

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

-----X
GABY GIBSON,

Plaintiff,

- against-

NAOMI CAMPBELL, RZO, L.L.C.,
OMI, LTD., OMI, I.L.C, LONDON K.I.T,
INC., and AMANDA SILVERMAN individually
and as an agent of Defendant Naomi Campbell,

Defendants
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Index: 117057/06

SUMMONS

Date Filed:
NEW YORK
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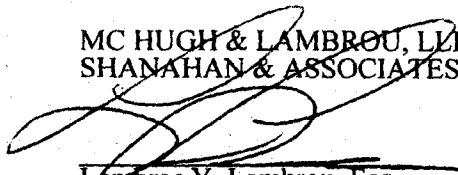
YOU ARE HEREBY SUMMONED and required

to serve upon plaintiff's attorney an answer to the complaint in this action within twenty days after the service of this summons, exclusive of the day of service, or within thirty days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis of the venue designated is residence of defendants place of residence and business and the county in which the cause of action accrued.

Dated: New York, New York
November 9, 2006

MC HUGH & LAMBROU, LLP
SHANAHAN & ASSOCIATES, P.C.



Lambros Y. Lambrou, Esq.
2 Rector Street, 20th Floor
New York, New York 10006
(212) 285-2100

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GABY GIBSON,

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Index:

**VERIFIED
COMPLAINT**

Date Filed

Plaintiff, by and through her attorneys, **MC HUGH & LAMBROU, L.L.P.** and
SHANAHAN & ASSOCIATES, P.C., as and for their verified complaint against
Defendants, allege as follows:

PRELIMINARY STATEMENT

1. This case seeks to remedy serious violations of the Civil Rights of Plaintiff by Defendant. In addition, the Plaintiff seeks damages for the violent and vicious assault of Defendant Naomi Campbell against her while in her employ which was ratified and facilitated by the additional Defendants named herein.
2. While Defendant Naomi Campbell is a world-famous "super-model" and both rich and powerful, the Plaintiff is nothing more than, and proud to be, a single-parent and working-mother in addition to recent immigrant to the United States.
3. Plaintiff brings this lawsuit as she believes that "single"-parents, working-mothers trying to earn a living should not be harassed and violently assaulted as they

engage in their employment to support themselves and their families. Even if beaten and assaulted by a world-famous, "super-model" such as Defendant Naomi Campbell.

4. Plaintiff also bring this lawsuit so that other single-parent working-class individuals particularly recent immigrants will stand-up and challenge abuse by their employers when based solely upon the fact that they are recent immigrants and so dependant on the wages they earn to put food on their table for their families.

5. Plaintiff requests herein that this "super-model" be held to the same standard as any other working-class person and taxpayer. Plaintiff requests that the "super-model" be held responsible for her actions irrespective of her celebrity and any additional privileges she believe that affords her to assault, engage in battery and discriminate against working-people.

5a. As alleged in detail herein, Defendant Naomi Campbell has demonstrated a long-term and maliciously violent and discriminatory pattern of illegal conduct toward her female employees most of whom are also recent immigrants.

5b. As alleged in detail herein, Defendant Naomi Campbell has clearly demonstrated a total and callous disregard for her actions and the damage suffered by her victims most recently by posing with a tee-shirt which states: "NAOMI HIT ME" on the front and "I LOVE IT" on the back. Defendant Campbell engages in this conduct even while criminal charges remain pending against her for another assault and battery against a colleague of Gibson.

5c. Plaintiff avers that this action seeks to demonstrate to this super-model that she is rather than a "super-model", not even a a role- model and nothing more than a "violent super-bigot." with upon information and belief, discriminatory tendencies

against working-people for which she must be held responsible. Any other result would reinforce the widely-held belief that celebrities are held to a different standard and free to engage in a reign of terror against society's most vulnerable in our working-class.

PARTIES

6. Plaintiff Gaby Gibson ("Gibson") is an individual and resident of Queens County.

7. Defendant Naomi Campbell ("Campbell") was and remains a resident of the County of New York and a Citizen of the United Kingdom.

8. Upon information and belief, Defendant RZO, L.L.C. ("RZO") is a Foreign Limited Liability Company formed in the State of Delaware and authorized to do business in the State of New York on or about January 12, 2001. The registered agent for service on RZO is Corporation System, 111 Eighth Avenue, New York, New York 10011.

9. Upon information and belief, Defendant OMI, LTD. ("OMI") is a Foreign Limited Liability Company formed in the State of North Carolina and authorized to do business in the State of New York.

10. Upon information and belief, Defendant OMI, LLC, ("OMI 2") is a Foreign Limited Liability Company formed in the State of Delaware and authorized to do business in the State of New York on or about May 5, 2003. The registered agent for service on OMI 2 is Corporation Service Company, 80 State Street, Albany, New York, 12207-2543.

11. Upon information and belief, Defendant LONDON KILT, INC. ("KILT") is a Domestic Business Corporation formed in the State of New York on May 19, 1992.

Defendant Campbell is the Chairperson and C.E.O. of Kilt. The principal place of business for Kilt is c/o Padell, 1775 Broadway, New York, New York 10019.

12. Upon information and belief, the collective corporate Defendants, RZO, OMI, OMI 2 and KILT are related businesses organized for the purpose of facilitating the career and business of Campbell.

13. Upon information and belief, the collective corporate Defendants, RZO, OMI, OMI 2 and KILT are for purposes of the federal, state and local statutes cited below, one employer. (Hereinafter, RZO, OMI, OMI 2 and Kilt are referred to collectively as the "collective corporate Defendants").

14. Upon information and belief, Defendant AMANDA SILVERMAN is an agent of Campbell and at the direction and insistence of Campbell, knowingly and intentionally disseminated false and defamatory statements against Gibson worldwide with the intent and effect of damaging her reputation and causing Gibson substantial injury.

VENUE

15. Venue is proper as New York County is the County in which the cause of action accrued.

STATUTES VIOLATED BY DEFENDANTS

16. Based upon the allegations which follow herein, the Defendants have violated 42 U.S.C. §2000(e) et seq., ("Title VII") by and through discriminatory conduct based towards Gibson based upon her sex, and national origin. Gibson intends to file a complaint with the E.E.O.C. which remains pending and intends to amend this Complaint upon the issuance of a Right to Sue Letter as required by Title VII. Gibson has waived

jurisdiction of the federal court and intends to pursue all remedies in the herein forum and action.

17. Based upon the allegations which follow herein, the Defendants have violated the Civil Rights Act of 1991, Pub. L. 102-166, enacted on November 21, 1991, which amended Title VII to provide for additional remedies for discriminatory treatment in employment based upon sex and national origin. Gibson intends to file a complaint with the E.E.O.C. which remains pending and intends to amend this Complaint upon the issuance of a Right to Sue Letter as required by Title VII and the Civil Rights Act of 1991. Gibson has waived jurisdiction of the federal court and intends to pursue all remedies in the herein forum and action.

18. Based upon the allegations which follow herein, the Defendants have violated the New York State Executive Law, Article 15, §296, et seq. which prohibits discriminatory treatment in employment based upon sex and national origin. As required by statute, Gibson has served a copy of this complaint on the New York State Attorney General and New York State Division of Human Rights.

19. Based upon the allegations which follow herein, the Defendants have violated the Administrative Code and Charter of the City of New York, §801, et. seq., which prohibits discriminatory treatment in employment based upon gender and national origin. As required by statute, Gibson has served a copy of this complaint on the New York City Division of Human Rights and New York City Corporation Counsel.

COMMON LAW CAUSES OF ACTION

20. In addition to the foregoing, Gibson pleads common law causes of action including but not limited to intentional infliction of emotional distress, negligent

infliction of emotional distress, common law civil assault, common law civil battery, false imprisonment, and defamation, breach of contract, vicarious liability and breach of fiduciary duty.

ALLEGATIONS RELEVANT TO ALL CAUSES OF ACTION

21. Gibson was hired by Campbell, RZO and the collective corporate Defendants on or about November 2005 to perform various services for Campbell at Campbell's residence in New York County.

22. Prior to commencing work for Campbell, Gibson applied to for placement as a domestic worker for Naomi Campbell.

23. Gibson gained employment as a domestic worker at the residence of Campbell.

24. At all times during her employment, Gibson's job performance was satisfactory.

25. From November 2005 through January 2006, during the course of her employment, Gibson on numerous occasions observed Campbell act in a disrespectful, demeaning and discriminatory manner to employees at her residence including but not limited to Gibson.

26. From November 2005 through January 2006, during the course of her employment, Gibson on numerous occasions observed Campbell act in a abusive and sometimes violent manner towards employees at her residence including but not limited to Gibson.

27. During the course of her employment, Campbell subjected Gibson to extreme emotional abuse with the intent to cause Gibson harm for no reason other than Campbell's discriminatory animus and uncontrollable rage.

28. During the course of her employment, Campbell subjected Gibson to repeated verbal threats to her physical well-being including threats of imminent physical bodily harm and assault.

29. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "When will you learn English ?".

30. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "You are not in the third world anymore stupid".

31. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "Romanians are not usually as dumb as you?"

32. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "How long will it take for you Easterner's [Europeans] to catch up with the rest of the world?"

33. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "I should never have hired a stupid bitch like you that is incomprehensible".

34. During the course of her employment, Campbell subjected Gibson to repeated discriminatory assaults based upon her national origin and foreign accent including but not limited to: "Are all the women in Romania as pathetic as you".

35. As Gibson is a recent immigrant and needed employment and to be paid, she continued to subject herself to the foregoing conduct to support herself and her family.

36. On or about January 17, 2006, Campbell was preparing to depart for a business trip while at her residence in New York where Gibson was working.

37. On January 17, 2006, Campbell could not find a pair of Stella McCartney jeans and accused Gibson of stealing same. Gibson denied stealing the jeans and Campbell had all staff present search for same.

38. While searching a closet for the Stella McCartney jeans, Campbell approached Gibson from behind yelling discriminatory comments. Gibson was on her knees facing into the closet searching for the jeans as Campbell approached.

39. Gibson recalled Campbell yelling, inter alia, at Gibson and stating: "I have had it with you fuck 'in bitch".

40. Immediately thereafter, Gibson felt a physical impact to the back of her head and neck, as she was assaulted and battered by Campbell. As Gibson was bent over searching the closet for the Stella McCartney jeans, Campbell either punched or kicked at the back of Gibson's head during the assault and while yelling discriminatory comments at Gibson.

41. Campbell continued to hit Gibson numerous times at or about the head during the incident on January 17, 2006.

42. After the assault, Campbell and her agents acting on her behalf prevented Gibson from leaving the premises by having the agents apologize and then telling Gibson she would not be paid if she left for services previously rendered.

43. As Gibson was intimidated and threatened by Campbell and her agents and needed the funds to support herself and her loved ones, she remained against her will at the Campbell residence.

44. Gibson was crying, upset and substantially traumatized by the conduct of Campbell.

45. As Gibson was visibly upset and traumatized, Campbell and her agents forced Gibson into remaining at the residence until she calmed down against her will and subject her to threats and duress including but not limited to physical harm and withholding of monies owed her for services already performed.

46. Gibson desired to have the authorities immediately informed of the criminal conduct of Campbell and requested an ambulance be called.

47. Campbell and her agents prevented Gibson from called the authorities to complain about Campbell's criminal conduct and continued to hold her against her will and subject her to threats and duress including but not limited to physical harm and withholding of monies owed her for services already performed and threatened to file false criminal complaints against her stating that she had friends in the NYPD and that they would arrest her.

48. Once Gibson was able to collect herself emotionally, she was permitted to leave the residence but threatened as indicated above not to contact the authorities to report the conduct of Campbell.

49. Gibson returned home without contacting the authorities and against her will acquiesced to the demands of the Defendants as she was to be paid in full by January 19, 2006 for monies owed for services she performed.

50. Gibson was paid a portion of the funds owed to her on January 19, 2006, immediately quit and went directly to the 18th Precinct, located at 306 West 54th Street, New York, New York, 10019, to file a complaint against Campbell.

51. On January 19, 2006, Gibson filed a report with the 18th Precinct.

52. While taking the report from Gibson, an agent of the New York City Police Department stated to Gibson: "Oh, not another one involving Campbell".

53. Upon information and belief, the N.Y.P.D. refused to arrest Campbell as Gibson was not bleeding and had no physical injury readily apparent.

54. Gibson filed a complaint with the New York County District Attorney.

55. Upon information and belief and for reasons unknown to Gibson, the District Attorney has chosen not to file criminal charges against Campbell for her conduct.

56. Gibson continues to desire that the District Attorney pursue her criminal complaint filed on January 19, 2006 and does not understand the decision not to pursue those charges.

57. Upon information and belief, the conduct of Campbell complained of herein is well-known to the N.Y.P.D., general public and collective corporate Defendants.

58. Gibson has not received all monies due and owing to her from the Defendants to the date of the filing of this complaint.

59. Upon information and belief, Defendants refuse to compensate Gibson in retaliation for the complaint filed against Campbell with the N.Y.P.D.

60. Upon information and belief, Campbell and the collective Defendants denied the assault upon Gibson in the media by and through a press release claiming "she was not in the country". Said response was made publicly in response to a private demand letter sent to Campbell and RZO by counsel for Gibson.

61. Numerous national media outlets published the defamatory statements contained in the Campbell press release worldwide.

62. The press release issued by Defendants was knowingly false, misleading and intended to defame and impugn the integrity of Gibson with the public and did in fact accomplish that nefarious goal.

63. As a result of the press release which was knowingly false, Campbell disseminated to third parties the knowingly false and malicious statement that "she was out of the country" to impugn the integrity of Gibson.

64. Agents of Campbell continued to knowingly and intentionally defame Gibson by stating publicly the allegations of Gibson were not true including but not limited to Silverman.

65. Acting on behalf of Campbell, Silverman stated in the New York Post and to other media outlets: the allegations are "completely not true".

66. Silverman acted at all times at the request and with direct and explicit authorization of Campbell in an intentional effort to defame Gibson and cause her damage.

67. As more fully explained in the punitive damages section herein and upon information and belief, the Defendants intentionally, knowingly and with wanton disregard of the rights and reputation of Gibson and other female employees of Campbell subjected to similar treatment, lie, deceive and defame any and all victims of the violent and discriminatory pattern of conduct of Campbell.

68. As more fully explained in the punitive damages section herein and upon information and belief, the Defendants intentionally, knowingly and with wanton disregard of the rights and reputation of Gibson and other female employees of Campbell subjected to similar treatment, "circle the wagons" to protect Campbell from responsibility for her conduct by and through a media campaign designed to defame and impugn the integrity of her victims.

69. Upon information and belief, said media campaign to undertaken at the direct and explicit direction of Campbell with intentional or reckless disregard for the impact on her victims.

ALLEGATIONS SUPPORTING PUNITIVE DAMAGES

70. Upon information and belief, Campbell has anger management and rage issues caused upon information and belief by factors including but not limited to her discriminatory animus which results in her demeaning, discriminatory and physical assaults against women in her employ.

71. Upon information and belief, Campbell targets and engages in her violent and discriminatory behavior solely towards female employees.

72. Upon information and belief, Campbell chooses to target for verbal and physical abuse and discrimination solely female employees, female immigrants to the

United States in her employ, female employees with foreign accents and any other female employees as she perceives as vulnerable, with a limited ability to defend themselves and as members of the following protected classes for purposes of discrimination laws: gender, sex and national origin.

73. Upon information and belief, the collective corporate Defendants were fully aware of the violence and discriminatory conduct of Campbell directed at Gibson and the individuals identified in Paragraph 21 but took no steps to remedy such conduct.

74. Upon information and belief, even with substantial notice of the conduct of Campbell, the collective corporate Defendants took no steps to remedy her violent and discriminatory conduct and instead ratified same by and through their notice and inaction.

75. Purple ignored previous incidents involving other similarly situated clients and placed Gibson in the employ of Campbell.

76. The collective corporate Defendants covered up, ratified and condoned and through their acquiescence facilitated the violent and discriminatory conduct of Campbell.

77. Silverman intentionally and knowingly with malice aforethought and at the specific direction and instruction of Campbell lied, defamed and caused injury to the reputation of Gibson.

**CONDUCT SUPPORTING PUNITIVE DAMAGES AS DEMONSTRATIVE OF
KNOWING AND INTENTIONAL PATTERN AND PRACTICE**

**1998 THROUGH 1999
Georgina Galanis**

78. Upon information and belief, Georgina Galanis, a former personal assistance

of Campbell was subjected to conduct including but not limited to: being assaulted and battered by in the head with a telephone; grabbed in the neck while having her head violently shaken; being slammed against a wall; having Campbell threaten to throw her out of a car traveling at high speed down a highway; and threatening to have Ms. Galanis deported.

2000

CAMPBELL PLEADS GUILTY TO CANADA ASSAULT

79. Upon information and belief, Campbell was arrested in Toronto in 1998 for the assault on Galanis and in 2000 plead guilty to the assault.

80. Upon information and belief, as part of her sentencing, Campbell was required to "express remorse" to Ms. Galanis and attend anger management therapy.

81. Upon information and belief, conditioned upon the foregoing, Canadian authorities agreed to expunge of "clear" her record of any conditions.

2001

ATTACK AGAINST MAID OF FLAVIO BRIATORE

82. Upon information and belief, on or about 2001, the N.Y.P.D. were called to the Chelsea, Manhattan, apartment of then boyfriend to Campbell, Flavio Briatore when Campbell assaulted and attempted to batter the female domestic worker employed by Mr. Briatore.

AUGUST 2004

Milicent Burton

83. Upon information and belief, in August 2004, Milicent Burton, a female employee of Campbell was assaulted and battered by Campbell resulting in her admission to Lenox Hill Hospital in Manhattan during an argument about packing a bag.

84. Upon information and belief, Campbell denied the charges.

2005 THROUGH 2006
Amanda Black

85. Upon information and belief, Amanda Brack, a former personal assistance of Campbell was subjected to conduct including but not limited to: verbal assault on a regular basis including but not limited to being called a "fucking idiot"; physically assaulted and battered in the face with a cell phone by Campbell in Mexico City; restraining Ms. Brack against her will from leaving the scene of the Mexico City assault; attempting to kick Ms. Brack during a verbal argument at the residence; having items thrown at her by Campbell during fits of rage at the residence; calling Ms. Brack a "malicious bitch" on a trip to Marrakesh; assaulting and battering Ms. Brack during the Marrakesh trip; restraining Ms. Brack against her will from leaving the scene of the Marrakesh assault; stealing property of Ms. Brack including her passport to prevent her reentry into the United States and telling her "I fucking ripped up your passport bitch"; ripping off Ms. Brack's clothes in the residence while yelling "where did you get the money to buy these clothes" and "fucking bitch, fucking idiot or malicious bitch".

MARCH 2006
Ana Scolavino

86. Upon information and belief, on March 30, 2006, approximately two months after assaulting Gibson, Campbell again engaged in her life-long pattern of violent and discriminatory conduct by assaulting Ana Scolavino, a domestic employee of Campbell and colleague of Gibson also employed at the Campbell residence.

87. Ms. Scolavino was allegedly assaulted and battered by Campbell by and through being struck in the head with a telephone by Campbell while Campbell yelled

discriminatory and derogatory comments.

88. While engaging in her violent and discriminatory conduct and eerily similar to the allegations of Gibson, Campbell accused Ms. Scolavino of stealing a \$200.00 pair of Chip and Pepper Jeans.

89. Upon information and belief, Ms. Scolavino was also placed in the employment of Campbell by Purple.

90. Similar to the defamation of Gibson, Campbell publically denied the allegations of Ms. Scolavino and stated publically in the world wide media: "The allegations are completely untrue...She is sadly mistaken if [Ms. Scolavino] thinks she can extract money form me by concocting lies by recycling old stories...I have asked my lawyer to look into filing both theft and extortion charges against [Ms. Scolavino]".

91. The aforementioned conduct perpetrated against Ms. Scolavino by Defendants is similar if not identical to the allegations of Gibson alleged herein.

92. Upon information and belief, the conduct of Campbell, the additional Defendants and her agents acting on her behalf of knowingly and intentionally defaming her victims via the world-side media in an attempt to circle the wagons to cover up her rage, discriminatory animus and upon information and belief, drug addiction, is a malicious and intentional patter of illegal conduct which causing substantial harm to Gibson and the other victims of Campbell.

93. Campbell's denials and pattern of defamation have failed to convince a grand jury of her innocense as Campbell was indicted for the assault of Ms. Scolavino.

94. At the time of the filing of this complaint, criminal charges remain pending against Campbell for his vicious assault on Ms. Scolavino.

95. Consistent with her long-term pattern of disregard for the law and consequences for her actions, Campbell failed to appear for a required appearance in criminal court on October 25, 2006.

JULY 2006
Breach of the Peace

96. Upon information and belief, Campbell was arrested in London on July 10, 2006 for disorderly conduct and breach of the peace for causing a disruption outside of the house of her boyfriend Badr Jafar.

OCTOBER 2006
London Attack on Campbell's Drug Counselor

97. Upon information and belief, Campbell again assaulted a female, reported to be her drug counselor, in London on or about October 25, 2006.

98. Upon information and belief, while attending drug counseling to renew her visa to return to the United States, Campbell "scratched the face" of her counselor resulting in substantial injury and the arrest of Campbell.

99. Upon information and belief, the London Attack took place at Campbell's London residence and Campbell attempted to detain the victim against her will from leaving said residence and reporting the assault and battery.

100. Upon information and belief, Campbell has attended Narcotics Anonymous meeting among other self-help groups both voluntarily and as ordered by the various courts to deal with her violent and discriminatory conduct.

101. Upon information and belief, the voluntary and court ordered therapy has unfortunately failed to protect either Campbell or her numerous victims to the detriment of her victims and their actual damages and pain and suffering.

102. Intentionally omitted.

**UPON INFORMATION AND BELIEF, CAMPBELL HAS AND CONTINUES TO
DEFAME AND SUE HER VICTIMS, SUE THE MEDIA AND ENGAGE HER
AGENTS INCLUDING THE DEFENDANTS NAMED HEREIN IN A KNOWING
AND INTENTIONAL PATTERN OF MALICIOUS CONDUCT INTENDED TO
DECEIVE THE PUBLIC AND COVER-UP HER VIOLENT AND
DISCRIMINATORY CONDUCT TO THE DETRIMENT OF HER VICTIMS
AND PUBLIC RIDICULE**

103. As previously alleged upon information and belief, Campbell publically denied the allegations of victim Ms. Scolavino and stated in the world wide media: "The allegations are completely untrue...She is sadly mistaken if [Ms. Scolavino] thinks she can extract money form me by concocting lies by recycling old stories...I have asked my lawyer to look into filing both theft and extortion charges against [Ms. Scolavino]".

104. Upon information and belief, the foregoing is indicative of the threats of Campbell to any person or entity which exposes her violent and discriminatory conduct including the media.

105. Upon information and belief, Campbell sued unsuccessfully the London Daily Mirror in 2001 for publishing photos of Campbell leaving a Narcotics Anonymous meeting in London.

106. Upon information and belief, Campbell, Silverman and the collective corporate Defendants named herein utilize threats of litigation, public humiliation and defamation among other illegal and improper methods to silence the victims of Campbell

and perpetuate her pattern of violent and discriminatory conduct towards females in her employ.

107. Upon information and belief, Campbell is currently suing a British newspaper for reporting that Campbell damaged the yacht of her boyfriend Badr Jafar following an argument with an employee of Mr. Jafar.

CAMPBELL THINKS ITS ALL A "JOKE"

108. Campbell has posed publically in a tee-shirt reading "NAOMI HIT ME" on the front and "I LOVE IT" on the back.

109. Campbell had full knowledge of her prior conduct, or misconduct, and its damage to her victims when she posed with her the aforementioned tee-shirt. In addition, she has reaped financial rewards from her unlawful behavior by earning money by her presence in commercial advertisements of her anger management issues in both the United States and England. Said financial rewards, tantamount to an unjust enrichment as a result of unlawful and socially unacceptable behavior.

110. Upon information and belief, Campbell is either unwilling or incapable of comprehending the damage to the victims of her violent and malicious conduct including but not limited to Gibson however can and continues to reap financial rewards from her behavior.

111. Upon information and belief, the perpetuation and facilitation of Campbell's violent and discriminatory conduct is aided and abetted by and through the knowing and intentional acquiescence of her agents including the Defendants named herein.

112. Upon information and belief, the perpetuation and facilitation of Campbell's violent and discriminatory conduct is covered up by and therefore ratified by and through the knowing and intentional acquiescence of her agents including the Defendants named herein.

**AS AND FOR A FIRST CAUSE OF ACTION FOR
CIVIL ASSAULT**

113. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

114. Defendant CAMPBELL intentionally engaged in physical conduct that placed the plaintiff herein in imminent apprehension of harmful contact.

115. Further, defendant CAMPBELL, intentionally engaged in physical conduct that resulted in offensive contact with the plaintiff.

116. As a direct and proximate result of the actions of the defendant CAMPBELL, as alleged supra, the plaintiff suffered bodily injury, resulting pain and suffering, mental anguish, loss of capacity for enjoyment of life, loss of earnings and loss of ability to earn money.

117. These losses are continuing and permanent.

**AS AND FOR A SECOND CAUSE OF ACTION
FOR BATTERY**

118. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

119. On numerous occasions, the defendant CAMPBELL, intentionally and willfully contacted the plaintiff without the plaintiff's consent.

120. The contacts with the Plaintiff by the defendant were offensive in nature and in no way provoked by the plaintiff.

121. These contacts took place at the plaintiff's place of employment, to wit the residence of Defendant, NAOMI CAMPBELL.

122. These contacts took place in the month of January, 2006 at the residence of the defendant, NAOMI CAMPBELL.

123. As a direct and proximate result of the actions of the defendant CAMPBELL, as alleged supra, the plaintiff suffered bodily injury, resulting pain and suffering, mental anguish, loss of capacity for enjoyment of life, loss of earnings and loss of ability to earn money.

124. These losses are continuing and permanent.

**AS AND FOR A THIRD CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

125. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

126. Defendant NAOMI CAMPBELL'S intentional conduct towards the plaintiff, as described, supra, was so extreme and outrageous that it crossed all boundaries of decency and thus, was atrocious and intolerable in a civilized community.

127. While engaged in the aforementioned conduct, defendant NAOMI CAMPBELL, intentionally caused or disregarded the substantial probability of causing severe emotional distress to the plaintiff.

128. As a result of the aforementioned behavior on the part of the defendant, NAOMI CAMPBELL, the plaintiff was directly and proximately caused severe

emotional distress which she suffered in the past and continues to suffer from today and it is believed that the suffering will continue in the future.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR
RECKLESS INFLICTION OF EMOTIONAL DISTRESS**

129. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

130. Defendant NAOMI CAMPBELL'S conduct towards the plaintiff, as described, supra, was so reckless, extreme and outrageous that it crossed all boundaries of decency and thus, was atrocious and intolerable in a civilized community.

131. While engaged in the aforementioned conduct, defendant NAOMI CAMPBELL, recklessly caused or disregarded the substantial probability of causing severe emotional distress to the plaintiff.

132. As a result of the aforementioned behavior on the part of the defendant, NAOMI CAMPBELL, the plaintiff was directly and proximately caused severe emotional distress which she suffered in the past and continues to suffer from today and it is believed that the suffering will continue in the future.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

133. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

134. Defendant NAOMI CAMPBELL'S conduct towards the plaintiff, as described, supra, constituted negligent conduct on the part of all of the defendants herein.

135. While engaged in the aforementioned conduct, defendant NAOMI

CAMPBELL, constituted a willful violation of the statutory standard of conduct and a violation of the standards of care applicable to the employee-employer relationship.

136. As a result of the aforementioned negligent behavior, on the part of all of the defendants herein, the plaintiff was directly and proximately caused severe emotional distress which she suffered in the past and continues to suffer from today and it is believed that the suffering will continue in the future.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR
FALSE IMPRISONMENT**

137. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

138. Defendant NAOMI CAMPBELL'S intentionally and without any justification, intentionally caused the plaintiff, by both acts and threats as described supra, herein, to be confined for an unreasonable amount of time, without any means of escape.

139. As a result of the aforementioned behavior on the part of the defendant, NAOMI CAMPBELL, the plaintiff was directly and proximately caused severe emotional distress which she suffered in the past and continues to suffer from today and it is believed that the suffering will continue in the future.

**AS AND FOR A SEVENTH CAUSE OF ACTION FOR
VICARIOUS LIABILITY OF THE DEFENDANTS RZO, L.L.C.,
OMI, LTD., OMI, LLC, LONDON KILT, INC.**

140. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

141. At all time mentioned herein, the Defendant NAOMI CAMPBELL was an

employee of defendants RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC., and was acting within the course and scope of her employment when she committed the acts described, supra, herein.

142. That at all times herein mentioned, the defendant NAOMI CAMPBELL was an officer of the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC. and was acting in her official capacity as an agent, officer and director of the aforementioned defendants when she committed the acts described herein.

143. As a result, the defendants RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC. are vicariously liable for the acts of defendant NAOMI CAMPBELL.

144. As a result of the aforementioned behavior on the part of the defendant, NAOMI CAMPBELL, for which the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC., are vicariously liable, the plaintiff was directly and proximately caused severe emotional distress which she suffered in the past and continues to suffer from today and it is believed that the suffering will continue in the future.

**AS AND FOR A EIGHTH CAUSE OF ACTION FOR
NEGLIGENCE OF THE DEFENDANTS RZO, L.L.C.,
OMI, LTD., OMI, LLC, and LONDON KILT, INC.**

145. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

146. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC., knew or should have known of the vicious propensities of the defendant NAOMI CAMPBELL including her history

of assaulting females within her employ.

147. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC., had an obligation to inform all persons coming within the employ of the defendant NAOMI CAMPBELL, of her violent, vicious and assaulting propensities.

148. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC., had an obligation to ensure that defendant NAOMI CAMPBELL was receiving the appropriate anger management therapies and that she was not a danger to those around her.

149. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC. had an obligation to screen its employees, officers, potential employers and agents for violent propensities.

150. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC. had an obligation to place a plan to screen its employees, officers, potential employers and agents for drug abuse and anger management issues.

151. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC. were negligent by failing to take the appropriate steps to inform the plaintiff herein about the vicious and violent propensities of the defendant NAOMI CAMPBELL.

152. At all times relevant to the allegations herein, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC. were negligent for failing to

full and thorough investigation of the facts and with intent to damage the reputation of the plaintiff GABBY GIBSON.

164. That the defendants herein, in callous disregard for the reputation of the plaintiff, GABBY GIBSON, made statements to the media that were publicly disseminated that were false and misleading; to wit that Ms. Campbell was out of the country at the time of the alleged assault.

165. That as a result of the aforementioned conduct the plaintiff was caused emotional distress, damage of her reputation and she was further labeled a liar.

**AS AND FOR A TENTH CAUSE OF ACTION FOR
PUNITIVE DAMAGES ON THE TORT CAUSES OF ACTION**

166. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

167. The plaintiff seeks punitive damages from the defendants herein for the repeated pattern of behavior that gave rise to the circumstances that lead to emotional distress and physical harm that was caused to her.

168. That the repeated conduct of the defendants as described in paragraphs 81-103, supra, has caused the plaintiff, emotional distress, pain and suffering loss of enjoyment of life.

169. That the conduct of the defendants as described in paragraphs 81-103, is sufficiently malicious, repetitious and outrageous as to entitle plaintiff to punitive damages.

**AS AND FOR AN ELEVENTH CAUSE OF ACTION FOR
VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE
CODE AND CHARTER: GENDER DISCRIMINATION**

170. Plaintiff repeats and re-alleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

171. Plaintiff has been discriminated against and subjected to disparate treatment in the terms, conditions and privileges of her employment including but not limited to discrimination in her employment including but not limited to her retaliatory termination based upon her gender in violation of the Administrative Code and Charter of the City of New York §8-107(a) and §8-502, et seq. and §8-602, et seq., whereby she has suffered and will continue to suffer both irreparable injury and compensable damage unless and until this Court grants relief. Furthermore, Plaintiff is entitled to punitive damages based upon the egregious nature of the conduct of Plaintiff.

172. In accordance with said statute, a copy of this Verified Complaint has been served on the New York City Commission on Human Rights and Corporation Counsel.

**AS AND FOR AN TWELFTH CAUSE OF ACTION FOR
VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE
CODE AND CHARTER: NATIONAL ORIGIN DISCRIMINATION**

173. Plaintiff repeats and re-alleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

174. Plaintiff has been discriminated against and subjected to disparate treatment in the terms, conditions and privileges of her employment including but not limited to discrimination in her employment including but not limited to her retaliatory termination based upon her national origin in violation of the Administrative Code and

Charter of the City of New York §8-107(a) and §8-502, et seq. and §8-602, et seq., whereby she has suffered and will continue to suffer both irreparable injury and compensable damage unless and until this Court grants relief. Furthermore, Plaintiff is entitled to punitive damages based upon the egregious nature of the conduct of Plaintiff.

175. In accordance with said statute, a copy of this Verified Complaint has been served on the New York City Commission on Human Rights and Corporation Counsel.

**AS AND FOR AN THIRTEENTH CAUSE OF ACTION FOR
VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE
CODE AND CHARTER AGAINST ALL CORPORATE DEFENDANTS:
NATIONAL ORIGIN DISCRIMINATION**

176. Plaintiff repeats and re-alleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

177. Plaintiff has been discriminated against and subjected to disparate treatment in the terms, conditions and privileges of her employment including but not limited to discrimination in her employment including but not limited to her retaliatory termination based upon her national origin in violation of the Administrative Code and Charter of the City of New York §8-107(a) and §8-502, et seq. and §8-602, et seq., whereby she has suffered and will continue to suffer both irreparable injury and compensable damage unless and until this Court grants relief. Furthermore, Plaintiff is entitled to punitive damages based upon the egregious nature of the conduct of Plaintiff.

178. In accordance with said statute, a copy of this Verified Complaint has been served on the New York City Commission on Human Rights and Corporation Counsel.

**AS AND FOR AN FOURTEENTH CAUSE OF ACTION FOR
VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE
CODE AND CHARTER AGAINST ALL CORPORATE DEFENDANTS:
GENDER DISCRIMINATION**

179. Plaintiff repeats and re-alleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

180. Plaintiff has been discriminated against and subjected to disparate treatment in the terms, conditions and privileges of her employment including but not limited to discrimination in her employment including but not limited to her retaliatory termination based upon her gender in violation of the Administrative Code and Charter of the City of New York §8-107(a) and §8-502, et seq. and §8-602, et seq., whereby she has suffered and will continue to suffer both irreparable injury and compensable damage unless and until this Court grants relief. Furthermore, Plaintiff is entitled to punitive damages based upon the egregious nature of the conduct of Plaintiff.

181. In accordance with said statute, a copy of this Verified Complaint has been served on the New York City Commission on Human Rights and Corporation Counsel.

**AS AND FOR A FIFTEENTH CAUSE OF ACTION
FOR VIOLATION OF THE NEW YORK STATE EXECUTIVE LAW:
SEX/GENDER DISCRIMINATION**

182. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

183. Plaintiff had been routinely and regularly subjected to a pattern of offensive, demeaning and discriminatory conduct described in the allegations of this complaint, supra.

184. Defendant CAMPBELL'S conduct was severe and pervasive such as it created a discriminatory, hostile and abusive work environment.

185. Defendant CAMPBELL'S conduct was motivated by plaintiff's gender/sex in violation of the New York State Human Rights Law.

186. As a result of the foregoing, plaintiff has suffered and will continue to suffer both irreparable injury, including but not limited to humiliation, mental anguish, emotional distress and loss of enjoyment of life and compensable damage unless and until this Court grants relief.

**AS AND FOR A SIXTEENTH CAUSE OF ACTION
FOR VIOLATION OF THE NEW YORK STATE EXECUTIVE LAW:
NATIONAL ORIGIN DISCRIMINATION**

187. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

188. Plaintiff had been routinely and regularly subjected to a series of offensive and demeaning physical contacts and derogatory verbal assaults as described in the allegations of this complaint, supra.

189. Defendants conduct was severe and pervasive such as it created a hostile and abusive work environment in violation of Executive Law § 296.

190. Defendant CAMPBELL'S discrimination and disparate treatment of the plaintiff was prompted by plaintiff's National Origin and was in violation of the New York State Human Rights Law.

191. As a result of the foregoing, plaintiff has suffered and will continue to suffer both irreparable injury, including but not limited to humiliation, mental anguish,

emotional distress and loss of enjoyment of life and compensable damage unless and until this Court grants relief.

**AS AND FOR A SEVENTEENTH CAUSE OF ACTION
FOR VIOLATION OF THE NEW YORK STATE EXECUTIVE LAW AGAINST
CORPORATE DEFENDANTS: NATIONAL ORIGIN DISCRIMINATION**

192. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

193. Plaintiff had been routinely and regularly subjected to a series of offensive and demeaning physical contacts and derogatory verbal assaults as described in the allegations of this complaint, supra.

194. Defendants conduct was severe and pervasive such as it created a discriminatory, hostile and abusive work environment in violation of Executive Law §296.

195. Defendants discriminatory and disparate treatment of the plaintiff was prompted by plaintiff's National Origin and was in violation of the New York State Human Rights Law.

196. As a result of the foregoing, plaintiff has suffered and will continue to suffer both irreparable injury, including but not limited to humiliation, mental anguish, emotional distress and loss of enjoyment of life and compensable damage unless and until this Court grants relief.

**AS AND FOR A EIGHTEENTH CAUSE OF ACTION
FOR VIOLATION OF THE NEW YORK STATE EXECUTIVE LAW AGAINST
CORPORATE DEFENDANTS: SEX/GENDER DISCRIMINATION**

197. Plaintiff repeats and realleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

198. Plaintiff had been routinely and regularly subjected to a series of discriminatory, offensive and demeaning physical contacts and derogatory verbal assaults as described in the allegations of this complaint, supra.

199. Defendants conduct was severe and pervasive such as it created a discriminatory, hostile and abusive work environment in violation of Executive Law §296.

200. Defendants discriminatory and disparate treatment of the plaintiff was motivated by plaintiff's gender/sex and was in violation of the New York State Human Rights Law.

201. As a result of the foregoing, plaintiff has suffered and will continue to suffer both irreparable injury, including but not limited to humiliation, mental anguish, emotional distress and loss of enjoyment of life and compensable damage unless and until this Court grants relief.

**AS AND FOR A NINETEENTH CAUSE OF ACTION FOR
VICARIOUS LIABILITY OF THE DEFENDANTS RZO,
L.L.C., OMI, LTD., OMI, LLC, and LONDON KILT, INC.**

202. Plaintiff repeats and re-alleges each and every allegation contained in the proceeding paragraphs, as if fully set forth herein.

203. At all times herein after mentioned, NAOMI CAMPBELL was an employee of the defendants RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC. and was acting within the scope of her employment when she harassed plaintiff such that it created a hostile work environment.

204. Defendant NAOMI CAMPBELL was a high-level managerial employee

or officer or director of the aforementioned defendants when she engaged in abusive conduct.

205. As a result, the defendants, RZO, L.L.C., OMI, LTD., OMI, LLC and LONDON KILT, INC. are vicariously liable for the acts/conduct of its employee, officer, and/or director, NAOMI CAMPBELL.

WHEREFORE, plaintiff, GABBY GIBSON demands judgment against all defendants, and each of them, on every cause of action stated herein, in amounts which exceed the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action, in a sum to be determined by a trier of facts, including damages actual, compensatory and punitive together with the costs and disbursements of this action as well as attorney's fees where applicable as well as pre-judgment interest where applicable and post verdict interest.

Dated: New York, New York
November 9, 2006

McHUGH & LAMBROU, LLP
SHANAHAN and ASSOCIATES, P.C.

By: 

Lambros Y. Lambrou, Esq.
2 Rector Street, 20th Floor
New York, New York 10006
(212) 285-2100

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

-----X
GABY GIBSON,

Plaintiff,

-against-

Index No.:

NAOMI CAMPBELL, RZO, L.L.C.,
OMI, LTD., OMI, LLC, LONDON KILT,
INC., and AMANDA SILVERMAN individually
and as agent of Defendant Naomi Campbell,

Defendant.
-----X

SUMMONS AND VERIFIED COMPLAINT

MCHUGH & LAMBROU, LLP

Attorney(s) for

PLAINTIFF

2 Rector Street, 20th Floor
NEW YORK, NEW YORK 10006

Tel: (212) 285-2100

To

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for

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