

(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:

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,
(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."