

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

JANE DOE,

CASE NO:

Plaintiff,

COMPLAINT

v.

IRVING DOMINGO LORENZO, JR.
a/k/a IRV GOTTI,

Defendant.

_____ /

Plaintiff Jane Doe, by and through her undersigned counsel, hereby states her Complaint against Defendant Irving Domingo Lorenzo, Jr. a/k/a “Irv Gotti” for sexual assault and rape based upon personal knowledge and information and belief:

PARTIES

1. Plaintiff Jane Doe is an individual who was during the relevant time period a resident of Florida.
2. Upon information and belief, Defendant Irving Domingo Lorenzo, Jr. a/k/a “Irv Gotti” is an American DJ, music producer, record executive, and the CEO and co-founder of Murder Inc. Records.

JURISDICTION AND VENUE

3. This Court has jurisdiction because the amount in controversy exceeds the jurisdictional limits of all lower courts that may otherwise have jurisdiction not counting interests and costs.
4. Venue is proper in the Circuit Court of the Seventeenth Judicial Circuit in and for Miami-Dade County, Florida because a substantial portion of the conduct underlying this Complaint occurred in this county.

STATEMENT OF FACTS

5. Plaintiff met Irv Gotti through a mutual friend at a poker tournament in the summer of 2020.

6. Gotti invited Plaintiff to go on vacation with him in Saint Martin, to which she agreed.

7. After flying her to Saint Martin, Gotti coerced Plaintiff into having sex with him.

8. Gotti specifically threatened Plaintiff that he would send her home if she did not comply with his demands. Accordingly, and due to his power and influence in the music world, she complied.

9. Following the trip to Saint Martin, Gotti and Plaintiff entered into a relationship where, for two years, Plaintiff suffered constant abuse at Gotti's hands.

10. During this abusive relationship, Gotti demanded that Plaintiff perform unwanted sexual acts and often berated and scolded her.

11. Notably, in January 2022, Gotti flew Plaintiff out to Miami, and the two stayed at the Four Seasons hotel. There, Gotti forced her to perform oral sex on him in an elevator.

12. Later in the summer of that same year, he flew her out to Atlanta, and he again forced her to perform oral sex on him in an Uber. Following this event, the relationship ended.

13. As a result of this sexually abusive relationship, Plaintiff has suffered severe emotional and psychological harm for which she had to be committed to a psychiatric ward. These injuries continue and affect Plaintiff to this day.

14. Moreover, Plaintiff has been made aware that Gotti is slandering her to his vast social network in and around Los Angeles.

15. As a result, and in addition to the severe emotional distress described above, Plaintiff now fears leaving her home.

CAUSE OF ACTION

Sexual Assault and Battery

16. Plaintiff re-alleges and incorporates the preceding paragraphs 1-15 as if fully set forth herein.

17. Defendant's sexually offensive actions were conducted in his individual capacity and intended to cause a harmful or offensive contact with Plaintiff.

18. A harmful, offensive, unprivileged, and unpermitted contact with Plaintiff actually occurred as a result of Defendant's intent.

19. The acts perpetrated by Defendant against Plaintiff were against Plaintiff's will.

20. As a result of the egregious sexual conduct perpetrated by Defendant against Plaintiff, Plaintiff has experienced and will continue to experience severe emotional anguish, pain and suffering, and loss of dignity damages. Plaintiff accordingly demands attorney's fees and costs, and compensatory damages in an amount to be determined at trial.

CLAIM II: Intentional Infliction of Emotional Distress

21. Plaintiff re-alleges and incorporates the preceding paragraphs 1-20 as if fully set forth herein.

22. The aforementioned sexual assault and battery of Plaintiff was intentional.

23. Defendant's intentional actions and inactions set forth above caused severe and debilitating emotional distress to Plaintiff.

24. Defendant's conduct was malicious, wanton, and willful.

25. Plaintiff seeks compensatory damages in an amount to be determined at trial, and

an award of attorneys' fees, costs, and disbursements.

26. As a direct and proximate result of Defendant's intentional acts, Plaintiff suffered temporary and permanent injuries; has endured significant pain and suffering of both mind and body and will continue to endure such pain and suffering in the future; has incurred medical expenses in an undetermined amount and/or will continue to incur medical expenses in the future; has suffered damages for the lost enjoyment of life and lost the ability to perform usual activities, resulting in a diminished quality of life and loss of enjoyment of life.

JURY TRIAL DEMANDED

27. Plaintiff hereby demands trial by jury of all triable issues.

PRAYER FOR RELIEF

Plaintiff requests the following relief for the violations set forth in this Complaint:

- a. Compensatory damages, including those for mental anguish, in an amount to be proven at trial that exceeds the jurisdictional limits of all lower courts that may otherwise have jurisdiction;
- b. An imposition of penalties available under applicable laws;
- c. Litigation costs and expenses, including attorney's fees; and
- d. Any other relief that the Court deems just and proper.

Dated: July 11, 2024

Respectfully submitted,

/s/ Adriana Alcalde

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