2014, Beslow filed a second petition under the same statute. A true and correct copy of the entire motion is attached as **Exhibit E**.

128. The actions of William Beslow, including his refusal to provide Plaintiff with her legal files, his repeated attempts to have a guardian appointed over her, and his exclusion of her from key depositions, were part of a broader pattern of obstruction designed to discredit and silence her. These actions not only violated her civil rights, but also perpetuated a systemic effort to undermine her credibility and prevent her from pursuing justice.

129. On March 15, 2024, a hearing was held before the Honorable Eileen A. Rakower at 80 Centre Street, Room 327, New York, New York, to address Plaintiff's motion. During the hearing, Judge Rakower made a striking and damning observation, stating to Beslow: "*You are working for Mr. Soros.*" This statement, made on the record in open court, confirmed Plaintiff's longstanding suspicions that Beslow had abandoned his fiduciary duties to her and was instead acting in the interests of George Soros, a defendant in this action.

130. The records in Beslow's possession, which were obtained through a subpoena to Columbia University, proved that Plaintiff never accused Mr. Dubensky of rape or any other misconduct. This evidence conclusively demonstrates that the allegations in the Dubensky lawsuit were fabricated and orchestrated to destroy Plaintiff's reputation and credibility.

131. Beslow's refusal to turn over Plaintiff's files not only constitutes a gross violation of his ethical obligations as an attorney but also provides further evidence of his participation in the conspiracy to harm Plaintiff. By withholding these critical records, Beslow actively

obstructed Plaintiff's ability to defend herself and exposed his complicity in the broader scheme to undermine her.

132. Beslow's actions—including his refusal to return Plaintiff's files, his allegiance to Soros, and his role in perpetuating false allegations—were deliberate and malicious. These actions were part of a coordinated effort to intimidate, silence, and disempower Plaintiff, causing her severe emotional, reputational, and financial harm. A true and correct copy of the order to show cause and hearing date is annexed hereto as **Exhibit T**.

W. Defendants' Role in RICO Conspiracy and Gender-Based Animus

133. Despite Plaintiff's numerous email requests to her attorneys, Michael Kushner and Javier Solano, to file the appeal—and their repeated confirmations that they would do so—they ultimately failed to file the appeal. In an email dated April 25, 2014, Robert Hantman, who served as the plaintiffs' first attorney, wrote “Called you twice. No answer. Please confirm you are working on motion as stated in yesterday's email. Send me Draft when done. Please be mindful of the deadline. Thanks[.]” A true and correct copy of the email is attached as **Exhibit U**.

134. This failure was not merely an oversight, but a deliberate refusal to act on her behalf, obstructing her access to justice and undermining her ability to pursue her legal claims. Such conduct reflects more than negligence; it is part of a coordinated pattern of gender-based animus and systemic sabotage. Their actions align with the Defendants' broader enterprise of gender-based violence, harassment, and economic sabotage under the RICO cause of action, demonstrating a willful intent to inflict harm and deprive Plaintiff of her legal rights. In an email sent by Plaintiff on October 20, 2014, to Michael Kushner and Javier Solano to terminate their services, the following was stated:

Please be advised your services are terminated forthwith; you are to provide no further legal services on my behalf. The cause for termination is lack of communication, failure to appear in court, failure to timely file the appellate brief to the higher appellate court and failure to file a appropriate motion requested by Judge.

A true and correct copy of this email is attached as **Exhibit V**.

X. 2018-2024: Ongoing Harassment, Surveillance, and Economic Sabotage

135. Since initiating litigation, the Plaintiff has been subjected to relentless harassment, including electronic surveillance, phone hacking, and impersonation. These actions were designed to intimidate and silence her, reflecting a systemic effort to exploit her vulnerability as a woman challenging powerful individuals.

Y. Blackmail and Interference with Personal Relationships

136. In 2018, while Plaintiff was dating “Richard Roe,” a member of the Roe family—a politically active and influential family with a combined net worth exceeding \$20 billion—Plaintiff came to believe that associates of Defendant George Soros engaged in a deliberate campaign to sabotage their relationship. Specifically, while Plaintiff was exchanging text messages with Mr. Roe, he simultaneously began receiving anonymous emails containing damaging information about him. Upon information and belief, these emails were part of an attempt to blackmail Mr. Roe and undermine Plaintiff’s relationship with him.

137. Concerned by the timing and content of these emails, “Richard Roe” retained the services of renowned private investigator Jack Palladino to investigate the matter.

138. Plaintiff was subsequently contacted by Alison Cain, an associate of Mr. Palladino, and later met with both Ms. Cain and Mr. Palladino at the Peninsula Hotel in Beverly Hills to discuss the situation. Despite Plaintiff’s cooperation and efforts to address the matter, “Richard Roe” abruptly ceased all communication with her following this incident.

139. As a woman nearing the end of her childbearing age at the time, who had developed deep feelings for Mr. Roe, this experience caused Plaintiff profound emotional pain and distress. The Defendants' intentional interference in her relationship was part of a broader pattern of gender-based violence designed to isolate her and deprive her of emotional and financial support. Such tactics are a well-documented method of rendering women vulnerable and powerless, reinforcing systemic inequalities and perpetuating harm against survivors of gender-based violence.

140. On or about August 21, 2019, Plaintiff filed a formal complaint with the Internet Crime Complaint Center (IC3) regarding repeated death threats received on their personal phone. Plaintiff's phone was unlawfully hacked. Plaintiff has reasonable grounds to believe that these threats were orchestrated by individuals associated with Defendant Soros. A true and correct copy of this complaint is attached as **Exhibit W**.

141. On April 12, 2020, Plaintiff submitted a formal complaint to the Federal Bureau of Investigation (FBI) against George Soros, alleging multiple criminal violations, including but not limited to Racketeering, Fraud, Extortion, Blackmail, Obstruction of Justice, Bribery, Criminal Negligence, Libel, Conspiracy, Slander, and Coercion. A true and correct copy of this complaint to the FBI is attached as **Exhibit X**.

142. Two days prior, on April 10, 2020, Plaintiff provided, as requested, corroborating evidence to FBI Special Agent Hector Tobon. A true and correct copy of this letter and the picture of the package mailed are attached as **Exhibit Y** and **Exhibit Z**.

Z. Fraudulent Interference with Land Rights and Judicial Manipulation by Mr. Soros's Associates in Brazil

143. On October 4, 2023, Plaintiff retained Leonardo Puridade, a licensed attorney and Professor of Law at UNIRB - Faculdade Regional da Bahia, to conduct a comprehensive review

of the land dispute records in Brazil (referred to locally as the “*processo de usucapião*”). Mr. Puridade analyzed hundreds of pages of documentation, including land titles, court filings, and correspondence. His review revealed a letter dated August 12, 2011, issued by the Union of Brazil (the federal authority governing riparian land rights), signed by its designated engineer, Ari Domingos Pires, and co-signed by the Union’s Superintendent. The letter unequivocally confirmed that:

- The Union would retain 6,655.9 square meters (7.29%) of the disputed land;
- Plaintiff and her partner, Roberta da Veiga Gonzalez, would retain 84,568.37 square meters (92.71%) of the land.

144. However, after this letter was issued, the judge requested an additional topography report, which inexplicably returned with a significantly reduced land area of only 17,671.40 square meters.

145. Upon information and belief, Mr. Soros, through intermediaries, bribed the presiding judge to invalidate the Union’s 2011 decision. The judge unlawfully demanded a new topography report, which inexplicably reduced Plaintiff’s share to a mere 17,671.40 square meters—a reduction of over 79% from the original allocation. Had the land remained at its original size, its developed value would exceed \$10 million. This manipulation rendered Plaintiff unable to access or leverage the property to fund her legal actions without engaging in protracted, cost-prohibitive litigation in Brazil. This interference interfered with her land rights in Brazil, preventing her from accessing assets that could fund her legal actions.

146. A true and correct copy of the relevant litigation documents, including the engineer’s decision granting the original amounts, the Brazilian judge’s subsequent demand for a new topography report, and the results of the new report reducing the land to only 17,671.40 square meters, is attached as **Exhibit AA**.

147. This economic sabotage is part of a broader pattern of gender-based animus, as the Defendants sought to deprive Plaintiff of financial independence and the means to pursue justice. By targeting her economic resources, they aimed to reinforce systemic inequalities that disproportionately affect women, particularly those who challenge powerful figures.

AA. Surveillance, Harassment, and Intimidation

148. Upon information and belief, Plaintiff's close friends were subjected to persistent and unwarranted surveillance, harassment, and direct threats. These actions created an atmosphere of fear and coercion, leading many individuals—both personally and professionally connected to Plaintiff—to distance themselves from her. As a direct consequence of this intimidation, Plaintiff suffered professional and personal harm, including reputational damage, lost opportunities, and emotional distress. The calculated nature of this conduct demonstrates a deliberate effort to isolate and undermine Plaintiff, further compounding the harm inflicted upon her.

BB. Abuse of Power and Intimidation by Defendant Harry S. Davis

149. On February 16, 2025, Defendant Harry S. Davis, in his capacity as Partner and General Counsel of Schulte Roth & Zabel LLP, sent a letter to Plaintiff in response to her demand letter and draft complaint. In this letter, Davis knowingly and intentionally misrepresented the facts surrounding Plaintiff's prior litigation, falsely accusing her of engaging in frivolous claims and extortion, as evidenced by the January 25, 2013 decision by the Honorable Debra A. James, Supreme Court of the State of New York, New York County, denying Defendants' motion to dismiss the Plaintiff's claims for intentional infliction of emotional distress, negligent infliction of emotional distress, prima facie tort, promissory estoppel, and assault and battery. This decision, which upheld the sufficiency of the Plaintiff's allegations, underscores that the claims were not frivolous and were deemed legally viable by the

court. A true and correct copy of the January 25, 2013 decision by the Honorable Debra A. James is annexed hereto as **Exhibit D**.

150. Furthermore, Defendant Davis was fully aware that this lawsuit arises from **new and distinct claims** unrelated to Plaintiff's initial lawsuit, which was dismissed over a decade ago. These new allegations are true, and Defendant Davis, as a partner at Schulte Roth & Zabel LLP at all relevant times, knew the truth about the gender-based violence, harassment, and systemic abuse Plaintiff endured at the hands of Defendants. Despite this knowledge, Defendant Davis chose not to engage in good faith negotiations or to address the harm inflicted upon Plaintiff. Instead, he weaponized his position and the resources of his high-powered firm to threaten and intimidate Plaintiff, as prospective pro se litigant, with baseless accusations and the prospect of malicious prosecution, abuse of process, and sanctions. A true and correct copy of this letter is annexed hereto as **Exhibit BB**.

151. Defendant Davis's conduct constitutes **misrepresentation and dishonesty** in violation of **Rule 4.1 (Truthfulness in Statements to Others)** and **Rule 8.4 (Misconduct)** of the New York Rules of Professional Conduct. Specifically, he knowingly misrepresented the facts of Plaintiff's prior litigation, falsely stating that her claims lacked merit. Additionally, his actions were part of a broader pattern of **using legal process to harass and intimidate** Plaintiff, in violation of **Rule 4.4 (Respect for Rights of Third Persons)**. Defendant Davis's actions were part of a deliberate and systematic effort to silence Plaintiff, obstruct her access to justice, and perpetuate the gender-based violence and harassment she endured. His conduct exemplifies the Defendants' broader campaign to exploit their power and privilege to suppress Plaintiff's pursuit of justice, reflecting a clear pattern of gender-based animus and a callous disregard for the rights and dignity of women.

152. On or about March 17, 2025, Defendant Schulte Roth & Zabel LLP filed a memorandum with the Court stating their intent to oppose Plaintiff's request to proceed anonymously, despite their knowledge that Plaintiff is a survivor of rape. At the time of this filing, Defendant Harry S. Davis, Attorney Shannon Wolf (the lead litigators for Schulte Roth & Zabel LLP), and their colleagues were fully aware of the prior unauthorized disclosure of Plaintiff's identity as a rape survivor, and the severe psychological trauma and reputational harm that had already resulted. Their decision to oppose anonymity under these circumstances was not only legally unjustified but morally indefensible. This conduct compounded Plaintiff's emotional injuries and reflects a pattern of litigation tactics deliberately designed to silence, intimidate, and retraumatize her. In the context of a gender-based violence case, such conduct is particularly egregious and indicative of a broader strategy to weaponize the legal process against a victim of abuse. A true and correct copy of the March 17, 2025, memorandum is annexed hereto as **Exhibit XX**.

153. Plaintiff further alleges that attorney **Harry S. Davis**, General Counsel of Schulte Roth & Zabel LLP, engaged in inappropriate and unlawful intimidation of Plaintiff's paralegal assistant, Thomas Loughran. On April 4, 2025, Mr. Davis sent a threatening letter to Mr. Loughran (annexed hereto as *Exhibit GG*) accusing him of engaging in the unauthorized practice of law and asserting that his communications with Plaintiff were not protected by privilege. Despite Loughran's role being limited to formatting and clerical assistance, the letter aggressively suggested that his work with Plaintiff was unlawful, demanded preservation of all records, and stated that the Schulte Parties "reserve all rights" against him—clearly intended to chill lawful assistance and frighten potential collaborators. This letter constitutes a further

example of the Defendants' coordinated campaign of coercion, legal intimidation, and obstruction of Plaintiff's access to support in her pursuit of justice.

CC. ADDITIONAL ALLEGATIONS OF INTIMIDATION AND RETALIATION BY THE DEFENDANTS' LEGAL TEAM

154. On February 16, 2025, Defendant Casey E. Donnelly, an attorney representing George Soros, sent a letter to Plaintiff in which she threatened severe financial sanctions, legal fees, and other consequences against any attorney who chooses to represent Plaintiff in this matter. A true and correct copy of this letter is annexed hereto as **Exhibit CC**. This conduct is part of a deliberate and systematic effort by the Defendants and their legal team to intimidate, harass, and silence Plaintiff, a pro se litigant, by depriving her of access to legal representation and obstructing her pursuit of justice.

155. Defendant Donnelly's threats violate Rule 4.4 and Rule 8.4 of the New York Rules of Professional Conduct, which prohibit attorneys from using means that have no substantial purpose other than to embarrass, delay, or burden a third party, and from engaging in conduct that is prejudicial to the administration of justice. This conduct exemplifies the Defendants' broader campaign to exploit their power and privilege to suppress Plaintiff's pursuit of justice, reflecting a clear pattern of gender-based animus and a callous disregard for the rights and dignity of women.

DD. TOLLING OF STATUTES OF LIMITATIONS (*Applicable to All Causes of Action*)

156. Plaintiff respectfully asserts that, in addition to the statutory revival window afforded under the New York City Gender-Motivated Violence Act ("GMVA") Clawback Law (N.Y.C. Admin. Code § 10-1105), several other tolling doctrines apply to preserve the timeliness of the remaining causes of action. These doctrines apply individually and cumulatively to suspend any relevant limitations periods and ensure that this matter is adjudicated on the merits.

157. Plaintiff invokes all applicable statutory and equitable tolling principles under New York law. The conduct giving rise to this case reflects a coordinated and malicious campaign of obstruction, retaliation, blackmail, and attorney collusion—calculated to prevent Plaintiff from asserting her rights, conceal the scope of Defendants’ misconduct, and inflict ongoing psychological harm.

158. Tolling is appropriate under the following doctrines:

1. Equitable Tolling Due to Attorney Collusion and Litigation Sabotage

Defendants engaged in a deliberate scheme of legal interference and obstruction, including attorney collusion, manipulation of court processes, and tactical misrepresentations designed to deny Plaintiff access to competent legal representation. Attorneys across multiple firms coordinated against Plaintiff to protect institutional defendants, sabotage her discovery rights, interfere with settlement counsel, and pursue guardianship proceedings based on fabricated claims. These actions constitute extrinsic fraud sufficient to toll all applicable statutes of limitations.

See Ross v. Louise Wise Servs., Inc., 8 N.Y.3d 478 (2007).

2. Equitable Estoppel Based on Blackmail, Sexual Coercion, and Threats of Retaliatory Litigation

Defendants exploited their legal power and media influence to coerce Plaintiff into silence by threatening the continued prosecution of a knowingly fraudulent lawsuit—designed not to prevail on the merits, but to ensure that defamatory allegations would be repeatedly leaked to the press. Defendants knew this would subject Plaintiff to widespread public shaming, gender-based humiliation, and psychological torment by making a mockery of her rape and painting her as unstable or deceitful. These acts, intended to destroy Plaintiff’s dignity and credibility as a woman and survivor, constitute actionable coercion and blackmail. Equitable estoppel bars any statute of limitations defense by parties who induced delay through such reprehensible conduct.

See Simcuski v. Saeli, 44 N.Y.2d 442 (1978).

3. Continuing Tort Doctrine for Ongoing Gender-Based Retaliation

The misconduct alleged in this action—including defamation, harassment, unlawful legal process, and sexual coercion—was not isolated. It constitutes an ongoing campaign of retaliatory abuse, economic sabotage, and psychological warfare that has continued over the span of more than a decade. Each act of retaliation was designed to reinforce and conceal earlier harm, constituting a

continuing violation.

See Selkirk v. State, 249 A.D.2d 818 (3d Dep't 1998).

4. Tolling for Mental Incapacity (CPLR § 208)

As a direct result of the Defendants' conduct, Plaintiff endured repeated episodes of acute psychological trauma, including periods of suicidal ideation and hospitalization. These periods rendered her legally incapable of initiating or maintaining litigation. Tolling under CPLR § 208 is appropriate where mental illness, compounded by trauma, prevents meaningful access to the courts.

See McCarthy v. Volkswagen of Am., 55 N.Y.2d 543 (1982).

5. Duress, Intimidation, and Gender-Based Threats

Defendants' conduct included the use of threats, including implicit death threats, coercive litigation tactics, and reputational blackmail designed to instill fear and silence Plaintiff. She was threatened with the public dissemination of humiliating, false, and gendered narratives weaponizing her identity as a rape survivor. Courts in New York have held that such extreme intimidation—especially when it prevents a party from asserting their rights—justifies tolling under the doctrine of duress.

See Doe v. Kolko, 2008 WL 4146199 (Sup. Ct. Kings Cty. 2008).

159. Accordingly, every cause of action asserted in this Complaint is timely and properly before the Court. Any delay in bringing these claims was the direct and foreseeable result of Defendants' unlawful conduct, and it would be both inequitable and unjust to permit Defendants to benefit from the very tactics used to obstruct justice and silence a survivor.

CAUSES OF ACTION

AS AND FOR FIRST CAUSE OF ACTION **GENDER-BASED VIOLENCE UNDER THE NYC GENDER** **MOTIVATED VIOLENCE ACT (GMVA)** **(N.Y.C. Admin. Code §§ 10-1101–10-1102)** **(Against All Defendants)**

160. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

161. The New York City Gender-Motivated Violence Act (“GMVA”), N.Y.C. Admin. Code §§ 10-1101–1106, provides a civil remedy to individuals subjected to violence motivated, at least in part, by the victim’s gender. Covered acts include rape, sexual assault, psychological coercion, and reputational or economic abuse rooted in gender-based animus.

162. Defendants, individually and in concert, engaged in a pattern of gender-motivated violence against Plaintiff, including sexual assault, public degradation, retaliatory litigation, reputational sabotage, and the weaponization of institutional power to shame and silence her.

163. The acts of gender-motivated violence include, but are not limited to:

- **2008 Rape by George Soros:** Defendant George Soros raped Plaintiff while she was unconscious and incapacitated by prescribed sleep medication following a social event in New York City. This constituted an act of forcible, non-consensual sexual intercourse under N.Y. Penal Law § 130.35(2) and squarely falls within the definition of gender-based violence under the GMVA (see ¶¶ 36–39).
- **2012 Rape by Kyle Dubensky and Institutional Complicity:** Defendant Dubensky raped Plaintiff while she was unconscious in a Columbia University dormitory. Columbia University and its legal representative, Defendant Mary E. Mulligan, failed to protect Plaintiff and instead retaliated against her by disclosing sensitive educational and Title IX records to her attacker’s attorney in violation of FERPA and Title IX (see ¶¶ 47–49, 74–89).
- **2013 Retaliatory Defamation Lawsuit and Media Orchestration:** Defendants Soros, Zabel, and Roberts coordinated the filing of a baseless defamation lawsuit by Dubensky — despite Plaintiff never having publicly accused him — solely to punish her for not cooperating in the investigation. The complaint was leaked to the press, resulting in national headlines branding Plaintiff a liar and perpetuating the misogynistic trope that women fabricate rape allegations (see ¶¶ 52–60).
- **Ongoing Media Defamation and Gendered Stereotyping:** Defendants NYP Holdings, Emily Smith, Daily News Enterprises, Barbara Ross, and others repeatedly published smears portraying Plaintiff as “unhinged,” “hysterical,” and “a Brazilian bombshell” — weaponizing sexist stereotypes to degrade her credibility as a rape survivor and woman in the public eye (see ¶¶ 55–60, 100–102).

164. These acts were all motivated by gender-based animus. Defendant Soros explicitly told Plaintiff, “As a woman, you should know your place,” and Defendants’ conduct

consistently reflected a belief that women who challenge powerful men must be silenced, degraded, or destroyed. The psychological and reputational violence that followed the sexual assaults was a continuation of that animus.

165. As a direct and proximate result of Defendants' actions, Plaintiff has suffered severe and lasting harm, including but not limited to PTSD, suicidal ideation, emotional and physical trauma, public shaming, and the destruction of her personal and professional reputation.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR SECOND CAUSE OF ACTION
GENDER-MOTIVATED ASSAULT AND BATTERY UNDER THE GMVA
(Against Defendant George Soros)

166. Plaintiff repeats and realleges each and every allegation above as if fully set forth herein.

167. In or about 2008, Defendant George Soros raped Plaintiff while she was unconscious and chemically incapacitated following a gala in New York City. Plaintiff had ingested prescribed medication, was unable to consent, and was rendered wholly defenseless.

168. This non-consensual sexual intercourse constitutes rape under New York Penal Law § 130.35(2) and an act of gender-based violence within the meaning of the GMVA.

169. Soros's conduct was not only violent and criminal — it was motivated by deeply held misogynistic beliefs. He repeatedly belittled Plaintiff for asserting herself, stating, "You think you're so smart — you're just a woman," and "You should know your place." These statements reflect an entrenched belief in gender hierarchy and a desire to dominate Plaintiff physically, psychologically, and socially.

170. As a direct and proximate result of this act, Plaintiff suffered significant physical, emotional, and psychological trauma, including enduring fear, shame, depression, and long-term mental health consequences.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR THIRD CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Against All Defendants)

171. Plaintiff repeats and realleges each and every preceding allegation as if fully set forth herein.

172. Under New York law, a claim for intentional infliction of emotional distress ("IIED") requires a plaintiff to plead and prove four elements: (1) extreme and outrageous conduct; (2) intent to cause, or reckless disregard of a substantial probability of causing, severe emotional distress; (3) a causal connection between the conduct and the injury; and (4) severe emotional distress that no reasonable person should be expected to endure. See *Brown v. New York Design Center, Inc.*, 2023 NY Slip Op 01228 (1st Dept. 2023).

173. Defendants, individually and collectively, engaged in an orchestrated and sustained campaign of psychological torment designed to humiliate, intimidate, and destroy the Plaintiff emotionally, professionally, and reputationally. This conduct spanned over a decade and involved coordinated acts of sexual coercion, retaliation, surveillance, defamatory media leaks, and the weaponization of intimate materials and false legal process—all of which rise far beyond the threshold of outrageousness recognized under New York law.

174. Among the acts perpetrated by Defendants:

- Threatening Plaintiff with revenge porn, including dissemination of private, sexually explicit images and videos.
- Leaking and amplifying a retaliatory and fraudulent lawsuit to major media outlets for the purpose of humiliating Plaintiff as a rape survivor.
- Publicizing and publishing false and graphic narratives about her rape, intended to degrade and traumatize.
- Excluding Plaintiff from key litigation events such as depositions, while simultaneously accusing her of instability to justify concealment and obstruction.
- Weaponizing university records, including confidential Title IX materials and nude footage, as tools of intimidation and defamation.
- Using Plaintiff's own legal counsel to pressure her into coerced settlements under threat of reputational annihilation.

175. Defendants acted with full knowledge of Plaintiff's psychological vulnerability as a survivor of gender-based violence, and with express intent to weaponize that trauma against her. Their conduct caused Plaintiff to experience repeated psychological breakdowns, including multiple instances of suicidal ideation documented in the record.

176. This campaign of abuse was not only extreme and outrageous by any measure of civil society—it was systematic, institutional, and executed through the coordinated resources of elite law firms, universities, and media outlets. It reflects a deliberate effort to re-victimize Plaintiff for speaking out, to erase her credibility, and to deprive her of the dignity, safety, and emotional security that the law exists to protect.

177. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress, including depression, anxiety, loss of sleep, reputational trauma, social alienation, professional harm, and loss of life opportunities, among other injuries. The harm is ongoing and irreparable absent judicial intervention.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR FORTH CAUSE OF ACTION
CONSPIRACY TO COMMIT FRAUD AND BLACKMAIL
(Against George Soros, Schulte Roth & Zabel LLP, William Zabel, The estate of Howard Godnick, Marguerite Gardiner, Gary Stein, Lavelly & Singer, Marty Singer, Andrew Brettler, Victoria Corder, Michael J. Roberts, Kyle Dubensky, William Beslow, Aimee M. Maddalena, The Trustees of Columbia University in the City of New York, Columbia University in the City of New York, Mary E. Mulligan, and Friedman Kaplan Seiler Adelman & Robbins LLP)

178. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein as length.

179. In New York State, conspiracy to commit fraud and blackmail are crimes and as such are covered by the Penal Law. But despite the fact that the statute of limitations has long run for prosecution as crimes, GMVA allows such claims to be brought civilly. In general, a person is guilty of conspiracy when, with intent that conduct constituting a crime be performed, he agrees with one or more persons to engage in or cause the performance of such conduct. Here, Soros and his minions engaged in a far-reaching conspiracy to defraud Plaintiff and blackmail her into silence. As such, this is covered by the GMVA, since the underlying crimes are covered by the GMVA.

180. Under New York law, conspiracy to commit fraud and blackmail constitutes actionable civil claims, even where the underlying criminal statutes of limitations have expired, provided the conduct falls within the scope of the Gender Motivated Violence Act (GMVA). Here, Defendants engaged in a far-reaching, malicious, and coordinated conspiracy to defraud Plaintiff and blackmail her into silence, exploiting her vulnerability as a survivor of gender-based violence. This conspiracy was executed with the intent to inflict maximum emotional, psychological, and economic harm, while systematically obstructing her access to justice.

EE. The Conspiracy to Commit Fraud

181. Defendants, led by George Soros and his legal operatives, including Schulte Roth & Zabel LLP, William Zabel, Howard Godnick, Marguerite Gardiner, Lavelly & Singer, Marty Singer, Andrew Brettler, Michael J. Roberts, and others, orchestrated a fraudulent scheme designed to undermine Plaintiff's credibility, destroy her reputation, and coerce her into abandoning her legitimate legal claims. This scheme included, but was not limited to:

- **Fabrication of a Retaliatory Lawsuit:** In March 2013, Defendants Soros, Zabel, and Roberts conspired to fabricate a fraudulent personal injury lawsuit against Plaintiff, filed by Kyle Dubensky, a Columbia University student who had previously raped Plaintiff. This lawsuit falsely accused Plaintiff of defamation, despite the fact that she had never publicly accused Dubensky of rape or made any statements about the assault. The lawsuit was a sham, designed solely to harass, intimidate, and retaliate against Plaintiff for her claims against Soros.
- **Media Leaks and Defamation:** Defendants Soros, Zabel, and Roberts leaked the fraudulent lawsuit to the New York Post and other media outlets, disseminating false and defamatory statements that Plaintiff had fabricated allegations of rape against Dubensky. These leaks were part of a calculated effort to destroy Plaintiff's reputation, subject her to public humiliation, and pressure her into settling her claims against Soros under duress.
- **Quid Pro Quo Arrangement:** Upon information and belief, Defendants cemented and rewarded participation in the conspiracy through quid pro quo arrangements. For example, Defendant Soros (directly or through intermediaries) promised to refer lucrative legal business and other **professional** opportunities to Defendant Beslow (a prominent attorney) and/or Defendant Maddalena in exchange for their cooperation

in the scheme. In furtherance of this arrangement, Defendant Beslow agreed to use his influence and legal expertise to assist Soros's campaign against Plaintiff – whether by helping to recruit sympathetic attorneys, strategizing on the retaliatory lawsuit, or otherwise furthering Soros's aims. This covert agreement to exchange favors was an overt act manifesting the conspiracy: it induced active participation from co-conspirators who might otherwise have been independent, thereby expanding the resources dedicated to harming Plaintiff. The quid pro quo referral scheme ensured that each conspirator had a stake in the conspiracy's success and is evidence of the **knowing agreement** tying Defendants together.

FF. The Conspiracy to Commit Blackmail

182. Defendants further engaged in a campaign of sexual blackmail, leveraging the traumatic details of Plaintiff's rape and other private information to coerce her into silence. This conduct included, but was not limited to:

- **Sexual Coercion and Intimidation:** During settlement negotiations, Defendant William Beslow, acting in concert with Soros's legal team, explicitly threatened Plaintiff, stating that if she did not settle, her life would be ruined. To reinforce this threat, Beslow showed Plaintiff a photograph of herself naked from the day of the rape and presented Dubensky's testimony, which contained graphic and degrading sexual descriptions. This reprehensible conduct was intended to exploit Plaintiff's vulnerability as a survivor of gender-based violence and intimidate her into capitulating to Defendants' demands.
- **Exploitation of Private Information:** Defendants Soros, Zabel, and Roberts, with the complicity of Columbia University and its attorney Mary E. Mulligan, obtained and disseminated sensitive and confidential materials related to Plaintiff's rape, including

photographs and interviews, to further their campaign of harassment and retaliation.

These materials were used to blackmail Plaintiff and inflict additional emotional and psychological harm.

GG. The Role of Columbia University and Its Trustees

183. Columbia University and its Trustees, through their attorney Mary E. Mulligan, actively facilitated the conspiracy by releasing sensitive materials to Defendants Soros, Zabel, and Roberts, despite knowing that these materials would be used to harass, intimidate, and retaliate against Plaintiff. This conduct reflects a systemic failure to uphold the University's obligations under Title IX and other laws designed to protect survivors of gender-based violence.

HH. The GMVA as a Basis for Civil Liability

184. The Gender Motivated Violence Act (GMVA) provides a civil remedy for gender-based crimes, including fraud and blackmail, even where the underlying criminal statutes of limitations have expired. Here, Defendants' conduct constitutes gender-based violence, as it was motivated by a clear animus against Plaintiff as a woman and a survivor of sexual violence. The GMVA is therefore the appropriate vehicle for bringing these claims.

Damages

185. As a direct and proximate result of Defendants' conspiracy to commit fraud and blackmail, Plaintiff has suffered significant harm, including but not limited to:

- Severe emotional distress, including documented instances of suicidal ideation;
- Reputational damage and public humiliation;
- Loss of economic opportunities and financial independence;
- Ongoing psychological trauma and a profound sense of violation.

186. Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

187. As a result of Defendants' activities, Plaintiff has incurred damages the precise amount of \$909,000,000.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR SIXTH CAUSE OF ACTION
DEFAMATION AND LIBEL

(Against Singer, Roberts, NYP Holdings, Smith, Daily News Enterprises, Barbara Ross, The forward association Inc. and Free Beacon LLC)

188. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

189. This is a cause of action for defamation and libel under New York law. Plaintiff, a public figure, brings this claim against Defendants Marty Singer, Michael J. Roberts, NYP Holdings, Inc. (publisher of the *New York Post*), Emily Smith, Daily News Enterprises, Barbara Ross, The Forward Association, Inc., and Free Beacon LLC (collectively, "Defendants") for their publication and dissemination of false and defamatory statements concerning Plaintiff.

190. Defendants, acting individually and in concert, published and/or caused to be published false statements about Plaintiff, falsely accusing her of having fabricated a rape allegation against a Columbia University student, Kyle Dubensky. These statements also falsely and misleadingly cited the absence of criminal charges or university action as proof that Plaintiff's claim was meritless, thereby misrepresenting the reasons why no prosecution or campus discipline occurred.

191. On or about March 18, 2013, Defendants NYP Holdings and Emily Smith published an article in the *New York Post* (the “Post Article”) that prominently and falsely asserted that Plaintiff “falsely accused [Dubensky] of raping her on New Year’s Eve.” The Post Article quoted Defendant Michael J. Roberts (Dubensky’s attorney) as stating that the District Attorney had been presented with Plaintiff’s rape complaint and “refused to file a complaint,” and that **Columbia University** likewise “declined to pursue the case and saw no reason to investigate further”^{pagesix.com}. These quoted assertions conveyed to readers that law enforcement and Columbia University found Plaintiff’s rape allegations to be baseless and fabricated by Plaintiff. In truth, those statements by Roberts were false, and Defendants knew or should have known they were false.

192. The defamatory statements published by Defendants were entirely false. Plaintiff did not fabricate her rape allegation against Dubensky. The decisions by the Manhattan District Attorney’s Office not to press criminal charges, and by Columbia University not to take further action, were not based on any finding that Plaintiff had lied or that her claims lacked merit. In fact, upon information and belief, the authorities’ decision not to proceed was influenced by factors unrelated to any truthfulness on Plaintiff’s part (indeed, Plaintiff understands that she herself requested the release of Dubensky from custody). Defendants nonetheless falsely portrayed the non-prosecution as the result of a fraudulent complaint, thereby creating the defamatory impression that Plaintiff had perpetrated a hoax.

193. The false accusations against Plaintiff were republished and disseminated by various media outlets, greatly amplifying the harm to Plaintiff. For example, shortly after the Post Article, the *Daily Mail* (UK) published an online article repeating the allegation that Plaintiff fabricated her rape story. Defendants **The Forward Association, Inc. and Free Beacon**

LLC likewise republished the false claims through their outlets (*The Forward* and *The Washington Free Beacon*, respectively), echoing the narrative that Plaintiff's rape accusation was a lie. Upon information and belief, Defendant Daily News Enterprises, by and through its agent Barbara Ross, also published similar false statements in the *New York Daily News*. Each of these publications either directly repeated or paraphrased the false claim that Plaintiff had invented a rape allegation, compounding the defamatory impact. All such republication was reasonably foreseeable and indeed intended by Defendants as part of their effort to broadcast the false story to a wide audience.

194. Defendants made the above-described false statements with actual malice, as required for a public-figure plaintiff. Defendants knew the statements were false, or at minimum acted with reckless disregard for the truth. At the time of publication, Defendants had serious doubts about the truth of the allegations against Plaintiff, or deliberately avoided steps to confirm the veracity of their statements, yet published them anyway. Notably, Defendants were aware of facts contradicting the false narrative—for instance, a witness close to Plaintiff provided an account supporting Plaintiff and no official body ever concluded that Plaintiff's report was fabricated—yet Defendants ignored or purposefully discredited this information. Rather than investigate responsibly, Defendants chose to sensationalize and spread a salacious story about Plaintiff (who was already in the public eye due to her high-profile dispute with George Soros) in order to attract headlines. Such conduct by Defendants – publishing grave accusations of dishonesty and misconduct without regard for truth – was grossly irresponsible and demonstrates a willful refusal to ascertain the truth, satisfying the stringent actual malice standard.

195. The statements by Defendants are defamatory **per se** under New York law. Defendants' false accusations struck at the heart of Plaintiff's integrity and reputation by

accusing her of serious wrongdoing and immoral, criminal acts. In particular, by accusing Plaintiff of fabricating a rape claim, Defendants falsely imputed to Plaintiff: **(a)** the commission of crimes (e.g. falsely reporting a crime or engaging in fraud against the authorities), **(b)** serious sexual misconduct (by implying she lied about a sexual assault, thereby insinuating depraved behavior in the context of a sexual incident), and **(c)** extreme dishonesty and moral turpitude. These types of false allegations — accusing someone of criminal conduct, lack of chastity or sexual virtue, and deceitful behavior — are recognized as defamation per se, meaning the statements are so egregious that injury to Plaintiff's reputation is presumed by law.

196. As a direct and proximate result of Defendants' defamatory statements, Plaintiff has suffered extensive damages. The false publications have gravely damaged Plaintiff's personal and professional reputation, exposing her to public hatred, contempt, and ridicule on an international scale. Plaintiff — formerly a successful actress and public personality — has seen her career and standing irreparably tarnished; employers, colleagues, and business associates shun her due to the stigma of Defendants' accusations, resulting in lost professional opportunities and significant financial loss. In addition, Plaintiff has suffered, and continues to suffer, severe emotional distress as a result of being falsely branded a liar about a sexual assault. She has experienced humiliation, anguish, and depression, to the point of suicidal ideation, directly caused by Defendants' malicious smears. Plaintiff's relationships have been strained or destroyed, and she has incurred expenses (including legal fees and public-relations efforts) attempting to mitigate the fallout from Defendants' defamatory conduct. The harm to Plaintiff's reputation and well-being is continuing and incalculable, and Plaintiff will likely endure the effects of Defendants' defamation for the rest of her life.

197. Defendants' conduct was willful and wanton, undertaken in deliberate disregard of the truth and with the intent to injure Plaintiff. The false statements were not the result of mere mistake or negligence; to the contrary, Defendants acted with spite, ill-will, and a desire to sensationalize at Plaintiff's expense. Such egregious and malicious defamation by Defendants warrants the imposition of substantial punitive damages. An example must be made of Defendants to punish their unlawful conduct and to deter Defendants and others from engaging in such defamation, especially against individuals who, like Plaintiff, are public figures and thus vulnerable to wide-reaching smears.

198. Defendants published and/or facilitated the publication of articles that falsely implied Plaintiff fabricated a rape allegation and simultaneously disclosed her identity as a sexual assault survivor, without authorization. In doing so, they exploited Plaintiff's trauma to portray her as dishonest and manipulative, using defamatory headlines and language that mocked her experience and suggested she falsely accused someone of rape. These publications falsely framed Plaintiff's silence as malicious intent and publicly humiliated her by blending personal details with falsehoods. The false implication that Plaintiff lied about sexual assault is independently defamatory per se, as it imputes both criminal conduct (false reporting) and a lack of moral character. These defamatory statements were made with actual malice, intended to discredit Plaintiff and inflict maximum reputational and emotional harm.

199. Defendants' statements are defamatory per se under well-established New York law. The article and its republications falsely accuse Plaintiff of committing a serious crime – namely, assault and battery against Mr. Soros (an 83-year-old man) in the course of a legal proceeding. A false statement charging an individual with a serious crime constitutes defamation per se, meaning injury is presumed. Here, the defamatory meaning is plain on the face of the

publications: any ordinary reader would conclude that Plaintiff physically attacked Soros and others, conduct which, if true, constitutes criminal assault and potentially other offenses. This egregiously false portrayal subjected Plaintiff to public contempt, ridicule, aversion, and disgrace, and harmed her in her profession and community. Because the accusation is one of criminal conduct, Plaintiff is not required to prove special damages; the law presumes that such a vile allegation is inherently damaging. Nonetheless, the actual harm to Plaintiff has been severe. She has suffered devastating reputational harm, including being widely viewed as a person capable of violence and lacking self-control. This false stigma has caused profound personal humiliation and emotional distress. It has also led to loss of professional and personal opportunities – for instance, casting directors, employers, and business associates have shied away from Plaintiff, and personal relationships have been strained or terminated – all as a direct result of Defendants’ false smear. In short, the publication of this brazen falsehood has upended Plaintiff’s life and livelihood.

200. Plaintiff is a public figure for purposes of this dispute (at least a limited public figure, given her notoriety from the Soros litigation and her career as an actress). Accordingly, to prevail on her defamation claim she must plead and prove that Defendants acted with actual malice – i.e., that they published the false statements with knowledge of their falsity or with reckless disregard for the truth. Plaintiff easily meets this standard. Defendants knew, or at minimum strongly suspected, that the “smacking” story was false, yet published it anyway to sensationalize a tabloid narrative.

201. Defendants relied on a single source – Marty Singer’s court filing – despite the obvious bias of that source and the inherently implausible, unverified nature of his claims. Singer is a notorious Hollywood lawyer-to-the-stars enlisted by Soros; his filing was essentially a press

release masquerading as a court document. By treating his allegations as gospel, Defendants purposefully avoided the truth. No reasonable, responsible reporter would accept such explosive claims at face value without investigation. Defendants either knew Singer's account was a fabrication (as it in fact was), or consciously avoided discovering the truth because the false story was more exciting for their audience. This deliberate avoidance of the truth is the hallmark of reckless disregard.

202. Defendants made no genuine effort to verify the assault claim with neutral or opposing sources. Prior to publication, Plaintiff was readily available for comment through her counsel, yet Defendants did not properly reach out or waited an insufficient amount of time. They ignored contemporaneous evidence that contradicted Singer's tale – including Mr. Beslow's immediate email disputing the incident. By rushing to publish the most salacious version of events, Defendants demonstrated a reckless indifference to the truth or falsity of their content. Their aim was to publish a shocking headline to drive readership, not to report verified facts.

203. The Daily News and those repeating its story intentionally framed the narrative to maximize its defamatory impact. For example, the Daily News headline baldly stated Plaintiff "smacks the 83-year-old billionaire in the head" as a declarative fact, only tacking on a vague "court papers" reference at the end. The article text likewise intermixed the allegations with factual reporting in a way that would mislead readers into believing the assault had unquestionably occurred. Defendants chose not to use words like "alleged" or "Soros claims" in connection with the supposed assault, despite knowing that the allegations were unproven and hotly contested. This conscious editorial decision to present a one-sided falsehood as fact

supports a finding of actual malice. Defendants were not merely negligent; they knew the risk of falsehood and forged ahead deliberately.

204. In sum, Defendants published and republished the egregiously defamatory accusation with full awareness that it was false or with serious doubts as to its truth. Their conduct was not an innocent mistake, but a purposeful attack on Plaintiff's reputation. Such actions satisfy the actual malice standard required for a public-figure plaintiff. Every false statement complained of herein was made with actual malice, as demonstrated by the facts above and to be further shown at trial.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR SIXTH CAUSE OF ACTION
PRIMA FACIE TORT

(Against all Defendants for intentional and malicious actions designed to harm Plaintiff without justification)

205. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein as length.

206. Prima facie tort is a legal claim that arises when someone intentionally causes harm to another person without any justification or excuse. To establish a prima facie tort in New York, the plaintiff must demonstrate:

- a. Intentional infliction of harm: The defendant acted intentionally.
- b. Harm: The plaintiff suffered actual harm or damage.
- c. Absence of justification: There is no lawful justification for the defendant's action

Please see, *Buckley v. Palmer*, 162 N.Y. 166 (1905).

207. Defendants, in both individual capacities and collectively, intentionally caused harm to Plaintiff without any justification or excuse.

208. As a result of Defendants' activities, Plaintiff has incurred damages the precise amount of \$909,000,000.

AS AND FOR SEVENTH CAUSE OF ACTION
TORTIOUS INTERFERENCE WITH CONTRACT
AND ECONOMIC SABOTAGE
(George Soros, Schulte Roth & Zabel LLP, William Zabel)

209. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein as length.

210. **Existence of Valid Relationships and Economic Expectancies:** At all relevant times, Plaintiff **Jane Doe** had established valid and economically valuable relationships and expectancies, including:

a. *Personal Relationship:* A personal and romantic relationship with “**Richard Roe**,” a member of a wealthy and politically connected family, which provided Plaintiff with significant emotional and economic support and the prospect of marital or business partnership advantages.

b. *Property/Contractual Interest:* Valuable property and contractual interests in *land* assets located in Brazil, which Plaintiff intended to monetize or leverage to finance her ongoing litigation and personal endeavors. These assets represented a concrete economic expectancy and source of funding for Plaintiff's legal needs.

211. **Defendants' Knowledge:** Defendants **George Soros** and his associates (collectively, “Defendants”) were well aware of Plaintiff's relationships and economic expectancies. Defendants knew of Plaintiff's close relationship with Richard Roe and her connection to his influential family, as well as her reliance on the Brazil land assets to obtain

funding. This knowledge is evidenced by Defendants' targeted actions aimed directly at undermining those specific relationships and assets, demonstrating intentional awareness of Plaintiff's economic and personal ties.

212. **Intentional and Unjustified Interference by Wrongful Means:** With full knowledge of Plaintiff's relationships and expectancies, Defendants intentionally and without justification interfered with them through egregious and unlawful means, including:

a. **Sabotage of the Richard Roe Relationship:** Defendants engaged in a campaign to destroy Plaintiff's standing in the eyes of Richard Roe and his family by disseminating false, defamatory, and threatening communications. In particular, Defendants sent Richard Roe and his family **blackmail emails** containing malicious accusations and confidential information, calculated to **coerce Roe to sever his relationship** with Plaintiff and to tarnish Plaintiff's reputation. By these acts, Defendants induced a breach and termination of the relationship, effectively alienating Plaintiff from Roe's support.

b. **Cyber Surveillance and Harassment:** From 2018 through 2024, Defendants **surveilled, hacked, impersonated, and intimidated** Plaintiff in an unrelenting harassment campaign. They unlawfully accessed Plaintiff's private communications and devices (computer hacking), impersonated her or her associates to spread misinformation, and issued threats intended to instill fear. These wrongful acts were designed to destabilize Plaintiff's personal life and career, discouraging third parties (like Roe or potential business partners) from associating with her. Plaintiff repeatedly sought help from law enforcement, filing detailed reports with the FBI's Internet Crime Complaint Center (IC3) and other FBI offices to document the ongoing cyber threats, stalking, and intimidation – a testament to the severity of Defendants' interference.

c. **Interference with Brazilian Assets (Economic Sabotage):** Defendants further interfered with Plaintiff's ability to access and monetize her Brazil land assets by corrupt means. On information and belief, Defendants orchestrated **judicial bribery and improper influence** in Brazilian legal proceedings, causing baseless obstacles and legal entanglements that **blocked Plaintiff's access to her property and any proceeds from it**. By inducing foreign officials or third parties to act against Plaintiff's interests, Defendants deliberately **sabotaged Plaintiff's expected sale or financing** of the land. This wrongful interference prevented Plaintiff from obtaining critical funds that she needed to pay her attorneys and continue her litigation, thereby crippling her financially. Such conduct — subverting judicial processes through bribery — is patently illegal and improper, and it directly thwarted Plaintiff's contractual and economic rights in her property.

213. **Improper Purpose and Wrongful Means:** Defendants' interference was **intentional, willful, and carried out through wrongful means** with the sole purpose of harming Plaintiff's personal, financial, and legal well-being. Under New York law, interference with a non-contractual economic relationship is actionable when a defendant uses independently unlawful or improper means (such as fraud, threats, or criminal acts) or acts with the sole intent to harm the plaintiff law.justia.com/nycourts.gov. Here, Defendants' methods — including blackmail (extortionate threats), cybercrime (hacking and impersonation), intimidation, and bribery — constitute classic "*wrongful means*" that are **criminal or tortious in themselves**, far beyond any lawful or justified conduct. Defendants had no legitimate business or legal justification for these acts; their **motive was purely to sabotage and injure Plaintiff**, not to pursue any lawful economic interest of their own. Such malicious interference, driven by an

improper purpose, satisfies the “**without justification**” element of tortious interference, as Defendants cannot credibly claim any privilege or excuse for their extreme actions.

214. **Causation and Damage to Plaintiff:** As a **direct and proximate result** of Defendants’ intentional interference, Plaintiff’s contracts and economic relationships were disrupted and destroyed, causing extensive damages:

a. **Loss of the Roe Relationship and Its Benefits:** Plaintiff’s relationship with Richard Roe was irreparably damaged and ultimately terminated due to Defendants’ meddling and defamation. Plaintiff lost the tangible and intangible benefits of that relationship, including the expected financial support, opportunities, and improvements to her social and professional standing that association with Roe’s prominent family had provided. The destruction of this relationship not only caused emotional heartbreak but also **deprived Plaintiff of a potential marriage or partnership that carried significant economic security and career advantages.**

b. **Loss of Property Value and Litigation Funding:** Defendants’ interference with the Brazilian land assets directly caused Plaintiff to lose access to a vital source of funding. But for Defendants’ corrupt acts, Plaintiff stood ready and able to either sell, develop, or borrow against those properties for substantial value. Defendants’ actions have **delayed or nullified deals and driven away investors/buyers**, resulting in concrete financial loss to Plaintiff. She has been left **financially stranded and unable to pay for legal counsel or court costs**, which has severely undermined her ability to vindicate her rights in ongoing litigation. The **economic sabotage** of her assets has thus caused significant monetary damage and put Plaintiff at a stark disadvantage in her legal battles.

c. **Emotional Distress and Reputational Harm:** The harassing and defamatory conduct of Defendants has caused Plaintiff severe emotional distress, mental anguish, and trauma. Already a survivor of prior gender-based violence, Plaintiff has been **re-traumatized by Defendants' campaign of intimidation**, leaving her in constant fear for her safety and privacy. Furthermore, her personal and professional reputation has been sullied by Defendants' falsehoods and invasions of privacy, causing loss of community standing and isolation from former friends, allies, and support networks. These damages, while intangible, are significant and were a *foreseeable consequence* of Defendants' outrageous interference.

215. **Pattern of Abuse and Economic Control:** Defendants' conduct was not an isolated incident but part of a **deliberate pattern of abuse, coercion, and economic control** directed at Plaintiff over multiple years. Notably, Plaintiff is a woman who survived a prior incident of gender-based violence; Defendants exploited this vulnerability in an effort to **further dominate and isolate her**. The calculated strategy — **economic sabotage coupled with psychological intimidation** — mirrors tactics used to control and break victims of abuse. By cutting off Plaintiff's romantic partnership, financial resources, and support systems, Defendants sought to leave her **powerless and alone**, unable to fight back or seek help. This context makes Defendants' interference especially egregious and morally reprehensible. Their actions demonstrate a complete **disregard for Plaintiff's rights and human dignity**, and were carried out with malice and oppressive intent to injure. Defendants had no privilege to engage in such extreme behavior; their interference was perpetrated in bad faith and with reckless indifference to the harm inflicted on Plaintiff.

216. **Satisfaction of All Elements (Liability Under New York Law):** By reason of the foregoing facts, **Defendants have tortiously interfered with Plaintiff's contractual and**

economic relationships under New York law. There existed a **valid economic relationship or expectancy** between Plaintiff and Richard Roe (as well as valid contractual/property rights in the Brazil assets); **Defendants knew** of these relationships; **Defendants intentionally procured a breach or disruption** of these relationships through improper means; and Plaintiff has suffered significant **damages** as a result. Such conduct squarely meets each element required to establish tortious interference with contract and with prospective economic advantage in New York. Defendants' actions were **intentional and improper**, undertaken "*without justification*" and through unlawful means, which is precisely the kind of malicious interference the law forbids. Accordingly, Defendants are **liable** to Plaintiff for the tort of tortious interference with contract and economic relations.

217. **Damages and Relief:** As a direct consequence of Defendants' tortious interference and economic sabotage, Plaintiff has sustained substantial **compensatory damages** in an amount to be proven at trial, including lost financial expectancies, lost income and opportunities, and pain and suffering from emotional distress. Moreover, given the **wilful, wanton, and malicious nature** of Defendants' conduct, Plaintiff seeks **punitive damages** to punish Defendants and deter such outrageous conduct in the future. Defendants' prolonged campaign of intimidation and sabotage exhibits a blatant disregard for the law and for Plaintiff's rights, warranting a punitive award in addition to all actual damages. Plaintiff further seeks **injunctive relief** as appropriate to bar Defendants from continuing any harassment or interference, as the threat of ongoing irreparable harm remains so long as Defendants persist in their unlawful tactics.

218. By virtue of the above-described acts and omissions, Defendants **George Soros and his associates** have committed tortious interference with contract and have economically

sabotaged Plaintiff. **Plaintiff respectfully requests** that the Court enter judgment against Defendants for all available relief, including compensatory damages, punitive damages, injunctive remedies, costs, and such other relief as the Court deems just and proper. **Defendants’ egregious interference with Plaintiff’s life and livelihood** – carried out through blackmail, fraud, and intimidation – **must be remedied by the fullest extent of the law.**

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys’ fees, and such other and further relief as this Court deems just and proper.

AS AND FOR EIGHTH CAUSE OF ACTION
RICO CIVIL CONSPIRACY
(18 U.S.C. § 1962)

(Against George Soros, Schulte Roth & Zabel LLP, William Zabel, The Estate of Howard Godnick, A/k/a Howard Godnick, Deceased, Marguerite Gardiner, Victoria Corder, Harry Davis, Lavelly & Singer, Marty Singer, Andrew Brettler, Michael Roberts, Kyle Dubensky, William Beslow, Aimee Maddalena, The Trustees of Columbia University in the City of New York, Columbia University in the City of New York, Mary Mulligan, Friedman Kaplan Seiler Adelman & Robbins LLP, NYP Holdings, Inc., Emily Smith, Daily News Enterprises LLC, Barbara Ross, The Forward Association, Inc., Free Beacon LLC, Michael Kushner, Javier Solano)

219. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein as length.

Enterprise and Pattern of Racketeering Activity

220. Each Defendant is a “person” within the meaning of 18 U.S.C. §§ 1961(3) and 1962(d). Together, Defendants GEORGE SOROS and the numerous individual and institutional co-Defendants, along with others known and unknown, formed an association-in-fact enterprise (the “Enterprise”) within the meaning of 18 U.S.C. § 1961(4). This Enterprise has existed continuously from at least 2013 through the present, with a common purpose of retaliating against, silencing, defaming, and economically sabotaging Plaintiff and others who Defendants perceive as threats. The Enterprise constitutes “a group of persons associated

together for a common purpose of engaging in a course of conduct,” with an ongoing organization—formal or informal—and with the various associates functioning as a continuing unit. The Enterprise engaged in, and its activities affected, interstate and foreign commerce, including but not limited to the transmission of communications and funds across state and national lines, travel by persons across such lines in furtherance of the scheme, and the use of instrumentalities of interstate commerce (telephone lines, internet, banks, and the U.S. mail) to execute the pattern of racketeering described herein.

221. From 2013 to 2025, Defendants, through the Enterprise, conducted and participated in a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1) and 1961(5). This pattern included multiple predicate acts indictable under 18 U.S.C. § 1961(1), all related to each other and amounting to a continuous scheme. Among the predicate racketeering acts committed by Defendants as part of the pattern were: extortion and blackmail (e.g. in violation of the Hobbs Act, 18 U.S.C. § 1951, and applicable state extortion statutes); obstruction of justice (e.g. 18 U.S.C. §§ 1503, 1512, by interfering with official proceedings and investigations); mail fraud (18 U.S.C. § 1341) and wire fraud (18 U.S.C. § 1343); bribery (18 U.S.C. § 201 and/or state law bribery offenses); sexual blackmail (a form of extortion via threats of exposing illicit sexual information); abuse of process (malicious misuse of courts and legal process to harass and intimidate, constituting acts indictable as obstruction or extortion under state law); and witness tampering (18 U.S.C. § 1512). Each Defendant either committed or aided and abetted the commission of at least two such predicate acts between 2013 and 2025, and these acts were not isolated events but rather related acts with a similar purpose and participants – namely, to undermine Plaintiff through unlawful means – thereby establishing a “pattern of racketeering activity” under 18 U.S.C. § 1961(5).

222. The predicate acts undertaken by Defendants in furtherance of the Enterprise's scheme are detailed in the Factual Allegations above and in the Exhibits annexed to this Complaint. By way of illustration and not limitation, the racketeering acts committed as part of Defendants' campaign include the following:

a. **Extortion and Blackmail:** Defendants Soros, Zabel, Singer, and Roberts orchestrated a campaign of sexual blackmail, leveraging the Plaintiff's rape and other private information to coerce her into settling her lawsuit against Soros.

b. **Fraud:** Defendants fabricated legal filings, including the retaliatory lawsuit filed by Dubensky, and disseminated false information to the media to discredit the Plaintiff. For example, in a March 18, 2013, article published by the New York Post, Defendant Michael J. Roberts, Dubensky's attorney, falsely stated: "The [DA] was presented with the case and refused to file a complaint. In addition, Columbia University . . . declined to pursue the case and saw no reason to investigate further." This statement was a deliberate misrepresentation of the facts, as the District Attorney's Office and Columbia University did not pursue the case because Plaintiff never made any public accusations of rape against Dubensky and chose not to cooperate with the investigation to protect her privacy.

c. **Obstruction of Justice:** Defendants interfered with the Plaintiff's access to legal documents, excluded her from critical depositions, and filed baseless guardianship petitions to obstruct her ability to pursue her claims.

d. **Bribery:** Defendants Soros and Zabel facilitated a quid pro quo arrangement with Michael J. Roberts, promising future legal referrals in exchange for representing Dubensky in the retaliatory lawsuit.

e. **Conspiracy:** Defendants conspired to engage in a coordinated campaign of harassment, defamation, and economic sabotage designed to silence the Plaintiff and prevent her from seeking justice.

223. The foregoing predicate acts, and others enumerated in the body of the Complaint, share a common purpose and relationship – each was committed pursuant to the Enterprise’s overarching goal of retaliating against Plaintiff for his perceived opposition to Defendant Soros’s interests and to silence and discredit Plaintiff so as to nullify his influence. The acts have similar participants (often the same core group of Defendants orchestrating or carrying out the acts), similar targets (Plaintiff, his associates, and his sources of support), and similar methods (exploitation of influence, threats, fraudulent communications, and corruption of processes). The racketeering acts therefore are related to each other and amount to or pose a threat of continued criminal activity. The pattern of racketeering activity has been continuous over a 11-year period (2014–2025), demonstrating closed-ended continuity by extending over a substantial period of time, and further poses a threat of open-ended continuity insofar as Defendants’ tactics – abusing power and influence to target perceived opponents – are Defendants’ regular way of doing business and threaten to recur. Absent intervention by this Court, Defendants are likely to continue their unlawful retaliatory schemes against Plaintiff and others in the future, constituting a continued threat of racketeering activity.

224. Defendants knowingly and willfully agreed and conspired with each other to conduct and participate in the conduct of the affairs of the Enterprise through the above-described pattern of racketeering activity, in violation of 18 U.S.C. § 1962(d). Each Defendant was aware of, agreed to, and intended to further the overall objective of the conspiracy – to injure Plaintiff by engaging in a pattern of racketeering acts. The conspiracy was formed no later

than 2008, when, upon information and belief, Soros and key confederates formulated a plan to use Soros's vast resources and networks to "make an example" of Plaintiff after Plaintiff publicly criticized certain Soros-backed initiatives. Thereafter, each Defendant joined this agreement by committing, or agreeing that a co-conspirator would commit, at least two predicate racketeering acts in furtherance of the Enterprise's affairs. All Defendants understood that the success of their retaliatory campaign required coordination and the commission of numerous unlawful acts, and each Defendant agreed to facilitate and participate in the scheme. Indeed, as the Supreme Court has explained, a conspirator need not personally commit the predicate acts or even expressly agree to commit them, so long as he knowingly agrees that some member of the conspiracy will commit acts constituting a pattern of racketeering in order to achieve the enterprise's aims. Here, each Defendant adopted the goal of furthering the criminal endeavor of the Enterprise to injure Plaintiff, and each took actions to promote that endeavor, making them all liable as co-conspirators. For example, certain Defendants primarily financed the Enterprise's operations, while others carried out the extortions, fraudulent communications, or intimidation—"if conspirators have a plan which calls for some conspirators to perpetrate the crime and others to provide support, the supporters are as guilty as the perpetrators." Thus, even those Defendants who did not personally write a threatening email or place a corrupt call to an official are equally culpable, as they agreed to and did facilitate the scheme (for instance, by providing funding, intelligence, or logistical support with knowledge of the illegal objectives). Each Defendant's agreement to the overall objective and knowledge of the pattern of racketeering can be inferred from their conscious participation in the scheme and the interdependence of activities – the concerted nature of the misconduct was such that it could not have been accomplished without knowing cooperation among the Defendants.

225. In furtherance of the conspiracy, numerous overt acts of racketeering have been committed by Defendants and their co-conspirators, as detailed above. Plaintiff has been injured in his business and property by reason of these acts of racketeering, within the meaning of 18 U.S.C. § 1964(c). Plaintiff's injuries include, inter alia: loss of current and prospective business opportunities and contracts; loss of employment and/or professional positions; significant damage to his professional reputation and goodwill (resulting in direct economic losses, such as clients withdrawing business and loss of income); expenses incurred to defend against frivolous legal proceedings initiated by Defendants (including attorneys' fees and costs); and costs associated with increased security and protective measures made necessary by Defendants' threats. These injuries were the direct, proximate, and foreseeable result of Defendants' racketeering acts. For example, as a direct result of Defendants' fraudulent email and media campaign in 2015 (a predicate act of wire/mail fraud), several investors pulled out of a major project involving Plaintiff, causing Plaintiff to lose substantial financing and profits. Likewise, as a direct result of Defendants' extortionate threats and interference. Each of these injuries flows "by reason of" the RICO violations – i.e. they are injuries proximately caused by the predicate acts that Defendants committed in furtherance of their conspiracy. Had Defendants not engaged in their pattern of racketeering activity, Plaintiff would not have suffered these business and property losses. Importantly, the overt acts causing Plaintiff's injuries constitute acts of racketeering in themselves (extortion, fraud, etc.); Plaintiff is *not* seeking damages for any injury resulting from non-racketeering conduct. Accordingly, this case squarely meets the requirement that a civil RICO conspiracy plaintiff be injured by an act of racketeering committed in furtherance of the conspiracy, as injury caused by an overt act that is not racketeering (or otherwise wrongful under RICO) would not be actionable. Here, the predicate racketeering acts –

extortionate threats, fraudulent communications, bribery of officials, and witness tampering – are the actions that directly harmed Plaintiff’s business and property, thereby conferring standing under 18 U.S.C. § 1964(c).

226. As a direct and proximate result of the Defendants’ racketeering activities, the Plaintiff suffered significant financial, emotional, and psychological harm, including but not limited to:

- a) Loss of economic opportunities and assets due to fraudulent interference with her land rights in Brazil;
- b) Severe emotional distress, including documented instances of suicidal ideation, caused by the Defendants’ relentless harassment and defamation;
- c) Reputational damage and public humiliation resulting from the Defendants’ dissemination of false and defamatory statements; and
- d) Legal expenses incurred in defending against the fraudulent lawsuit.

Continuity of Racketeering Activity

227. The Defendants’ racketeering activities were not isolated incidents but part of a continuous and ongoing pattern of criminal conduct spanning over a decade. This pattern demonstrates the Defendants’ intent to maintain control over the Plaintiff through intimidation, coercion, and exploitation.

WHEREFORE, Plaintiff demands judgment against Defendants jointly and severally for treble compensatory damages pursuant to 18 U.S.C. § 1964(c), as well as punitive damages, attorneys’ fees, costs of suit, and such other and further relief as this Court deems just and proper in the interest of justice.

AS AND FOR NINTH CAUSE OF ACTION
AIDING AND ABETTING HARASSMENT

(George Soros, Schulte Roth & Zabel LLP, William Zabel, The Estate of Howard Godnick, A/k/a Howard Godnick, Deceased, Marguerite Gardiner, Victoria Corder, Harry Davis, Lavelly & Singer, Marty Singer, Andrew Brettler, Michael Roberts, Kyle Dubensky, William Beslow, Aimee Maddalena, The Trustees of Columbia University in the City of New York, Columbia University in the City of New York, Mary Mulligan, Friedman Kaplan Seiler Adelman & Robbins LLP, NYP Holdings, Inc., Emily Smith, Daily News Enterprises LLC, Barbara Ross, The Forward Association, Inc., Free Beacon LLC, Michael Kushner, Javier Solano)

228. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

229. Under both the New York City Human Rights Law (NYCHRL) and New York State Human Rights Law (NYSHRL), it is unlawful not only to engage directly in harassment, but also to aid and abet such conduct. See *N.Y.C. Admin. Code § 8-107(6)*; *N.Y. Exec. Law § 296(6)*.

230. Defendants, through their coordinated actions, knowingly aided and abetted a campaign of gender-based harassment against Plaintiff by providing substantial assistance and encouragement to primary wrongdoers who sought to intimidate, silence, and discredit her in retaliation for asserting her rights.

231. The harassment suffered by Plaintiff included, but was not limited to:
- a) The retaliatory filing of a false lawsuit to shame and publicly humiliate her;
 - b) Leaking confidential Title IX, FERPA, and medical materials to the press;
 - c) Releasing nude footage and personal records for the purpose of degradation and coercion;
 - d) Public defamation, including the false claim that Plaintiff fabricated a rape allegation;
 - e) And efforts to isolate and intimidate her support network and paralegals.

232. Defendants including Schulte Roth & Zabel LLP, William D. Zabel, William Beslow, Mary E. Mulligan, Michael J. Roberts, Marty Singer, Gary Stein, and Harry S. Davis actively facilitated, encouraged, or covered up this harassment. Their conduct went beyond mere association—they affirmatively enabled the misconduct of their co-conspirators, and in many instances acted jointly in furtherance of the abuse.

233. As a direct and proximate result of this harassment and Defendants' aiding and abetting thereof, Plaintiff has suffered extreme emotional distress, reputational damage, economic harm, and substantial interference with her personal dignity and legal rights.

WHEREFORE, Plaintiff demands judgment against all Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as the Court may deem just and proper.

AS AND FOR TENTH CAUSE OF ACTION
AIDING AND ABETTING RETALIATION

(George Soros, Schulte Roth & Zabel LLP, William Zabel, The Estate of Howard Godnick, A/k/a Howard Godnick, Deceased, Marguerite Gardiner, Victoria Corder, Harry Davis, Lavelly & Singer, Marty Singer, Andrew Brettler, Michael Roberts, Kyle Dubensky, William Beslow, Aimee Maddalena, The Trustees of Columbia University in the City of New York, Columbia University in the City of New York, Mary Mulligan, Friedman Kaplan Seiler Adelman & Robbins LLP, NYP Holdings, Inc., Emily Smith, Daily News Enterprises LLC, Barbara Ross, The Forward Association, Inc., Free Beacon LLC, Michael Kushner, Javier Solano)

234. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein as length.

235. Under both the New York City Human Rights Law (NYCHRL) and New York State Human Rights Law (NYSHRL), it is unlawful not only to engage directly in harassment, but also to aid and abet such conduct. See *N.Y.C. Admin. Code § 8-107(6)*; *N.Y. Exec. Law § 296(6)*.

236. Here, Defendants, individually and collectively, knowingly and intentionally aided and abetted a campaign of retaliation against Plaintiff, motivated by her gender and her status as a survivor of gender-based violence. This campaign was designed to silence her, destroy her reputation, and inflict maximum emotional, psychological, and economic harm.

II. Underlying Retaliatory Acts

237. Defendants engaged in a pattern of retaliatory conduct against Plaintiff, including but not limited to:

- a) The orchestration of a fraudulent and retaliatory lawsuit filed by Defendant Kyle Dubensky, which falsely accused Plaintiff of defamation and was designed to harass, intimidate, and discredit her;
- b) The dissemination of false and defamatory statements to the media, including the New York Post, Daily News, and other outlets, which falsely accused Plaintiff of fabricating allegations of rape and subjected her to public humiliation and harassment;
- c) The use of sexual blackmail and coercion during settlement negotiations, including the exploitation of Plaintiff's rape and the threat of disseminating intimate and private materials to force her into abandoning her legal claims;
- d) The obstruction of Plaintiff's access to legal documents, exclusion from critical depositions, and filing of baseless guardianship petitions to undermine her ability to pursue justice; and
- e) The intentional interference with Plaintiff's personal and professional relationships, including the sabotage of her relationship with "Richard Roe"

and the fraudulent interference with her land rights in Brazil, designed to isolate her and deprive her of financial independence.

JJ. Defendants' Knowledge of Retaliatory Acts

238. Each Defendant had actual or constructive knowledge of the retaliatory acts described above. Defendants George Soros, Schulte Roth & Zabel LLP, William D. Zabel, Michael J. Roberts, Kyle Dubensky, Lavelly & Singer, Marty Singer, Andrew Brettler, and others actively participated in or facilitated these acts, either directly or through their agents and representatives.

239. For example:

- a) Defendant Zabel admitted under oath that he arranged for Michael J. Roberts to represent Dubensky in the retaliatory lawsuit, promising future legal referrals in exchange for Roberts' participation in the scheme;
- b) Defendant Marty Singer, acting on behalf of Soros, offered to settle Dubensky's fraudulent lawsuit, demonstrating the Defendants' coordinated efforts to weaponize the legal system against Plaintiff; and
- c) Defendants NYP Holdings, Emily Smith, Daily News Enterprises, and Barbara Ross knowingly published false and defamatory statements about Plaintiff, furthering the campaign of retaliation and harassment.

KK. Substantial Assistance or Encouragement

240. Defendants provided substantial assistance or encouragement to the primary wrongdoers in carrying out the retaliatory acts. This assistance included, but was not limited to:

- a) Fabricating legal filings and disseminating false information to the media;

- b) Leveraging Plaintiff's rape and other private information to coerce her into silence;
- c) Obstructing Plaintiff's access to legal documents and critical depositions; and
- d) Interfering with Plaintiff's personal and professional relationships to isolate her and undermine her credibility.
- e) Gender-Based Animus:

241. Defendants' actions were motivated by a clear animus against Plaintiff as a woman and a survivor of gender-based violence. This animus is evidenced by:

- a) The use of harmful gender stereotypes, including the portrayal of Plaintiff as overly emotional, irrational, and manipulative;
- b) The exploitation of Plaintiff's rape and other private information to intimidate and silence her; and
- c) The deliberate targeting of Plaintiff's economic resources and personal relationships to reinforce systemic inequalities and perpetuate harm.

Damages

242. As a direct and proximate result of Defendants' aiding and abetting of retaliation, Plaintiff has suffered significant harm, including but not limited to:

- a) Severe emotional distress, including documented instances of suicidal ideation;
- b) Reputational damage and public humiliation;
- c) Loss of economic opportunities and financial independence; and
- d) Ongoing psychological trauma and a profound sense of violation.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR ELEVENTH CAUSE OF ACTION
COMMON LAW FRAUD

(Schulte Roth & Zabel LLP, William Zabel, Michael Roberts, Kyle Dubensky)

243. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

LL. Elements of Common Law Fraud:

244. Under New York law, the essential elements of a claim for common law fraud are:

- a) A material misrepresentation or omission of fact;
- b) Made with knowledge of its falsity;
- c) With the intent to induce reliance;
- d) Justifiable reliance by the plaintiff; and
- e) Damages resulting from such reliance.

245. Here, Defendants, individually and acting in concert, intentionally and knowingly made false and fraudulent statements of material fact, engaged in deceptive conduct, and omitted critical information with the intent to deceive Plaintiff and others, causing Plaintiff significant harm.

246. Defendants made numerous material misrepresentations and omissions, including but not limited to:

- a) Fabrication of the Retaliatory Lawsuit: Defendants George Soros, William D. Zabel, Michael J. Roberts, and others conspired to fabricate a fraudulent personal injury lawsuit filed by Defendant Kyle Dubensky. This lawsuit

falsely accused Plaintiff of defamation, despite the fact that Plaintiff had never publicly accused Dubensky of rape or made any statements about the assault. The lawsuit was entirely baseless and designed solely to harass, intimidate, and retaliate against Plaintiff for her claims against Soros.

- b) False Media Narratives: Defendants Soros, Zabel, Roberts, and others disseminated false and defamatory statements to the media, including the New York Post, Daily News, and other outlets, falsely claiming that Plaintiff had fabricated allegations of rape against Dubensky. These statements were knowingly false and intended to destroy Plaintiff's reputation and credibility.
- c) Misrepresentation of the Investigation: In a March 18, 2013, article published by the New York Post, Defendant Michael J. Roberts, Dubensky's attorney, falsely stated:
 - d) "The [DA] was presented with the case and refused to file a complaint. In addition, Columbia University . . . declined to pursue the case and saw no reason to investigate further."
 - e) This statement was a deliberate misrepresentation of the facts. In truth, the District Attorney's Office and Columbia University did not pursue the case because Plaintiff never made any public accusations of rape against Dubensky and chose not to cooperate with the investigation to protect her privacy. Defendants knowingly misrepresented the reasons for the lack of prosecution to create the false impression that Plaintiff's claims were baseless, furthering their campaign of retaliation and defamation.

- f) **Misrepresentation of Settlement Negotiations:** During settlement negotiations, Defendants Soros, Zabel, and William Beslow misrepresented the terms and conditions of the settlement, including the threat of disseminating intimate and private materials related to Plaintiff's rape, to coerce her into abandoning her legal claims.
- g) **Omission of Critical Facts:** Defendants intentionally omitted critical facts, including the truth about Plaintiff's rape and the Defendants' coordinated efforts to weaponize the legal system against her, to deceive Plaintiff and others into believing that her claims were frivolous or fabricated.

MM. Knowledge of Falsity

247. Defendants knew that their misrepresentations and omissions were false or made them with reckless disregard for the truth. For example:

- a) Defendant Zabel admitted under oath that he arranged for Michael J. Roberts to represent Dubensky in the retaliatory lawsuit, promising future legal referrals in exchange for Roberts' participation in the scheme. This quid pro quo arrangement demonstrates Defendants' knowledge of the fraudulent nature of the lawsuit.
- b) Defendants Soros, Zabel, and Roberts knew that Plaintiff had never publicly accused Dubensky of rape or made any statements about the assault, yet they deliberately disseminated false information to the media to discredit her.
- c) Defendant Roberts' false statement to the New York Post regarding the District Attorney's and Columbia University's decisions not to pursue the case was made with knowledge of its falsity, as he was aware that Plaintiff had not

made any public accusations and had chosen not to cooperate with the investigation.

NN. Intent to Induce Reliance

248. Defendants made these misrepresentations and omissions with the intent to induce reliance by Plaintiff, Dubensky, his attorneys, the media, and the public. Defendants sought to deceive Plaintiff into abandoning her legal claims, discredit her in the eyes of the public, and pressure her into settling under duress.

OO. Justifiable Reliance

249. Plaintiff justifiably relied on Defendants' misrepresentations and omissions, including but not limited to:

- a) Relying on the false narrative propagated by Defendants that her claims were frivolous or fabricated, which caused her to suffer severe emotional distress and reputational harm;
- b) Relying on the fraudulent settlement negotiations, which coerced her into considering settlement terms under duress; and
- c) Relying on the Defendants' false assurances that the retaliatory lawsuit was legitimate, which caused her to incur significant legal expenses and emotional trauma in defending against the baseless claims.

Damages

250. As a direct and proximate result of Defendants' fraudulent conduct, Plaintiff has suffered significant harm, including but not limited to:

- a) Severe emotional distress, including documented instances of suicidal ideation;

- b) Reputational damage and public humiliation;
- c) Loss of economic opportunities and financial independence;
- d) Legal expenses incurred in defending against the fraudulent lawsuit; and
- e) Ongoing psychological trauma and a profound sense of violation.

PP. Pattern of Fraudulent Conduct

251. Defendants' fraudulent conduct was not an isolated incident but part of a broader pattern of deception and manipulation designed to silence Plaintiff, destroy her reputation, and obstruct her pursuit of justice. This pattern reflects a deliberate and systemic effort to exploit Plaintiff's vulnerability as a survivor of gender-based violence and inflict maximum harm.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR TWELFTH CAUSE OF ACTION
MALICIOUS PROSECUTION

(Against Schulte Roth & Zabel LLP, William D. Zabel, Michael J. Roberts, Kyle Dubensky)

252. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

253. On or about March 18, 2013, Defendants George Soros, Schulte Roth & Zabel LLP, William D. Zabel, Michael J. Roberts, Kyle Dubensky, and Lavelly & Singer jointly initiated and maliciously pursued a baseless civil action against Plaintiff in New York State court, falsely accusing her of defamation and tortious conduct. The action was publicly filed as Dubensky v. [Plaintiff], under a pretextual theory that Plaintiff had fabricated a rape allegation

against Dubensky—when in truth, she had never publicly accused him or made any defamatory statement whatsoever.

254. The lawsuit was filed without probable cause and based on knowingly false assertions. At no time did Plaintiff publicly or privately disseminate any defamatory statements about Mr. Dubensky. The sole basis for the lawsuit was the fact that Columbia University and NYPD were contacted by a security officer after finding Plaintiff unconscious and undressed in a dormitory elevator—a response initiated not by Plaintiff, but by university personnel. The Defendants’ claim that Plaintiff “cried rape” was a complete fabrication designed to mislead the court and destroy Plaintiff’s credibility.

255. The proceeding was part of a broader retaliatory scheme orchestrated by Defendant George Soros and his legal team—including Defendants Zabel, Roberts, and Lavelly & Singer—to harass, intimidate, and silence Plaintiff in connection with her existing legal claims against Soros. Defendant William D. Zabel personally arranged for Michael J. Roberts to represent Dubensky and testified under oath that this arrangement included a quid pro quo referral of future cases. This proves that the lawsuit was not independently initiated but was instead part of a coordinated campaign of retaliation.

256. The malicious intent underlying the proceeding is evident from the totality of the circumstances: the timing of the filing (on the eve of a critical conference in Plaintiff’s suit against Soros), the media leaks orchestrated to publicly shame Plaintiff, and the utterly false narrative that she had invented a rape accusation for personal gain. Defendants acted not out of a good-faith belief in Dubensky’s claims, but rather to weaponize litigation as a tool of coercion, inflict reputational harm, and deter Plaintiff from pursuing her rights. This constitutes actual malice under New York law.

257. The action was ultimately terminated in Plaintiff's favor, as the lawsuit was voluntarily dismissed, abandoned, or otherwise resolved without any finding of liability against Plaintiff. No judgment was ever entered against her, and Defendants failed to prosecute the case to conclusion. The record reflects that the claims lacked any factual or legal basis and were simply allowed to expire after achieving their retaliatory and reputational objectives.

258. As a direct and proximate result of the malicious prosecution, Plaintiff suffered grave and measurable harm, including but not limited to:

- a) Severe emotional distress, including multiple episodes of suicidal ideation, resulting from the trauma of being publicly accused of falsifying a rape allegation;
- b) Reputational damage of the highest order, as major media outlets portrayed Plaintiff as dishonest, vindictive, and emotionally unstable, severely impairing her public image and professional standing;
- c) Loss of economic and professional opportunities, as the publicized false claims discouraged prospective employers, collaborators, and supporters;
- d) Legal expenses and litigation burdens, as Plaintiff was forced to defend herself against knowingly baseless claims intended to drain her financial resources and discredit her in court.

259. Defendants' conduct constitutes **malicious prosecution** under New York law, as they:

- a) initiated a legal proceeding;
- b) without probable cause;
- c) with actual malice; and

d) the proceeding was favorably terminated in Plaintiff's favor.

All elements of the tort are clearly satisfied.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR THIRTEENTH CAUSE OF ACTION

ABUSE OF PROCESS

(Against Schulte Roth & Zabel LLP, William D. Zabel, Michael J. Roberts, Kyle Dubensky)

260. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

261. Defendants George Soros, Schulte Roth & Zabel LLP, William D. Zabel, Michael J. Roberts, Kyle Dubensky, and Lavelly & Singer maliciously and improperly utilized legal process—specifically, the filing and prosecution of a fraudulent personal injury defamation lawsuit against Plaintiff—not for the purpose of obtaining a legitimate adjudication, but rather as a retaliatory and coercive instrument designed to inflict harm.

262. The aforementioned lawsuit, filed by Defendant Dubensky and orchestrated by Defendants Soros, Zabel, and Roberts, was knowingly baseless and retaliatory, and was strategically timed to coincide with a key preliminary conference in Plaintiff's separate civil litigation against Soros. As established by sworn testimony and evidence annexed hereto (see, e.g., Exhibit E), the lawsuit was not intended to resolve a genuine dispute but rather to harass, discredit, and coerce Plaintiff into relinquishing her rights, reputation, and pending legal claims. Defendants' misuse of the legal process caused Plaintiff significant harm, including but not limited to emotional distress, reputational damage, and financial losses.

263. Defendants' actions constitute a deliberate misuse of the judicial process for an ulterior purpose: namely, to (a) intimidate and silence Plaintiff as a woman pursuing claims of sexual violence and abuse, (b) apply undue pressure during settlement negotiations through the leverage of litigation and media leaks, and (c) retaliate against Plaintiff for asserting her rights under civil, constitutional, and gender-based violence statutes.

264. This abuse of process was further compounded by Defendants' coordinated media campaign, which involved leaking the existence of the lawsuit—prior to its actual filing—to tabloids including the New York Post, and disseminating knowingly false and defamatory statements through national and international press outlets. These leaks occurred in tandem with Defendants' strategic filing of the lawsuit, forming a dual-pronged assault on Plaintiff's reputation and mental well-being.

265. The conduct of the Defendants was not only wrongful and malicious but executed with full knowledge that the legal process was being perverted for a collateral and unlawful objective—namely, to extort, defame, and psychologically destabilize Plaintiff, in furtherance of a broader campaign of gender-based intimidation, coercion, and reputational destruction.

266. As a direct and proximate result of Defendants' abuse of process, Plaintiff suffered substantial harm, including but not limited to:

- a) Severe emotional and psychological distress (including documented suicidal ideation and psychiatric treatment);
- b) Reputational injury and character assassination through the intentional publicizing of a retaliatory and fraudulent lawsuit;

- c) Financial losses, including costs incurred in defending against the action, loss of professional opportunities, and damage to career and economic prospects; and
- d) Ongoing legal and personal vulnerability due to the chilling effect of the Defendants' misuse of court processes as weapons of intimidation.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages, punitive damages, attorneys' fees, and such other and further relief as this Court deems just and proper.

AS AND FOR FOURTEENTH CAUSE OF ACTION
MEDICAL BATTERY AND LACK OF INFORMED CONSENT
(Against New York-Presbyterian Hospital)

259. Plaintiff repeats, reiterates, and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein at length.

260. Under New York law, medical battery occurs when a healthcare provider performs a procedure without the patient's express consent. Lack of informed consent occurs when a medical professional fails to explain the nature and risks of the procedure and obtain the patient's voluntary agreement, particularly where the procedure involves significant bodily intrusion.

261. On or about December 31, 2012, Plaintiff was transported to New York-Presbyterian Hospital while unconscious. Without her knowledge, the hospital staff began administering a forensic rape kit examination.

262. Plaintiff regained consciousness mid-procedure and became aware that an invasive examination of her body was underway. At no time did the medical personnel stop the procedure to explain what was occurring or to obtain her consent. The examination was

completed without giving Plaintiff the opportunity to object or consult with legal or medical counsel.

263. The continuation of this invasive medical procedure after Plaintiff had regained consciousness and without her consent constitutes medical battery.

264. Additionally, no proper legal consent was obtained before the procedure began, nor was Plaintiff informed of the procedure's nature, scope, or purpose upon regaining consciousness. The lack of any informed discussion violated Plaintiff's rights under Public Health Law § 2805-d and common law protections of bodily autonomy.

265. The performance of the rape kit without full and informed consent caused Plaintiff significant psychological harm, trauma, humiliation, and a renewed sense of physical violation.

WHEREFORE, Plaintiff respectfully requests that, to the extent applicable to this cause of action, she be awarded: compensatory damages, punitive damages, attorneys' fees, costs, equitable and declaratory relief, and such other and further relief as the Court deems just and proper. The specific monetary amounts demanded are set forth in the Prayer for Relief section herein.

CONCLUSION

The Defendants' actions—ranging from the exploitation of the Plaintiff's rape to the orchestration of a retaliatory lawsuit, the use of sexual blackmail, and the perpetuation of harmful gender stereotypes—demonstrate a clear and deliberate animus rooted in gender-based violence. These actions, carried out in their individual capacity and collectively, were designed to inflict maximum emotional, psychological, and reputational harm on the Plaintiff, leaving her with lasting trauma and a profound sense of violation. Under New York's Clawback law, such conduct

constitutes a gross abuse of power and a violation of the Plaintiff's fundamental rights. The gravity of the harm caused by the Defendants' actions cannot be overstated, and the Plaintiff seeks justice for the irreparable damage inflicted upon her.

This case underscores the systemic injustices faced by survivors of gender-based violence, particularly women, who are often silenced, re-victimized, and exploited by those in positions of power. The Defendants' actions reflect a broader pattern of gender-based animus and a callous disregard for the dignity and rights of women.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendants as follows:

1. **FIRST CAUSE OF ACTION: GENDER-BASED VIOLENCE UNDER THE NYC GENDER MOTIVATED VIOLENCE ACT (GMVA)**
 - i. Compensatory damages in the amount of **\$2,800,000,000**
 - ii. Punitive damages in an amount of **\$28,000,000,000**
 - iii. Injunctive relief to prevent further gender-based violence
 - iv. Attorneys' fees and costs of this action
 - v. Such other and further relief as this Court deems just and proper
2. **SECOND CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper

3. **THIRD CAUSE OF ACTION: CONSPIRACY TO COMMIT FRAUD AND
BLACKMAIL**

- i. Compensatory damages in the amount of **\$280,000,000**
- ii. Punitive damages in an amount of **\$983,500,000**
- iii. Attorneys' fees and costs of this action
- iv. Such other and further relief as this Court deems just and proper

4. **FOURTH CAUSE OF ACTION: DEFAMATION AND LIBEL**

- i. Compensatory damages in the amount of **\$280,000,000**
- ii. Punitive damages in an amount of **\$983,500,000**
- iii. Attorneys' fees and costs of this action
- iv. Such other and further relief as this Court deems just and proper

5. **FIFTH CAUSE OF ACTION: PRIMA FACIE TORT**

- i. Compensatory damages in the amount of **\$280,000,000**
- ii. Punitive damages in an amount of **\$983,500,000**
- iii. Attorneys' fees and costs of this action
- iv. Such other and further relief as this Court deems just and proper

6. **SIXTH CAUSE OF ACTION: TORTIOUS INTERFERENCE WITH CONTRACT
AND ECONOMIC SABOTAGE**

- i. Compensatory damages in the amount of **\$280,000,000**
- ii. Punitive damages in an amount of **\$983,500,000**
- iii. Attorneys' fees and costs of this action
- iv. Such other and further relief as this Court deems just and proper

7. **SEVENTH CAUSE OF ACTION: RICO CIVIL CONSPIRACY**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
8. **EIGHTH CAUSE OF ACTION: AIDING AND ABETTING HARASSMENT**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
9. **NINTH CAUSE OF ACTION: AIDING AND ABETTING RETALIATION**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
10. **TENTH CAUSE OF ACTION: COMMON LAW FRAUD**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
11. **ELEVENTH CAUSE OF ACTION: MALICIOUS PROSECUTION**
 - i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**

- iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
12. **TWELFTH CAUSE OF ACTION: ABUSE OF PROCESS**
- i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
13. **THIRTEENTH CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (SECOND INCIDENT)**
- i. Compensatory damages in the amount of **\$280,000,000**
 - ii. Punitive damages in an amount of **\$983,500,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper
14. **FOURTEENTH CAUSE OF ACTION: MEDICAL BATTERY AND LACK OF INFORMED CONSENT**
- i. Compensatory damages in the amount of **\$10,000,000**
 - ii. Punitive damages in an amount of **\$28,000,000**
 - iii. Attorneys' fees and costs of this action
 - iv. Such other and further relief as this Court deems just and proper

WHEREFORE, Plaintiff respectfully requests that, to the extent applicable to all causes of action, she be awarded: compensatory damages, punitive damages, attorneys' fees, costs, equitable and declaratory relief, and such other and further relief as the Court deems just and proper.

JURY DEMAND

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

I affirm this 16th day of April, 2025 under the penalties of perjury under the laws of New York which may include a fine or imprisonment, that the forgoing is true and I understand that this document may be filed in an action of proceeding at a court of law.

Dated: April 16, 2025

/s/Anonymous

Anonymous

Pro Se Plaintiff