

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 1:20-CV-24357

JANE DOE,

Plaintiff,

v.

SUELYN MEDEIROS,

Defendant.

COMPLAINT

1. Defendant Suelyn Medeiros (“Medeiros”) has conspired with Peter J. Nygard (“Nygard”) by knowingly and actively recruiting young women for Nygard to rape as part of his sweeping international sex trafficking venture.

2. Plaintiff Jane Doe is one such innocent victim of Medeiros’ recruiting.

3. Medeiros recruited, lured, and coerced Jane Doe to Nygard’s private compound, and once confined there, Medeiros told Jane Doe that she was required to have sex with Nygard, instructing her that the forced sex would be “really fast and easy.”

4. After the terrified Jane Doe refused, Medeiros and Nygard conspired to falsely imprison and drug Jane Doe. Nygard then forcibly raped her.

5. As detailed in *Jane Does Nos. 1-57 v. Nygard, et al.*, No. 20-cv-01288 (ER) (June 10, 2020) (Ramos, J.), and *John Does 1 and 2 v. Nygard, et al.*, No. 20-cv-06501 (ER) (August 16, 2020), Nygard and the Nygard Companies perpetrated a decades-long, international sex trafficking venture, centered in New York but with co-conspirators also located in Florida,

California, Canada, and the Bahamas, that lured, enticed, and coerced countless girls, women, and boys to be raped.

6. This is a civil action for damages under the United States Federal sex trafficking statute, 18 U.S.C. §§ 1591, *et seq.*, brought by Jane Doe arising from Defendant Suelyn Medeiros' trafficking of Jane Doe to Peter J. Nygard ("Nygard") and Nygard's subsequent rape of Jane Doe. Defendant Suelyn Medeiros conspired for years with Nygard, Nygard Inc., Nygard International Partnership ("Nygard International"), and Nygard Holdings Limited ("Nygard Holdings") (collectively, the "Nygard Companies"), in knowingly aiding, abetting, facilitating, conspiring, and participating in Nygard and the Nygard Companies' trafficking of girls and women, including Jane Doe, in violation of the Trafficking Victims Protection Reauthorization Act ("TVPRA") and other state laws.

Suelyn Medeiros Conspired in Trafficking Jane Doe for Peter Nygard to Rape.

7. Medeiros conspired to rape Jane Doe by using Nygard Company resources to lure, entice, and transport Jane Doe from Florida to Nygard's compound in the Bahamas, with the pre-planned intention of Nygard raping her.

8. Medeiros was a "full-time paid employee" of the Nygard Companies. But she was really a sex worker for Nygard.

9. As a "sex worker," her job was to have sex with Nygard and recruit and lure other young women to have sex with (or be raped, sexually assaulted, or sexually battered by) Nygard.

10. Medeiros explained her conduct of knowingly luring young women so Nygard could rape them: "I would rather it be them than me that has to f--- Nygard."

11. For her services of recruiting women for Nygard to rape, Medeiros was paid extensively in cash and benefits by the Nygard Companies, including plastic surgery, stem cell

injections, jewelry, travel, lodging and food at Nygard's myriad private compounds, an American Express card with nearly no limit, a Hummer, a DeLorean, a BMW, and a Ferrari.



12. Medeiros even had her own checking account tied to Nygard's sex den compound on 1 Yawl Street in Marina Del Rey (recently raided by the FBI as a part of its sex trafficking investigation, and the site of countless rapes by Nygard¹):



13. According to flight logs, in just a four-month period, Medeiros flew on Nygard's private jet on nearly 30 trips.

14. Medeiros was not just one of Nygard's many "girlfriends;" Medeiros was referred to as his "top girlfriend" and was a sex trafficker.

15. Nygard's "girlfriends" were paid sex workers and usually victims of Nygard that were manipulated, forced and/or coerced to work as a "girlfriend" for Nygard. "Girlfriends" were paid based on their race, ethnicity, physical appearance, the level of sexual conduct they would engage in with Nygard and, also, the number of attractive young women they could lure for Nygard to have sex with.

16. Medeiros was, for many years, considered Nygard's "top girlfriend" based on her ability, willingness, and proclivity to lure, entice, coerce, and defraud young women to meet Nygard so that Nygard could ultimately rape them.

¹ <https://www.nytimes.com/2020/02/25/us/peter-nygard-international-fbi-raid.html>.

17. Unlike many of Nygard's "girlfriends," Medeiros has consistently denied that Nygard has ever had sexually abused her or had sex with her against her will.

Jane Doe Was Lured by Suelyn Medeiros from Florida to Be Raped by Peter Nygard.

18. In 2010, Jane Doe was an eighteen-year-old Florida resident and aspiring model when Medeiros invited her to a party in Miami, Florida, with the ultimate intention of trafficking her to Nygard. Jane Doe told Medeiros how old she was.

19. Medeiros took Jane Doe to a dance club and illegally provided Jane Doe with alcohol, knowing she was only eighteen years old.

20. Medeiros, preying on the innocence of Jane Doe, as well as her dream to be a successful model, lured and enticed Jane Doe to travel to the Bahamas from Florida, telling her that it would be a fun party weekend and that her "friend" owned a fashion company. Medeiros invited Jane Doe knowing that Nygard would use means of force, fraud, and coercion to engage in commercial sex acts with Jane Doe.

21. Acting on behalf of and with the resources of Nygard and the Nygard Companies from the State of Florida, Medeiros, an "employee" and co-conspirator of Nygard and the Nygard Companies, arranged for Jane Doe's flight to the Bahamas, booked through, and paid for by, the Nygard Companies.

22. After arriving at Nygard's private compound in the Bahamas, Medeiros took Jane Doe to meet her fashion designer "friend." The "friend" was Peter Nygard.

23. After arriving, Jane Doe realized that she was not free to leave the Nygard compound—which was surrounded by a fence with barbed wire and a gate guarded by security at all times—without Nygard's explicit permission.

24. At the Nygard compound, Medeiros had her own walkie-talkie (with her name emblazoned on it) so she could readily communicate with Nygard.

25. While confined within the Nygard compound, Medeiros instructed Jane Doe that she was required to have sex with Nygard against Jane Doe's wishes, stating that she shouldn't worry because sex with Nygard "wasn't that bad" and would be "really fast and easy."

26. Jane Doe refused to have sex with Nygard.

27. Medeiros abruptly informed Jane Doe that Medeiros would be leaving the Bahamas early and Jane Doe would be left there alone.

28. Medeiros then intentionally abandoned Jane Doe at the property, knowing that Nygard would use means of force, fraud, and coercion to engage in commercial sex acts with Jane Doe against her will.

29. While isolated and confined within the Nygard compound, Nygard approached Jane Doe, and using force, instructed her that she was going with him to his bedroom.

30. Nygard forced Jane Doe onto his bed, holding her arms down and ignoring her attempts to tell him "no." Nygard then forcibly raped her.

31. The next morning, Nygard handed Jane Doe \$500 in U.S. currency as "payment" for the rape.

Medeiros Knowingly Benefitted from Conspiring in the Nygard Sex Trafficking Venture.

32. Medeiros knowingly benefited from Nygard's sex trafficking of Jane Doe (and others). She lived in Nygard's Marina del Rey compound for at least five years, received significant cash, salary, jewelry, plastic surgery, stem cell injections, and cars in exchange for trafficking victims, including Jane Doe, to Nygard.

33. Medeiros' conduct violates the TVPRA, which outlaws using means of interstate or foreign commerce to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize solicit or lure a person and force, defraud, or coerce that person to engage in commercial sexual acts.

34. Medeiros also aided and abetted Nygard's crimes by conspiring with Nygard to violate the TVPRA by knowingly agreeing to facilitate and enable his illegal conduct for her own gain.

35. Medeiros also directly violated the TVPRA and other state laws because she knowingly benefitted from her conspiracy with and/or participation in Nygard's venture with knowledge, or in reckless disregard of the fact, that Nygard sex trafficked Jane Doe and others.

Medeiros is Actively Conspiring with Nygard to Lie about their Sex Trafficking Venture.

36. In the summer of 2019, Nygard became aware that the New York Times was actively investigating his sex trafficking venture.

37. Nygard also became aware that the FBI and the Department of Justice were also investigating his criminal sex trafficking venture when they raided his New York and California Properties on February 26, 2020.²

38. In response, Nygard took several offensive measures to try to keep his sex trafficking concealed, including threatening the New York Times, suing the New York Times, concocting conspiracy theories, and enlisting his most trusted "girlfriends," including Medeiros, and several others, each of whom, upon information and belief, were paid thousands of dollars to keep quiet and lie for him.

² <https://www.nytimes.com/2020/02/25/us/peter-nygard-international-fbi-raid.html>.

39. In August 2019, upon information and belief, Medeiros visited Nygard's compound in Winnipeg (pictured below) to do damage control, including concocting lies in which Nygard instructed Medeiros to falsely claim she was "always" with him for wide swaths of time so she could be his alibi.



40. Defendant Suelyn Medeiros' conspiracy efforts continue to the filing of this lawsuit.

41. After the filing of the *Jane Does Nos. 1-57 v. Nygard, et al.* Complaint in February 2020, and up to the filing of this lawsuit, Medeiros has been actively conspiring with Peter Nygard, and others, to orchestrate a concentrated and deliberate effort to protect and conceal Nygard's criminal activities, including his sex trafficking of Jane Doe, by concocting alibis and other ways to lie about the incidents in question.

42. On June 30, 2020, Medeiros flew back to Winnipeg to meet with Nygard and others to continue orchestrating the web of lies.

43. Further, in a phone call just weeks before this filing, Medeiros called Nygard out of her concern for her complicit conduct in Nygard's sex trafficking venture. She was instructed by Nygard to "stand by and support" him, *i.e.*, continue lying for him.

44. On information and belief, Medeiros had a phone call, on Monday July 13, 2020, with Nygard's civil counsel in the *Jane Does No. 1-57 v. Nygard, et al.* Complaint. Because of concern for her own liability for her trafficking, Medeiros fled the United States for Brazil where she loitered in the outskirts of Rio de Janiero and encountered her own legal difficulties there.

45. Medeiros then snuck back in the country and was staying in the apartment of a Beverly Hills plastic surgeon (who, months ago, said he would never be seeing her again and that she would not be returning).

46. Medeiros is, to this day, communicating regularly with Nygard and continuing to conspire to evade and lie to law enforcement.

Jane Doe Was Prevented from Previously Pursuing Her Claims.

47. Medeiros' co-conspirator, Nygard, is notorious for using his wealth, political power, and influence in Canada, the United States, and the Bahamas to intimidate his victims and prevent them from coming forward.³

48. Nygard also uses violence, threats of violence, bribery, and corruption to intimidate and silence his victims and those that he believes have "betrayed" him. Nygard has silenced his victims by, among other means, having their tires slashed, committing arson, hiring thugs to intimidate his victims, having his victims followed, engaging in murder-for-hire plots, and otherwise threatening his victims with death.

³ See *Jane Does Nos. 1-57 v. Nygard, et al.* Complaint, filed February 2020.

49. Nygard also routinely threatens to use his wealth to sue and destroy the reputation of anyone who comes forward to report his crimes.

50. Due to Medeiros's conspiracy with Nygard and her close association with him as his "top girlfriend" and recruiter, Jane Doe legitimately feared for her life as well as other forms of retaliation if she pursued claims against Medeiros for trafficking her to Nygard.

51. It wasn't until Nygard was sued in a class action lawsuit,⁴ as well as investigated by the FBI,⁵ that Jane Doe felt she could pursue this claim without risk of harm or death.

JURISDICTION AND VENUE

52. This Court has federal question subject-matter jurisdiction pursuant to 28 U.S.C. § 1331, because Plaintiff brings this action under the federal TVPRA statute.

53. This Court also has supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a), because all claims alleged herein arise out of the same series of transactions or occurrences and form part of the same case or controversy.

54. This Court is "an appropriate district court of the United States" in accordance with 18 U.S.C. § 1595, as venue is proper in this District under 28 U.S.C. § 1391(b)(2), Defendant Suelyn Medeiros conducted substantial activities in this District and knowingly conspired, aided and abetted, facilitated, and directly participated in Nygard's illegal conspiracy and/or venture through actions that occurred in this District.

PARTIES

A. Plaintiff Jane Doe

55. Jane Doe is a United States citizen who resides in the United States.

⁴ *Id.*

⁵ <https://www.nytimes.com/2020/02/25/us/peter-nygard-international-fbi-raid.html>.

56. She is using a pseudonym because of the highly personal nature of this matter.

57. Plaintiff is at serious risk of retaliatory harm because Defendant's co-conspirators, Nygard and the Nygard Companies, have tremendous wealth and power and have used it to retaliate against others who have attempted to come forward, including by means of arson, property destruction, threats of physical violence, and threats of legal action.

58. Plaintiff is also vulnerable because of Defendant's co-conspirators' wealth and influence in Canada and the United States, and the corruption of law enforcement by the co-conspirators through bribery and political influence.⁶

59. Plaintiff's safety, right to privacy, and security outweigh the public interest in her identification.

60. Plaintiff's legitimate concerns outweigh any prejudice to Defendant by allowing Plaintiff Jane Doe to proceed anonymously.

B. Defendant Suelyn Medeiros

61. Defendant Suelyn Medeiros is a United States resident, and considers herself an "Instagram model" and historically was a dancer in music videos.

62. Upon information and belief, Defendant regularly travels to the State of Florida and conducts business there, including modeling and attending modeling events.

⁶ See, e.g., <https://www.youtube.com/watch?v=Pw1xUXQNeIg>;
<http://www.tribune242.com/news/2018/feb/14/nygard-outright-bribery-plp/>;
<http://www.tribune242.com/news/2014/jun/25/nygard-gave-money-plp-then-asked-help-over-land-is/>;
<http://www.tribune242.com/news/2017/may/05/fresh-questions-over-las-vegas-trip-pm-gibson-and-/>.

THE TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT

63. The TVPRA outlaws sex trafficking activities that affect interstate or foreign commerce or take place within the territorial jurisdiction of the United States. It is to be construed broadly because it serves a remedial purpose and uses intentionally broad language.

64. The TVPRA makes it unlawful for:

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or, except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).⁷

65. As alleged herein, Defendant knowingly used interstate and foreign commerce to violate the TVPRA by enticing, luring, providing and/or transporting Jane Doe to be raped and engage in commercial sex acts.

66. The TVPRA's civil provision, 18 U.S.C. § 1596, applies extraterritorially to all violations that occurred after December 19, 2003, wherein the alleged offender is a national of the United States; an alien lawfully admitted for permanent residence; or is present in the United States. The violations against Jane Doe occurred in Florida and the Bahamas after December 19,

⁷ 18 U.S.C. § 1591(a).

2003, and the Defendant is lawfully admitted to the United States for permanent residence and/or is present in the United States.

67. Further, Defendant has substantial contacts with the United States, both individually as well as through her co-conspirators, Nygard and the Nygard Companies.

68. Defendant conspired with Nygard and the Nygard Companies and aided and abetted, facilitated, and directly participated in Nygard's conspiracy and/or venture through conduct that originated and/or occurred in the United States.

69. Although the locus of Nygard's sex trafficking venture and conspiracy is in New York, Defendant intentionally lured and enticed Jane Doe from the State of Florida, through actions that occurred in the State of Florida, for the purpose of sex trafficking her to Nygard.

70. Given these substantial and systematic contacts between the United States and Defendant's misconduct in the United States and the Bahamas, it is neither arbitrary nor unfair to exercise application of the TVPRA for Defendant's activities that partially occurred in the Bahamas.

71. Application of the TVPRA is also consistent with international law by virtue of the Palermo Protocols, which are three protocols adopted by the United Nations to supplement the 2000 Convention against transnational organized crime, including the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children.

72. In addition to violating the TVPRA, as alleged herein, Defendant conspired to violate and/or violated the laws of the State of Florida, as well as the laws of the Bahamas.

CLAIMS ALLEGED

COUNT I

**VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION ACT,
18 U.S.C. §§ 1591(a)**

73. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-72, as if fully set forth in this Count.

74. Defendant knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1), occurring both in and outside of the territorial jurisdiction of the United States.

75. Defendant's conduct was in or affecting interstate or foreign commerce for purposes of the TVPRA.

76. Defendant knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and/or solicited Plaintiff for the purpose of causing her to engage in commercial sex acts, pursuant to 18 U.S.C. § 1591(a).

77. Defendant and her co-conspirators provided Jane Doe \$500 in U.S. currency after Nygard raped her.

78. Defendant's conduct has caused Plaintiff serious and permanent harm, including, without limitation, physical, psychological, financial, and reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, in order to avoid incurring that harm.

COUNT II

**PARTICIPATING IN A VENTURE IN VIOLATION OF
THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1591(a)**

79. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-72, as if fully set forth in this Count.

80. Defendant participated in a venture with Nygard and the Nygard Companies, in violation of 18 U.S.C. § 1591(a)(2).

81. Defendant knowingly benefited from, and received value for, her participation in the venture, in which Defendant and Nygard would lure, entice, and transport Plaintiff, to engage in commercial sex acts.

82. Defendant knew, or was in reckless disregard of the fact, that it was Nygard's pattern and practice to use the channels and instrumentalities of interstate and foreign commerce, as well as the Nygard Companies' resources to entice, recruit or cause young and underage individuals to engage in commercial sex acts, and offering something of value in exchange for the sexual act.

83. Defendant had actual knowledge that she was facilitating and participating in Nygard's use of company resources to recruit, entice, harbor, transport, provide, obtain, maintain, patronize, coerce, and/or solicit Plaintiff and others, into commercial sex acts.

84. Despite such knowledge, Defendant facilitated and participated in Nygard's violations of 18 U.S.C. § 1591, where Defendant knew, or was in reckless disregard of the facts that, Nygard would lure, entice, harbor, transport, provide, obtain, maintain, patronize, coerce, and/or solicit Plaintiff to engage in commercial sex acts.

85. Defendant also provided or promised Plaintiff items of value in exchange for engaging in the sexual acts with Plaintiffs, including flights, lodging, and cash.

86. In exchange for facilitating and covering up Nygard's scheme, Defendant received significant financial benefits.

87. Defendant's conduct has caused Plaintiff serious harm including, without limitation, physical, psychological, financial, and reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, in order to avoid incurring that harm.

COUNT III

CONSPIRACY TO COMMIT VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1594

88. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-72, as if fully set forth in this Count.

89. Defendant conspired, by agreement or understanding, to further Nygard's unlawful plan and/or purpose to commit illegal commercial sex acts with Plaintiff.

90. Defendant committed overt acts in furtherance of the agreement or understanding by playing an active role in transporting Plaintiff to engage in commercial sex acts and by arranging and paying for Plaintiff to be transported to Nygard.

91. Defendant provided or promised Plaintiff items of value in exchange for engaging in the sexual acts with Nygard, including but not limited to, air flights, lodging, food, and cash.

92. Defendant's participation in the furtherance of Nygard's illegal sex trafficking plan and/or purpose was intentional and/or willful and, therefore, Defendant intentionally and/or willfully caused Nygard's facilitation of the sex acts with Plaintiff in her affirmative acts supporting Nygard.

93. Defendant knew that her acts and conduct supporting and facilitating Nygard would lead to unlawful commercial sex acts facilitated by Nygard and involving Plaintiff.

94. Defendant conspired with Nygard through her affirmative acts and provided substantial support to Nygard causing commercial sex acts upon Plaintiff.

95. Defendant's conduct has caused Plaintiffs serious harm, including, without limitation, physical, psychological, financial, and reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.

COUNT IV

AIDING AND ABETTING SEXUAL BATTERY IN VIOLATION OF FLORIDA LAW

96. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-72, as if fully set forth in this Count.

97. Defendant knowingly aided and abetted, facilitated, and enabled the sexual battery of Plaintiff, a Florida resident, in violation of Florida law.

98. Defendant originated the scheme that began in Florida when Plaintiff was transported from Florida to the Bahamas with the intention of her being sexually battered by Nygard.

99. Defendant knew, or should have known, that Nygard's conduct constituted a breach of duty and/or tortious conduct.

100. Defendant knowingly gave substantial assistance or encouragement to Nygard in accomplishing the breach of duty and/or tortious conduct and Nygard's conduct, separately considered, constitutes a breach of duty to Plaintiff.

101. Defendant, through Nygard, had actual knowledge that she was providing substantial assistance by facilitating, aiding and abetting, and participating in Nygard's use of company resources to cause sexual battery against Plaintiff.

102. Despite such knowledge, the Defendant facilitated, and aided and abetted Nygard's sexual battery of Plaintiff.

103. Defendant knowingly facilitated and aided and abetted Nygard's scheme because she was rewarded with cash and gifts.

104. This affirmative conduct of Defendant was committed knowing, or in reckless disregard of the facts that, Nygard would use Defendant's resources to cause sexual battery against Plaintiff.

105. Plaintiff has been damaged as a direct result of the Defendant's conduct. Defendant's conduct has caused Plaintiff serious and permanent harm and/or damage, including, without limitation, physical, psychological, emotional, financial, and reputational harm.

COUNT V

CIVIL CONSPIRACY IN VIOLATION OF FLORIDA LAW

106. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-72, as if fully set forth in this Count.

107. Defendant participated in a conspiracy to cause the sexual battery of Plaintiff.

108. Defendant formed a group of two or more persons and agreed to a common plan or design to commit tortious acts, including causing the sexual battery of Plaintiff.

109. Defendant had actual knowledge that sexual battery was planned and concurred in the tortious scheme with knowledge of its unlawful purpose.

110. Defendant intended to aid in the commission of the planned tort, including sexual battery.

111. Defendant committed numerous wrongful acts, including transporting Plaintiff from the State of Florida to the Bahamas, pursuant to the agreement with co-conspirators.

112. Defendant committed wrongful acts by knowingly luring, enticing, and transporting Plaintiff from the State of Florida to the Bahamas where Defendant knew that Nygard would cause the sexual battery of Plaintiff.

113. In exchange for conspiring to facilitate and cover-up Nygard's sexual misconduct, the Defendant received significant financial benefits.

Plaintiff was damaged as a direct result of Defendant's agreement. Defendant's conduct has caused Plaintiff serious and permanent harm and/or damage, including, without limitation, physical, psychological, emotional, financial, and reputational harm.

REQUEST FOR RELIEF

Plaintiff respectfully requests that the Court enter judgment in her favor, and against Defendant, as follows:

- a. That the Court grant permanent injunctive relief to prohibit Defendant from continuing to engage in the unlawful acts and practices described herein;
- b. That the Court award Plaintiff compensatory, consequential, general, and nominal damages in an amount to be determined at trial;
- c. That the Court award punitive or exemplary damages in an amount to be determined at trial;
- d. That the Court award to Plaintiff the costs and disbursements of the action, along with reasonable attorneys' fees, costs, and expenses;

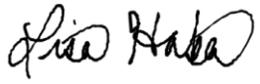
- e. That the Court award pre- and post-judgment interest at the maximum legal rate;
- and
- f. That the Court grant all such other relief as it deems just and proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all claims so triable.

Dated: October 22, 2020

Respectfully Submitted,

By: 

Lisa D. Haba
FL Bar No. 077535
THE HABA LAW FIRM, P.A.
1220 Commerce Park Drive, Suite 207
Longwood, Florida 32779
Tel.: 844-422-2529
lisahaba@habalaw.com

Greg G. Gutzler*
DICELLO LEVITT GUTZLER LLC
444 Madison Avenue, Fourth Floor
New York, New York 10022
Tel.: 646-933-1000
ggutzler@dicellolevitt.com

Adam J. Levitt*
Amy E. Keller*
DICELLO LEVITT GUTZLER LLC
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
Tel.: 312-214-7900
alevitt@dicellolevitt.com
akeller@dicellolevitt.com

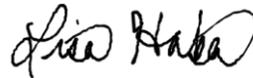
Mark A. DiCello*
Robert F. DiCello*
Justin J. Hawal*
DICELLO LEVITT GUTZLER LLC
7556 Mentor Avenue
Mentor, Ohio 44060
Tel.: 440-953-8888
mad@dicellolevitt.com
rfdicello@dicellolevitt.com
jhawal@dicellolevitt.com

Attorneys for Plaintiff

* *Pro Hac Vice* applications to be filed

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered to a Process Server for personal service upon the Defendant on October 23, 2020, and was electronically served on all counsel or parties of record on the Service List below on October 22, 2020.



Lisa D. Haba

SERVICE LIST

Lisa D. Haba
lisahaba@habalaw.com
THE HABA LAW FIRM, P.A.
1220 Commerce Park Drive, Suite 207
Longwood, Florida 32779
Tel.: 844-422-2529
Attorney for the Plaintiff

Mark A. DiCello
mad@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
7556 Mentor Avenue
Mentor, Ohio 44060
Tel.: 440-953-8888
Attorney for the Plaintiff

Greg G. Gutzler
ggutzler@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
444 Madison Avenue, Fourth Floor
New York, New York 10022
Tel.: 646-933-1000
Attorney for the Plaintiff

Robert F. DiCello
rfdicello@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
7556 Mentor Avenue
Mentor, Ohio 44060
Tel.: 440-953-8888
Attorney for the Plaintiff

Adam J. Levitt
alevitt@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
Tel.: 312-214-7900
Attorney for the Plaintiff

Justin J. Hawal
jhawal@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
7556 Mentor Avenue
Mentor, Ohio 44060
Tel.: 440-953-8888
Attorney for the Plaintiff

Amy E. Keller
akeller@dicellolevitt.com
DiCELLO LEVITT GUTZLER LLC
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
Tel.: 312-214-7900
Attorney for the Plaintiff