

conduct, to ensure that he can no longer hide behind his father's wealth and privilege, and to make sure no additional women are victimized by his acts of sexual violence.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to New York Civil Practice Laws and Rules ("CPLR") § 301.

3. Venue is proper in this County pursuant to CPLR § 503 because a substantial part of the events giving rise to Plaintiff's claims took place in New York County.

PARTIES

4. Plaintiff Taylor Lawrence is a female resident of New York County, New York.

5. Defendant Christopher Dawson is a male resident of New York County, New York. Christopher Dawson is currently a Director at SquareFoot, a real estate company.

FACTUAL ALLEGATIONS

6. Plaintiff Taylor Lawrence was employed at Wellspring— a private equity investment firm – from approximately September 2010 through January 2018. Ms. Lawrence was the Head of Marketing & Investor Relations.

7. Throughout her employment at Wellspring, Bill Dawson was the Chief Executive Officer and one of several supervisors to whom Ms. Lawrence directly reported.

8. On the evening of December 29, 2014, Ms. Lawrence was scheduled to meet Bill Dawson for drinks at Lexington Bar & Books located at 1020 Lexington Avenue (73rd Street and Lexington Avenue).

9. The venue was chosen in part due to its proximity to Bill Dawson's nearby apartment.

10. Ms. Lawrence arrived at Lexington Bar & Books and waited for Bill Dawson to arrive. However, significant time passed, and he did not.

11. Ms. Lawrence texted Bill Dawson via Snapchat to confirm that he was going to meet her, and he initially told her he was, but that he was running late because he was out drinking with his sons.

12. Eventually, Bill Dawson stopped responding to Ms. Lawrence's texts. Accordingly, Ms. Lawrence decided to walk over to Bill Dawson's apartment which was across the street (located at 132 East 72nd Street, 14th Floor), intending to ask him to come down. Bill Dawson had previously told Ms. Lawrence that his wife would be out of town.

13. Ms. Lawrence arrived at the lobby of Bill Dawson's building at approximately 11:00 p.m. Ms. Lawrence asked the doorman to call Bill Dawson's apartment to ask if he would come downstairs. The doorman called up to the apartment and told Ms. Lawrence that "Mr. Dawson" said she was approved to go upstairs.

14. As Bill Dawson's apartment is the only one on the floor, the elevator opened up directly to his apartment.

15. This was the first time Ms. Lawrence had ever been to Bill Dawson's apartment.

16. After she entered, Ms. Lawrence saw a much younger man who she would later learn to be Christopher Dawson – Bill Dawson's son. Ms. Lawrence introduced herself as someone who worked with his father.

17. Christopher Dawson said his father was sleeping and Ms. Lawrence responded that she was going to leave. Before she could leave, Christopher Dawson asked her if she wanted a drink. Ms. Lawrence figured she would have one drink while she called for a taxi and waited for her ride.

18. Christopher Dawson then made Ms. Lawrence a drink.

19. Upon information and belief, Christopher Dawson added a narcotic to the drink he made for Ms. Lawrence.
20. Upon information and belief, Christopher Dawson drugged Ms. Lawrence.
21. Upon information and belief, Christopher Dawson drugged Ms. Lawrence with the intent of securing her incapacity to sexually assault and rape her.
22. Ms. Lawrence did not consent to Christopher Dawson adding any narcotic or other illicit substance to her drink.
23. Ms. Lawrence consumed the drink given to her by Christopher Dawson.
24. After consuming this drink, Ms. Lawrence was incapable of lawfully consenting to any sexual activity.
25. Upon information and belief, Christopher Dawson was aware that Ms. Lawrence was incapable of lawfully consenting to any sexual activity.
26. Upon information and belief, Christopher Dawson drugged Ms. Lawrence with the specific intent to rape and sexually assault her.
27. Christopher Dawson then turned pornography on the TV.
28. Ms. Lawrence said, "I'm leaving" and got up to leave the apartment.
29. Christopher Dawson then exposed his erect penis to Ms. Lawrence.
30. Christopher Dawson said, "You're not leaving this. You're not going anywhere" and physically pushed Ms. Lawrence to the floor.
31. Christopher Dawson then took physical and sexual advantage of Ms. Lawrence without her consent.
32. Christopher Dawson repeatedly raped and sexually assaulted Ms. Lawrence.
33. Christopher Dawson repeatedly anally raped Ms. Lawrence.

34. Due to her incapacity, Ms. Lawrence lacked the ability to physically stop Christopher Dawson's rape and sexual assault.

35. Ms. Lawrence was awoken by Bill Dawson's other son, William Dawson III. Ms. Lawrence found herself lying on the floor, with her top on but with nothing on the bottom half of her body or legs. Ms. Lawrence did not have on any pants or undergarments.

36. Ms. Lawrence's body was physically discolored, bruised and sore from Christopher Dawson's rape and sexual assault, including but not limited to on her upper thighs, lower back, buttocks and arms.

37. William Dawson III said to Ms. Lawrence, "What are you doing here? You can't be here! You have to leave."

38. Ms. Lawrence said she could not leave until she found her purse, but William Dawson III told her she had to leave immediately, and Ms. Lawrence was forced to leave without finding her purse.

39. On several occasions thereafter, Ms. Lawrence told Bill Dawson and a Managing Partner at Wellspring that Christopher Dawson had raped her.

40. Following the incident, Bill Dawson told Ms. Lawrence that his son, Christopher Dawson, bragged to him "he plugged you in the ass." Ms. Lawrence told Bill Dawson that it was not consensual.

41. On another occasion, when Ms. Lawrence told Bill Dawson – in front of a Managing Partner – that his son had raped her, Bill Dawson responded by saying: "I will destroy you. I will ruin you" if Ms. Lawrence ever pursued those allegations.¹

¹ This, among other reasons, is why Ms. Lawrence did not raise her claims sooner.

42. Upon information and belief, Christopher Dawson is well aware of his father's wealth and believes it gives him license to act with impunity, including but not limited to drugging Ms. Lawrence and raping her.

FIRST CAUSE OF ACTION
Violations of the GMVA

43. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

44. Under the GMVA, "any person claiming to be injured by an individual who commits a crime of violence motivated by gender as defined in section 8-903 of this chapter, shall have a cause of action against such individual in any court of competent jurisdiction."

45. Under the GMVA, a "Crime of violence" means "an act or series of acts that would constitute a misdemeanor or felony against the person as defined in state or federal law or that would constitute a misdemeanor or felony against property as defined in state or federal law if the conduct presents a serious risk of physical injury to another, whether or not those acts have actually resulted in criminal charges, prosecution, or conviction."

46. Under the GMVA, a "Crime of violence motivated by gender" means "a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim's gender."

47. By the actions described above, Defendant engaged in a "crime of violence" and a "crime of violence motivated by gender" against Plaintiff.

48. Pursuant to Breest v. Haggis, 115 N.Y.S.2d 322, 330 (1st Dep't 2019):

Rape and sexual assault are, by definition, actions taken against the victim without the victim's consent. Without consent, sexual acts such as those alleged in the complaint are a violation of the victim's bodily autonomy and an expression of the perpetrator's contempt for that autonomy. Coerced sexual activity is

dehumanizing and fear-inducing. Malice or ill will based on gender is apparent from the alleged commission of the act itself. Animus inheres where consent is absent.

49. By the actions described above, Plaintiff was subjected to rape and sexual assault by Defendant.

50. As a direct and proximate result of the aforementioned gender-motivated violence, Plaintiff has sustained, and will continue to sustain, physical injury, pain and suffering, serious psychological and emotional distress, mental anguish, anxiety, embarrassment and humiliation, entitling her to an award of damages in the maximum amount permitted by law.

51. Under the GMVA, Plaintiff is also entitled to an award of punitive damages in the maximum amount permitted by law and an award of attorneys' fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enters judgment in her favor and against Defendant for the following relief:

- A. A declaratory judgment that the actions of Defendant complained of herein violates the laws of the City of New York;
- B. An award of damages against Defendant, in an amount to be determined at trial, plus interest, to compensate Plaintiff for all applicable damages permitted by law;
- C. An award of damages against the Defendants, in an amount to be determined at trial, plus interest, to compensate Plaintiff for all compensatory damages, including, but not limited to, compensation for Plaintiff's emotional distress, pain and suffering;
- D. An award of punitive damages in an amount to be determined at trial;
- E. Prejudgment interest on all amounts due;
- F. An award of Plaintiff's reasonable attorneys' fees and costs; and
- G. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: July 9, 2020
New York, New York

Respectfully submitted,

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