

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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COMPLAINT

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JILL HARTH HOURANEY

Plaintiff,

JURY TRIAL DEMANDED

-vs-

DONALD J. TRUMP, NICK RIBIS and  
ROGER WAGNER,

Defendants.  
-----X

*[Seal of the Southern District of New York]*

APR 30 3 19 PM '97

JURISDICTION:

1. This action is brought pursuant to 42 U.S.C. 1985 (2) (3), 42 U.S.C. 1986, Ninth and Thirteenth Amendments to the U.S. Constitution. Jurisdiction is founded on 28 U.S.C. 1331, 1332 and 1343 (3)(4) on the basis of diversity of citizenship. The plaintiff is a resident of the State of Florida and the defendant Trump is a resident of the State of New York and defendants Ribis and Wagner are residents of the State of New Jersey.

2. Plaintiff invokes the pendent jurisdiction of this Court pursuant to 28 U.S.C. 1367 to adjudicate state law claims as to violations of the State of New York Civil Rights Law, Sec. 40-c, the laws and constitution of the State of Florida, prima facie tort sounding in "outrageous conduct," defamation and intentional infliction of emotional distress.

The Plaintiff:

3. The plaintiff Jill Harth Houraney is a citizen of the State of Florida and resides at 7134 San Sebastian Drive, Boca Raton, Fla.

The Defendants:

4. The defendant Donald J. Trump, at all times hereinafter mentioned, is a citizen of the State of New York and resides at 721 Fifth Avenue, New York, N.Y. Defendant Trump is being sued in defendant's individual capacity.

5. The defendant Nick Ribis, at all times hereinafter mentioned, is a citizen of the State of New Jersey and resides in New Jersey. Defendant Ribis, who is in charge of defendant Trump's casino interests in Atlantic City, is being sued in defendant's individual capacity.

6. The defendant Roger Wagner, at all times hereinafter mentioned, is a citizen of the State of New Jersey and resides at 93 Lagoon Blvd., Brigatine, N.J. Wagner, formerly President of the Trump Castle casino in Atlantic City, N.J., is being sued in his individual capacity.

Statement of Facts:

7. On or about December 11th, 1992, the plaintiff accompanied George Houraney to make a business presentation to defendant Donald J. Trump with regard to the American Dream Festival:

(a) The American Dream Festival is an event-oriented affair that includes a "Calendar Girl" competition, whereby young, often vulnerable female contestants compete for prizes and titles. Additionally, music, comedy and automotive design competitions are a major part of the festival.

(b) Defendant Trump expressed an interest in participating in American Dream's annual affair as a joint venture between Mr. Houraney and Trump.

(c) George Houraney was and is the principle owner of all rights, title and interest in American Dream Festival and its component "Calendar Girl" competition. Defendant Trump, through agreement between defendant and Mr. Houraney, became a 50% partner in American Dream Festival as the main sponsor of the 1993 event.

(d) Plaintiff Jill Harth Houraney was an employee of American Dream Festival, which was plaintiff's sole source of income, and as a result of the agreement between George Houraney and Trump, became subjected to the control and authority of Trump.

8. That during the aforementioned meeting and presentation in New York, defendant Trump inquired of Mr. Houraney about the plaintiff, to wit: "Are you sleeping with her?" and further demanded to know whether it was "just for the night or what?"

9. On or about December 12th, 1992, at a subsequent business dinner/meeting at the Plaza Hotel to discuss the newly-formed venture between American Dream Festival, the defendant Trump repeatedly put his hands on plaintiff's thighs and violated plaintiff's "physical and mental integrity" by attempting to touch plaintiff's intimate private parts in violation of plaintiff's fundamental constitutional right to privacy and physical autonomy as a citizen of the United States.

10. That the defendant Trump later on the evening of December 12th, 1992, began introducing plaintiff to Trump business associates at the Plaza Hotel as defendant's "new girlfriend," though in fact plaintiff was only a business associate of defendant Trump.

11. That in the presence of plaintiff's co-employer Mr. Houraney, the defendant Trump made denigrating, lewd comments about all women in general as "sex objects," comparing the plaintiff with other women, and suddenly declared to Mr. Houraney: "You know, there's going to be a problem. I'm very attracted to your girlfriend."

12. Defendant Trump began making repeated personal "sexual" demands of plaintiff, which included attempts to lure plaintiff to defendant's Trump Tower apartment for late-night meetings to "talk and have a drink," but in fact constituted defendant's stated interest to exploit plaintiff as a "sex object and slave" to satisfy defendant's sexual appetite as a self-described "stud."

13. Plaintiff became emotionally distraught and feared reprisals because of plaintiff's rejection of the sexual demands of defendant, who was unrelenting in his pursuit of plaintiff as a "sex object." Plaintiff was aware that Trump had a prior history of abusive and sexual mistreatment of women in general, constituting a class-based invidious discriminatory animus towards all women, to wit:

(a) Defendant's ex-wife Ivana caught the defendant sneaking "sex object" Marla Maples into Trump Tower to cavort sexually with Maples in Ivana's marital chambers.

(b) During divorce proceedings initiated by Ivana against the defendant Trump for engaging in sexual acts of fornication with Maples in violation of N. Y. Criminal Penal Law 255.17, which proscribes adultery as a Class "A" misdemeanor, Ivana accused Trump of marital rape, spousal battery and physical abuse.

(c) That defendant Trump consistently humiliated self-admitted adulterer/ paramour Marla Maples, if that were possible, by making a public spectacle of Maples through routine public announcements in press releases and statements to the media that Maples was being dumped.

(d) That defendant Trump, after being the subject of a negative article in the Village Voice, owned and published by Leonard Stern, spread false malicious "sexual innuendo" to the public about Stern's wife Allison, asserting that Mrs. Stern asked defendant for sex, which was Trump's way of retaliating against Stern for telling the truth about how Trump cheated his banks, bondholders, investors and the government, suggesting Trump should be jailed for tax evasion.

(e) That defendant Trump made lewd, derogatory sex-oriented remarks about a British female broadcast journalist, who dared to criticize Trump as a buffoon, short-fingered vulgarian and womanizer who betrayed his ex-wife and three children with an adulterous affair.

(f) That defendant Trump resorted to personal attacks on Justice Phyliss Gangel-Jacobs of the Supreme Court of the State of New York as a woman because Justice Gangel-Jacobs concluded that Trump was an adulterer who betrayed ex-wife Ivana and awarded substantial sums to Ivana.

(g) That defendant Trump spread racial slurs and malicious gossip about black actress Robin Givens to business associates and the media, including that Ms. Givens left marks from her "white teeth" on defendant's genitals during alleged oral sex with defendant.

14. Defendant Trump subsequently engaged in further Svengali-type acts to control and subjugate plaintiff to defendant's will with demeaning and perverted communications demanding that plaintiff become defendant's sex slave:

(a) On or about January 4th, 1993, defendant made numerous telephone calls to plaintiff in Boca Raton, Fla., from New York demanding that plaintiff "sleep with him".

(b) On or about January 9th, 1993, at a business dinner party at defendant's estate in Palm Beach, plaintiff out-of-fear of reprisals relented to defendant's demands that plaintiff be seated next to defendant, whereupon defendant again sought to violate plaintiff's "physical and mental integrity" by depriving plaintiff of her constitutionally-protected fundamental right to privacy in plaintiff's physical autonomy by maneuvering his hand up plaintiff's thigh in an attempt to touch plaintiff's private parts.

(i) On or about January 24th, 1993, plaintiff had no choice with regard to defendant Trump's demand that plaintiff attend a business meeting at defendant's estate Mar-A-Lago in Palm Beach, Fla. After Trump business associates left, the defendant over plaintiff's objection forcibly prevented plaintiff from leaving and forcibly removed plaintiff to a bedroom, whereupon defendant subjected plaintiff to defendant's unwanted sexual advances, which included touching of plaintiff's private parts in an act constituting attempted "rape":

(i) Before the defendant would allow plaintiff to leave the bedroom, defendant placed a call to defendant/co-conspirator Roger Wagner in Atlantic City, New Jersey, saying that defendant wanted to make defendant Wagner aware of how plaintiff "was so beautiful and Roger loves beautiful women, too."

(ii) Defendant Trump proclaimed that defendant "did not want a scandal like Willie Smith had in Palm Beach," inferring that plaintiff should "keep her mouth shut."

(iii) As plaintiff attempted to leave the premises, defendant Trump again became sexually abusive by intimately touching plaintiff's person and uttering Svengali-type proclamations of "love." Plaintiff immediately became nauseated and vomited profusely.

(j) Plaintiff felt degraded and humiliated as a female, human being and citizen of the United States by defendant Trump's "outrageous" conduct in violation of plaintiff's constitutionally-protected right to privacy in plaintiff's "physical and mental integrity" and "physical autonomy as a female" for defendant's sole purpose of relegating and/or otherwise subjugating plaintiff to the status of a "sex slave" to satisfy defendant's sexual perversions, ignited by defendant's general hatred and class-based, invidiously discriminatory animus towards women, whom defendant considered to be mere "sex objects" to fulfill defendant's prurient sexual fantasies.

(k) As a direct and proximate result of the continuing acts and actions of defendant Trump against plaintiff, plaintiff was emotionally devastated, distraught and began experiencing mental anguish, exhaustion, pain and suffering, intentionally inflicted upon plaintiff by defendant Trump solely because of plaintiff's status as a woman. Plaintiff feared sudden class-based reprisal and retaliation, including violence against plaintiff's person by the defendant, for reason of plaintiff's refusal to be further sexually and mentally violated by defendant Trump.

(l) On or about February 2nd, 1993, defendant Trump called plaintiff from Pebble Beach, Calif., and demanded that plaintiff join him at a golf tournament and expressed his dissatisfaction with the appearance there of Marla Maples and Maples' mother Ann Ogletree.

(m) On or about February 9th, 1993, defendant Trump again contacted plaintiff from Palm Springs, Calif., stating that defendant thought plaintiff was "the most beautiful girl in the whole world" and that defendant "loved and adored" plaintiff.

(n) On or about February 25th, 1993, defendant discovered Maples to be pregnant and in April held a press conference to promote the out-of-wedlock pregnancy, then invited plaintiff to have sex with defendant "whenever I was ready."

15. On or about July 15th, 1993, plaintiff went to Atlantic City, New Jersey, for meetings at the Trump Castle with the casino's president, the defendant Roger Wagner.

16. On or about July 16th, 1993, defendant Trump arrived in Atlantic City, New Jersey, and introduced plaintiff to the defendant Nick Ribis and both assumed an uninvited "sexual familiarity" with plaintiff by "touching" and "feeling" plaintiff's person. The defendant Trump conveyed the impression to defendant Ribis that plaintiff had slept with defendant Trump and was available to Ribis. Over a two-day period both defendant Ribis and Trump exhibited a class-based invidious animus towards women in general and plaintiff specifically with sexual innuendo that demeaned plaintiff as a "sex object".

17. On or about November 16th, 1993, the plaintiff attended a press conference at the Trump Castle in Atlantic City, N.J., to announce the Trump/American Dream Festival event:

(i) Defendant Ribis inquired of plaintiff about the availability of various female contestants attending the press conference and repeatedly requested "personal" and "sexual" information without any entitlement thereto and for the sole purpose of defendant's "sexual gratification" if defendant "got lucky."

(ii) Defendant Ribis subsequently approached plaintiff and advised plaintiff that plaintiff was "too old" for defendant Trump, insinuating by sexual innuendo that defendant Ribis had a "greater appreciation for older women."

(iii) Defendant Ribis revealed that defendant Trump had spoken to defendant of, about and concerning plaintiff and approved of a purported "sexual relationship" claimed by Trump to exist between defendant Trump and plaintiff.

(iv) Defendant Ribis suggested that defendant wanted a similar relationship with plaintiff.

18. On or about November 20th, 1993, defendant Trump demanded that plaintiff provide defendant with access to a 17-year-old contestant from Czechoslovakia, who was a contestant in the "Calendar Girl" competition, whom Trump referred to with "sexual innuendo" in describing the contestant's status as a woman and "sex object" in the eyes of defendant.

19. That co-conspirators/defendants Wagner and Ribis, because of their personal knowledge and approval of the conduct of defendant Trump as set forth herein to treat women in general as "sex objects," participated in a conspiracy to facilitate and cover-up defendant Trump's acts and actions to violate plaintiff's constitutionally-protected fundamental right to privacy, the right to be free from defendant Trump's unwarranted intrusion into plaintiff's "physical" and "mental" autonomy and "integrity." Co-conspirators Wagner and Ribis were in a position to prevent Trump's conduct, but instead condoned and participated in a conspiracy against plaintiff to facilitate Trump's "sexual fantasies" of, about and concerning plaintiff in violation of 42 U.S.C. 1986.

20. That a conspiratorial agreement may be deemed to exist between defendants Trump, Ribis and Wagner may be inferred from the "words and actions" of defendants that manifested in the complained of conduct as set forth and further described herein.

21. That defendants Trump, Ribis and Wagner engaged in a subsequent conspiracy to cover-up the acts and actions of defendants with threats to harm and injure plaintiff's constitutionally-protected liberty interest in plaintiff's business reputation:

(a) Defendants Trump, Ribis and Wagner with intent to inflict harm and injury to plaintiff's business, business reputation, person, personality and property, engaged in a vendetta against plaintiff and plaintiff's husband George Houraney, who was subsequently informed by plaintiff of the nefarious sexual misconduct of defendants against plaintiff.

(b) Defendants Trump, Ribis and Wagner assaulted plaintiff's character with malicious invective innuendo conveyed to plaintiff's friends and business associates, including the host of the "Calendar Girl" competition Jim Gibson.

(c) On or March of 1994, the plaintiff was subjected to derisive banter from defendant Trump in an interstate telephone conversation between plaintiff and defendant, which included threats against plaintiff by defendant to "keep her mouth shut" or else.

(d) That on or about October of 1993, defendant Trump engaged in conversations with plaintiff, expressed his "boredom" with Marla Maples and said he didn't want to marry her, stating that he wasn't "even sure that kid was mine," and that Maples "had lost her "tits" and was no longer appealing to him as a "sex object". Additionally, defendant made lewd, prurient demands of plaintiff to submit to his still-festering interest to seduce and subjugate plaintiff sexually and exploit plaintiff as a "sex object."

(e) That on or about April of 1994, the plaintiff rejected defendant Trump's sexual advances and subtle suggestions that plaintiff make herself available to defendant to exploit as a "sex object," such acts constituting continuing wrongs against plaintiff.

(f) That on or about August 10, 1994, plaintiff telephoned Wagner in Atlantic City, New Jersey, and admitted to plaintiff that defendant Trump only wanted the deal with American Dream Festival as a source for women and "was just trying to get into your pants, just like Nick Ribis," confirming by "words and actions" that Trump, Ribis and Wagner had manifested a "meeting of the minds" in an agreement by, amongst and between defendants to violate plaintiff's constitutionally-protected fundamental right to privacy, including the right to personal, physical and mental autonomy:

(i) In fact, defendant Wagner opined that plaintiff should take the "sage advice of former TV weatherman Tex Antoine," who is obviously a role model to co-conspirators/defendants Trump, Ribis and Wagner, because as Wagner said: "Antoine was right about women facing rape, they shouldn't fight it, just lay down relax and enjoy it."

22. That plaintiff has been informed by several young, vulnerable women associated with the "Calendar Girl" competition in the American Dream Festival that defendant Trump placed calls to them throughout the period 1993-1997 promising to provide them with positions/and/or career advancement help in return for sexual favors.

23. That the co-conspirators/defendants Trump, Ribis and Wagner viewed the plaintiff and women in general, including the young, vulnerable women participating in the "Calendar Girl" competition in the American Dream Festival, as "sex objects" and demonstrated a class-based invidiously discriminatory animus towards women in general, specifically and in particular as "sex objects" and "sex slaves" to men, specifically and in particular, the defendants Trump, Ribis and Wagner.

24. That the conspiratorial acts and acts of Ribis, Trump and Wagner against plaintiff were in violation of 42 U.S.C. 1985 (3), plaintiff's fundamental constitutionally-protected right to privacy and physical autonomy as secured by the Ninth Amendment, including plaintiff's right to freedom of thought, the right to be free from "mental rape," "sexual slavery and mental subjugation" and freedom from physical invasion of one's personal autonomy.

25. That plaintiff is a witness in a civil proceeding in Federal court against Trump, which was initiated by American Dream Festival in connection with breach of contract involving the joint venture, because plaintiff was an "unwilling victim of Trump's sexual fantasy to control plaintiff as a sex slave" and eyewitness to Ribis, Wagner and Trump's attempt to convert a legitimate beauty pageant/model search event into a "sex orgy" for a purpose bordering on "white slavery" to fulfill the "sexual" whims of defendants.

26. That Trump, Ribis and Wagner through business associates have made concerted personal attacks upon and threats against plaintiff in a conspiracy to discourage plaintiff from testifying fully, completely and truthfully, in a Court of the United States, and by defendants "words and actions" manifested an agreement towards and in furtherance of that objective, to wit:

(a) On or about September of 1996, defendant Trump instigated a malicious, defamatory article in the Enquirer of, about and concerning plaintiff, which included the false words of Trump saying that plaintiff "was trying to get into my pants."

(b) That on or about December of 1996 at the World Finals of the American Dream Festival in the Bahamas, the event's host Jim Gibson, acting on behalf of and in the interest as agent for defendants Trump, Ribis and Wagner, stated that "Trump wants to destroy you any way it takes, legally or illegally."

(c) That the threats constitute a deliberate and intentional attempt by defendants to deter, by force, intimidation or threat, the plaintiff from appearing as a witness in a Court of the United States in the Southern District of New York to testify to a matter therein, freely, fully, and truthfully, against said defendants in a breach of contract suit in violation of 42 U.S.C. 1985 (2).

(d) That the defendants engaged in a conspiracy to threaten to injure plaintiff in plaintiff's business, business reputation, person, property and personality if plaintiff testified in said proceeding.

(e) That on or about March 24th, 1997, the defendant Trump within the sight and hearing of plaintiff and plaintiff's husband George Houraney, stated to attorney Jay Goldberg in a public area at the federal courthouse, 500 Pearl Street, New York, N.Y., where plaintiff was appearing in support of the litigation on behalf of American Dream Festival, the following words: "See, I told you she was gorgeous. She was a great piece of ass."

(f) That on or about March 24th, 1997, during a mediation session at the federal courthouse, 500 Pearl Street, New York, N.Y., in connection with plaintiff's appearance as a witness and in support of litigation on behalf of American Dream Festival, the defendant Trump violated plaintiff's right to be free from intrusion into plaintiff's "physical and mental integrity" with improvident, spontaneous verbal outbursts constituting personal attacks upon plaintiff, intentionally calculated to inflict emotional injury.

right to be free from invasion of one's "physical and mental integrity," freedom from "mental rape, mental slavery and sexual subjugation," which is a constitutional right secured by the Thirteenth Amendment.

34. That by virtue of the acts and actions of defendants in furtherance of defendants' conspiracy, designed for the purpose of depriving, either directly or indirectly, the plaintiff of equal protection of laws and equal privileges and immunities under the laws, plaintiff suffered injuries and seeks relief pursuant to defendants' violation of 42 U.S.C. 1985 (3).

34. That as a direct and proximate result of the acts and actions of defendants, plaintiff suffered mental and emotional trauma, physical pain and suffering, some or all of which may be permanent, to the damage of plaintiff in the amount of \$25,000,000.00.

35. That as a direct and proximate result of the acts and actions of defendants, plaintiff suffered loss of employment, loss of business reputation and customer goodwill and impairment of plaintiff's ability to develop new business, to the special damage of plaintiff in the amount of \$501,000.00.

AS AND FOR A SECOND CAUSE OF ACTION  
AGAINST DEFENDANTS TRUMP, RIBIS AND WAGNER

36. Plaintiff repeats and realleges all the allegations contained in paragraphs 1-35 as if set forth fully and incorporated by reference verbatim herein and further alleges as follows.

37. That defendants Trump, Ribis and Wagner, because of defendants' having knowledge that any or all of the wrongs conspired to be done as are set forth herein, and having power to prevent or aid in preventing the commission of the same, violated 42 U.S.C. 1986 and are liable therefore as to all damages caused by such wrongful acts, which such defendants by reasonable diligence could have prevented.

38. That as a direct and proximate result of the negligence of defendants to prevent the wrongs inflicted upon plaintiff by the defendants, plaintiff suffered damages in the sum of \$25,501,000.00.

AS AND FOR A THIRD CAUSE OF ACTION  
AGAINST THE DEFENDANT DONALD J. TRUMP  
(Plaintiff invokes the pendent jurisdiction of the court to adjudicate state law claims)

39. Plaintiff repeats and realleges all the allegations contained in paragraphs 1-39 as if set forth fully and incorporated by reference verbatim herein and further alleges as follows.

40. That on or about September of 1996, the defendant Trump spoke false, defamatory words of, about and concerning plaintiff to a reporter for the Enquirer, which were published in an article in an edition thereof, which is annexed hereto and incorporated by reference herein, to wit:

*"The truth is that Jill Harth is obsessed with me and would do everything she could to get into my pants!"*



(c) During the late evening of January 9th, 1993, defendant Trump forcefully removed plaintiff from public areas of Mar-A-Lago in Florida and forced plaintiff into a bedroom belonging to defendant's daughter Ivanka, wherein defendant forcibly kissed, fondled and restrained plaintiff from leaving, against plaintiff's will and despite plaintiff's protests.

(d) Defendant Trump thinks generally of women as sex objects and slaves to defendant's sexual whims. Consequently, defendant engaged in bizarre behavior towards plaintiff with depraved and reckless indifference and disregard for and in violation of plaintiff's (i) constitutional right to privacy and physical autonomy as a female member of a protected-class, (ii) constitutional right to freedom from defendant Trump's Svengali-type acts to control and subject plaintiff to compulsory "involuntary servitude" as a "sex slave" to satisfy defendant's deranged, uncontrollable "lust" to subjugate women in general as "sex objects" and (iii) constitutional right to equal protection under the laws and constitution of the State of Florida, which guarantees a right to privacy.

(e) That during the evening of January 9th, 1993, the defendant also became abusive to other women associated with the "Calendar Girl" competition, who were invited by Mr. Houraney as guests, although defendant Trump directed that any black female contestants be excluded, with sexually-explicit rhetoric communicated to female targets designed to trap women in daughter Ivanka's bedroom alone with Trump:

(i) The defendant Trump also sexually accosted Lauren Petrella, an invited guest of American Dream Festival, by sneaking uninvited into Ms. Petrella's room at Mar-A-Lago in pre-dawn hours for the purpose of taking sexual advantage of a "sleeping beauty." A startled Ms. Petrella awoke and inquired of the defendant why he was in her bed. A leering, groping Trump replied: "You said you don't sleep with men on the first date. Now it's the second date and here I am!"

(ii) The defendant Trump's conduct in excluding black female contestants also demonstrated a class-based discriminatory animus bias towards women because of race and color.

(f) That the unrelenting "outrageous" acts and actions of defendant against plaintiff constituted "mental rape" of plaintiff by virtue of defendant's unceasing efforts to obtain mental and physical control over plaintiff by use of fear, force and economic intimidation to enslave plaintiff as a "sex object" for the purpose of defendant's sexual perversions.

(g) On or about January 15th, 1993, plaintiff returned defendant's telephone call regarding the business event, only to be again subjected to demeaning sexual innuendo because of plaintiff's status as a woman. Defendant Trump stated that he "wished he was curled up in bed" with plaintiff, queried plaintiff on the subject of what plaintiff "was like in bed" and that if plaintiff slept with defendant, plaintiff "would be an awakened woman", that defendant "was the best lover you'll ever have" and demanded that plaintiff "cheat on George."

(h) On or about January 16th, 1993, defendant Trump again engaged in demeaning sexual slurs in an attempt to wear down plaintiff's resistance and bend plaintiff to defendant's will to fulfill defendant's sexual demands that plaintiff engage in fornication with defendant because of defendant's belief that women are mere "sex objects" to subjugate

41. That on or about January of 1997, the defendant Trump spoke false, defamatory words of, about and concerning plaintiff to High Society Magazine, a porn magazine that published said false words in an article annexed hereto and incorporated by reference herein, to wit:

*"do anything to get into my pants"*

42. That on or about December 24th, 1997, the defendant Trump spoke false, defamatory words of, about and concerning plaintiff in a public area of the federal courthouse, 500 Pearl Street, New York, N.Y., to attorney Jay Goldberg, which were heard by an audience of bystanders waiting for an elevator, plaintiff and plaintiff's husband George Houraney, to wit:

*"She was a great piece of ass"*

43. That on or about March 24th, 1997, in a conference room at the federal courthouse, 500 Pearl Street, New York, N.Y., the defendant Trump spoke false, defamatory words of, about and concerning plaintiff, to wit:

*"slept with him"*

*"had sex with him"*

*"was very good in bed"*

44. That the words complained of spoken by defendant of, about and concerning plaintiff, because of defendant's knowledge of the falsity thereof, were intentionally malicious with actual malice of forethought towards plaintiff, were spoken with utter and reckless disregard of the truth or falsity thereof and impute that plaintiff is an unchaste woman, which is defamatory per se and actionable without proof of malice or pleading of special damages. Plaintiff has never slept with the defendant Trump, had sex with the defendant Trump nor been intimate with the defendant Trump, except as described in the complaint with respect to defendant Trump's "attempted rape" of plaintiff, "mental rape" of plaintiff and rejected "sexual advances".

45. That as a direct and proximate result of defendant's false words of, about and concerning plaintiff, plaintiff suffered emotional and mental trauma, physical pain and suffering, stigma and has been irreparably injured in her good name, business, business reputation, person, personality and social standing, and has lost the esteem and respect of her friends, acquaintances, business associates and the public generally to plaintiff's damage in the amount of \$25,000,000.00.

46. That as a direct and proximate result of the defendant's false, malicious, defamatory publication of plaintiff, plaintiff has been injured in her business, business reputation, impairment of future earning capacity, suffered loss of her business and client relationships, loss of employment and income and loss off the ability to developo new business to plaintiff's damage in the sum of \$501,000.00.

AS AND FOR A FOURTH CAUSE OF ACTION  
AGAINST DEFENDANTS TRUMP, RIBIS AND WAGNER  
(Plaintiff invokes the pendent jurisdiction of the court to adjudicate state law claims)

47. Plaintiff repeats and realleges all the allegations contained in paragraphs 1-46 as if set forth fully and incorporated by reference herein verbatim and further alleges as follows.

48. That the acts and actions of defendants were so extreme as to be considered outrageous in character to a degree as to go beyond all possible bounds of decency, and to be regarded as atrocious and utterly intolerable in a civilized society.

49. That the conduct of defendants was so extreme as to constitute intentional infliction of emotional distress upon plaintiff, which was so severe that no reasonable person could be expected to endure it. That the acts and actions of defendants were continuous over an extended period of time and are subject to the doctrine of continuing wrong.

50. That as a direct and proximate result of the acts and actions of defendants, plaintiff sought emotional counseling and professional help, became intensely and emotionally distraught, suffered from frequent physical illness and constant depression, suffered anxiety attacks, nervousness, nightmares, sleepless nights, severe headaches and became extremely irritable, some or all of which may be permanent, to plaintiff's damage in the sum of \$50,000,000.00.

51. That as a direct and proximate result of the acts and actions of defendants, plaintiff suffered special medical damages, including brief hospitalization, estimated to be in the sum of \$11,530.00.

AS AND FOR A FIFTH CAUSE OF ACTION  
AGAINST DEFENDANTS TRUMP, RIBIS AND WAGNER  
(Plaintiff invokes the pendent jurisdiction of the court to adjudicate state law claims)

52. Plaintiff repeats and realleges all the allegations contained in paragraphs 1-51 as if set forth fully and incorporated by reference herein verbatim and further alleges as follows.

53. That defendants by virtue of their acts and actions as set forth herein in a conspiracy against plaintiff, violated the constitution and Civil Rights Law, Section 40-c, of the State of New York,

the constitution and civil rights laws of the State of Florida and the constitution and civil rights laws of the State of New Jersey.

54. That as a direct and proximate result of the acts and actions of defendants, plaintiff suffered damages to be determined by a jury after trial.

AS AND FOR A SIXTH CAUSE OF ACTION  
AGAINST THE DEFENDANT DONALD J. TRUMP

55. Plaintiff repeats and realleges all the allegations contained in paragraphs 1-54 as if set forth fully and incorporated by reference herein verbatim and further alleges as follows.

56. That defendant Trump by virtue of defendants acts and actions as are set forth herein has exhibited a dangerously psychotic proclivity for violence towards and physical abuse of women, which included the "sexual assaults," "attempted rape" and "sexual molestation" of plaintiff, as set forth and described herein.

57. That defendant Trump represents a clearly present, future and constant danger to women in general and in particular those women involved in beauty pageants, such as American Dream Festival's "Calendar Girl" competition and "Miss Universe," "Miss USA" and "Miss Teen USA."

58. That defendant Trump is a co-owner of the aforementioned "Miss Universe," "Miss USA" and "Miss Teen USA" pageants with the CBS Television Network, which is owned by Westinghouse Electric Company of Pittsburgh, Pa.

59. That the plaintiff requests that a Temporary Restraining Order enter against the defendant Donald J. Trump, prohibiting and enjoining defendant from any personal contact or involvement whatsoever with any past, present or future female contestant in the "Calendar Girl" competition of the American Dream Festival, and otherwise prohibiting, preventing and enjoining defendant from any personal contact or involvement with any other beauty pageant involving women, including "Miss Universe," "Miss USA" and "Miss Teen USA" to prevent irreparable harm and injury to women by repetition of defendant's class-based invidious discriminatory acts and actions against women, which are intended to subjugate female victims thereof to "sexual slavery," "mental rape," or deprivation of a woman's fundamental right to privacy, mental and physical autonomy, such acts and actions of defendant being adjudged as threatening to continue unabated without this Court's intervention, pending a decision by this Court as to whether permanent injunctive relief may be granted in favor of plaintiff to enter against defendant.

WHEREFORE, the plaintiff requests that this Court award the following compensatory and injunctive relief to plaintiff.

- (a) FIRST CAUSE OF ACTION.....\$25,501,000.00.
- (b) SECOND CAUSE OF ACTION.....\$25,501,000.00
- (c) THIRD CAUSE OF ACTION.....\$25,501,000.00
- (d) FOURTH CAUSE OF ACTION.....\$50,011,530.00
- (e) FIFTH CAUSE OF ACTION in an amount to be determined by a Jury after trial.
- (f) SIXTH CAUSE OF ACTION.....INJUNCTIVE RELIEF

- (g) Award punitive damages against defendants for egregious, willful, malicious acts and actions designed to intentionally inflict injury to plaintiff in her business, business reputation, person, personality and property in a sum to be determined by the jury.
- (h) Award costs, reasonable attorney's fees and expenses to the plaintiff, together with what other and further relief as this Court may deem proper.

DATED: APRIL 25, 1997

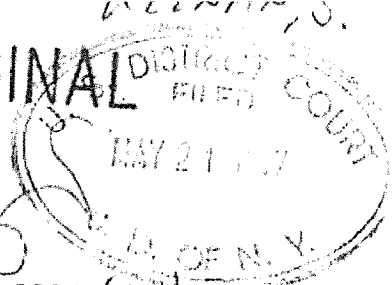
JILL HARTH HOURANEY  
PLAINTIFF

*Jill Harth Houraney*

7134 SAN SEBASTIAN DRIVE  
BOCA RATON, FLORIDA

5/21/97

ORIGINAL



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JILL HARTH HOURANEY

Docket #97 CIV 3135 (EKK)

Plaintiff,

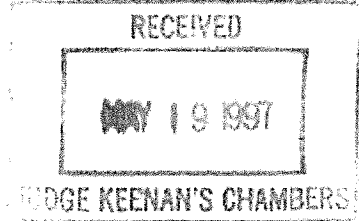
-vs-

DONALD J. TRUMP, NICK RIBIS  
ROGER WAGNER,

Defendants.

*Emily*

WARRANTY DISMISSAL  
T TO FRCP 41(a)1



Plaintiff, Jill Harth Houraney, pursuant to Federal Rule FRCP 41(a) does voluntarily dismiss the above entitled action, which voluntarily dismissal is without prejudice.

*Jill Harth Houraney*  
Jill Harth Houraney

Dated: Boca Raton, Florida

SO ORDERED

*John F. Keenan*

U. S. D. J.

5-21-97

MEI

MICROFILM

MAY 22 1997 9:03 AM