

IN THE CIRCUIT COURT OF THE STATE OF FLORIDA

Elyse Relford

142 Scroggins Park Drive

Georgetown, KY 40324

Plaintiff, Pro Se

v.

Donald J. Trump

Habba Madaio & Associates LLP 1430 US Highway 206, Suite 240 Bedminster, NJ
07921

Dhillon Law Group Inc. 177 Post Street, Suite 700 San Francisco, CA 94108

Defendant.

COMPLAINT

Plaintiff, Elyse Relford, appearing pro se, alleges as follows:

I. PARTIES

1. Plaintiff, Elyse Relford, is an individual residing at 142 Scroggins Park Drive, Georgetown, Kentucky 40324.
2. Defendant Donald J. Trump is an individual who may be served through counsel or as otherwise authorized by applicable law.

II. JURISDICTION AND VENUE

3. This action is brought in the State of Florida because the events giving rise to these claims are alleged to have occurred in Florida.
4. Venue is proper in the appropriate Florida court because the alleged wrongful conduct occurred within the State of Florida.

III. FACTUAL ALLEGATIONS

5. Plaintiff incorporates the preceding paragraphs as though fully set forth herein.
6. In or about 1997, Plaintiff was present at a hotel in the State of Florida with Jeffrey Epstein and Defendant Donald J. Trump.

7. Plaintiff informed Defendant that her birthday was the following day and that she was disappointed she would not be able to celebrate it.
8. Plaintiff alleges that Defendant then raped her, causing vaginal bleeding and severe physical injury.
9. Plaintiff further alleges that Defendant repeatedly impersonated Plaintiff's biological father by saying, "I'm Manuel," intending to taunt Plaintiff because Defendant allegedly knew Plaintiff had been separated from her biological father by Jeffrey Epstein.
10. Plaintiff further alleges that Defendant stated, "Oh, she's a black girl. What if I get a disease?"
11. Plaintiff alleges that Jeffrey Epstein responded by stating, "She's rich."
12. Plaintiff alleges that Defendant's conduct caused severe emotional trauma, humiliation, mental anguish, and continuing psychological harm.
13. Plaintiff further alleges that Defendant's conduct damaged her reputation and caused financial losses.

COUNT I - SEXUAL BATTERY (RAPE)

14. Plaintiff realleges all preceding paragraphs.
15. Plaintiff alleges that Defendant intentionally subjected Plaintiff to nonconsensual sexual intercourse.
16. Plaintiff alleges that Defendant's conduct caused physical injury, pain, emotional suffering, and other damages.

COUNT II - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

17. Plaintiff realleges all preceding paragraphs.
18. Plaintiff alleges that Defendant engaged in extreme and outrageous conduct.
19. Plaintiff alleges that Defendant's conduct intentionally or recklessly caused severe emotional distress.
20. As a direct result, Plaintiff has suffered emotional pain, mental anguish, humiliation, and continuing psychological injuries.

COUNT III - DEFAMATION (IF SUPPORTED BY APPLICABLE LAW AND FACTS)

21. Plaintiff realleges all preceding paragraphs.
22. Plaintiff alleges that Defendant made false and defamatory statements that injured Plaintiff's reputation.

23. Plaintiff alleges that these statements caused reputational and financial damages.

COUNT IV - HARASSMENT (TO THE EXTENT RECOGNIZED UNDER APPLICABLE LAW)

24. Plaintiff realleges all preceding paragraphs.
25. Plaintiff alleges that Defendant engaged in repeated harassing and degrading conduct that caused substantial emotional harm.

DAMAGES

26. As a direct and proximate result of Defendant's alleged conduct, Plaintiff has suffered:

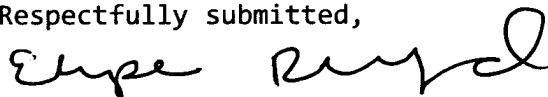
- a. Emotional distress;
- b. Physical injuries;
- c. Mental anguish;
- d. Damage to reputation;
- e. Financial loss; and
- f. Other damages to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Enter judgment in favor of Plaintiff and against Defendant;
- B. Award compensatory damages in the amount of **\$**1,300,000;
- C. Award any additional damages authorized by law;
- D. Award costs of this action as permitted by law; and
- E. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,



Elyse Relford
Plaintiff, Pro Se
142 Scroggins Park Drive
Georgetown, KY 40324

NOT A CERTIFIED COPY

