

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

E-FILED SUMMONS

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JANE DOE 1,

Plaintiff designates New York County as the place of trial.

Plaintiff,

v.

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

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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TO: TAL ALEXANDER
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**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

JANE DOE 1,

Plaintiff,

v.

TAL ALEXANDER,

Defendant.

Case No.:

COMPLAINT FOR DAMAGES

JURY TRIAL DEMANDED

Plaintiff Jane Doe 1 (“Plaintiff”), brings this action against Tal Alexander (“Defendant” or “Tal”) to recover damages arising from the injuries she suffered because of Defendant’s sexual abuse, and alleges as follows:

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I. INTRODUCTION

1. For over a decade, Tal, Alon Alexander (“Alon”), and Oren Alexander (“Oren”), and (collectively, “Defendants” or 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 – and in particular sexual violence committed by Tal. With this action, she seeks to hold Tal accountable for what he did to her and for Tal’s devastating campaign of abuse against dozens of women.

2. Behind the facade of their successful real estate business, Defendant and his younger brothers—Alon and Oren Alexander—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 at celebrity parties and 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 Defendant’s operation with his brothers is staggering. In announcing federal criminal charges against Defendant and his brothers 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 [Defendant or his brothers] – or if you know anything about their alleged crimes – we urge you to come forward.”¹

¹ 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 4. The criminal charges have empowered dozens of women—including Plaintiff—to break
2 their silence. Like many others, Plaintiff was strategically targeted and brutally assaulted by
3 Defendant in his New York penthouse. Plaintiff’s experience bears the hallmarks of their
4 established pattern: the identification of targets at celebrity parties and the deployment of drugs to
5 incapacitate victims.

6 5. Accordingly, Plaintiff brings this action against Defendant to hold him accountable for
7 violating the Victims of Gender-Motivated Violence Protection Law, N.Y.C. Admin. Code §§ 10-
8 1101, *et seq.* (“VGMVPL”) and to hold Defendant accountable for the sexual assault of Plaintiff
9 and his broader campaign of systematic, gender-motivated violence. Defendant’s conduct reflects
10 not merely opportunistic criminality, but a deliberate enterprise built on the targeted exploitation
11 and abuse of women.

12 II. PARTIES

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

16 7. Defendant Tal Alexander resides in Brooklyn, New York, specifically the Metropolitan
17 Detention Center (“MDC”) in Brooklyn, New York, and upon information and belief, resided in
18 Brooklyn prior to his incarceration.

19 III. JURISDICTION AND VENUE

20 8. The Court has personal jurisdiction pursuant to Civil Practice Law and Rules (“CPLR”) §
21 301, *inter alia*, because Plaintiff and Defendant Tal Alexander reside in New York.

22 9. Venue is proper in this County pursuant to CPLR § 503(a) because a substantial part of the
23 events giving rise to Plaintiff’s claims took place in New York County, and because the horrific
24 abuse Plaintiff endured occurred in New York.

25 IV. FACTUAL ALLEGATIONS

26 A. Defendant Deliberately Targeted, Drugged, and Repeatedly Assaulted Plaintiff.

27 10. One morning approximately ten years ago, Plaintiff woke up in the bed of Defendant in his
28 New York City apartment, without knowing how she got there. This nightmarish awakening would

1 prove to be just one instance of Defendant’s calculated pattern of assault, deployed repeatedly to
2 victimize young women.

3 11. Plaintiff first met Defendant at Mark Birnbaum’s birthday party at Catch New York in the
4 Meatpacking District. In this carefully curated environment of celebrity and wealth, where young
5 women would naturally feel safe to lower their guard due to the public nature of the establishment
6 and presence of other guests, Defendant approached Plaintiff at the party, where they exchanged
7 contact information.

8 12. After cultivating a sense of trust through careful communication, Plaintiff eventually
9 decided to go on a date with the Defendant in the following weeks. She and Defendant met at Lur
10 Fish Bar in New York - a deliberate choice of upscale venue designed to project sophistication and
11 trustworthiness - before stopping by a now-closed nightclub named Provocateur.

12 13. Plaintiff’s plan was to spend a short time at the nightclub with Defendant before meeting
13 up with a female friend of hers afterwards - a safety plan that Defendant would systematically
14 dismantle.

15 14. Instead, Plaintiff had one or two drinks with Defendant in the nightclub. Shortly thereafter,
16 she began experiencing extreme and unusual intoxication far beyond what her limited alcohol
17 consumption could explain.

18 15. Upon information and belief, Defendant deliberately contaminated Plaintiff’s drink with an
19 intoxicating substance, consistent with his established pattern of using drugs to facilitate sexual
20 assault.

21 16. The next thing Plaintiff remembers is waking up in Defendant’s bed, where her state of
22 undress, physical position, and vaginal pain left no doubt that Defendant had raped her while she
23 was in a state of extreme intoxication. Plaintiff did not and could not have consented to sex that
24 night.

25 17. Rather than showing any remorse upon her awakening, Defendant escalated his predatory
26 behavior. When Plaintiff woke up and told Defendant that she was going home, Defendant refused
27 to let her leave.
28

1 18. Despite her verbal protestations and repeated “No’s,” Defendant ignored her clear refusal
2 of consent and proceeded to rape her *again*, using his physical dominance and control of the
3 environment to perpetrate another violent assault while she remained trapped and unable to escape.

4 19. Only after he sexually assaulted Plaintiff for a second time did Defendant permit Plaintiff
5 to leave, albeit in a controlled fashion – having his driver take her home - a calculated move that
6 both emphasized his power and attempt to create an air of legitimacy around the sexually violent
7 encounter.

8 20. The sexual assault was substantially motivated by Defendant’s animus toward women, as
9 evidenced by Defendant’s:

- 10 a. Premeditated use of alcohol and other intoxicants to impair Plaintiff, as demonstrated
11 by her rapid and severe impairment despite minimal alcohol consumption;
- 12 b. Deliberate exploitation of her chemically induced vulnerability, shown by timing his
13 assault to occur after the drugs took effect;
- 14 c. Treatment of Plaintiff as a mere object for their sexual gratification rather than a human
15 being, demonstrated by assaulting her while unconscious and then again upon her
16 awakening;
- 17 d. Complete disregard for Plaintiff’s explicit verbal refusals, showing his view that
18 women’s expressions of non-consent were meaningless and irrelevant to his pursuit of
19 sexual contact;
- 20 e. Use of physical intimidation and environmental control to prevent escape, reflecting his
21 view that women could be physically dominated at will;
- 22 f. Calculated progression from drugging to assault to forcible confinement, showing an
23 escalating pattern of control and violence;
- 24 g. Exploitation of his wealth, status, and social connections to create a circumstance where
25 he believed himself immune from consequences;
- 26 h. Strategic use of public venues and social settings to establish a false sense of safety
27 before isolating his victim;
- 28

- 1 i. Sophisticated understanding of how to use wealth markers like private drivers to mask
- 2 criminal misconduct;
- 3 j. Pattern of targeting young, vulnerable women through mutual connections,
- 4 demonstrating his deliberate selection of victims he believed he could overpower,
- 5 silence, and discredit;
- 6 k. Escalation of violence upon Plaintiff's awakening, showing his comfort with overt force
- 7 once his victim was isolated;
- 8 l. Calculated use of drugs to ensure victims would have impaired memory and therefore
- 9 be less likely to report or be believed; and
- 10 m. Deliberate selection of assault locations that maximized his control while minimizing
- 11 potential witness intervention.

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

19 **B. Defendant and His Brothers Had a Well-Known Penchant for Sexually Assaulting**
 20 **Women.**

21 22. Unfortunately, Plaintiff is far from the only victim of Defendant or his brothers.

22 23. For years, Defendant and his brothers engaged in a similar pattern of schemes, acts, and
 23 conduct with different women, many of whom have found the courage to come forward and seek
 24 justice.

1 24. As they “built an image as jet-setting bachelors,” Defendant and his brothers “were quietly
2 earning another reputation: Accusations that they drugged and sexually assaulted women were
3 spreading throughout the world of high-end real estate.”²

4 25. Two brave women—Rebecca Mandel and Kate Whiteman—stood up in March 2024 and
5 filed suit in New York against Defendant’s brothers, Alon and Oren, accusing them of assault,
6 battery, and rape.³ They alleged a similar pattern of behavior against other women.

7 26. They were correct. A third woman—Angelica Parker—filed a lawsuit in June of 2024,
8 accused all three brothers of rape. She noted in her complaint that thirty more women came forward
9 after news broke of the initial lawsuits against Defendant and his brother.⁴

10 27. Like Plaintiff, Ms. Parker was a victim of a coordinated sexual assault. Ms. Parker was
11 vaginally raped and forcibly orally raped at the same time by Defendant and his brothers.⁵

12 28. Upon further investigation, “dozens of former classmates, brokerage employees and
13 agents” have said “that they had knowledge of drugging and violent sexual assault by the brothers,
14 dating back at least twenty years to when the men were high school students.”⁶

15 29. Law enforcement agencies around the country have followed these brave women and filed
16 criminal charges against Defendant and his brothers.

17 30. A federal grand jury in the Southern District of New York indicted Defendant, and his
18 brothers, Alon and Oren, in December 2024. The U.S. Attorney’s Office alleged repeated and
19 violent drugging, assaulting, and raping of dozens of women since at least in or about 2010.⁷ The
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21 _____
22 ² Debra Kamin, *These Brothers Were Real Estate Hotshots. And Predators, Some Women Say*, N.Y. TIMES (July 26,
2024), <https://www.nytimes.com/2024/07/24/realestate/tal-oren-alexander-sexual-assault.html>.

23 ³ 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-rape-in-new-york/>.

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

27 ⁵ *Id.* at 6-7.

28 ⁶ Kamin, *supra* note 2.

⁷ 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 indictment alleged that Defendant, and his brothers, Alon and Oren, used their wealth to lure
2 women to locations where they were forcibly raped them, sometimes by Defendant and his
3 brothers, and sometimes by multiple other men, and often with the aid of drugs to prevent the
4 women from fighting back.

5 31. The allegations demonstrate Defendant had a history of drugging and assaulting women
6 using a playbook almost identical to what he used on Plaintiff.

7 32. As outlined in the superseding indictment, Defendant, along with his brothers Alon and
8 Oren, “used social connections or the guise of starting a relationship to lure and entice women to
9 meet . . . then sexually assaulted the woman, sometimes within hours of their meeting.”⁸

10 33. Defendant “used deception, fraud, and coercion” to get women “to meet them in private
11 locations.”⁹ He then “used various methods, including drugging the victims and, at times, physical
12 force, to rape and sexually assault the victims—sometimes alone and sometimes together.”¹⁰

13 34. Federal prosecutors say that “[Defendant and his brother have] spoken to more than 60
14 alleged victims of the three men so far,”¹¹ and have videos of Defendant and his brothers “engaged
15 in sexual acts with who appear to be under the influence of drugs or alcohol.”¹² They plan to bring
16 more charges.¹³

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

19 36. According to one of the victims, she took a drink from Oren, began to feel “weird,” and did
20 not “have the strength” to “push” Oren away as he raped her.¹⁴

21 _____
22 ⁸ *Id.* at 3.

23 ⁹ *Id.* at 2.

24 ¹⁰ *Id.* at 2-3.

25 ¹¹ *Id.*

26 ¹² 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/>.

27 ¹³ *Id.*

28 ¹⁴ 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>.

1 37. Another victim described a harrowing scene. As she was forcibly pinned down, Alon and
2 Oren asked each other, “Do you want to go first? Do you want to go first?” before raping her.¹⁵

3 **V. PLAINTIFF’S CLAIMS**

4 **FIRST CAUSE OF ACTION**

5 **Violation of the Victims of Gender-Motivated Violence Protection Law,**

6 **N.Y.C. Admin. Code §§ 10-1101, et seq. (“VGMVPL”)**

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

9 39. This claim is brought against Defendant Tal Alexander.

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

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

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

19 43. Defendant's actions meet the first element of a VGMVPL violation, as his conduct violates
20 Article 130 of the New York Penal Law:

- 21 a. Defendant committed Rape in the first degree, a violation of § 130.35, by engaging in
- 22 vaginal sexual contact with Plaintiff (a) by forcible compulsion when he would not let
- 23 Plaintiff leave in the morning without having sex; and (b) when Plaintiff was incapable
- 24 of consent by reason of being physically helpless as a result of the intoxicant.
- 25 b. Defendant's actions incorporate the lesser and included crimes of: § 130.25—Rape in
- 26 the third degree—because Plaintiff was “incapable of consent”; § 130.65—Sexual

27 _____
28 ¹⁵ *Id.*

1 abuse in the first degree—because Defendant raped Plaintiff “by forcible compulsion”
2 and Plaintiff was “incapable of consent by reason of being physically helpless”; and §
3 130.20—Sexual misconduct—because Plaintiff did not consent to the vaginal sexual
4 contact.

5 c. Defendant also violated § 130.90—Facilitating a sex offense with a controlled
6 substance—by adding an intoxicant to Plaintiff’s drink “without [her] consent and with
7 intent to commit . . . conduct constituting a felony.” The drink left Plaintiff unaware and
8 unable to consent to sex or to physically resist Defendant’s sexual assault.

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

17 45. Defendant’s violent acts were motivated by gender as evidenced by Defendant’s as outlined
18 herein.

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

22 47. Plaintiff brings this action under VGMVPL’s revival statute, passed by the New York City
23 Council in January 2022, which allows otherwise time-barred claims to be brought until March 1,
24 2025. Admin. Code § 10-1105(a).

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

27 49. The Defendant’s misconduct was willful, wanton, malicious, and oppressive, and
28 manifested a conscious disregard for Plaintiff’s rights and safety, thereby warranting punitive

1 damages under the common law standard for the purpose of punishing and deterring reprehensible
2 conduct. *Chauca v. Abraham*, 30 N.Y.3d 325 (2017).

3 **PRAYER FOR RELIEF**

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

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

18 **DEMAND FOR A JURY TRIAL**

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

20 Date: February 25, 2025

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24 By: 

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