

[Print in **black ink** all areas in bold letters. This summons **must** be served with a complaint.]

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

**SUMMONS**

Jessica Denson

[your name(s)]

Plaintiff(s)

- against -

Donald J. Trump for President, Inc.

[name(s) of party being sued]

Defendant(s)

Date Index Number purchased

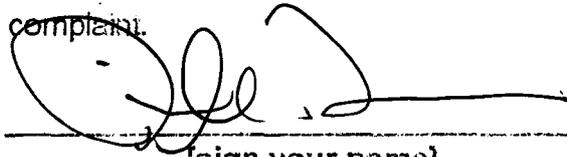
11/14, 2007

To the Person(s) Named as Defendant(s) above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: November 9, 2007  
[date of summons]

  
[sign your name]

Jessica Denson  
[print your name]

**FILED**  
NOV. 14 2017  
COUNTY CLERK'S OFFICE  
NEW YORK

  
[your address(es), telephone number(s)]

Defendant(s) Donald J. Trump for President, Inc.  
725 Fifth Ave.  
New York, NY 10022

[address(es) of defendant(s)]

Venue: Plaintiff(s) designate(s) New York County as the place of trial. The basis of this designation is: [check box that applies]

- Plaintiff(s) residence in New York County
- Defendant(s) residence in New York County
- Other [See CPLR Article 5]: \_\_\_\_\_

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

\_\_\_\_\_  
JESSICA DENSON,

Plaintiff,

Index No.

-against-

COMPLAINT

DONALD J. TRUMP FOR PRESIDENT, INC.

Defendant.  
\_\_\_\_\_

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, Jessica Denson (“Denson” or “Plaintiff”), respectfully shows and alleges as follows:

PARTIES

1. The plaintiff herein, Jessica Denson, was employed by the Donald J. Trump for President campaign during the 2016 presidential election.

2. Denson is a summa cum laude graduate of the George Washington University, an award-winning journalist, and a member of SAG-AFTRA with film and TV credits, and a lifelong advocate for the bullied and voiceless, both human and animal.

3. The defendant herein, Donald J. Trump for President, Inc. (“the campaign”), has a principal place of business at 725 Fifth Avenue, New York, NY 10022.

NATURE OF THE CASE

4. This case arises from violations by the campaign of New York state law prohibiting defamation and defamation per se; New York City Human Rights Law, New York City Administrative Code § 8-107; and the torts of intentional and negligent infliction of emotional distress. The campaign has unlawfully protected the harassment and sexual discrimination of a

former male superior of the Plaintiff, Camilo Jaime Sandoval, who targeted the plaintiff because she was a woman who received a promotion out from under his control by the campaign CEO. The campaign compounded a slander crusade executed by Sandoval against Denson, including the claim that she was responsible for an illegal leak of Donald Trump's taxes, and extended his assault, step-by-step thwarting and eliminating her very ability to perform the tasks she had been given, and perpetuating a climate of fear and terror for the extent of her employment and beyond.

5. When Denson reported Sandoval's severe and pervasive slander, aggravated harassment, attempted theft, cyberbullying, and sexual discrimination and harassment based on disturbance with her promotion, the campaign retaliated against Denson by severely diminishing the conditions and scope of her employment and preventing her from career advancement.

6. Throughout and beyond her employment, the campaign further harassed and discriminated against Denson, and endorsed and extended the defamatory characterization of her as one who is a threat and danger to her colleagues, future members of the White House administration, and the President of the United States.

#### CLAIM

7. On August 18, 2016, plaintiff Jessica Denson was hired as a national phone bank administrator on the Donald J. Trump for President campaign by data director Camilo Jaime Sandoval.

8. Beginning work on August 22, 2016, Sandoval routinely overworked Denson, requiring that she arrive in the morning, but allowing her to sit idle for hours, even outright ignoring her requests for tasks to work on, and then coming up with assignments at the end of the work day that would require her to stay late into the evening hours. Under Sandoval's

supervision, Denson was required to work seven days per week at an average of ten hours per day, more than any other staffer in her position.

9. Denson also assumed a full-time assignment for campaign manager Kellyanne Conway shortly after her hire.

10. On September 1, 2016, a Spanish-speaker was needed to translate for a critical campaign event. Sandoval (a Spanish-speaker himself) deferred to Denson (also a Spanish-speaking Hispanic) to complete the task, saying that he preferred to “stay behind the scenes.”

11. As a result of the Plaintiff’s excellent work on this task, on September 3, 2016, campaign CEO Stephen Bannon, removed the Plaintiff from the data department to mobilize the campaign’s Hispanic engagement effort, making her the only staffer dedicated to this task on a national level.

12. When Denson informed Sandoval of her promotion, he asked her male supervisor Ron Wilson in front of her, “Why are you letting your sheep wander?” - referring to the Plaintiff as Wilson’s “sheep.” Sandoval also stated with teeth clenched and in a threatening, domineering and intimidating manner, “I hired you and I can fire you.”

13. At least this early on, the campaign was aware of Sandoval’s harassment, which resulted in the female who replaced Denson being removed from data as well, only days after she was hired, after she reported being subjected to a hostile tirade from Sandoval.

14. On September 16, 2016, after contributing to various critical tasks as directed by Bannon, Denson received a significant salary increase and assumed the role of Hispanic Engagement Director.

15. Between September 8 and September 26, 2016, Denson launched the campaign’s

Hispanic engagement effort: fueling a Spanish-language digital ad campaign, successfully advocating for critical foreign policy stances, assembling a team effort among Spanish-speaking staffers, coming up with the official Spanish campaign slogan (¡Vive el Sueño Americano!), developing bilingual campaign literature, launching an official Team Trump Twitter account in Spanish, supporting Hispanic engagement events in targeted states, and providing a crucial link between the national campaign and ground efforts for Hispanic engagement. Denson became acquainted with and began to work collaboratively with Arlene (AJ) Delgado, a more recently hired campaign surrogate and senior advisor. During this time and since her hiring, Denson enjoyed growing mutual respect among her colleagues in Trump Tower, and exceptionally positive feedback from the field.

16. During the week of September 26, 2016, Delgado displayed a sudden shift in behavior and subsequently usurped the Plaintiff's position in the campaign, henceforth calling herself, "Hispanic Outreach Director."

17. On October 1, 2016, upon arrival to Colorado for campaign travel, the Plaintiff was urgently alerted by two data staffers, one of whom witnessed a phone call placed on speaker by Sandoval in the campaign's data office, that an aggressive conspiracy was underway between Sandoval and Delgado to sabotage her personally and professionally, including "tracking" Denson's whereabouts, trying to "find dirt" on her, "getting Secret Service involved," and finding a way to "get her fired." The staffer also disclosed at that time that since Denson's promotion Sandoval would routinely make derogatory and demeaning comments about her to others in the data department. That evening Denson sent a brief, urgent email to Conway and Bannon notifying them of the phone call, but neither replied.

18. The following day, October 2, 2016, Sandoval executed an assault that included:
- a. starting a rumor that she was responsible for the October 2016 leak of Donald Trump's taxes, a crime against the very candidate whom she was working to elect;
  - b. attempting to have another staffer be complicit in theft of the Plaintiff's personal laptop and personal files that she had left at the home of a friend she had worked with in the data department for safe keeping. Sandoval and Wilson told this friend to bring these items to work with her because, "Jessica is in trouble and you should separate yourself from her;"
  - c. blocking the Plaintiff's access to the national supporter database that she used to support Hispanic coalitions;
  - d. and cyberbullying the Plaintiff by making multiple unauthorized attempts to reset the password on the Spanish Twitter account solely authorized to the Plaintiff by campaign officials and registered to her phone.

19. On October 2, 2016, Denson reported the above and made urgent and repeated attempts to receive aid from senior campaign officials, including COO Jeff DeWit, but was ignored.

20. On the morning of October 3, 2016, a GOP colleague driving Denson to the rally she had travelled to Colorado for, was contacted and told that he should abandon her at her hotel and keep her away from the candidate at the rally.

21. On the evening of October 3, 2016, DeWit ordered that Denson fly back to New York to address "serious allegations," and on October 4, 2016 Denson did so.

22. On the morning of October 5, 2016, in an obligatory meeting with human resources director Lucia Castellano, Castellano was antagonistic towards Denson from the outset. Denson

came accompanied by the other female staffer who was bullied by Sandoval to explain the similar nature of his sexual discrimination and harassment, but Castellano exclaimed, “Not her!” and instead required that Denson speak with her in the presence of two other male staffers.

23. Denson specifically recounted Sandoval’s assault and harassment, and answered Castellano’s questions, which were primarily concerned with how she was hired, why she was promoted, and the depth of her relationships with friends on the campaign. Castellano argued the Plaintiff was not qualified for her position, and demanded to know if she was meeting with campaign donors. When Denson said she was not, but had only been videotaping supporters for digital ads, Castellano was determined to make a fact of the slanderous accusation of unauthorized donor meetings, and quipped back, “You can’t meet with donors!!”

24. Castellano did not express concern over Sandoval’s attempts to illegally obtain the Plaintiff’s personal belonging. She rather expressed great alarm while reading a transcript of a voicemail left by the Plaintiff’s mother warning Sandoval that if he did not cease his attempts the law would be invoked (only after the campaign had failed to respond to her daughter’s pleas for help), and said of the voicemail message, “That’s bad!!”

25. Following her meeting with the Plaintiff, Castellano, instead of making it clear that Sandoval’s attempted criminal activity, slander, and harassment was not to be tolerated in a presidential campaign, retaliated against the Plaintiff with further harassment, discrimination, and marginalization:

a. excusing and covering up Sandoval’s unauthorized attempts to access a Twitter account solely assigned to the Plaintiff, and the compromising of that account that occurred simultaneously while the Plaintiff experienced irregular and repeated remote rebooting of her

iPhone;

b. failing to squash Sandoval's broader false characterization of the Plaintiff to all possible campaign staff, including to a relative of Governor Pence, as one whom they should be "careful of" and "distance themselves from," the full scope and substance of which is not to this day even fully known by the Plaintiff;

c. eviscerating the Plaintiff's scope of work and ordering that she spend the remainder of the campaign in Colorado, even after confirming other arrangements;

d. humiliating the Plaintiff and causing her to be ostracized by her colleagues;

e. prohibiting any possible future contact between the Plaintiff and the candidate, who on previous occasions had shown great respect and appreciation for the Plaintiff and her work.

26. On October 9, 2016, a week after Denson's reporting of the coordinated assault, in response to none other than Denson's request for this flight change as directed by Conway in the presence of deputy campaign manager David Bossie, COO Jeff DeWitt published a libelous email to at least four other staffers that Denson had "wasted campaign money" and was banned from Trump Tower effective immediately, without *any* explanation. The Plaintiff *never once* wasted campaign money, but on the contrary saved the campaign money on multiple occasions.

27. On October 9, 2016 Denson immediately reached out to Conway and Bossie for intervention, and was ignored by both.

28. During the week of October 10, 2016, and in fact until her employment ended, Denson was both physically ill and greatly distressed due to the dismissal of her serious report of violations in her workplace - a presidential campaign, and subsequent retaliation by the

campaign, specifically Castellano and DeWit. After multiple ignored requests for this behavior to be explained and answered, the Plaintiff maintained her employment with the campaign under duress for the sole purpose of protecting the candidate, presuming that he was not aware of or endorsing these actions, and fearing that seeking outside aid may harm his chances in the election.

29. Castellano or DeWit at no point terminated the Plaintiff's at-will employment, but retaliated against the Plaintiff, perpetuating a climate of fear and torment for the Plaintiff and her family whilst treating her as a threat and danger to Donald Trump for the duration of the campaign, by:

a. Narrowing Denson's scope of work to one minor task, effectively eliminating her ability to continue any legitimate contribution to Hispanic engagement, expand the progress made thus far, or continue any meaningful professional development;

b. Repeatedly changing the travel arrangements agreed upon for Denson, and then portraying her questioning of these changes as an inability to "follow direction" and characterizing her as "disrespectful and unprofessional."

c. Causing new superiors to prohibit Denson from attending campaign events, in particular where a member of the Trump family was present;

d. Disabling Denson's ability to perform even the limited task she had been reduced to by permitting Sandoval to continue to block her access to the supporter database.

e. Conway and Bannon made apparent subsequent attempts to have Denson join the campaign's women's tour, spearhead other projects, and regain a healthy and positive role in the campaign, but both allowed Castellano and DeWit to trump their authority and restrain

Denson in a feckless and degrading - virtually non-existent - position for the remainder of the campaign;

30. Castellano also specifically engaged in menacing and inconsistent communications and threats to the Plaintiff, including:

a. notifying an excessive number of staffers of her private hotel accommodations;

b. telling the Plaintiff, while she was driving her campaign-provided rental car, that it was about to be reported stolen, putting the Plaintiff in fear of arrest for possession of a stolen vehicle. This was false as verified by the rental company;

c. suggesting that the Plaintiff was in possession of a campaign phone distributed by Sandoval that never existed;

d. when Denson refuted the defamation being made about her by Sandoval to another staffer, threatening Denson not to make any such defense or comment about Sandoval; and

e. Failing to investigate the disappearance of a laptop charger that may have implicated one or more individuals in unauthorized access to Denson's personal laptop in Trump Tower, and refusing to reimburse Denson for the loss of that item.

31. In the morning hours of November 9, 2016, the campaign's defamation spread to a Secret Service agent, who approached the Plaintiff at the election night victory party and told her she had to leave, after three hours in attendance, just prior to the candidate's victory and arrival. Only because the brother of the candidate, who had been in the Plaintiff's company for much of the night, stepped in and said, "She's with us," did the Secret Service agent finally leave her alone.

32. On November 10, 2016, the last day of Denson's employment, she sent emails from her work account requesting from Castellano that she be able to recover items left on her desk before she was banned from Trump Tower, as well as a non-spoilation notice to preserve the surveillance camera footage from the night her personal laptop charger went missing. Immediately after sending that notice, the Plaintiff's access to her work email ceased, a discriminatory act against her, whereas all other staffer's access continued into the following week by means of which they received invitations to apply for administration positions.

33. On November 16, 2016, Denson again reached out to Bannon, who responded that Denson had done "great work" and he had given her name to the Presidential Transition Team.

34. On November 22, 2016, Bannon offered Denson a job on the Transition Team in an email copied to a leading member of the transition. That individual immediately responded confirming that they would "find the right fit" for Denson and speak the next day, but the offer vaporized. Despite multiple attempts in the following days, weeks, and month to reach this individual, he never responded, confirming that the campaign's defamation of her reputation had at some point on or after November 23, 2016 reached this individual as well, and Denson was successfully blocked from assuming any position.

35. Denson made only positive, legal and uplifting contributions to the campaign, yet her prospect for work-reward was definitively annihilated and her character defamed on all possible levels. The sexual discrimination and harassment of a domineering male superior who targeted her because she was a woman, referring to her as another man's "sheep," was allowed to prevail even after she was promoted, and his hostile work environment was concealed, validated and extended by the human resources of the campaign, which served as an instrument to further

defame and intentionally torment the Plaintiff through shame and fear at every opportunity.

Sandoval's hostility, assaults and defamation were not only fully supported during the campaign, but he was further rewarded with a personnel position on the Presidential Transition Team, and Sandoval subsequently acquired a senior post in the Treasury department of the Trump administration. Castellano received a similar post in the Small Business Administration.

36. DeWit's defamatory statements and actions, which became known to a large number of campaign staffers, the United States Secret Service, and future members of the Trump administration, served to extend the character assassination launched by Sandoval and Delgado, falsely portraying the Plaintiff as wasteful, distrustful, and as a danger and threat in the eyes of these individuals and organizations.

37. By reason of the facts and circumstances stated above, the campaign caused Denson severe emotional distress, fear of continued cyber-invasion and unwarranted invasion of privacy, and immense loss of opportunity - derailing her professional work and defaming her character.

38. Denson was specifically prohibited from assuming a position she was offered on the Presidential Transition Team, and deprived of every natural progression of personal and professional relationships resulting from her positive and substantial contributions to the campaign of the future President of the United States. Furthermore, due to the wanton and reckless acts committed under the auspices of a presidential campaign, the Plaintiff fears, including but not limited to,

unknown damage to her reputation in official records that could cause arbitrary and significant harm to her regardless of her career path moving forward.

39. WHEREFORE, Plaintiff demands judgment against the campaign in the sum of \$25,000,000.00, to include:

- A. Compensatory damages, including lost compensation, lost opportunity, damage to career path, damage to reputation and pain and suffering damages;
- B. Damages for mental anguish;
- C. Punitive damages;
- D. Attorneys fees and costs of suit;
- E. Such other relief as the court may deem equitable and just.

Dated: November 9, 2017



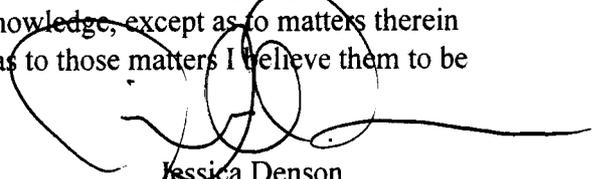
Jessica Denson  
Pro Se



**VERIFICATION**

Jessica Denson, being duly sworn, deposes and says:

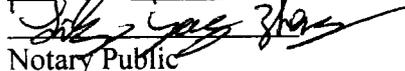
I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on the information and belief and as to those matters I believe them to be true.



Jessica Denson  
11/10/2017

State of New York )  
County of New York )

Sworn to before me this  
10 day of 11 2017

  
Notary Public

