

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

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BRENDA RAMIREZ,

Plaintiff,

v.

ARTHUR RABIN,

Defendant.

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Index No.:

SUMMONS

Plaintiff designates New York County
as the place of trial.

Basis for Venue: Defendant's
residence.

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To the above-named Defendant:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service, or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: September 29, 2025
New York, New York

Respectfully submitted,

WIGDOR LLP

By: Meredith Firetog
Meredith A. Firetog

WIGDOR LLP

Meredith A. Firetog
Katherine Vask

85 Fifth Avenue
New York, NY 10003
Telephone: (212) 257-6800
Facsimile: (212) 257-6845
mfiretog@wigdorlaw.com
kvask@wigdorlaw.com

Counsel for Plaintiff Brenda Ramirez

Defendant.

Index No.:

VERIFIED COMPLAINT

Jury Trial Demanded

Plaintiff Brenda Ramirez (“Plaintiff” or “Ms. Ramirez”), in her Verified Complaint against Defendant Arthur Rabin (“Defendant” or “Mr. Rabin”), hereby alleges as follows:

PRELIMINARY STATEMENT

1. Octogenarian Arthur “Artie” Rabin is the multi-millionaire co-founder of clothing manufacturing company Wear Me Apparel LLC and a former co-owner of the Brooklyn Nets.
2. Ms. Ramirez is a 39-year-old single mom working two jobs: as both a substitute teacher and as a flight attendant. Based in Florida, Ms. Ramirez has worked as a flight attendant for nearly 12 years, regularly flying routes between New York and Miami.
3. After Ms. Ramirez met Mr. Rabin on a flight she worked from New York to Florida in January 2022, the two began a platonic friendship consisting of frequent phone calls and occasional shared meals.
4. On December 27, 2024, Mr. Rabin invited Ms. Ramirez to dinner at his suite at the W Hotel in South Beach, Florida. He ordered room service and told Ms. Ramirez the hotel provided dessert and bottle of champagne for them to share. Ms. Ramirez agreed to drink a glass. Mr. Rabin handed a glass of champagne to Ms. Ramirez but did not pour one for himself.

5. Ms. Ramirez alone drank the glass of champagne, noticing that it tasted flat. Almost immediately, Ms. Ramirez felt sleepy and disoriented. She closed her eyes for what felt like a moment, but when she opened her eyes, she found herself naked in bed, with Mr. Rabin performing oral sex on her.

6. Ms. Ramirez could not move or speak, slipping in and out of consciousness. When Ms. Ramirez finally woke up, it was around 4 a.m., and she felt extremely sick.

7. The assault left Ms. Ramirez shaken. It took her days to make sense of and process the violation she endured from Mr. Rabin, a man she thought was a platonic friend. Mr. Rabin's sexual assault has had a profound emotional and physical impact on Ms. Ramirez. Ms. Ramirez experiences trauma that she has still not recovered from. She brings this lawsuit to seek justice and accountability.

JURISDICTION AND VENUE

8. This Court has jurisdiction over Defendant pursuant to Civil Practice Law & Rules ("CPLR") § 301 because Defendant Rabin, upon information and belief, resides in the County of New York.

9. Venue is proper pursuant to CPLR § 503(a) because Defendant Rabin, upon information and belief, resides in the County of New York.

PARTIES

10. Plaintiff Brenda Ramirez is a resident of the state of Florida.

11. Upon information and belief, Defendant Arthur Rabin is a resident of the state of New York.

FACTUAL ALLEGATIONS

I. MS. RAMIREZ MEETS MR. RABIN

12. Ms. Ramirez met Mr. Rabin while working a commercial flight from LaGuardia Airport in New York to Miami International Airport in Florida on January 5, 2022. She assisted with first-class onboarding and saw Mr. Rabin enter the plane.

13. During meal and drink service, Ms. Ramirez went to the back of the plane and sat with a coworker on a two-seater jump seat.

14. At the time, Ms. Ramirez had just returned from maternity leave and was discussing her new baby with a colleague.

15. Mr. Rabin overheard their conversation and interjected, telling Ms. Ramirez that she did not “look like she had a kid” and asked, “where is the kid’s dad?” Ms. Ramirez explained that she was a single mom.

16. Mr. Rabin and Ms. Ramirez exchanged pleasantries; in accordance with her general polite demeanor with passengers, Ms. Ramirez engaged in the conversation.

17. Mr. Rabin told Ms. Ramirez that he owned a successful garment business and would like to send her son some clothes. At the end of the conversation, Ms. Ramirez gave Mr. Rabin her phone number for that purpose.

18. Later that day, Mr. Rabin called Ms. Ramirez and left a voicemail.

19. After connecting by phone, the two began a friendship consisting of frequent phone calls. These conversations were friendly and generally polite. They discussed work, family, politics, and travel. Mr. Rabin confided in Ms. Ramirez about his late wife’s passing, expressed concerns he had about his business, and told her about property he rented on Fisher Island. He

also showed concern for Ms. Ramirez and how hard she worked as a single mother. Ms. Ramirez shared personal details about her son and her son's father.

20. At some point, Mr. Rabin began calling Ms. Ramirez extremely frequently—even daily. Between January 2024 and May of this year, for example, Mr. Rabin called Ms. Ramirez approximately two hundred and thirty-eight times.

21. Ms. Ramirez did not always answer the phone when Mr. Rabin called—although she saw him as a friend, she was a busy single mother and could not speak as frequently as Mr. Rabin desired.

22. If Ms. Ramirez did not pick up or immediately return his phone calls, Mr. Rabin would leave a hasty voicemail, demanding she call him back. He frequently directed his assistants to reach out to Ms. Ramirez on his behalf to ask her to return his calls.

23. Despite Mr. Rabin's short temper for missed phone calls and incessant calling, Ms. Ramirez saw him as a friend with whom she had a distanced but supportive friendship.

24. Ms. Ramirez considered Mr. Rabin, a man over forty years her senior, an elderly, lonely man who needed someone to talk to, and she herself appreciated having someone else to listen to her.

25. While there were times when Mr. Rabin called Ms. Ramirez daily, there were also stretches when they went weeks or even months without speaking.

26. Mr. Rabin also displayed generosity towards Ms. Ramirez, which she never requested but was grateful for. For example, several weeks after they met, Mr. Rabin followed through on his promise to send Ms. Ramirez's son clothes from his business warehouse. Over their three-year friendship, he did so several times. He also—without prompting or request—sent

Ms. Ramirez a number of wire transfers, contending that she worked very hard and had a son to support and that he was concerned about her well-being.

27. Ms. Ramirez never asked him to send her money, and she did not believe Mr. Rabin expected anything in return.

28. While the friendship existed primarily through phone calls, Ms. Ramirez and Mr. Rabin did meet in person a few times over the last three years. In April 2022, shortly after they first met, they had lunch together in Miami.

29. On another occasion, Mr. Rabin invited Ms. Ramirez for a lunch in Miami followed by time spent at his hotel pool. During this meeting, Mr. Rabin and Ms. Ramirez discussed her potentially undergoing a breast reduction surgery—a big insecurity of hers since breastfeeding her child—and Mr. Rabin encouraged her to undergo the surgery. He suggested that she find a good surgeon, and told her he would pay for the procedure. Ms. Ramirez was grateful for the offer, and believed at the time he was just being kind to her given her insecurities.

30. Each time Ms. Ramirez and Mr. Rabin met, their conversations were consistently platonic and friendly in nature. There was never anything romantic or sexually suggestive about their interactions—even the conversation about her breast reduction was matter-of-fact, and more a business discussion than about her physical appearance. Indeed, during this time, Ms. Ramirez periodically dated and was involved in a romantic relationship with someone else.

31. On July 27, 2023, Ms. Ramirez agreed to join Mr. Rabin for dinner during a work flight layover she had in Los Angeles, California. Before meeting him for dinner at a hotel restaurant, Ms. Ramirez explained that she could not stay out late because she needed to work on a flight back to Florida early in the morning.

32. Once they were finished with dinner, Mr. Rabin invited Ms. Ramirez to his hotel room. Ms. Ramirez declined and explained, again, that she had to work an early flight. Ms. Ramirez asked Mr. Rabin's driver to take her back to her hotel. Mr. Rabin became furious with Ms. Ramirez and expressed frustration that she would not just join him in his hotel room. He was so angry with her that he did not speak to her again for several months following that dinner meeting.

II. MR. RABIN SEXUALLY ASSAULTS MS. RAMIREZ

33. Although Mr. Rabin and Ms. Ramirez continued their friendship by phone, they did not meet again in person until December 27, 2024, after Mr. Rabin invited Ms. Ramirez to dinner at the W Hotel in South Beach, Florida.

34. Mr. Rabin said that he preferred to stay in his room and order room service, and although Ms. Ramirez had never had a private meal with him before, she agreed to join him for dinner.

35. Ms. Ramirez drove herself to the hotel. When Ms. Ramirez arrived, she picked up two mixed drinks from the hotel bar and brought them upstairs to Mr. Rabin's hotel room.

36. When Ms. Ramirez arrived at Mr. Rabin's suite, she felt comfortable—Mr. Rabin was very nice and spoke to her calmly. He ordered room service and told her the hotel had provided a dessert and bottle of champagne for them to share.

37. Surprised, since she had never experienced a hotel leaving a bottle of champagne for her before, Ms. Ramirez agreed to drink a glass. Mr. Rabin handed a glass of champagne to Ms. Ramirez but did not pour one for himself.

38. Ms. Ramirez alone drank the glass of champagne, noticing that it tasted flat.

39. Almost immediately, Ms. Ramirez felt sleepy and disoriented. She had never felt that way from alcohol before; oddly, the feeling was most similar to how she felt when she had been sedated for wisdom tooth extraction surgery.

40. She felt her eyes close for what she thought was a brief moment, but when she opened her eyes, she found herself naked in Mr. Rabin's bed, with Mr. Rabin performing oral sex on her.

41. She had no control over her body, and found herself fading in and out of consciousness and unable to speak.

42. When Ms. Ramirez finally woke up, it was around 4 a.m., and she felt extremely sick.

43. She ran to the bathroom and vomited excessively, including all over her naked body. Having no memory of how she became undressed or how she ended up in the bed, and remembering the one brief moment of consciousness during which Mr. Rabin performed a sex act on her, she panicked.

44. Ms. Ramirez showered to wash off the vomit from her body, continuing to panic as she realized that something horrible had happened that she did not consent to.

45. When she turned on the shower, Mr. Rabin began shouting towards the bathroom and asking what was going on. Ms. Ramirez repeatedly told him "I have to go," and proceeded to grab her clothes and purse and run out of the suite as quickly as she could.

46. As soon as she got to her car in the hotel parking lot, Mr. Rabin started calling her repeatedly. Still confused and scared, she picked up the phone and lied to Mr. Rabin, telling him she was fine and that she was sorry she got sick.

47. In response, Mr. Rabin said, “You disappointed me” and “You passed out on me.” He went on to blame Ms. Ramirez for how she was feeling by saying, “You’re cut off. You can’t drink around me anymore.”

48. Ms. Ramirez was shaken, as it took her a number of days to process the non-consensual activity forced upon her by Mr. Rabin, a man she thought was a platonic friend. Since then, Mr. Rabin has continued to try to call her, but Ms. Ramirez cannot bring herself to have a fulsome conversation with him, feeling nauseated when remembering their last meeting.

49. The two have not spoken since May 2025, when Ms. Ramirez realized how much what had happened was impacting her health and well-being.

50. Mr. Rabin’s assault has had a profound emotional and physical impact on Ms. Ramirez. Since the incident, Ms. Ramirez has had intense anxiety—something she never experienced before—which manifests in physical pain, difficulty sleeping, and a loss of appetite. For the first time in her life, Ms. Ramirez considered mental health treatment.

51. Ms. Ramirez blocked Mr. Rabin’s phone numbers to prevent him from being able to contact her, as she lives in fear of seeing him.

FIRST CAUSE OF ACTION
(Assault and Battery)
Against Defendant Arthur Rabin

52. The violent sexual acts committed intentionally by Defendant against Plaintiff and without her consent, including, but not limited to, his sexual assault of Plaintiff, created a reasonable apprehension in Plaintiff of immediate harmful or offensive contact to Plaintiff’s person.

53. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained in the past, and will continue to sustain, *inter alia*, physical injury, monetary damages,

pain and suffering, psychological and emotional distress, humiliation and loss of career fulfillment.

54. Defendant's conduct was wanton, malicious, willful and/or cruel, entitling Plaintiff to an award of punitive damages.

SECOND CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)
Against Defendant Arthur Rabin

55. Defendant engaged in conduct toward Plaintiff that is extreme and outrageous so as to exceed the bounds of decency in a civilized society.

56. Defendant's conduct of forcibly and violently sexually assaulting Plaintiff is extreme and outrageous conduct that shocks the conscience.

57. Defendant's actions were taken with intent to cause, or disregard for, the substantial probability of causing severe emotional distress.

58. As a direct and proximate result of Defendant's extreme and outrageous conduct, Plaintiff has suffered severe emotional distress.

59. Defendant's conduct was wanton, malicious, willful and/or cruel, entitling Plaintiff to an award of punitive damages.

PRAYER FOR RELIEF

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

- A. An award of compensatory damages;
- B. An award of punitive damages;
- C. A declaratory judgment that the actions of Defendant, complained of herein, violate the laws of the State of Florida;

- D. Prejudgment interest on all amounts due;
- E. An award of Plaintiff's reasonable attorneys' fees and costs; and
- F. 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: September 29, 2025
New York, New York

Respectfully submitted,

WIGDOR LLP

By: Meredith Firetog
Meredith A. Firetog

WIGDOR LLP

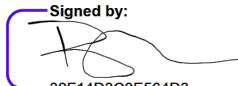
Meredith A. Firetog
Katherine Vask
85 Fifth Avenue
New York, NY 10003
Telephone: (212) 257-6800
Facsimile: (212) 257-6845
mfiretog@wigdorlaw.com
kvask@wigdorlaw.com

Counsel for Plaintiff Brenda Ramirez

VERIFICATION

I, Brenda Ramirez, affirm under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, have read the foregoing verified complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

Dated: 9/29/2025
New York, New York

Signed by:

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BRENDA RAMIREZ