

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

JANE DOE,

CASE NO:

Plaintiff,

vs.

VERIFIED COMPLAINT

**ALON ALEXANDER and OREN
ALEXANDER,**

Defendants.

/

COMES NOW, Plaintiff, JANE DOE,¹ by and through the undersigned counsel, and hereby sues Defendants, ALON ALEXANDER and OREN ALEXANDER (hereinafter collectively referred to as “Defendants”) and alleges as follows:

PRELIMINARY STATEMENT:

1. Defendants are twin brothers who gained notoriety for their successful careers in real estate and other business ventures and were fixtures in New York’s social scene.

2. In the fall of 2016, Plaintiff met Alon Alexander through the dating app Bumble and engaged in a brief casual relationship in New York City.

3. In December of 2016, Plaintiff traveled to Miami, Florida to celebrate the New Year. Unbeknownst to Plaintiff, Alon happened to also be in Miami, Florida at that same time, unrelated to Plaintiff’s trip.

4. On December 31, 2016, Alon enticed Plaintiff to meet him at a luxury condo for what he claimed was a barbeque and pool party.

¹ Plaintiff is proceeding through the use of Jane Doe as a pseudonym due to the sensitive nature of the allegations set forth below.

5. When Plaintiff arrived, she was greeted by Alon who introduced her to his twin brother Oren and Ohad Fisherman, who he referred to as a “cousin.” Shortly thereafter, Plaintiff was led into a room where she was held down by Fisherman while Oren forcibly raped her, as his brother, Alon, watched from a chair in the corner. Alon then forcibly raped Plaintiff.

6. Accordingly, Plaintiff brings this action pursuant to the Victims of Gender-Motivated Violence Protection Law, NYC Admin. Code §§ 10-1101, *et. seq.* (VGMVPL), for the planned and brutal rape of Plaintiff by Defendants, Alon and Oren Alexander, that occurred on December 31, 2016.

PARTIES

7. Plaintiff is an individual female currently residing in the State of Florida. On December 31, 2016, Plaintiff was a resident of the City and State of New York.

8. On December 31, 2016, Defendant Alon Alexander (hereinafter referred to as “Alon”) was a resident of the State and City of New York, and currently resides in the State of Florida.

9. On December 31, 2016, Defendant, Oren Alexander (hereinafter referred to as “Oren”) was a resident of the State and City of New York, and currently a resident of the State of Florida.

10. At all times relevant herein, Defendants maintained a residence located at 158 Mercer Street, New York, New York.

11. Venue is proper in this County as designated by Plaintiff and the parties resided in New York County at the time of the subject rape.

12. This cause of action is timely filed pursuant to § 10-1105(a), as it is commenced within two years and six months of September 1, 2022.

FACTUAL ALLEGATIONS

13. Defendants engaged in a repeated pattern of rape and sexual assault of women dating as far back as 2010. They utilized their status, wealth and influence, to lure women, including the Plaintiff, into isolated settings to violently rape and assault them.

14. Unfortunately, Plaintiff was not their only target. Over the course of at least a decade, Defendants engaged in a disturbing pattern of coordinated sexual violence against dozens of women.

15. Upon information and belief, Defendants utilized dating applications, such as Bumble, for the sole purpose of finding women to eventually rape and sexually assault.

16. Around the fall of 2016, Plaintiff met Alon through the dating application Bumble. Thereafter, they communicated via the application and text messages and developed a brief and casual relationship. Prior to her assault, Plaintiff met Alon on two occasions at his New York City apartment located at 158 Mercer Street, New York, New York.

17. In December of 2016, Plaintiff traveled from her residence in New York City to central Florida to visit family for the holidays. Plaintiff traveled from central Florida to Miami, Florida with her sisters and friends to celebrate the New Year.

18. Upon information and belief, Alon utilized location identifying measures and social media to discover that Plaintiff was in Miami.

19. Around midafternoon on December 31, 2016, on New Year's Eve, Alon and Plaintiff began communicating via electronic messaging. Plaintiff learned through her text conversation with Alon, that he was also in Miami.

20. Alon invited Plaintiff to a barbeque and pool party that he claimed was being held at a luxury building located at 5875 Collins Ave, Miami Beach, Florida, 33140 (the "Property"). To

entice Plaintiff to attend, Alon sent Plaintiff a photograph of the “barbeque” with several people seemingly enjoying themselves at a luxury pool near the beach.

21. Under Alon’s fraudulent representations, Plaintiff took an Uber to the Property. When Plaintiff arrived, Alon escorted her up to a luxury unit. Once inside, Plaintiff was introduced to his brother Oren and a “cousin” Ohad Fisherman, she quickly realized she was the only guest.

22. Within a few minutes, Alon led Plaintiff into a bedroom, Oren and Fisherman followed quickly behind, the door was shut and locked behind them. Alon and Oren then engaged in a demonic discussion about which brother would be the first to rape Plaintiff.

23. Oren apparently prevailed in that conversation and put on a condom while Alon went and sat on a chair in the corner to watch. Fisherman grabbed Plaintiff from behind and pinned her shoulders down while Oren forcibly vaginally raped Plaintiff, ignoring Plaintiff’s tears and pleas for him to stop. At some point, likely when Fisherman was confident Plaintiff could not fight back, Fisherman let go of Plaintiff as Oren continued his brutal rape of Plaintiff. While being raped, Plaintiff instinctively started pretending to enjoy the rape, as she had previously heard a rapist may stop if the victim acts like they are enjoying the rape. It worked, shortly thereafter Oren stopped and angrily exclaimed “f**k this” as he threw his condom on the ground and stormed out of the bedroom.

24. Next, Alon forcibly vaginally raped Plaintiff against her will as she laid there numb and disassociated. After Alon finished, he attempted to force Plaintiff to perform sexual acts on Fisherman, threatening that she needed to do so in order to leave. At this point, Plaintiff was uncontrollably crying and managed to not be assaulted further. Alon then forced Plaintiff to shower, where he briefly joined her while Fisherman stayed in the room monitoring Plaintiff. After Plaintiff showered, she left via an Uber, in disbelief, forever changed and fearful of the demonic Defendants.

25. Throughout this horrific time, Plaintiff was begging and pleading with the Defendants to stop.

26. Defendants' demeanor throughout this orchestrated assault was composed, as if it was just a normal routine in the course of their day. With complete and utter disregard for the lifetime of trauma, shame, emotional turmoil they imposed on the Plaintiff.

27. Defendants intentionally lured Plaintiff to the Property under false pretenses motivated entirely by the fact that they wanted to rape a woman.

28. Unsurprisingly, numerous women with similar allegations have courageously come forward demonstrating that the Defendants routinely engaged in premeditated horrific sexual assaults against women.

29. The Defendants do not regard women as human – but rather objects to fulfill their deranged violent desires. Defendants, who were wealthy and arguably good-looking, could have engaged in all of the consensual sex they desired - but that is not what they sought – it was the brutal and violent assault and rape of women.

FIRST CAUSE OF ACTION

Violation of the Victims of Gender-Motivated Violence Protection Law

Plaintiff hereby incorporates and realleges each and every allegation contained in paragraphs 1 through 29 as though fully set forth herein and further states:

30. Defendants' sexual assault, rape and battery of Plaintiff constitutes a "crime of violence motivated by gender" against Plaintiff as defined by the NYC Victims of Gender-Motivated Violence Protection Law, NYC § 10-1103. Defendants' actions were motivated by Plaintiff's gender, on the basis of her gender, and due, at least in part, to an animus based on her gender.

31. Defendants committed crimes of violence against Plaintiff because she is a female and, at least in part, because they had an animus toward women. Defendants' gender-motivated

animus towards women is evidenced by, among other things, their humiliating and degrading sexual assault and repeated raping of Plaintiff and other women.

32. As a direct and proximate result of the aforementioned crime of violence motivated by gender, Plaintiff suffered and continues to suffer physical injury, severe psychological and emotional trauma, emotional distress, anguish, ridicule, embarrassment, loss of enjoyment of life, and her injuries will be permanent in nature and effect.

WHEREFORE, Plaintiff, JANE DOE, demands judgment against the Defendants, ALON ALEXANDER and OREN ALEXANDER in an amount which exceeds the monetary jurisdiction of all other courts which might otherwise have jurisdiction including compensatory and punitive damages, declaratory relief, prejudgment interest, attorneys fees, together with interest, costs and disbursements of this action and such other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

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

Dated: December 12, 2024
Plantation, Florida

By: /s/ Carissa M. Peebles
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ATTORNEY'S
VERIFICATION

Defendant.

CARISSA PEBBLES., hereby affirms under the penalties of perjury as follows:

That I am an associate of the law firm of MORGAN & MORGAN, P.A., attorneys for the Plaintiff in the within action.

That I have read the foregoing VERIFIED COMPLAINT and know the contents thereof and the same is true to my own knowledge except as to the matters therein stated to be alleged upon information and belief and as to those matters, I believe them to be true.

That the reason this verification is made by affiant and not by Plaintiff is that Plaintiff is not presently in the county wherein your affiant's office is located.

Affiant further states that the source of my information and the grounds for my belief as to all matters made on behalf of Plaintiff and/or information are contained in your affiant's file.

Date: Plantation, Florida
December 12, 2024

/s/ Carissa Peebles
Carissa Peebles, Esq.

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