

STATE OF INDIANA)
) SS: MARION COUNTY _____ COURT
COUNTY OF MARION)
 CAUSE NO.: _____

NIKI DASILVA, SAMANTHA LOZANO,)
GABRIELLE MCLEMORE and MARA)
CANDELARIA REARDON,)

Plaintiffs,)

vs.)

CURTIS T. HILL, JR., Individually,)

Defendant.)

PLAINTIFFS' COMPLAINT AND JURY TRIAL DEMAND

Plaintiffs Niki DaSilva, Samantha Lozano, Gabrielle McLemore, and Mara Candelaria Reardon (collectively referred to as "Plaintiffs"), by counsel, for their Complaint and Jury Trial Demand against Defendant Curtis T. Hill, Jr., individually ("Defendant" or "Hill"), state as follows:

JURISDICTION, VENUE AND PROCEDURAL HISTORY

1. This action arises out of the laws of the State of Indiana for claims of battery, defamation, and false light invasion of privacy.

2. Venue is appropriate in Marion County, Indiana because all of the alleged unlawful conduct occurred in Marion County, Indiana.

3. Plaintiffs originally filed their battery, defamation, and false light invasion of privacy claims (the "State Law Claims") against Hill on June 18, 2019 in the United States District Court for the Southern District of Indiana, Civil Action No.: 1:19-cv-02453-JRS-DLP.

4. On June 9, 2020, the District Court in Civil Action No.: 1:19-cv-02453-JRS-DLP issued an Order on Hill's Motion to Dismiss the State Law Claims declining to exercise

supplemental jurisdiction over Plaintiffs' State Law Claims. The District Court dismissed the State Law Claims, WITHOUT PREJUDICE, for Plaintiffs to re-file in state court.

PARTIES

5. Plaintiff Niki DaSilva ("Ms. DaSilva") is a citizen of the United States of America and a former resident of the State of Indiana. Ms. DaSilva currently resides in Washington, D.C.

6. Plaintiff Samantha Lozano ("Ms. Lozano") is a citizen of the United States of America and the State of Indiana and resides in Marion County, Indiana.

7. Plaintiff Gabrielle McLemore ("Ms. McLemore") is a citizen of the United States of America and the State of Indiana and resides in Johnson County, Indiana.

8. Plaintiff Mara Candelaria Reardon ("Ms. Reardon") is a citizen of the United States of America and the State of Indiana and resides in Lake County, Indiana.

9. Defendant Curtis T. Hill, Jr. ("Hill"), sued in his individual capacity, was at all relevant times the Indiana Attorney General of the Office of the Indiana Attorney General.

FACTUAL ALLEGATIONS

The Plaintiffs

10. At all times relevant hereto, Ms. DaSilva, Ms. Lozano, and Ms. McLemore all worked in or around the Indiana General Assembly for either the Indiana House of Representatives or the Indiana Senate.

11. The General Assembly meets annually at the Indiana Statehouse ("Statehouse") in Indianapolis, but does not meet year-round.

12. Instead, the General Assembly convenes on the first Tuesday after the first Monday in January.

13. During odd-numbered years, the legislature meets for sixty-one (61) days (not necessarily consecutively) and must be adjourned by April 30.

14. During even-numbered years, the legislature meets for thirty (30) days (not necessarily consecutively) and must be adjourned by March 15.

15. The end or adjournment of the legislative session is referred to as “Sine Die.”

16. Ms. DaSilva worked for the Senate from December 2015 to August 8, 2019.

17. From June 6, 2016 until her resignation on August 8, 2019, Ms. DaSilva worked as a Legislative Assistant for the Indiana Senate Republican Caucus.

18. Ms. Lozano has worked for the House since August 2017.

19. Ms. Lozano currently is a Legislative Assistant for the House and has been a Legislative Assistant since January 2018.

20. Ms. McLemore worked for the Senate from September 2016 until her resignation on February 7, 2020.

21. From May 2018 until her resignation, Ms. McLemore worked as the Communications Director for the Indiana Senate Democrats.

22. At all times relevant herein, Ms. Reardon was a member of the House who represents the 12th District of Indiana. Ms. Reardon was first elected to the Indiana General Assembly in 2006.

Curtis T. Hill, Jr.

23. Hill is currently the Attorney General for the State of Indiana.

24. Hill was elected in 2016 and assumed office January 9, 2017.

25. Hill is Indiana’s highest law enforcement official.

26. Upon information and belief, Hill maintains a residence in Marion County, Indiana.

Sine Die 2018

27. In 2018, the Indiana General Assembly adjourned shortly after midnight on March 15, 2018.

28. After Sine Die, members of the House and Senate, legislative staff, and lobbyists typically go out to a party organized by Statehouse lobbyists to celebrate the end of the legislative session (the “Sine Die Celebration”).

29. In the early hours of March 15, 2018, consistent with a long-standing tradition, lawmakers, staff, and others working with the General Assembly engaged in the legislative process gathered to mark the end of the legislative session.

30. The Sine Die Celebration is a work-related event.

31. In 2018, as in many prior years, the Sine Die Celebration was held at AJ’s Lounge in Indianapolis, Indiana (“AJ’s Lounge” or “AJ’s”).

32. On March 15, 2018, after Sine Die, Ms. DaSilva headed to AJ’s Lounge with several of her co-workers.

33. When she arrived, Ms. DaSilva walked toward the bar to join three (3) of her female colleagues.

34. The group chatted while waiting to be served at the bar when Hill approached them.

35. Ms. DaSilva was surprised to see Hill at AJ’s, as Sine Die is historically a celebration among legislators, staff and lobbyists.

36. Upon information and belief, no other Attorney General had ever attended a Sine Die Celebration. Hill is not involved in the legislative process, nor a member of the General Assembly, and from the perspective of the Plaintiffs and many others, was not an expected attendee at the Sine Die Celebration.

37. Ms. DaSilva observed that Hill seemed rather gregarious. He approached her and her group of friends and asked what they were doing standing at the bar.

38. The group answered that they were waiting to order a drink and Hill remarked, “Ah, come on ladies! You haven’t figured out how to get a drink yet? You’ve got to show a little skin!”.

39. In that moment, Ms. DaSilva’s mouth fell open in shock. She was stunned that Hill, the Indiana Attorney General, told her to “show a little skin.”

40. Ms. DaSilva turned to her colleagues and asked them to confirm what she had just heard. Her colleagues acknowledged that Hill did indeed tell them to show some skin to be served drinks.

41. Ms. DaSilva then moved around the corner of the bar top to put some distance between herself and Hill, who was hovering nearby.

42. Two (2) of the four (4) women received their drinks and left the bar area, leaving Ms. DaSilva and another co-worker, Ms. Lozano, at the bar with Hill.

43. Ms. DaSilva was getting ready to leave and join another group when she observed Ms. Lozano’s eyes widen, signaling Ms. DaSilva to come closer to her.

44. When Ms. DaSilva approached, Ms. Lozano whispered, “Please don’t leave me alone with him. He’s being really weird.” Ms. DaSilva then positioned herself between Ms. Lozano and Hill to act as a buffer and prevent further contact between Ms. Lozano and Hill.

45. After a few moments, Hill put his hand on Ms. DaSilva’s back. Ms. DaSilva was taken aback by this gesture.

46. Ms. DaSilva felt Hill’s hand start to slide slowly down her back. She tried to push his hand away. When their hands met on Ms. DaSilva’s back, instead of taking her overt cue to

remove his hand from her lower back, Hill grabbed Ms. DaSilva's hand at her wrist and moved both of their hands over her buttocks, lingering there before eventually releasing her hand.

47. Hill looked at Ms. DaSilva with a grin on his face and continued the conversation. Ms. DaSilva made it clear to Hill that his unlawful acts were not consensual and were unwelcome.

48. Soon after, Ms. DaSilva and Ms. Lozano found an escape route and moved away from the area to avoid further interaction with Hill.

49. On March 15, 2018, Ms. Lozano and her intern accompanied Ms. Reardon to AJ's Lounge.

50. Ms. Lozano entered AJ's behind Ms. Reardon. Ms. Lozano saw Hill approach Ms. Reardon and lean closely toward her, place his hand on her back and slide his hand down to Ms. Reardon's buttocks and grab Ms. Reardon underneath her dress.

51. Ms. Lozano was appalled by Hill's behavior and observed that Ms. Reardon appeared shocked as well.

52. Later, Ms. Lozano approached the bar to order some drinks with her co-workers. Hill was at the bar.

53. Ms. Lozano noticed that Hill had a drink in his hand and smelled like alcohol.

54. Hill asked Ms. Lozano, "Do you know who I am?" Ms. Lozano responded that she did know that he was the Indiana Attorney General and informed him that she attended college with his daughter.

55. After observing Hill's actions toward Ms. Reardon, Ms. Lozano was concerned that Hill may attempt similar uninvited physical contact with her.

56. Ms. Lozano hoped that Hill would leave her alone and not make any unwelcome sexual advances towards her if he knew she was the same age as his daughter.

57. As Ms. Lozano ordered drinks with her co-workers she commented, “it’s really hot in here.” Hill responded, “Yes, you’re really hot.”

58. Ms. Lozano thought Hill’s statement was disturbing and inappropriate, especially after she had just told Hill that she attended college with his daughter, and particularly in light of seeing how he improperly touched Ms. Reardon without her consent.

59. Hill then grabbed Ms. Lozano around the waist and pulled her close to him.

60. Ms. Lozano looked at her colleague, Ms. DaSilva, made eye contact with her and said, “Don’t leave me alone with him, he’s being really weird.”

61. Ms. DaSilva observed that Hill had grabbed Ms. Lozano and was touching her without consent.

62. Based on Ms. Lozano’s reaction to Hill’s behavior, Ms. DaSilva then moved in between Ms. Lozano and Hill to prevent further unwelcome physical contact between them.

63. On March 15, 2018, Ms. McLemore also went to AJ’s to celebrate the end of the legislative session.

64. Ms. McLemore arrived at AJ’s with several of her co-workers.

65. During the gathering, Hill approached Ms. McLemore, who was leaning up against the bar, and said, “Do you know who I am?” as he pulled up a stool next to Ms. McLemore, forcing her to move uncomfortably closer to the bar’s ledge on her right with people both in front and behind her.

66. Hill cornered and trapped Ms. McLemore against the bar and began rubbing her back without her consent.

67. Hill did not just touch Ms. McLemore's back. He instead used his entire hand to rub up and down Ms. McLemore's back for an extended period of time without Ms. McLemore's consent.

68. Hill's conduct was unwelcome and not consensual.

69. Ms. McLemore mouthed "HELP ME" to her intern who helped Ms. McLemore get away from Hill.

70. Ms. Reardon also went to AJ's Lounge to celebrate the end of the legislative session.

71. Shortly after she arrived, Ms. Reardon encountered Hill.

72. Hill greeted Ms. Reardon and Ms. Lozano.

73. Ms. Reardon did not know Hill personally, but they had met before on a few occasions.

74. As they were exchanging pleasantries, Hill leaned toward Ms. Reardon, placed his hand on her back and slid his hand down, underneath her dress, reached to her buttocks and grabbed it.

75. Ms. Reardon immediately said, "back off," explicitly telling Hill that his actions were unwelcome and not consensual and walked away. Ms. Lozano, who observed this encounter from a few feet away, stood nearby, shocked by what she had just witnessed.

76. Later, Ms. Reardon was standing with a group of people, and Hill approached the group.

77. Hill came up behind Ms. Reardon and put his hand on her back a second time and said, "That skin. That back."

78. Ms. Reardon recoiled away before Hill could touch her buttocks again, despite his efforts to do so.

79. Hill attended the Sine Die Celebration with Tony Samuels, a lobbyist.

80. Hill went to the Sine Die Celebration to speak to Senator Taylor and thank him for opposing a bill that impacted certain funding of the Office of the Indiana Attorney General.

81. Hill saw the event as an opportunity to thank Senator Taylor and to speak with other legislators in his professional capacity as Attorney General about the legislative session that had concluded that night.

82. Hill greeted several people at the Sine Die Celebration by asking, “Do you know who I am?”

83. Hill “worked the room” after he arrived at the Sine Die Celebration. According to Hill’s own sworn statements, he found Senator Taylor and thanked him for his work. He also spoke with Senator Mishler and gained his assurance that they would work together in a professional capacity moving forward. He also talked to Senator Randolph.

84. Hill has stated publicly, including in testimony under oath, that his attendance at the Sine Die Celebration and many communications while there were directly related to his official duties as Attorney General.

Plaintiffs’ Complaints About Hill’s Illegal Conduct

85. In or around April 2018, a few weeks following the Sine Die Celebration, Ms. Reardon had lunch with a fellow legislator and Ms. Lozano.

86. Ms. Reardon learned from Ms. Lozano that Hill’s unlawful conduct directed towards Ms. Reardon at the Sine Die Celebration was not an isolated event.

87. Ms. Lozano reported to Ms. Reardon that Hill targeted several other women at the Sine Die Celebration, including herself.

88. On or around May 14, 2018, Ms. Reardon went to the Democratic leadership to report these incidents.

89. Afterwards, Ms. Reardon and Ms. Lozano went together to the then-Speaker of the House, Brian Bosma (“Bosma”), where Ms. Reardon reiterated her report of Hill’s unlawful conduct at the Sine Die Celebration.

90. Thereafter, staff attorneys with the General Assembly interviewed at least six (6) women.

91. The law firm representing the Legislative Services Agency prepared a memorandum analyzing the March 15, 2018 allegations.

92. The Memorandum, dated June 18, 2018, detailed the investigation and the risk of liability (the “Taft Memo”).

93. On or around July 2, 2018, the Taft Memo was leaked to the press.

After Complaining, Hill Defamed and/or Placed the Plaintiffs in a False Light

94. After the Plaintiffs complained about Hill’s unlawful conduct, Hill defamed the Plaintiffs and/or placed them in a false light.

95. Hill repeatedly used the resources, powers and privileges of the Office of the Attorney General to defame and/or place the Plaintiffs in a false light.

96. In addition, Hill has used his official State of Indiana Attorney General Twitter and Facebook accounts to defame and/or place the Plaintiffs in a false light.

97. In July 2018, Hill issued a written statement on www.CURTISHILLFORINDIANA.com where he made the following false, disparaging, and defamatory statements:

- “The allegations against me, which continue to change, are vicious and false.”

- “At no time did I ever grab or touch anyone inappropriately.”
- “At least one story has dramatically changed from the document that was the basis for all the calls for resignation.”
- “A key witness confirmed that her accusation contained in the confidential report was materially inaccurate.”

98. Hill enlisted a group of Office of the Attorney General employees, paid consultants, surrogates, contributors, and supporters (“Hill’s Team”) to coordinate an extensive media campaign to protect his public image. Throughout the media campaign, Hill’s Team exchanged emails in which they discussed and shared drafts of opinion pieces and letters to the editor that defended Hill and attempted to discredit the Plaintiffs’ accounts, character, and motivations.

99. On Friday, July 6, 2018, Hill began exchanging emails with employees of the Office of the Indiana Attorney General. The emails contained drafts of a news release regarding the Plaintiffs’ allegations.

100. On or around July 7, 2018, during a press conference held at the Office of the Indiana Attorney General, Hill made statements to the public that the complaints made against him are false and that he is falsely accused.

101. During the July 7, 2018 press conference, Hill also called the allegations “materially inaccurate.”

102. Hill has also stated that the Plaintiffs’ allegations are “deeply troubling,” “viciously false,” and “contain numerous misstatements and misrepresentations.”

103. Hill denied that he engaged in inappropriate behavior with anyone.

104. Hill stated that he is “falsely and publicly accused of abhorrent behavior.”

105. Hill stated that the accusations have “irretrievably damaged his reputation.”

106. Hill called Ms. Reardon's allegations "materially inaccurate" and stated that Ms. Reardon confirmed such inaccuracies.

107. Throughout July and August 2018, Hill's campaign funds were used to purchase sponsored Facebook advertisements on the "Curtis Hill for Indiana" Facebook page questioning the credibility, fairness, and accuracy of the Plaintiffs' reports and all investigations thereof.

108. For example, one CURTISHILLFORINDIANA.COM Facebook advertisement provides, "Apparently the standard is guilty and who cares if you're innocent...We are living in a time where accusations alone have the power of conviction."

109. Another CURTISHILLFORINDIANA.COM Facebook advertisement provides, "A key witness confirmed that her accusation contained in the confidential report was materially inaccurate."

110. Another CURTISHILLFORINDIANA.COM Facebook advertisement provides, "The fundamental lack of fairness and due process regarding this prejudicial investigation is concerning...I have not been contacted by any investigator nor informed of who made these allegations."

111. Another CURTISHILLFORINDIANA.COM Facebook advertisement provides, "These allegations against me are vicious and false. Don't believe them."

112. In July 2018, Hill posted the following statement to his official Twitter account: "These allegations against me are vicious and false. At no time did I ever grab or touch anyone inappropriately."

113. On or around July 12, 2018, Hill also posted a tweet to his official Twitter account, accusing Ms. DaSilva of coordinating with others to write her account of what occurred at the Sine Die Celebration in March 2018. Hill tweeted, "Accuser sought guidance to strengthen attack on

Attorney General Curtis Hill.” The tweet included a link to a press release posted on the website of the Office of the Indiana Attorney General. The press release stated that on July 11, 2018, the Office of the Indiana Attorney General received an email of a draft “story” from Ms. DaSilva, who was trying to email a close friend, that Ms. DaSilva “editorialized her recollection of events” and asked for help from her friend, and that the integrity of the investigation was compromised because the Plaintiffs were coordinating and changing their stories under the direction of others. The press release provided a link to Ms. DaSilva’s email.

114. Contrary to Hill’s press release, Ms. DaSilva’s actual email only requested that her friend assist her with proofreading and editing a draft of a public statement.

115. On Friday, July 13, 2018, Hill’s Team began exchanging emails regarding drafts of a statement to “expose DaSilva[.]” One draft referred to a “coordinated attack on” Hill that was “false and vicious” and a “malicious onslaught.”

116. On Wednesday, July 18, 2018, Hill’s team began exchanging emails regarding a draft of a press release regarding Plaintiffs’ allegations. In one email, one employee of the Office of the Indiana Attorney General suggested titling the draft of the press release “Leakers & Liars.”

117. Upon information and belief, Hill tweeted, posted, and/or published additional false and defamatory statements about the Plaintiffs. These tweets have been deleted from Hill’s official Twitter account, despite being on notice of the Plaintiffs’ claims.

118. In July 2018, Hill’s representatives held a press conference in which they threatened to pursue civil claims for defamation and, among other things, stated, “As we know, sometimes between 1 a.m. and 2 a.m., when alcohol is flowing, perceptions can be different.”

119. All of the Plaintiffs worked in and around the General Assembly, where they regularly interacted with legislators and their staff, as well as lobbyists, journalists, constituents, and government officials.

120. The Plaintiffs' respective professional reputations are critical to each Plaintiff's career. Their trustworthiness, character, credibility, and personal conduct are closely intertwined with their opportunities for development, advancement, and future opportunities.

121. In 2018, Ms. DaSilva, Ms. McLemore, and Ms. Lozano were all in their twenties in relatively junior positions at the Statehouse, just beginning their professional careers.

122. Ms. Reardon's reputation, credibility, and character are all important considerations for role as an Indiana State Representative, in which she is elected by her constituents to represent their interests.

123. All of the Plaintiffs were gravely concerned about the professional ramifications of their involvement in this situation. At the Sine Die Celebration, they were concerned that their colleagues would believe that Hill's improper touching was consensual. In the months that followed, Hill explicitly and publicly used the resources of his elected office to attack their honesty, motivations, and reactions to Hill's illegal conduct.

The Indiana Disciplinary Commission's Complaint Against Curtis T. Hill, Jr.

124. On March 19, 2019, the Indiana Supreme Court Disciplinary Commission (the "Commission") filed a Disciplinary Complaint against Hill in the Supreme Court of the State of Indiana, Case No. 19S-DI-00156.

125. The Commission filed the Disciplinary Complaint against Hill based on his conduct at the March 2018 Sine Die Celebration at AJ's Lounge and specifically Hill's conduct towards the Plaintiffs.

126. With respect to Ms. Reardon, the Commission alleged in its Disciplinary Complaint that Hill committed the criminal act of battery.

127. With respect to Ms. McLemore, the Commission alleged in its Disciplinary Complaint that Hill committed the criminal act of battery.

128. With respect to Ms. Lozano, the Commission alleged in its Disciplinary Complaint that Hill committed the criminal act of battery.

129. With respect to Ms. DaSilva, the Commission alleged in its Disciplinary Complaint that Hill committed the criminal act of sexual battery, or, in the alternative, criminal battery.

130. The hearing on the Disciplinary Complaint was held October 21 to October 24, 2019.

131. On February 14, 2020, the Hearing Officer filed the Hearing Officer's Report with the Indiana Supreme Court. The Hearing Officer's Report can be found at <http://media.ibj.com/Lawyer/websites/opinions/index.php?pdf=2020/February/SelbyRecommendation.pdf>.

132. On May 11, 2020, the Indiana Supreme Court filed its opinion in the Disciplinary Complaint case. *See In the Matter of Curtis T. Hill, Jr.*, 144 N.E.3d 184 (Ind. 2020).

133. The Indiana Supreme Court found that the Disciplinary Commission proved, by clear and convincing evidence, that Hill committed the criminal act of battery against all of the Plaintiffs.

134. In determining the appropriate disciplinary sanction, the Indiana Supreme Court found that Hill "went a step too far in decrying the allegations against him as not only 'false' but 'vicious' in a press release issued shortly after the Taft Report was leaked...[Hill's] use of the word 'vicious,'...implied malice or bad faith by the four women."

135. In determining the appropriate disciplinary sanction, the Indiana Supreme Court also found that Hill “went a step too far in issuing a subsequent press release in which he drew attention to, and published, a message written by [Plaintiff DaSilva] to a friend but mistakenly sent it to an email account associated with the Office of Attorney General...this press release in context contains a clear implication of malice and bad faith by the women and not mere disagreement regarding the substance of the accusations.”

136. The Indiana Supreme Court also found “[t]he victims has suffered significant harm that, while certainly exacerbated by other events, was caused most proximately by [Hill’s] misconduct.”

137. As a result of Hill’s unlawful conduct, Plaintiffs have suffered and continue to suffer emotional distress and anguish.

138. As a result of Hill’s unlawful conduct, Plaintiffs have suffered damage to their personal and professional reputations.

139. Hill’s actions were taken with malice or reckless indifference to Plaintiffs’ rights.

**COUNT I – CURTIS T. HILL, JR., INDIVIDUALLY
(Battery)**

140. All preceding paragraphs are incorporated herein by reference.

141. By the actions described above, Hill touched Ms. DaSilva, Ms. Lozano, Ms. McLemore, and Ms. Reardon in a rude, insolent, and angry manner at the Sine Die Celebration on March 15, 2018, thereby committing battery.

142. All of the Plaintiffs have suffered pain, humiliation, and mental anguish as a result of Hill’s unlawful and unwanted touching.

**COUNT II – CURTIS T. HILL, JR., INDIVIDUALLY
(Defamation)**

143. All preceding paragraphs are incorporated herein by reference.

144. Plaintiffs have the right to be secure in the possession of their good names and reputations.

145. Hill has repeatedly attacked the Plaintiffs' reputations and good names by falsely stating that Plaintiffs' complaints and reports about his unlawful conduct were, among other things, "vicious and false," "continue to change," are "deeply troubling," and "contain numerous misstatements and misrepresentations."

146. Hill's statements were published throughout Indiana, across the United States, on television, in newspapers, and on the Internet.

147. Hill's statements about Plaintiffs are defamatory per se.

148. As a direct and proximate result of Hill's publication of defamatory statements against Plaintiffs, Plaintiffs' reputations have been harmed and Plaintiffs have sustained damages.

**COUNT III – CURTIS T. HILL, JR., INDIVIDUALLY
(False Light Invasion of Privacy)**

149. All preceding paragraphs are incorporated herein by reference.

150. Hill placed the Plaintiffs in a false light before the public by publishing statements that directly or implicitly accused the Plaintiffs of misconduct in their trade, profession, office or occupation.

151. Hill's published statements that directly or implicitly accused Plaintiffs of misconduct in their trade, profession, office or occupation would be highly offensive to a reasonable person.

152. Hill had knowledge of or acted in reckless disregard as to the falsity of the published statements that directly or implicitly accused Plaintiffs of misconduct in their trade, profession, office or occupation and the false light in which Plaintiffs would be placed by those statements.

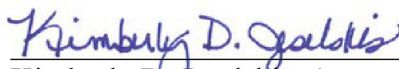
153. As a direct and proximate result of Hill's placing Plaintiffs in a false light by publishing statements that directly or implicitly accused Plaintiffs of misconduct in their trade, profession, office or occupation, Plaintiffs have sustained damages.

WHEREFORE, Plaintiffs Niki DaSilva, Samantha Lozano, Gabrielle McLemore, and Mara Candelaria Reardon respectfully request that this Court:

- A. Award judgment in favor of Plaintiffs and against Defendant;
- B. Require Hill to retract all defamatory statements;
- C. Award compensatory damages against Hill in an amount to be determined at trial to make Plaintiffs whole for the mental anguish, emotional distress and other non-pecuniary damages they have suffered because of Hill's unlawful conduct;
- D. Award punitive damages against Hill to be determined at trial to punish Hill for the unlawful conduct which was malicious and to deter others from similar conduct; and
- E. Award all other relief proper in the premises.

Dated this 7th day of July 2020.

Respectfully submitted,



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B.J. Brinkerhoff, Attorney No. 24811-53

Hannah Kaufman Joseph, Attorney No. 24974-49

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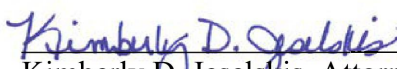
Counsel for Plaintiffs

TRIAL BY JURY

Plaintiffs Niki DaSilva, Samantha Lozano, Gabrielle McLemore, and Mara Reardon demand a trial by jury on all issues so triable.

Dated this 7th day of July 2020.

Respectfully submitted,



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