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### Statement of Gloria Allred

Today we filed a lawsuit in the U.S. District Court, Southern District of New York, for our client, plaintiff Thalia Graves (who has given her permission to use her name). The case number of the 26-page complaint is 1:24-CV-07201.

In her lawsuit, Thalia through her attorneys sues Sean Combs, (A.K.A. the defendant and another individual and other entities).

The complaint alleges in part in the first cause of action that defendant Combs and another defendant committed a “violation of New York City Victims of Gender-Motivated Violence Protection Act, by viciously and violently forcing sexual contact, oral sex, and sexual intercourse on the plaintiff.”

In addition, the complaint alleges in the second cause of action that defendant Combs and another defendant committed a violation of New York Civil Rights law “Section 52-B” by “raping plaintiff and recording it. Defendants caused plaintiff to be depicted in a video image unclothed and with intimate body parts exposed and engaged in sexual conduct with another person.”

The lawsuit also alleges that “defendant Combs and another defendant published and/or disseminated the videos without plaintiff’s knowledge or

consent. On information and belief, defendants have continued to disseminate the video, including by selling it as pornography through the present.”

In our complaint, we ask that “defendants should be ordered to account for and destroy all copies of the video that are in their actual or constructive possession, custody or control” and that “defendants should be temporarily and permanently enjoined from further disseminating or publishing any intimate videos of plaintiff.”

We also allege in the third cause of action that Combs and another defendant committed a violation of New York City administrative code Section 10-180 “recording and showing others the video of themselves violently raping the plaintiff and that defendants disclosed an intimate image of plaintiff without her consent.”

As a result of these and other allegations in our complaint we request that judgment be entered against defendants as follows:

- a. Awarding compensatory damages for all physical injuries, emotional distress, psychological harm, anxiety, humiliation, physical and emotional pain and suffering, family and social disruption, and other harm, in an amount to be determined at trial;
- b. Awarding punitive damages in an amount to be determined at trial;

- c. Awarding attorneys' fees and costs pursuant to any applicable statute or law, including under New York City Administrative Code § 10-1104, New York Civil Rights Law § 52-B(2), New York City Administrative Code § 10-180, and any other applicable statute or law;

We are also seeking additional relief that the court may deem just and proper.

As a result of what is alleged in the lawsuit Thalia alleges that she has suffered and continues to suffer among other damages, emotional harm, including mental anguish, emotional distress, humiliation and physical damage.

In a few minutes, Thalia will speak to the impact and harm that she has suffered and continues to suffer. She will take this courageous step because she thinks that it is important that the public understand the impact that rape and other criminal acts have on those who have been victimized.

Often victims do not speak publicly about the specific damages that criminal acts cause them. Some of the many reasons that victims do not speak out publicly about this include being ashamed, or shamed for this, but we believe that victims should not be shamed and instead those who committed the criminal acts against them should be ashamed and take responsibility for the harm that they have caused victims to suffer.

We are very proud of Thalia for speaking out today in order to help victims of rape and other acts of sexual violence against them.

In addition, we thank our co-counsel, Mariann Wang, Heather Gregorio and Jazly Liriano, for their exceptional legal work on this complaint.

Our goal for Thalia is very simple. We want justice for her, and we are looking forward to winning it. It is long overdue for those who have caused her to suffer to be held accountable.

Attorney Gloria Allred  
Representing Thalia Graves  
September 24, 2024