

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

**E-FILED SUMMONS**

-----X  
JANE DOE 1,

Plaintiff designates New York County as the place of trial.

Plaintiff,

Venue is based on the county where a substantial part of the events or omissions giving rise to the claim occurred

v.

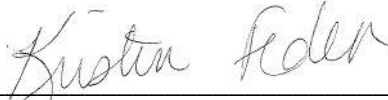
ALON ALEXANDER, OREN ALEXANDER, AND  
TAL ALEXANDER,

Defendant.  
-----X

To the above-named Defendant:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within thirty days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: February 25, 2025



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10 *Counsel for Plaintiff*

11 **SUPREME COURT OF THE STATE OF NEW YORK**  
 12 **COUNTY OF NEW YORK**

13  
 14 JANE DOE 1,  
 15 Plaintiff,  
 16 v.  
 17 ALON ALEXANDER, OREN  
 18 ALEXANDER, and TAL ALEXANDER,  
 19 Defendants.

Case No.:  
**COMPLAINT FOR DAMAGES**  
**JURY TRIAL DEMANDED**

24 Plaintiff Jane Doe 1 (“Plaintiff”), brings this action against Alon Alexander (“Alon”), Oren  
 25 Alexander (“Oren”), and Tal Alexander (“Tal”) (collectively, “Defendants” or the “Alexander  
 26 Brothers”), to recover damages arising from the injuries she suffered because of Defendants’ sexual  
 27 abuse, and alleges as follows:  
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**I. INTRODUCTION**

1. For over a decade, the Alexander Brothers raped and tormented women with impunity. From the gleaming penthouses of New York and Miami, using their wealth, social connections, and carefully crafted public personas, they engaged in and meticulously concealed a sweeping enterprise of sexual violence. Plaintiff is a survivor of that violence. With this action, she seeks to hold the Alexander Brothers accountable for what they did to her and for their devastating campaign of abuse against dozens of women.

2. Behind the facade of their successful real estate business, Defendants executed a calculated pattern of predation. They weaponized their social media presence, exploited their connections to celebrities and influencers, and deployed their wealth to create elaborate traps for young women. Their methodology was precise: identify vulnerable targets through social media, orchestrate seemingly innocent meetings, isolate and prey on women in their luxury apartments, employ intoxicants to facilitate their assaults, and then manipulate and scare their victims into silence.

3. The scale of Defendants’ operation is staggering. In announcing federal criminal charges against Defendants on December 11, 2024, U.S. Attorney Damian Williams revealed the horrifying scope: “As alleged in the Indictment, for more than a decade, the Alexander Brothers, alone and together, repeatedly and violently sexually assaulted and raped dozens of female victims. Today, the defendants are charged with multiple sex trafficking offenses. Our investigation is far from over.” U.S. Attorney Williams asked more women to come forward, continuing, “If you have been a victim of the alleged sexual violence perpetrated by [Defendants] – or if you know anything about their alleged crimes – we urge you to come forward.”<sup>1</sup>

4. The criminal charges have empowered dozens of women—including Plaintiff—to break their silence. Like many others, Plaintiff was strategically targeted and brutally assaulted in the Defendants’ New York penthouse. Her experience bears the hallmarks of their established pattern:

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<sup>1</sup> Press Release, U.S. Attorney’s Office, Southern District of New York, Alon Alexander, Oren Alexander, And Tal Alexander Charged In Manhattan Federal Court With Sex Trafficking Offenses (Dec. 11, 2024) (<https://www.justice.gov/usao-sdny/pr/alon-alexander-oren-alexander-and-tal-alexander-charged-manhattan-federal-court-sex>).

1 the use of social media to identify targets, the deployment of drugs to incapacitate victims, and the  
2 coordinated participation of multiple brothers in the assault.

3 5. Accordingly, Plaintiff brings this action to hold Defendants accountable for their violations  
4 of the Victims of Gender-Motivated Violence Protection Law, N.Y.C. Admin. Code §§ 10-1101,  
5 *et seq.* (“VGMVPL”). Their systematic, gender-motivated violence reflects not merely  
6 opportunistic criminality, but a deliberate enterprise built on the targeted exploitation and abuse of  
7 women.

## 8 **II. PARTIES**

9 6. Plaintiff Jane Doe is a resident of New York State. Given the sensitive nature of this action  
10 and the sexual assault allegations contained herein, Plaintiff proceeds under a pseudonym to protect  
11 her privacy, and will file the appropriate motion.

12 7. Defendant Tal Alexander resides in Brooklyn, New York, specifically the Metropolitan  
13 Detention Center (MDC) in Brooklyn, New York. Indeed, upon information and belief, prior to  
14 incarceration Tal lived in New York.

15 8. Defendant Alon Alexander resides in Brooklyn, New York, specifically the MDC in  
16 Brooklyn, New York.

17 9. Defendant Oren Alexander resides in Brooklyn, New York, specifically the MDC in  
18 Brooklyn, New York.

## 19 **III. JURISDICTION AND VENUE**

20 10. The Court has personal jurisdiction pursuant to Civil Practice Law and Rules (“CPLR”) §  
21 301, *inter alia*, because Plaintiff and Defendants reside in New York and the horrific assaults  
22 occurred in New York.

23 11. Venue is proper in this County pursuant to CPLR § 503(a) because a substantial part of the  
24 events giving rise to Plaintiff’s claims took place in New York County.

## 25 **IV. FACTUAL ALLEGATIONS**

### 26 **A. Jane Doe Was Systematically Targeted and Suffered a Devastating Sexual Assault by** 27 **Alon, Tal, and Oren Alexander.**

1 12. In 2016, when Plaintiff was 20 years old, she responded to an Instagram story by Chantel  
2 Jeffries—a prominent celebrity Disc Jockey with millions of followers—seeking someone to go on  
3 a date in New York City.

4 13. Plaintiff’s friend also responded to an Instagram story by Chantel Jeffries on behalf of  
5 Plaintiff.

6 14. Plaintiff’s friend ultimately connected with Alon via Instagram.

7 15. Plaintiff’s friend told Alon that she wanted to set up Plaintiff with a “loyal and family  
8 oriented” man for a long-term relationship. The below depicts the conversation between Alon and  
9 Plaintiff’s friend.



16. Executing his practiced predatory pattern, Alon messaged Plaintiff, from information  
supplied by her friend, in what would later prove to be a calculated scheme. He struck up a

1 conversation with Plaintiff on Instagram before transitioning their communications to text  
2 messages, giving Plaintiff a false sense of trust.

3 17. He strategically invited her to meet him for dinner in Manhattan. Trusting his  
4 representations, Plaintiff drove to Manhattan to meet Alon at the specified location.

5 18. Upon arrival, Plaintiff discovered there was no restaurant at the location—the first of many  
6 intentional deceptions. Alon said he was at a bar and invited her to join. Plaintiff told him that she  
7 was twenty years old and could not go to a bar. Alon then smoothly redirected Plaintiff to his  
8 apartment, located in New York City, New York, under the pretense that they would proceed to  
9 dinner afterward.

10 19. Plaintiff arrived at Alon's penthouse apartment building in New York City, where the  
11 building security required Plaintiff's identification and signature before permitting her entry to  
12 Defendants' penthouse apartment. Security kept her identification as she went upstairs.

13 20. Once inside the apartment, Alon immediately presented Plaintiff with a pre-prepared  
14 drink—a signature element of Defendants' methodical assault pattern. After consuming only a  
15 portion of the drink, Plaintiff began experiencing severe and unusual disorientation far beyond the  
16 effects of normal alcohol consumption.

17 21. Alon then told Plaintiff that he would show her around the Defendants' apartment. During  
18 the tour, Alon brought Plaintiff to a bedroom where his brother, Tal, was in bed with a woman  
19 watching television.

20 22. Plaintiff went to introduce herself to Tal with a kiss on the cheek. As she did so, Tal turned  
21 his head and forcibly kissed her on the lips.

22 23. Plaintiff and Alon left Tal and the woman, ultimately coming to rest on a sofa in a bedroom  
23 within the apartment. On the sofa, Alon began to kiss and touch Plaintiff.

24 24. Plaintiff physically resisted Alon's advance, removing his hands from her body.

25 25. She also told Alon to stop, making clear that she did not want to engage in sexual activity  
26 with Alon.

1 26. Plaintiff does not remember how she got on the bed but remembers feeling a sense of  
2 hopelessness once she was there.

3 27. On the bed, Alon told Plaintiff that if he could not touch her, she would have to perform  
4 oral sex on him.

5 28. Despite Plaintiff’s explicit verbal refusals and physical resistance, Alon grabbed Plaintiff’s  
6 head to force her to his penis. He physically controlled her head and forced her to perform oral sex  
7 on him.

8 29. While Plaintiff was being forced to perform oral sex on Alon, a third brother—Oren  
9 Alexander—approached Plaintiff from behind and began removing her clothes without her consent.

10 30. Oren then vaginally raped Plaintiff from behind while she was being forced to continue  
11 performing oral sex on Alon.

12 31. Alon and Oren then switched positions and continued to rape her.

13 32. Throughout the horrific assault, Plaintiff was in an impaired and disoriented state, likely  
14 due to an intoxicant in the drink provided by Alon. She experienced freezing, dissociation, and felt  
15 helpless to resist or escape during the assault.

16 33. Defendant Tal’s presence in the apartment was no coincidence, but rather part of  
17 Defendants’ coordinated scheme. During the apartment “tour,” Alon deliberately brought Plaintiff  
18 to Tal’s bedroom, where Tal was positioned with another woman to normalize the presence of  
19 multiple men and create an environment of implied sexual activity.

20 34. Tal’s forcible kiss of Plaintiff, turning his head to convert her greeting into unwanted sexual  
21 contact, marked the beginning of the Defendants’ orchestrated assault. This initial violation served  
22 to test Plaintiff’s boundaries and gauge her capacity to resist.

23 35. Throughout Plaintiff’s assault by Alon and Oren, Tal remained in the apartment, within  
24 earshot of the ongoing attack. Tal’s presence in the apartment served multiple roles in Defendants’  
25 scheme: it helped establish a false sense of safety through the appearance of a “double date”  
26 scenario, provided additional pressure against Plaintiff’s resistance, and ensured that she could not  
27 escape or seek help from others in the apartment. Tal took no action to intervene or assist her. His  
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1 participation extended beyond mere presence to active facilitation of the assault scheme through  
2 his actions and strategic inactions.

3 36. After sexually violating Plaintiff, Defendants Alon and Oren left her alone in the room,  
4 treating the violent assault as if it were insignificant.

5 37. Plaintiff, in a state of shock and confusion, gathered her clothes and fled the apartment. She  
6 got her identification back from the security desk before she left.

7 38. This pattern of coordinated activity among the Defendants, with each playing specific roles  
8 in facilitating horrific sexually violent assaults, is consistent with the Defendants' criminal  
9 indictment's allegations of their joint enterprise of sexual violence: using luxury properties as  
10 staging grounds, maintaining the presence of multiple brothers to overwhelm victims, and  
11 leveraging each other's presence to create an environment of implied consent and intimidation.

12 39. The sexual assault was substantially motivated by Defendants' animus toward women, as  
13 evidenced by Defendants':

- 14 a. Sophisticated and coordinated efforts to lure Plaintiff to the apartment under false  
15 pretenses, including the calculated use of a female celebrity's social media platform to  
16 create a false sense of security;
- 17 b. Premeditated use of alcohol or other intoxicants to impair and incapacitate Plaintiff, as  
18 demonstrated by the pre-prepared drink waiting upon her arrival;
- 19 c. Complete disregard for Plaintiff's explicit verbal refusals and physical resistance,  
20 showing their view that women's expressions of non-consent are meaningless;
- 21 d. Coordinated use of physical force and coercion, including forcibly controlling  
22 Plaintiff's head and body movements while she was in an impaired state;
- 23 e. Treatment of Plaintiff as a mere object for their sexual gratification rather than a human  
24 being, demonstrated by their coordinated "passing" of her between them without any  
25 regard for her autonomy or dignity;
- 26 f. Cavalier attitude after the assault, demonstrating their view that violating women is  
27 inconsequential;

- 1 g. Strategic division of roles during the assault, with each Defendant performing specific
- 2 actions as part of their coordinated attack;
- 3 h. Exploitation of their wealth, status, and social connections to create an environment
- 4 where they believed themselves immune from consequences; and
- 5 i. Pattern of targeting young, vulnerable women through social media and mutual
- 6 connections, showing their deliberate selection of victims they believed they could
- 7 overpower and silence.

8 40. As a direct and proximate result of Defendants’ actions, Plaintiff has suffered severe and  
 9 ongoing emotional distress, psychological impairment, and economic damages, including but not  
 10 limited to intrusive memories and flashbacks of the horrific assault, severe anxiety in social  
 11 situations, difficulty maintaining intimate relationships, sleep disturbances and nightmares,  
 12 hypervigilance and an exaggerated startle response, as well as panic attacks triggered by  
 13 environmental stimuli reminiscent of the assault; and will have an ongoing need for psychological  
 14 treatment and therapy.

15 **B. The Alexander Brothers’ Had a Well-Known Penchant for Sexually Assaulting**  
 16 **Women.**

17 41. Unfortunately, Plaintiff is far from the only victim of the Alexander Brothers.

18 42. For years, Defendants engaged in a similar pattern of schemes, acts, and conduct with  
 19 different women, many of whom have found the courage to come forward and seek justice.

20 43. As they “built an image as jet-setting bachelors,” Defendants “were quietly earning another  
 21 reputation: Accusations that they drugged and sexually assaulted women were spreading  
 22 throughout the world of high-end real estate.”<sup>2</sup>

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27 <sup>2</sup> Debra Kamin, *These Brothers Were Real Estate Hotshots, And Predators, Some Women Say*, N.Y.TIMES (July 26,  
 28 2024), <https://www.nytimes.com/2024/07/24/realestate/tal-oren-alexander-sexual-assault.html>.

1 44. Two brave women—Rebecca Mandel and Kate Whiteman—stood up in March 2024 and  
2 filed suit in New York against Alon and Oren, accusing them of assault, battery, and rape.<sup>3</sup> They  
3 alleged a similar pattern of behavior against other women.

4 45. They were correct. A third woman—Angelica Parker—filed a lawsuit in June of 2024,  
5 accused all three brothers of rape. She noted in her complaint that thirty more women came forward  
6 after news broke of the initial lawsuits against Defendants.<sup>4</sup>

7 46. Like Plaintiff, Ms. Parker was a victim of a coordinated sexual assault. She was vaginally  
8 raped and forcibly orally raped at the same time by Defendants.<sup>5</sup>

9 47. Upon further investigation, “dozens of former classmates, brokerage employees and  
10 agents” have said “that they had knowledge of drugging and violent sexual assault by the brothers,  
11 dating back at least twenty years to when the men were high school students.”<sup>6</sup>

12 48. Law enforcement agencies around the country have followed these brave women and filed  
13 criminal charges against Defendants.

14 49. A federal grand jury in the Southern District of New York indicted Alon, Oren, and Tal in  
15 December 2024. The U.S. Attorney’s Office alleged repeated and violent drugging, assaulting, and  
16 raping of dozens of women since at least in or about 2010.<sup>7</sup> The indictment alleged that Defendants  
17 used their wealth to lure women to locations where they were forcibly raped them, sometimes by  
18 the Defendants and sometimes by multiple other men, and often with the aid of drugs to prevent  
19 the women from fighting back.

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23 <sup>3</sup> Brooklee Han, *Real estate broker Oren Alexander and brother accused of rape in New York*, HOUSINGWIRE (June  
24 10, 2024, 5:21 PM) [https://www.housingwire.com/articles/real-estate-broker-oren-alexander-and-brother-accused-of-  
25 rape-in-new-york/](https://www.housingwire.com/articles/real-estate-broker-oren-alexander-and-brother-accused-of-rape-in-new-york/).

26 <sup>4</sup> Exhibit A - Docket and Summons & Complaint from Originating Court at 4, *Parker v. Alexander et al.*, 1:24-cv-  
27 04813-LAK (S.D.N.Y. June 25, 2024), ECF 1-1. Ms. Parker’s Complaint was dismissed, but the Court’s dismissal is  
28 being appealed.

<sup>5</sup> *Id.* at 6-7.

<sup>6</sup> Kamin, *supra* note 2.

<sup>7</sup> Superseding Indictment at 5, *U.S. v. Alexander et al.*, 1:24-cr-00676-UA (S.D.N.Y. Dec. 11, 2024), ECF 3.

1 50. The allegations demonstrate Defendants had a history of drugging and assaulting women  
2 using a playbook almost identical to what they used on Plaintiff.

3 51. As outlined in the superseding indictment, Alon, Oren, and Tal “used social connections or  
4 the guise of starting a relationship to lure and entice women to meet . . . then sexually assaulted the  
5 woman, sometimes within hours of their meeting.”<sup>8</sup>

6 52. Defendants “used deception, fraud, and coercion” to get women “to meet them in private  
7 locations.”<sup>9</sup> They then “used various methods, including drugging the victims and, at times,  
8 physical force, to rape and sexually assault the victims—sometimes alone and sometimes  
9 together.”<sup>10</sup>

10 53. Federal prosecutors say that “they’ve spoken to more than 60 alleged victims of the three  
11 men so far,”<sup>11</sup> and have videos of Defendants “engaged in sexual acts with who appear to be under  
12 the influence of drugs or alcohol.”<sup>12</sup> They plan to bring more charges.<sup>13</sup>

13 54. State authorities have filed charges too. Oren and Alon face felony sexual battery charges  
14 in Miami-Dade for three incidents involving three different women.

15 55. According to one of the victims, she took a drink from Oren, began to feel “weird,” and did  
16 not “have the strength” to “push” Oren away as he raped her.<sup>14</sup>

17 56. Another victim described a harrowing scene. As she was forcibly pinned down, Alon and  
18 Oren asked each other, “Do you want to go first? Do you want to go first?” before raping her.<sup>15</sup>

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21 <sup>8</sup> *Id.* at 3.

22 <sup>9</sup> *Id.* at 2.

23 <sup>10</sup> *Id.* at 2-3.

24 <sup>11</sup> *Id.*

25 <sup>12</sup> Alice Gainer, *Alexander brothers will face more charges as 60 women allege rape, prosecutors say*, CBS NEWS (Feb. 7, 2025, 8:22 PM), <https://www.cbsnews.com/newyork/news/alexander-brothers-will-face-more-charges/>.

26 <sup>13</sup> *Id.*

27 <sup>14</sup> Chloe Atkins, *Women detail alleged assaults by real estate star Oren Alexander and his brother*, NBC NEWS (Feb. 6, 2025, 7:23 PM), <https://www.nbcnews.com/news/us-news/women-detail-alleged-assaults-real-estate-star-oren-alexander-brother-rcna191110>.

28 <sup>15</sup> *Id.*

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**V. PLAINTIFF’S CLAIMS**  
**FIRST CAUSE OF ACTION**

**Violation of the Victims of Gender-Motivated Violence Protection Law,  
N.Y.C. Admin. Code §§ 10-1101, et seq. (“VGMVPL”)**

57. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

58. This claim is brought against Defendants Alon, Oren, and Tal.

59. As set forth below, Defendants violated the Victims of Gender-Motivated Violence Protection Law (VGMVPL) by “committing a crime of violence motivated by gender.”

60. The VGMVPL defines a “crime of violence motivated by gender” as “a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim's gender.” Admin. Code § 10-1103(b).

61. Put together, the elements of a violation of the VGMVPA are: (1) the alleged act constituted a misdemeanor or felony against the Plaintiff; (2) presenting a serious risk of physical injury; (3) that was perpetrated because of Plaintiff's gender; and (4) in part because of animus against Plaintiff's gender. *Id.*

62. Defendants’ actions meet the first element of a VGMVPL violation, as their misconduct violates Article 130 of the New York Penal Law:

- a. Alon and Oren violated § 130.35—Rape in the first degree—for “vaginal sexual contact . . . by forcible compulsion” and “oral sexual contact . . . by forcible compulsion.” Not only was the rape “by forcible compulsion,” but Plaintiff was also “incapable of consent by reason of being physically helpless,” given the drink Alon gave her.
- b. From the same facts, Alon and Oren also violated lesser related offenses, including § 130.65, Sexual abuse in the first degree.
- c. Alon also violated § 130.90—Facilitating a sex offense with a controlled substance—by giving Plaintiff a pre-made drink “without [her] consent and with intent to commit .

1 . . . conduct constituting a felony.” The drink left Plaintiff disoriented and unable to  
2 physically resist Defendants’ sexual assault.

3 d. Tal is criminally liable for his brothers’ violations of Article 30 because, under § 20.00,  
4 he “intentionally aid[ed]” their sexual assault of Plaintiff with full knowledge of their  
5 plans to violate her.

6 63. Defendants’ actions presented a serious risk of physical injury. As stated above, the direct  
7 and proximate result of Defendants’ gender-motivated violence is that Plaintiff has suffered and  
8 continues to suffer, severe and ongoing emotional distress, psychological impairment, and  
9 economic damages, including but not limited to intrusive memories and flashbacks of the assault,  
10 severe anxiety in social situations, difficulty maintaining intimate relationships, sleep disturbances  
11 and nightmares, hypervigilance and an exaggerated startle response, as well as panic attacks  
12 triggered by environmental stimuli reminiscent of the assault; and will have an ongoing need for  
13 psychological treatment and therapy.

14 64. Defendants’ violent acts were motivated by gender as evidenced by Defendants’ as outlined  
15 herein.

16 65. Additionally, the Appellate Division First Department has held that where the plaintiff is  
17 an alleged victim of rape, an allegation of rape is sufficient to show animus on the basis of  
18 gender. *Breest v. Harris*, 180 A.D. 3d 83 (1st Dept. 2019).

19 66. Plaintiff brings this action under VGMVPL’s revival statute, passed by the New York City  
20 Council in January 2022, which allows otherwise time-barred claims to be brought until March 1,  
21 2025. Admin. Code § 10-1105(a).

22 67. Plaintiff seeks compensatory damages, punitive damages, attorneys’ fees, costs, and such  
23 other relief as the Court deems just and proper under § 10-1104.

24 68. The Defendants’ misconduct was willful, wanton, malicious, and oppressive, and  
25 manifested a conscious disregard for Plaintiff’s rights and safety, thereby warranting punitive  
26 damages under the common law standard for the purpose of punishing and deterring reprehensible  
27 conduct. *Chauca v. Abraham*, 30 N.Y.3d 325 (2017).

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**PRAYER FOR RELIEF**


WHEREFORE, Plaintiff demands judgment against Defendants for the above-referenced claims and causes of action, and as follows:

- 1. Award compensatory damages in an amount to be determined at trial, including but not limited to damages for:
  - a. Medical expenses, past and future;
  - b. Impaired earning capacity;
  - c. Past and future emotional distress and psychological trauma;
  - d. Past and future loss of enjoyment of life;
- 2. Award punitive damages in an amount to be determined at trial sufficient to punish Defendants for their willful and malicious conduct and to deter similar conduct by others;
- 3. Award prejudgment and post-judgment interest to the fullest extent permitted by law;
- 4. Award reasonable attorneys' fees and costs;
- 5. For such other and further relief as the Court may deem just and proper.

**DEMAND FOR A JURY TRIAL**

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

Date: February 25, 2025

By: 

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