

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

----- X

KIRSTYN CRAWFORD,

Plaintiff,

AMENDED COMPLAINT

-against-

AMERICAN BROADCASTING COMPANIES, INC.,

Index No.: 157874/2021

-and-

MICHAEL CORN,

Defendants.

----- X

Plaintiff Kirstyn Crawford (“Crawford”), by her attorneys, Walden Macht & Haran LLP, alleges as follows:

NATURE OF THE ACTION

1. Plaintiff brings this lawsuit in response to the pervasive toxic work environment at Defendant American Broadcasting Companies, Inc. (“ABC”) caused by the actions of former top executive, Defendant Michael Corn (“Corn”) and the inactions of ABC.

2. Over the course of a decade, between 2010 and 2021, Corn sexually assaulted at least two female employees who reported to him, Plaintiff and Jill McClain (“McClain”).

3. Corn assaulted Plaintiff while traveling with Plaintiff in Los Angeles for ABC business. As described in more detail below, while in an Uber to their hotel, Corn pulled Crawford’s head into his chest and began kissing her and rubbing her legs. Each time Crawford tried to pull away, Corn pulled her right back. Later that evening, after Crawford believed she had escaped to her hotel room, Corn came to Crawford’s room for the express purpose of attempting to have sex with her.

4. Corn also assaulted McClain on two separate occasions—once on a redeye flight from Los Angeles to New York, and once in London—both times while traveling with McClain for ABC business. As described in more detail below, Corn groped McClain’s vagina over her jeans on an airplane, pinned her down on a hotel bed, pulled down the top of her jumpsuit, and fondled her bare breasts.

5. Both Plaintiff and McClain were traumatized and rendered incapable of reporting the incidents for fear of losing their jobs, since Corn was their supervisor.

6. Between 2010 and 2021, Corn also created and perpetuated a toxic work environment fraught with the discrimination and marginalization of women, which included verbal and physical abuse and unwelcome sexualized comments and harassment.

7. Despite the silencing effect the abuse had on Plaintiff, McClain, and others, ABC knew or should have known that Corn had a propensity to sexually harass female colleagues and that he perpetuated a hostile work environment at ABC. As early as 2017, ABC learned of Corn’s sexual assault on Plaintiff. Yet ABC did nothing to protect Plaintiff or remove Corn from his position of power. Indeed, Plaintiff has reason to believe that ABC was also aware of other women who complained about Corn. Instead, ABC looked the other way and elevated Corn through the ranks due to his commercial success as a producer. Thus, ABC facilitated the hostile workplace that Corn cultivated through his influence over subordinates’ careers, sexual harassment, gaslighting, and verbal and physical abuse. As a result, Plaintiff suffers from psychological trauma and a stalled trajectory to her budding career at ABC.

THE PARTIES

8. Plaintiff Kirstyn Crawford is a 31-year-old female. Crawford is currently an employee of ABC and has been with the company for more than eight years. She currently serves

as the Anchor Producer for George Stephanopoulos (“Stephanopoulos”) on Good Morning America, ABC’s morning news program.

9. Defendant ABC is a multinational commercial broadcast television network doing business continuously in New York. ABC is headquartered in New York, New York. At all relevant times, Crawford worked in ABC’s New York office, which has more than 20 employees.

10. Defendant Michael Corn is a former senior executive producer of Good Morning America. In his role, Corn was responsible for carrying out personnel decisions including, but not limited to, promoting, demoting, hiring, and firing ABC employees. In or around 2014, Corn joined Good Morning America from World News Tonight, ABC’s evening news program. When Corn made this transition, Crawford began reporting directly to him. Despite the sexual abuse that she endured from him, which is detailed further below, Crawford continued to report to Corn until April 2021 when he was finally fired by ABC as a result of his sexually predatory conduct. However, the manner in which ABC announced Corn’s departure made it appear to the other staff and employees at ABC that Corn was the victim of malicious and unfounded accusations.

JURISDICTION AND VENUE

11. The Court has jurisdiction over Defendants pursuant to CPLR §§ 301 and 302(a) because Defendants regularly transact business in the State of New York and Defendants have committed tortious acts within the State of New York or outside of New York, causing injury in this State and resulting in the claims herein.

12. Venue is proper in this Court pursuant to CPLR § 503, as a substantial part of the events or omissions giving rise to Plaintiff’s claims occurred in New York County.

FACTUAL ALLEGATIONS

A. Corn Sexually Assaulted Crawford.

13. In February 2015, members of the Good Morning America team, including Crawford and Corn, traveled to Los Angeles to cover the Academy Awards. On Saturday, February 21, the evening before the Academy Awards, there was a company party at a bar. Both Crawford and Corn attended the party.

14. At the bar, an ABC employee invited Crawford to join a smaller group who was planning on going to another location after the company party. Crawford was fairly new to the Good Morning America team and did not know the other employees all that well, so she accepted the invitation because she saw it as an opportunity to network and develop friendships with her coworkers. After the company party had winded down, Crawford and approximately eight other ABC employees, including Corn, went to the second location.

15. After spending some time at the second location, Crawford decided that she was ready to head back to her hotel room. Before saying goodbye to the group, Crawford excused herself to go to the restroom. As she exited the restroom and started to head back to say goodbye to the group, Corn called out to her. He was waiting in line to use the restroom, and he was noticeably intoxicated. Corn told Crawford that the group was getting ready to leave to go to a third location and asked Crawford not to leave without him. Crawford waited for Corn, and then the two headed back to the rest of the group. But Crawford received a message from one of the ABC employees that provided the address of the third location and explained that the rest of the group had already left. In addition, the ABC employee told Crawford that Corn had also gone to use the restroom and that Crawford should find Corn and meet the group at the third location. Crawford let Corn know that the rest of the group had already gone to the third location and told

him that she was going to call an Uber and head back to the hotel. Corn was annoyed that the rest of the group had left for the third location without him. Corn waited with Crawford until Crawford's Uber arrived. To Crawford's surprise, Corn then joined Crawford in the Uber.

16. In the Uber on the way back to the hotel, Corn grabbed Crawford's hand and told her that he wanted to be able to help her with her career. Corn claimed that it was unlikely that Stephanopoulos genuinely cared about Crawford's career. But Corn assured Crawford that he, on the other hand, truly did care about her career. Crawford was beyond uncomfortable; she was in a moving vehicle, her boss was forcibly touching her, and she did not know how to extract herself safely from the situation. Corn did not stop there. He grabbed Crawford's head and pulled it into his chest and kept telling her to "just relax" and kept asking "why are you so tense?" Corn then began kissing Crawford on the head and rubbing her legs. He accused Crawford of being "insecure" and asked her if she had "daddy issues." Each time Crawford tried to pull away, Corn pulled her right back.

17. After what felt like an interminable Uber ride back to the hotel, Corn told Crawford that he had lost his room key. Crawford, as Corn's subordinate, felt compelled to solve her boss's apparent problem. Corn provided Crawford with his room and floor number, and Crawford went to the front desk to explain that her boss had lost his room key. Just as Crawford was about to explain the situation to the clerk at the front desk, Corn called to Crawford and told her that he had found his room key and that he actually had it all along. Upon reflection, Crawford believes that Corn feigned losing his room key in a devious ploy to get her to invite him to her room.

18. With room keys in hand, Crawford and Corn got into the same elevator. They rode the elevator up to Corn's floor and Corn asked Crawford what floor her room was on. Crawford did not want Corn to know which floor she was on and did not know the best way to deal with

Corn. It was clear to her that her new boss was trying to end up in her room, and she wanted to figure out a way to extract herself from the situation as gently as possible so as not to upset her new boss. In that moment, Crawford was having a very difficult time standing up for herself and firmly telling Corn “no.” Crawford was afraid to go directly to her room because she thought Corn would want to follow her. So, she walked Corn to his room and planned to make sure he was in his room before she returned to her room; Crawford thought this would be a safe way to separate herself from Corn.

19. When Crawford and Corn arrived at Corn’s room, Corn told Crawford that he did not feel well, asked if she had any Advil, and then entered his room and laid down on his bed on his back, and kicked off his shoes. Crawford filled up a glass of water, took an Advil from a small medicine pouch in her purse, and placed the Advil and water on Corn’s nightstand. Corn then asked Crawford to sit down with him. Crawford was confused and did not know what she should do. She hesitated, but then sat on the edge of the bed. To this day, Crawford feels ashamed that she sat on the edge of that bed and wishes she had just left the room, but, in that moment, when her new boss asked her to sit with him, she feared that if she said “no,” Corn would lash out at her. As described in more detail below, Crawford knew Corn to be an aggressive person, who routinely had violent outbursts directed at his staff when he did not get what he wanted.

20. As Crawford was sitting on the bed, Corn grabbed Crawford’s arm and pulled her down onto the bed and pulled her head onto his chest. Crawford was frozen in fear. While holding Crawford’s head against his chest, Corn began kissing the top of Crawford’s head, petting her hair, and stroking her arm. Over and over again, Corn repeated, “Shhhh, let’s just lie here; shhhh, let’s just lie here, shhhh.” Thankfully, Crawford was able to pull away from Corn’s grasp and rushed to her room.

21. Later, when Crawford was back in her room, she heard Corn calling her name from the hallway. Crawford opened her door and Corn walked right past her into the room and lay down on the bed. Crawford was shaking; she was terrified. She repeatedly pleaded with Corn to leave. He did not immediately get up off the bed, but he did eventually. At that point, he looked at Crawford with disgust and abruptly left the room. As soon as Corn left, Crawford broke down and called her then-boyfriend (now husband), hysterically crying. Sobbing, she told her boyfriend what had happened and said that she never wanted to talk about it ever again.

B. Crawford's Experience was Not an Isolated Incident: It also Happened to Jill McClain.

22. Crawford is not Corn's only sexual assault victim. Jill McClain suffered grievous psychological harm resulting from Corn's sexually abusive actions, under eerily similar circumstances several years prior. Although the time for McClain to assert a claim against Defendants has expired, and thus she has no financial stake in this litigation, McClain shares her story here in support of Crawford, with a hope to ensure that Corn never has a chance to prey upon any other women, and that ABC is forced to address the hostile work environment that it has facilitated.

23. In the summer of 2008, McClain had met Diane Sawyer, a top ABC on-air personality, who created an opportunity for McClain to work at ABC. When Sawyer joined World News Tonight in or around January 2010, she brought in personnel, including McClain, and, in or around February 2010, Corn. McClain reported directly to Corn, who was soon promoted to Executive Producer in or around September 2011. Corn sought out McClain and initiated a friendship with her under the guise of wanting to mentor her through her career at ABC. McClain trusted Corn and genuinely believed that he had her well-being in mind. However, it became evident that Corn had ulterior motives.

24. In September 2010, members of the World News team, including McClain and Corn, traveled to Los Angeles for an event that Sawyer was attending. McClain had just turned 24 and was recently engaged. Corn knew that McClain was engaged, as he had met her fiancé the day before the trip. After the event, McClain took a redeye flight back to New York on a Friday evening. On that flight, McClain was seated next to Corn. In the middle of the night, McClain—out of nowhere—felt Corn begin to massage her hand and arm. McClain was immediately uncomfortable and stunned and asked Corn, “What are you doing?” Without responding, Corn began rubbing McClain’s upper right thigh with his left hand. McClain went into a state of shock and froze. She was in the window seat and unable to get out. She did not know how to react given that they were on a dark plane filled with sleeping passengers, and that she was Corn’s subordinate. McClain felt trapped. Corn then slid his hand from McClain’s upper right thigh to her vagina, and began rubbing her vagina, over her jeans. Not knowing what else she could do, McClain turned her body towards the window so Corn’s hand could no longer reach and grope her vagina, and she pretended to fall asleep.

25. As the plane was landing in New York early Saturday morning, Corn—unprompted—turned to McClain and said words to the effect of, “I hope your marriage is better than mine. I wish my wife was more like you. Wouldn’t it be great if the two of us could catch a flight somewhere else and spend the rest of the weekend together?” Corn otherwise acted as if he had not sexually assaulted McClain just a short while earlier. McClain felt violated, disgusted, and exposed. A man she trusted had violated her. Given his role as her boss, she did not know who to turn to or whether she could report the assault without suffering retaliation. Instead, McClain buried the assault and convinced herself that it was just a one-time thing and that Corn would not do it again.

26. Approximately seven months later, in April 2011, Corn sexually assaulted McClain again. This time, the sexual assault occurred in London while the World News team was covering the royal wedding of Prince William and Kate Middleton.

27. After the first night of coverage, the ABC team went to their hotel bar for drinks. Sawyer had generously offered to cover the expense and had given her personal credit card to McClain to close the tab at the end of the night. Towards the end of the night, Corn, who was visibly intoxicated, struck up a conversation with McClain and emphasized that he wanted to be able to help her with her career. In a disturbing parallel to what he would say to Crawford four years later, Corn told McClain that he cared more about her career than Sawyer ever would.

28. After the ABC employees turned in for the night, McClain closed Sawyer's tab. Corn waited for McClain to close the tab and then walked to the elevator with McClain. McClain's and Corn's rooms were on the same floor, along with some of the other ABC employees. McClain and Corn shared an elevator up to their floor. When they got out of the elevator, Corn told McClain that his room was in one direction, and McClain said that her room was in the other direction. As McClain started walking toward her room, she realized that Corn was following her. When McClain arrived at her door, she turned to Corn, quickly said "goodnight," entered her room, and closed the door behind her. Within seconds, there was a loud knocking on McClain's door. McClain cracked open the door to tell Corn to stop knocking and to go back to his room, but as McClain opened the door, Corn pushed his way into the room and immediately pinned McClain against a wall and began kissing her face and neck. McClain froze and had a flashback to the assault on the plane. Corn backed McClain into the room, pushed her down onto the bed on her back, and got on top of her. Corn then grabbed the top of McClain's jumpsuit as well as her bra and pulled them both down, exposing McClain's bare breasts. Corn began fondling McClain's

bare chest. McClain mustered all of the strength that she could and managed to push him off of her. She yelled at Corn to leave, and Corn left the room in a huff. McClain felt violated and was in shock; she took the clothes that she was wearing and threw them in the trash.

29. The next morning, Corn acted as if he had not sexually assaulted McClain the night before. McClain was horrified and could not believe that Corn was attempting to act normally. Shortly thereafter, McClain told two close colleagues that Corn was “creepy,” but was afraid to elaborate. McClain feared that ABC’s culture of tolerating this type of behavior would damage her career if she reported it.

30. In or around May 2013, McClain left ABC and the news industry because of the assaults. For one thing, McClain did not feel that she could safely report Corn’s conduct for fear that Corn would retaliate. But also, the prevailing hostile work environment between men and women at ABC made McClain feel that a future at ABC was unmanageable. McClain knew that her decision to leave ABC came as a surprise to her coworkers, but she did not tell anyone the real reason why she was leaving, not even her mentor, Sawyer.

31. Psychologically traumatized, McClain did not even disclose the assaults to her then-fiancé, now-husband, until 2016.

32. Since leaving her dream job, McClain has bounced between jobs, unable to stay for long periods of time because of the trauma Corn inflicted upon her. She has held the following positions:

- a. Edelman, Producer, June 2013 – October 2013
- b. Flour & Stone Pizza, Social Media Manager, December 2013 – March 2014
- c. Tribeca Boutique, Sales Associate, March 2014 – August 2014
- d. Make-A-Wish Illinois, Communications Specialist, January 2014 – April 2014

- e. The VING Project, Executive Director, May 2014 – September 2016
- f. Park Community Church, Communications Director, October 2016 – October 2019
- g. Freelance Communications Consultant, November 2019 – present

33. Corn's sexual assaults robbed McClain of her compass, her worth as an employee, and her job at ABC News. It has left an impact on McClain's emotional, physical, and professional well-being. Due to these assaults, for the past decade, McClain has undergone extensive therapy to deal with the fallout.

C. Corn's Discriminatory Conduct Created a Hostile Work Environment at ABC.

34. After the sexual assaults, Corn continued to perpetuate a hostile work environment that was pervasive, intimidating, and abusive. His behavior—which oscillated between rude, demeaning, and discriminatory on the one hand, and feigned kindness, humor, and faux camaraderie on the other hand—created a work environment and relationship that was untenable, suffocating, and psychologically toxic.

35. The morning following the assault on Crawford in February 2015, not only did Corn fail to acknowledge his inappropriate and inexcusable behavior, but he was also dismissive and rude to Crawford, which made Crawford feel self-conscious and uncomfortable.

36. The Monday after the sexual assault incident against Crawford, Corn was particularly terse. He exploded at Crawford, because Stephanopoulos decided he wanted to leave the show early and head home, which was something he did regularly. Corn yelled at Crawford, telling her that she had failed at her one job of ensuring that Stephanopoulos remained at the studio. Corn later tried to apologize and acknowledge that Crawford only had so much control, but this continued a pattern of harassing Crawford.

37. Crawford walked on eggshells, unsure of when Corn would explode. Corn would waffle between berating Crawford publicly and emailing her privately about personal and confidential matters in order to make her feel like she was some sort of confidante.

38. In the office, Crawford constantly noticed Corn staring at her and trying to make eye-contact, and Corn would often lurk by Crawford's desk.

39. In or around late 2015, not long after Corn had assaulted Crawford and Crawford had rejected him, Crawford was eligible for a title change (from Executive Assistant to Producer) and corresponding pay raise—a promotion that should have been awarded in the normal course. But Corn did not give Crawford this promotion, and, because Crawford was scared to be alone in an office with Corn, Crawford did not immediately approach Corn to advocate for herself. Over the next few years, Crawford attempted to speak with Corn about why she deserved the title change and raise, but these conversations went nowhere, with Corn telling Crawford things like “you're not selling yourself to me.”

40. Crawford finally received the promotion and raise she deserved in August 2018—approximately three years too late. Upon information and belief, the only reason why Crawford received the promotion and pay increase is because Stephanopoulos learned that Corn had been grossly underpaying Crawford for years, and that Crawford still had the title of Executive Assistant even though she had been live-producing Good Morning America since late 2014. Stephanopoulos was so shocked that he went over Corn's head and demanded that Crawford be given the title change and raise. As described more fully below, by August 2018, Stephanopoulos had learned about Corn's sexual assault of Crawford and reported it to Tanya Menton, a lawyer in ABC's litigation department.

41. In addition, Corn perpetuated a terrible bullying and drinking culture at ABC in which employees were peer-pressured into binge-drinking and belittled if they declined to participate in the drinking culture. ABC company parties were often alcohol-fueled and out-of-control. There have even been a few instances of ambulances being called to ABC company parties to attend to overly intoxicated staffers. Corn was often drunk at ABC holiday parties and would openly flirt with female staffers. Out of discomfort, Crawford stopped attending holiday parties after 2017, and Corn called out her absence in front of staff, claiming that she was not a team player. Crawford was mortified and angry given that Corn's rude and demeaning behavior was the very reason that she had stopped attending the holiday parties.

42. This abusive culture—particularly Corn's own alcohol abuse and anger management issues—facilitated and contributed to the hostile work environment that Crawford, McClain, and many other women, were subjected to at ABC. For example, on Friday mornings at around 9:00 a.m., Corn would pressure Good Morning America staffers, including Crawford, to go to a bar across the street from the studio. On several occasions, Corn used his ABC corporate credit card to pay for the drinks. Crawford never wanted to go to the bar with Corn because of the way he would act; Corn would drink heavily and belittle members of his staff who were not in attendance. When Crawford chose not to attend these gatherings, Corn would call out her absence publicly in front of colleagues, which made Crawford feel as if her boss's satisfaction with her work was contingent on her willingness to get drunk with him at 9:00 in the morning on Fridays. Further, it was widely known and discussed among ABC personnel that Corn was regularly intoxicated at work on Fridays. Specifically, senior management was also aware—Corn was often visibly intoxicated during 3:00 p.m. Friday meetings with then-ABC President James Goldston.

43. Unfortunately, even if Crawford chose not to join Corn at the bar and stayed at the office to work, she was not safe from his harassment. Corn would often return to the office and engage her in inappropriate conversations. On numerous occasions, Corn also drunkenly called Crawford on his way home from the bar. Because it was her boss calling, Crawford felt obligated to pick up the phone. When she did pick up, it was immediately obvious to Crawford that Corn was intoxicated. Corn's inappropriate, flirtatious comments during these encounters—both in the office and on the telephone—would include sexual innuendos and references to the intimate details of his own marriage. For example, in one phone call to Crawford, Corn told Crawford that his wife was sick of him and was no longer having sex with him; Corn followed these comments up by telling Crawford that he wanted to be able to help Crawford with her career. In another conversation, Corn complained to Crawford that his wife was no longer attracted to him.

44. It was very common for Corn to talk to Crawford about his personal life at length and would comment on Crawford's personal life as well. For example, Corn asked Crawford if she went out to bars with her girlfriends, and Corn would say words to the effect of "I'm sure you and your friends get a lot of attention from men." Crawford felt trapped by these conversations and Corn's forced intimacy. Crawford felt like Corn was using his power and control over her career to ensure that she continued to indulge and not complain about his sexual advances.

45. After the trauma Crawford endured because of Corn's sexual abuse, Crawford began actively avoiding traveling for work if she knew Corn was attending a trip. In needing to protect herself emotionally and physically from Corn, she lost valuable opportunities to travel with and learn from Stephanopoulos. For example, in 2018, when the Marjorie Top Stoneman Douglas school shooting occurred, Crawford learned that Corn would be traveling with Stephanopoulos. Crawford, who had planned to go on the trip, panicked and pretended that she could not secure a

flight to avoid traveling with Corn. That trip would have been the first time she was traveling alone with Corn since the sexual assault in 2015. Even though the trip was a major career opportunity, Crawford did not feel safe traveling with Corn.

46. Corn's abusive behavior perpetuated a hostile workplace culture. Corn managed his staff through intimidation and fear. To assert his control and power, he regularly made demeaning, discriminatory, and abusive statements. Examples of Corn's behavior—which were all part of the toxic environment—include, but are not limited to, the following:

- In or around February 2016, Crawford began to tell Corn that a male Good Morning America correspondent was having an inappropriate sexual relationship with a very junior female ABC employee, but before Crawford could provide any significant detail, Corn snapped at her to shut her mouth.
- Crawford regularly witnessed Corn making inappropriate comments about female employees, including about their weight, make-up, or general appearance.
- When Corn joined Good Morning America, he expressed annoyance at the fact that there were several senior female employees working for the show. Corn referred to these women as “news nuns,” which is a term he used to refer to older women who had worked for ABC for a long time and had never married or had children. For the most part, Corn only hired young women to work for him.
- In 2018, when ABC Female Employee 1 joined the Good Morning America staff as his co-Executive Producer, Crawford observed Corn undermining ABC Female Employee 1's attempts to forge relationships with anchors in efforts to marginalize her from her senior role. Specifically, he spoke negatively about her to Stephanopoulos and would place her in situations that would guarantee her failure. It was Crawford's impression that Corn was intent on cutting ABC Female Employee 1 out of the management chain.
- Corn made rude and inappropriate comments about female ABC employees' male spouses and/or significant others. For example, Crawford heard Corn tell a group of ABC employees that their coworker's boyfriend was probably gay. In another instance, at a Good Morning America holiday party, Corn asked Crawford's husband how long it would be until he “became a total douchebag” because of his job as a news reporter at a different network.
- In or around the end of 2019, Corn ridiculed a group of female employees as “hens clucking.”
- On several occasions, Corn stated that women who complained of sexual assault could not be trusted and described them as “crazy.” Upon information and belief, in one instance,

Corn mocked a former ABC employee for complaining about a sexual assault and suggested that that female employee had penetrated herself just to manufacture a claim of sexual assault. In or around 2019, Crawford heard Corn making fun of E. Jean Carroll's allegations of rape against Donald Trump. Corn was dismissive of Carroll's allegation that she had never washed the dress she was wearing when Trump raped her, and Corn said that Carroll would have to "rewind the clock" if she wanted any chance at being taken seriously or getting "Monica Lewinsky attention." In other words, Corn was saying that Carroll was not young enough or attractive enough for her claim of rape to deserve attention.

- Throughout Corn's time at ABC, Crawford witnessed numerous instances where he lost his temper in the control room, screamed and cursed at ABC employees, threw and broke several headsets, and slammed glass partitions. He regularly called employees "stupid," and "idiots," and other demeaning names. For example, Crawford witnessed Corn repeatedly berate ABC Female Employee 2, throw headsets, and storm out of the room.
- As early as his tenure with World News Tonight, Corn's toxic antics were so well known that the ABC Nightline crew would call into the control room during their meal break to listen to these histrionics for what they sarcastically deemed "dinner and a show."
- Corn asked ABC Female Employee 3 if she "had mental problems" because she made a minor mistake.
- In one instance, Crawford witnessed Corn berate a staffer in the control room and then repeatedly smack the staffer's back in anger. Corn was apparently unhappy with how certain production items were going on the show.
- In 2019, on a Good Morning America staff call, Corn referred to the staff as "fucking idiots" in response to what he perceived to be poor work product.
- During the global COVID-19 pandemic, Corn continued perpetuating a hostile work environment over work email and Zoom meetings, including, but not limited to the following examples:
 - In March 2020, when emailing with ABC colleagues regarding news that a major New York hospital had decided to not allow women to have a companion in the delivery room, Corn wrote the following:

"Am I terrible that I don't care about this people[?] It's about staying healthy. Sorry you missed the moment but so many bigger worries no?"

Unsurprisingly, this wholly insensitive and tone-deaf remark offended the female ABC employees on the email chain, including Crawford, who was pregnant at the time.

- He began a morning meeting where Crawford was in attendance by saying that he was “tired of looking at everyone’s face just staring at him with nothing important to say.”
- In February 2021, Corn was rude to ABC Female Employee 4, a fellow staffer, which caused her to break down in tears. Corn told her in front of the entire team to stop talking and said “Jesus, [first name omitted], is there a point to this?”
- During a meeting with the Booking Department, Corn berated the entire team for “being lazy” and humiliated them for failing to book major interviews.

47. Corn’s treatment of Crawford and others, including his dismissive generalizations about women who report sexual harassment, created a culture of intimidation at ABC, which made Crawford afraid to report Corn’s sexual assault and harassment. These continuous examples of the hostile workplace culture, largely dominated by Corn’s sexually predatory behavior, discriminatory animus, and anger management issues, made Crawford feel that she could not upset Corn without extreme consequences, and that there was nothing she could do about his sexual assault and harassment.

D. In 2017, ABC Learned that Corn Had Sexually Assaulted Crawford, Yet, Upon Information and Belief, Absolutely No Action Was Taken Against Corn.

48. In or around November 2017, Stephanopoulos called Crawford into his office and explained that he had recently learned from a third party about Corn’s sexual assault of Crawford that occurred in Los Angeles in 2015. Stephanopoulos was emotional. He further explained that he would have to inquire internally regarding his reporting obligations. Stephanopoulos disclosed the sexual assault to Heather Riley (then Senior Director of Publicity for Good Morning America) and Derek Medina (then Senior Vice President for Business Affairs at ABC News) and was directed to Tanya Menton (a Vice President in ABC’s litigation department).

49. Later, Stephanopoulos reached back out to Crawford and urged Crawford to call Menton and tell her about the assault. Stephanopoulos told Crawford that Menton was expecting Crawford’s call.

50. Around this time, Crawford spoke to Riley about Corn's sexual assault. Crawford inquired about the process for making a complaint and confided that she was scared to come forward. Riley commented that it seemed as if the assault was still weighing on Crawford since Crawford was still talking about it more than two years after the fact. Riley told Crawford that she should do what she thought was right, but Riley—Good Morning America's spokesperson—cautioned Crawford that reporting the assault and harassment might get “messy.”

51. November 2017 was also the same month that NBC and CBS fired Matt Lauer and Charlie Rose, respectively, due to complaints of sexual misconduct against them. ABC would have been keenly aware of the tremendous negative publicity that NBC and CBS were facing at that time.

52. Fearing retaliation from Corn and fearing that making a formal complaint would do more harm than good or even result in losing her job, Crawford never called Menton.

53. According to ABC's policies, whenever it is put on notice of alleged misconduct, it must conduct a meaningful, thorough investigation. But neither Menton nor anyone else from ABC's litigation or human resources department conducted such an investigation.

54. So, upon information and belief, by November 2017, Medina, Riley, and Menton knew about Corn's sexual assault of Crawford, yet absolutely no action was taken by ABC against Corn. On the contrary, by the time Crawford and McClain made a formal complaint regarding the incidents of sexual abuse, harassment, and discrimination in February 2021, Corn had been elevated to what was referred to as ABC News's “Office of the President”—the five most powerful executives (including Corn and Medina) who were placed in charge after ABC News's former president, James Goldston, resigned in early 2020.

55. Even worse, Crawford was not the first woman to complain to ABC about Corn's unwelcome sexual advances. In or around 2012, ABC Female Employee 5 had reported to ABC that Corn made an unwelcome sexual advance when he invited her to his hotel room, mirroring what would happen to Crawford a few years later.

56. And Corn's assault of Crawford was not the only allegation of sexual harassment that ABC failed to investigate in the fall of 2017. Around that time, ABC Female Employee 8 complained to human resources that a male ABC employee had grabbed her thigh, yet no disciplinary action was taken against the male employee. When ABC Female Employee 8 followed up with human resources, she was told that human resources had chosen not to investigate because ABC Female Employee 8 did not "seem that upset" by the unwanted sexual contact.

57. ABC's willful obliviousness to the hostile culture toward women acted as a protective shield for successful male executives. In addition to Corn, Benjamin Sherwood, former President of Disney-ABC Television Group and Co-Chairman of Disney Media Networks, would regularly engage in sexually harassing behavior. During his time as President of ABC News from 2010 to 2015, Sherwood would inappropriately touch women in the newsroom on their shoulders and arms and kiss them on the head. More than one female ABC employee felt this unwelcome behavior was "creepy." Although this inappropriate behavior was widely observed and known, ABC did nothing to stop it and continued to promote Sherwood.

E. Crawford and McClain Make a Formal Complaint to ABC in February 2021.

58. In or around 2017, Crawford had confided to a former ABC employee ("Former ABC Employee 1") that Corn had sexually assaulted her. Unbeknownst to Crawford, Former ABC Employee 1 was also friends with McClain.

59. Years later, in or around May 2020, McClain confided to Former ABC Employee 1 that she had experienced “a Me Too situation” while at ABC. Before McClain provided any detail, Former ABC Employee 1 immediately asked “Was it Michael Corn?” McClain could not believe how quickly Former ABC Employee 1 guessed that it was Corn. McClain asked Former ABC Employee 1 how Former ABC Employee 1 knew it was Corn. Former ABC Employee 1 explained that something similar had happened to a friend (Former ABC Employee 1 did not disclose Crawford’s name to McClain). Former ABC Employee 1 was under the impression that the situation had been “handled.” McClain assumed that by “handled,” Former ABC Employee 1 meant that Corn’s assault had been reported to ABC, and that ABC had taken appropriate disciplinary action. While McClain was horrified to learn that Corn had sexually assaulted another woman, McClain was relieved that that woman had reported Corn’s conduct.

60. Shortly after McClain was made aware of another victim, Sawyer happened to reach out to McClain and suggested that they should catch up since they had not spoken in a while. On the afternoon of New Year’s Eve 2020, McClain and Sawyer spoke on the phone for approximately two and a half hours. They spoke about their families, work, and other topics. During their conversation, McClain opened up to Sawyer about Corn. For the first time, McClain told Sawyer the real reason why McClain left ABC back in 2013. McClain explained how Corn sexually assaulted her, and she told Sawyer that she recently learned that she was not the only woman that Corn had assaulted at ABC. Sawyer was completely supportive of McClain. McClain was relieved to have told Sawyer about Corn after keeping it from Sawyer for nearly a decade.

61. A few days later, Sawyer reached back out to McClain and strongly encouraged McClain to report the assaults to ABC even though they had happened about 10 years prior and

even though McClain had not been an ABC employee for approximately eight years. Upon information and belief, Sawyer reported her conversations with McClain to Menton.

62. Soon after her second conversation with Sawyer, McClain called Former ABC Employee 1 to see if Former ABC Employee 1's friend would be willing to speak to McClain about the process of reporting a sexual assault at ABC. Former ABC Employee 1 said she would check to see if Former ABC Employee 1's friend would be willing to speak to McClain. Crawford agreed to speak to McClain, and Former ABC Employee 1 put McClain and Crawford in contact.

63. On or about January 11, 2021, McClain and Crawford spoke for the first time. McClain learned that, in fact, Crawford had not reported Corn's conduct. McClain shared that she had spoken with Sawyer, and that Sawyer was extremely supportive and strongly encouraged McClain to report the assaults.

64. Although Crawford felt empowered by Sawyer's and McClain's support, Crawford was still fearful about reporting Corn's conduct. Before Crawford and McClain made a formal complaint to ABC, Crawford sought advice from Riley, who is now ABC's VP of Crisis Management. Crawford reached out to Riley as a friend, as someone who Crawford thought she could trust. Crawford mentioned that she had connected with McClain, and Crawford explained that she wanted to come forward and report Corn's sexual assault and harassment to prevent him from sexually abusing any other women, but that she was still nervous about making such a report. Riley said that she was sorry that Crawford was still dealing with the effects of Corn's sexual assault and harassment. Riley mentioned that she had spoken to Stephanopoulos recently and that he had asked Riley whether she thought ABC had appropriately and fairly handled Crawford's claims against Corn when ABC learned about them back in 2017. Riley also said that she had experienced harassment during her career (before ABC) but did not deem it worthy of reporting.

Riley added that she would hate for her own past experiences to have to come up again now. Crawford took Riley's comments as a not-so-subtle indication that Riley thought Crawford should not make an official complaint about Corn's sexual assault and harassment. Crawford left her conversation with Riley feeling even more hesitant about making a complaint than she did before; Crawford continued to fear that her career would suffer if she were to come forward.

65. As ABC's VP of Crisis Management, Riley's advice to Crawford makes a mockery of ABC's "Speak Up" policy, which touts ABC's commitment to encouraging its employees to "speak up" about concerns regarding discrimination, harassment, or bullying.

66. Ultimately, in February 2021, Crawford and McClain, via counsel, formally reported the incidents of sexual abuse, harassment, and discrimination to ABC. ABC conducted an internal investigation, which included interviewing both women and numerous other individuals. Upon information and belief, ABC found both women's claims credible and corroborated by the investigation. Indeed, Riley called Crawford while the investigation was ongoing and said that she had spoken to Menton. According to Riley, she told Menton that Menton should accept as true Crawford's statement that Crawford spoke to Riley in 2017 about what Corn had done. Riley acknowledged that she remembered that she spoke to Crawford years ago but did not remember exactly when they spoke. Riley also offered a caveat that she did not recall the details of the sexual assault being as egregious as she now understood them to be.

67. In April 2021, following the conclusion of the investigation, upon information and belief, ABC either terminated Corn's employment or forced him to resign based on ABC's findings.

68. However, keeping in line with ABC's culture of sweeping sexual assault under the rug to protect its brand, ABC did not publicly acknowledge Corn's malfeasance. Instead, ABC

announced the departure in a manner which made it appear to the other staff and employees at ABC that he was the victim of malicious and unfounded accusations. Media reporting suggested Corn resigned because he was passed over for promotion to president. With his sexual assaults and harassment kept secret by ABC, Corn immediately landed a new top job at NewsNation where he can continue his predatory behavior. ABC has simply passed Corn off to NewsNation, where he is free to sexually abuse and harass his female subordinates.

F. ABC Knew or Should Have Known that Corn had Sexually Harassed and Discriminated Against Women and Created a Hostile Work Environment Well Before Crawford and McClain Made a Formal Complaint in February 2021.

69. ABC now asserts that it did not know, nor did it have reason to believe, that Corn was preying on female subordinates and creating a toxic workplace for over a decade. It maintains that when it did learn of Corn's behavior, it took immediate action. However, this position is not supported by the facts. In addition to the fact that ABC was aware of Corn's sexual assault of Crawford as early as 2017, upon information and belief, several women had reported Corn to ABC's Human Resources function and to senior management before February 2021. Yet ABC applauded Corn as a successful producer and rewarded him with promotions.

70. ABC's failure to investigate and take appropriate action to remove or discipline Corn is indicative of its reluctance to ensure a safe working environment when balanced against the predatory proclivities of a successful senior executive. Accordingly, ABC should be held responsible.

71. Upon information and belief, the following women reported Corn's abusive conduct to ABC. Their names are anonymized to protect their identities, for fear of retaliation. To be clear, this list is non-exhaustive. There are likely more women who have complained about Corn. The experiences of these women exhibit a clear pattern—one that ABC ignored.

- ABC Female Employee 5 – As described above, in or around 2012, ABC Female Employee 5 reported that Corn was intoxicated during a business trip and made an unwelcome sexual advance when he invited her to his hotel room.
- ABC Female Employee 7 – In or around 2012, Corn threatened ABC Female Employee 7 in a large staff meeting. In the meeting, Corn menacingly stated, “I’ll get you. You won’t know when it’s coming, but I’ll get you eventually.” ABC Female Employee 7 went to her supervisor and said she wanted to contact human resources to report the threat. The supervisor, however, stated that Corn’s human resources file was “a mile thick” and that everyone knew he was a “problem.” The supervisor advised ABC Female Employee 7 that if she reported to human resources, it would hurt her more than Corn. As a result of that conversation, Female Employee 7 did not make a formal complaint to human resources.
- ABC Female Employee 6 – In August 2017, ABC Female Employee 6 reported Corn to ABC Human Resources. During a shoot related to Hurricane Irma, a drone camera that she was using lost connection in the middle of a live shoot. Corn called her while she was in a ditch in pelting rain and said “are you a fucking idiot? I’m going to kill you!” Multiple colleagues heard Corn berating her from the control room. When ABC Female Employee 6 reported the incident to Human Resources, they apologized and said disciplinary action was taken against Corn. But Corn continued to work at ABC and receive promotions.
- ABC Female Employee 2 – In or around 2017, ABC Female Employee 2 had a public argument with Corn in the control room. Corn threatened her and threw an object at her. It was publicly known that she filed a complaint with Human Resources related to the incident. Corn allegedly apologized and attended an anger management class, but ABC took no known action to remove Corn from his position.

The above examples illustrate that it is unreasonable for ABC to assert that it was not aware of Corn’s toxic and abusive behavior towards ABC’s female staff.

72. Watching Corn’s sexual assault and harassment go unpunished while he was promoted into the “Office of the President” solidified Crawford’s understanding that ABC considered Corn to be untouchable and that any complaint against him would be futile. The culture of tolerating sexual assault and harassment prevailed even after ABC terminated Corn’s employment. Remarkably, on a staff-wide Zoom call when ABC announced Corn’s departure, Medina—who surely knew about Corn’s sexually predatory conduct—actually lamented over Corn’s departure, stating that it was “a very sad day” for ABC.

73. ABC is responsible for the suffering of Corn's victims, and the fact that he became a repeat offender. ABC's failure to take necessary steps to remove Corn from his supervisory position allowed the hostile workplace to continue. Rather than exercise reasonable care to prevent and correct sexually harassing behavior, ABC chose to condone it, and keep it under wraps.

G. ABC Retaliates Against Crawford Because She Made a Formal Complaint of Sexual Harassment.

74. After Crawford complained of Corn's sexual harassment and a hostile work environment to ABC, ABC retaliated against her by not offering her the job security and salary increase that she deserved.

75. After each year of employment between 2015 and 2017, ABC had informed Crawford that her employment would be extended for a one-year period.

76. When Crawford was finally promoted from Executive Assistant to Producer on August 8, 2018, ABC offered her a three-year contract, which Crawford accepted.

77. Typically, at least a few months before an employee's contract is set to expire, ABC will reach out to that employee to negotiate the terms of a new contract, including a salary increase. However, after Crawford made the formal complaint in February 2021, ABC delayed reaching out to Crawford about a new contract.

78. It was not until July 2021, approximately four months after Crawford made the formal complaint, and just one month before her 2018 contract was set to expire, that ABC reached out to Crawford about her expiring contract. Instead of offering Crawford another three-year contract, ABC merely offered a six-month extension and did not even offer a nominal salary increase.

H. Due to the Actions and Inactions of Defendants, Crawford Has Suffered Significant Injuries Impacting Her Life, Her Career, and Her Psychological Well-Being.

79. Defendants' actions and inactions have caused significant injury to Crawford's career trajectory and emotional well-being. In the last five years since the sexual assault, Crawford struggled to approach Corn to discuss standard matters such as raises or promotions without extreme stress. In many instances, Crawford declined to approach Corn regarding career matters because she did not want to be alone in a room with him. As a result, she was unable to advocate for her career, which directly detracted from her success at ABC.

80. In addition, Corn has caused her incredible emotional stress, anxiety, and impacted her psychological well-being. Every time that she interacted with Corn, Crawford recalled the sexual assault incidents. Corn's control over her career combined with his intimidation tactics acted as intense physical and emotional stressors.

81. It is only recently, in the past six months, that Crawford has begun to realize that she has suffered a tremendous amount of psychological damage at the hands of ABC and Corn. She has also begun to realize that she needs to undergo extensive therapy, even though it will take significant time and emotional energy away from her husband and young child.

82. As a direct and proximate result of Defendants' actions and inactions, Crawford suffered and continues to suffer actual damages, including monetary damages, damages to her reputation and career through retaliation, psychological and emotional pain, mental anguish, fear for her physical safety, and humiliation.

FIRST CAUSE OF ACTION

(Sexual Harassment, Hostile Work Environment, in Violation of the NYSHRL)
(Against All Defendants)

83. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

84. By reason of the foregoing, Defendants have subjected Crawford to sexual harassment and a hostile work environment within the meaning of the New York State Human Rights Law, N.Y. Exec. L. §§ 290, *et seq.* (“NYSHRL”).

85. The harassment was pervasive and affected the terms, conditions, or privileges of Crawford’s employment.

86. ABC knew, or should have known, about the sexual harassment and failed to take corrective action for many years.

87. As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm for which she is entitled to an award of damages.

88. As a direct and proximate result of Defendants’ unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, emotional distress for which she is entitled to an award of compensatory damages.

SECOND CAUSE OF ACTION

(Sexual Harassment, *Quid Pro Quo*, in Violation of the NYSHRL)
(Against All Defendants)

89. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

90. By reason of the foregoing, Defendants have subjected Crawford to *quid pro quo* sexual harassment within the meaning of the NYSHRL. Crawford was the subject of unwelcome sexual harassment in the form of sexual advances or requests for sexual favors.

91. The submission to the unwelcome advance was an express or implied condition for receiving job benefits. Crawford's refusal to submit to her supervisor's sexual demands resulted in the denial of job advancement opportunities.

92. Defendant ABC was responsible for Defendant Corn's conduct.

93. As a direct and proximate result of Defendants' unlawful conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer monetary and/or economic harm for which she is entitled to an award of damages.

94. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, emotional distress for which she is entitled to an award of compensatory damages.

THIRD CAUSE OF ACTION

(Discrimination in Violation of the NYSHRL) **(Against All Defendants)**

95. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

96. By reason of the foregoing, Defendants discriminated against Crawford within the meaning of the NYSHRL, on the basis of sex.

97. ABC knew, or should have known, about the sexual harassment and failed to take corrective action for many years.

98. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer monetary and/or economic harm for which she is entitled to an award of damages.

99. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, emotional distress for which she is entitled to an award of compensatory damages.

FOURTH CAUSE OF ACTION

(Retaliation, in Violation of the NYSHRL)
(Against Defendant ABC)

100. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

101. The NYSHRL prohibits an employer from retaliating against any employee who has engaged in any activity protected by the NYSHRL.

102. Defendant ABC violated the NYSHRL when it retaliated against Plaintiff for engaging in conduct protected by the NYSHRL.

103. Plaintiff is entitled to damages, including, but not limited to, past and future lost wages and benefits, damages to compensate her for past and future emotional distress, punitive damages, and reasonable attorneys' fees and costs of this action.

FIFTH CAUSE OF ACTION

(Sexual Harassment, Hostile Work Environment, in Violation of the NYCHRL)
(Against All Defendants)

104. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

105. By reason of the foregoing, Defendants have subjected Crawford to sexual harassment and a hostile work environment within the meaning of the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101, *et seq.* (“NYCHRL”).

106. The harassment was pervasive and affected the terms, conditions, or privileges of Crawford’s employment.

107. ABC knew, or should have known, about the sexual harassment and failed to take corrective action for many years.

108. As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer monetary and/or economic harm for which she is entitled to an award of damages.

109. As a direct and proximate result of Defendants’ unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, psychological and emotional pain, mental anguish, humiliation, and fear for her physical safety for which she is entitled to an award of compensatory damages.

SIXTH CAUSE OF ACTION

(Sexual Harassment, *Quid Pro Quo*, in Violation of the NYCHRL)
(Against All Defendants)

110. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

111. By reason of the foregoing, Defendants have subjected Crawford to *quid pro quo* sexual harassment within the meaning of the NYCHRL. Crawford was the subject of unwelcome sexual harassment in the form of sexual advances or requests for sexual favors.

112. The submission to the unwelcome advance was an express or implied condition for receiving job benefits. Crawford's refusal to submit to her supervisor's sexual demands resulted in the denial of job advancement opportunities.

113. Defendant ABC was responsible for Defendant Corn's conduct.

114. As a direct and proximate result of Defendants' unlawful conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer monetary and/or economic harm for which she is entitled to an award of damages.

115. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, emotional distress for which she is entitled to an award of compensatory damages.

SEVENTH CAUSE OF ACTION

(Discrimination in Violation of the NYCHRL)
(Against All Defendants)

116. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

117. By reason of the foregoing, Defendants discriminated against Crawford within the meaning of the NYCHRL, on the basis of sex.

118. ABC knew, or should have known, about the sexual harassment and failed to take corrective action for many years.

119. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer monetary and/or economic harm for which she is entitled to an award of damages.

120. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, emotional distress for which she is entitled to an award of compensatory damages.

EIGHTH CAUSE OF ACTION

(Retaliation, in Violation of the NYCHRL)
(Against Defendant ABC)

121. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

122. The NYCHRL prohibits an employer from retaliating against any employee who has engaged in any activity protected by the NYCHRL.

123. Defendant ABC violated the NYCHRL when it retaliated against Plaintiff for engaging in conduct protected by the NYCHRL.

124. Plaintiff is entitled to damages, including, but not limited to, past and future lost wages and benefits, damages to compensate her for past and future emotional distress, punitive damages, and reasonable attorneys' fees and costs of this action.

NINTH CAUSE OF ACTION

(Negligent and Intentional Infliction of Emotional Distress)
(Against All Defendants)

125. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

126. Defendants engaged in extreme and outrageous conduct.

127. Defendants intended to cause, or disregarded a substantial probability of causing, severe emotional distress to Plaintiff.

128. There exists a causal connection between the conduct and the injury.

129. Plaintiff has suffered extreme psychological and emotional pain, mental anguish, humiliation, and fear for her physical safety.

WHEREFORE, Plaintiff respectfully requests a judgement against Defendants:

1. Declaring that the acts and omissions complained of herein are unlawful and violate the NYSHRL, the NYCHRL, and New York State common law;
2. Awarding damages to Plaintiff, in an amount to be determined at trial, for lost opportunities and to otherwise make Plaintiff whole for any losses suffered as a result of Defendants' actions;
3. Awarding Plaintiff compensatory damages, in an amount to be determined at trial, for humiliation, mental anguish, emotional distress, and injury to reputation;
4. Awarding Plaintiff punitive damages;
5. Awarding Plaintiff attorneys' fees, costs, and expenses incurred in the prosecution of this action;
6. Awarding Plaintiff such other and further relief as the Court may deem equitable, just, and proper to remedy Defendants' actions.

JURY DEMAND

Plaintiff demands a trial by jury.

Dated: New York, New York
September 15, 2021

WALDEN MACHT & HARAN LLP

By: *Milton Williams*

Milton Williams

Avni Patel

Daniel Chirlin

Christopher Dioguardi

250 Vesey Street, 27th Floor

New York, New York 10281

mwilliams@wmhlaw.com

(212) 335-2030

Attorneys for Plaintiff