

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

ALWANTHA LAWSON,

Plaintiff,

-against-

MARC BAPTISTE and BAPTISTE MARC  
PHOTOGRAPHY, INC.,

Defendant.

**SUMMONS**

Index No.:

Date Purchased

**TO THE ABOVE-NAMED DEFENDANT:**

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 twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty [30] days after service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint. Plaintiff designates New York County as the place of trial. The basis of this designation is a substantial part of the events of omissions giving rise to the claim occurred in this County.

Dated: Brooklyn, New York  
March 15, 2024



Julia Elmaleh-Sachs  
Crumiller P.C.  
16 Court St, Ste 2500  
Brooklyn, NY 11241  
(212) 390-8480  
[julia@crumiller.com](mailto:julia@crumiller.com)  
Attorneys for plaintiff

TO:  
Marc Baptiste  
16 Old Barto Rd  
Brookhaven, NY 11719

Baptiste Marc Photography, Inc.  
490 Monroe St  
Brooklyn, NY 11221

SUPREME COURT OF THE STATE OF NEW YORK  
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ALWANTHA LAWSON,	
	Plaintiff,
-against-	
MARC BAPTISTE and BAPTISTE MARC PHOTOGRAPHY, INC.,	
	Defendant.

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**VERIFIED COMPLAINT**

**JURY TRIAL DEMANDED**

Alwantha Lawson, by her attorneys, Crumiller P.C., as and for her Complaint against Marc Baptiste, respectfully alleges, upon information and belief:

**PRELIMINARY STATEMENT**

1. In 2002, Lawson was a young, hopeful, and career-minded fashion model when a mutual acquaintance arranged for her to shoot with world renowned photographer Marc Baptiste for his upcoming photography book *Intimate: Nudes by Marc Baptiste*.
2. When Lawson arrived at Baptiste’s studio for the shoot, she was surprised to find Baptiste there alone. He instructed Lawson to disrobe entirely and then locked the door to his studio.
3. Once he began shooting, Baptiste attempted to force Lawson to masturbate “for the camera.” When Lawson refused, Baptiste came over to her and forcefully penetrated her vagina with his fingers repeatedly. While Baptiste assaulted Lawson, he continued photographing her as she protested, covered her face and cried. When Baptiste decided he was done, Lawson got up and dressed herself as quickly as possible. On her way out of the studio, Baptiste unlocked the door, looked at her and whispered, “thanks for getting intimate with me.”
4. After this incident, Baptiste effectively blacklisted Lawson from the modeling industry by spreading rumors amongst industry insiders that Lawson had been “difficult” to work with.

5. Now, thanks to the Gender Motivated Violence Act, Lawson hopes to hold Baptiste accountable for his conduct.

### **JURISDICTION AND VENUE**

6. Jurisdiction is proper pursuant to CPLR § 301 et seq.

7. Venue for this action is proper in the County of New York pursuant to CPLR § 503 in that a substantial part of the events or omissions giving rise to the claim occurred in this County.

### **THE PARTIES**

8. Plaintiff Alwantha Lawson is a 43-year-old woman and a former model. She is an artist, entrepreneur, and freelancer who works in media production. She resides in New York. Lawson worked on a photoshoot with Baptiste in 2002.

9. Defendant Marc Baptiste is a celebrity, editorial, and beauty photographer and a resident and domiciliary of the State of New York. Baptiste's work has been featured in influential magazines such as Elle, Cosmopolitan, Esquire, and Vanity Fair.

10. Defendant Baptiste Marc Photography, Inc. is a domestic corporation with its primary place of business located in Brooklyn, New York.

### **FACTUAL BACKGROUND**

#### ***Lawson Meets Baptiste as a Young Model***

11. In 2002, Lawson was a 22-year-old, up-and-coming fashion model. She had been featured in Cosmopolitan Magazine, Time Out New York, Seventeen Magazine, Glamour and Essence.

12. In the fall of that year, a mutual acquaintance, Randolph, set up a photoshoot for a book Baptiste was working on called *Intimate: Nudes by Marc Baptiste*.

13. That day, Lawson stopped by Baptiste’s studio for a meet-and-greet with him. Baptiste reviewed her lookbook and said, “you know I shoot nudes, right?” Lawson nodded and explained that she had come to New York to finish her college degree and start a modeling career. Baptiste scanned her from head to toe and told her to come by for the photoshoot that coming Saturday. Baptiste reassured her that there would be a stylist at the studio to help with hair and makeup.

***Baptiste Sexually Assaults Lawson in His Studio***

14. On October 3, 2002, at around noon, Lawson arrived at Baptiste’s studio.

15. Contrary to Baptiste’s assurances, it was just Lawson and Baptiste at the studio.

16. Baptiste instructed Lawson to sit in front of a video camera and answer questions about herself, such as: What brought you to New York? Why did you start modeling? What does intimacy mean to you?

17. Baptiste then told Lawson to disrobe and position herself on the set. After Lawson positioned herself on a mat, she watched Baptiste readjust his camera on the tripod and then lock the door to the studio. Her heart raced, and her stomach sank.

18. Lawson told Baptiste that she was uncomfortable completely exposing her body and would therefore be posing accordingly. Baptiste responded by telling her to “just think about what intimacy means to [her]” and to “give it” to the camera.

19. Baptiste began shooting but soon told Lawson that he was not “satisfied” with how she was positioning her body.

20. He approached Lawson, rearranging her hands on her body. He then instructed her to begin masturbating. Lawson did not feel comfortable masturbating in front of Baptiste but wanted to appear acquiescent, so instead she pretended to masturbate.

21. Baptiste whispered, “get into it, be free, love yourself, feel yourself!” Lawson grew increasingly uncomfortable and afraid but did her best to perform for the camera. Baptiste again stopped taking photographs and insisted, “I’m not going to shoot until you cum. Make yourself cum.”

22. This made Lawson’s stomach turn. She tried to remain professional despite Baptiste’s behavior.

23. Baptiste then went into a back room and returned with a liquid spray bottle. He approached Lawson again, sprayed her body with the liquid, and insistently positioned his hands over Lawson’s hands on her vagina, forcing her to touch herself.

24. Lawson tried to fight against Baptiste, but he repositioned her, yelling at her repeatedly, “show me! Show me what intimacy means to you.” Lawson was terrified and noticed that Baptiste was sweating uncontrollably and panting like a dog; she wondered whether Baptiste had taken any substances while he was in the back room.

25. Lawson began crying, asking Baptiste what he was doing and telling him to stop. But he did not stop.

26. Baptiste took several photos of Lawson crying. He then forcefully spread her legs open with his hands and began penetrating her vagina with his fingers.

27. Lawson told Baptiste to stop, asked what he was doing, and tried her best to move away from Baptiste, but he only grew more aggressive. Baptiste insisted that Lawson was “beautiful” and that she just needed to “get into it” and “be free.”

28. At some point, Lawson’s shock turned into helplessness: she froze and waited for Baptiste to stop sexually assaulting her.

29. Once Baptiste was done, he got up, and Lawson wiped the tears from her face. Baptiste acted like nothing had happened, as if this had been a normal photoshoot.

30. On Lawson's way out, Baptiste bizarrely whispered, "Alwantha, thanks for getting intimate with me."

31. Lawson's vagina was burning and in pain as she walked down the stairs of Baptiste's second-floor studio.

***Lawson's Agent and Baptiste Hold a "Meeting" to Mollify Lawson***

32. Lawson returned to her Queens apartment and told her boyfriend about the assault. He took her to the police to file a report against Baptiste. Once they arrived at the precinct, Lawson spoke to her agent, Taede Mathis, by phone and disclosed the assault. Mathis discouraged her from filing a police report before first speaking to Baptiste.

33. Lawson was young and naïve, and believed that Mathis was looking out for her. She left the police precinct without filing a police report.

34. Instead, Lawson wrote Baptiste a letter detailing the assault. She explained how hurt, disgusted and horrified she was. She asked for a signed letter of apology as well as all the film and video he had shot of her so that she could destroy it. On October 9, 2002 she sent Baptiste this letter via certified mail.

35. At the time, Baptiste was in Africa continuing his *Intimate* photobook project, so his wife, Jenny Baptiste, received the letter. Jenny Baptiste called Mathis after receiving the letter and asked if what Lawson had recounted in her letter was true. Mathis confirmed that it was.

36. Jenny Baptiste forwarded the letter to her husband *via* fax shortly thereafter.

37. Upon information and belief, following Baptiste's receipt of the letter, he abruptly ended his travels in Africa and returned to New York to meet with Lawson.

38. Mathis arranged a meeting at the OHM Model Management office between Baptiste, Lawson, and their respective representatives. Lawson hoped to persuade Baptiste to destroy all footage of her from the shoot during this meeting.

39. On October 15, 2002, Lawson arrived at the agency's office and was met by Mathis alongside a model booker, James Suozzi, and Baptiste's assistant, Amy Oldis. Mathis informed Lawson that Baptiste was waiting for her in the building's stairwell, which struck Lawson as strange.

40. Mathis walked Lawson to the stairwell and left her alone with Baptiste, who was pacing back and forth. When Baptiste saw Lawson enter, he shouted, "What is this? You are saying that I touched you?" "Yes, you did!" Lawson shouted back.

41. The two began arguing loudly, drawing the attention of the other tenants. Mathis returned to the stairwell and brought Lawson and Baptiste back into OHM's office where Suozzi and Oldis were waiting.

42. Lawson stated that she wanted all images – including negatives – Baptiste had taken of her burned.

43. Baptiste agreed to burn all the images, negatives, and film from the shoot and never use them, though he refused to admit that he had assaulted Lawson.

44. A few days after this meeting, Mathis informed Lawson that he had sent pictures of Lawson to other clients of his including photographers, fashion/beauty editors, and other professionals in the industry. However, he had repeatedly received the same feedback: "she's beautiful, but I heard she was difficult. I don't want to work with her."

45. Days later, photographer Barron Claiborne told Lawson that Baptiste had sexually assaulted another model and that Baptiste was now effectively blacklisting Lawson from the modeling industry. This was the end of Lawson's budding modeling career.

***Lawson Has Never Recovered***

46. In the months following Baptiste's assault of Lawson, Lawson suffered from night sweats, panic attacks, constant anxiety and loss of appetite. She consulted with several therapists and began journaling to try to process the trauma of the sexual assault.

47. Three and half years later, in January 2006, Lawson filed a police report regarding the assault, but nothing came of it.

**FIRST CAUSE OF ACTION**  
**Crime of Violence Motivated by Gender**  
**New York City Victims of Gender-Motivated Violence Protection Act**  
**NYC Admin. Code §§ 10-1103 *et seq.***

48. Lawson repeats and realleges all facts set forth above.

49. Baptiste's sexual assault and battery of Lawson constitutes a "crime of violence motivated by gender" against Lawson as defined by the NYC Victims of Gender-Motivated Violence Protection Law, NYC Admin Code § 10-1103 ("GMVA").

50. Baptiste committed crimes of violence against Lawson because she is female and, at least in part, because he has an animus towards women and girls. Baptiste's gender-motivated animus towards women and girls is demonstrated by, among other things, his degrading assaults of Lawson.

51. Defendants committed, enabled, participated in, and/or conspired in the commission of a crime of violence motivated by gender by sexually assaulting Lawson at Baptiste's photography studio in Manhattan.



52. As a result, Lawson has suffered emotional and psychological distress, physical injury, mental anguish, loss of enjoyment of life, humiliation, embarrassment, pain and suffering, and economic damages.

53. Defendants are liable to Lawson under the GMVA for compensatory and punitive damages, attorney's fees, and costs.

### DEMAND FOR RELIEF

WHEREFORE, Lawson respectfully requests that this Court enter judgment in her favor as against defendants, in an amount to be determined by the finder of fact, as follows:

- a) on the First Cause of Action, awarding emotional distress damages, punitive damages, attorney's fees, interest, and costs; and
- b) granting such other relief as may be just.

### DEMAND FOR TRIAL BY JURY

Lawson demands a trial by jury.

Dated: Brooklyn, New York  
March 15, 2024

Respectfully submitted,



Julia Elmaleh-Sachs

Crumiller P.C.

[julia@crumiller.com](mailto:julia@crumiller.com)

16 Court St, Ste 2500

Brooklyn, NY 11241

(212) 390-8480

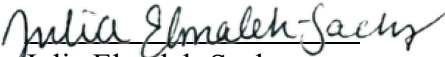
Attorneys for plaintiff

**ATTORNEY VERIFICATION**

Julia Elmaleh-Sachs, an attorney licensed to practice in the State of New York, affirms the truth of the following under penalties of perjury:

I am a Senior Associate at Crumiller P.C., attorneys for plaintiff. I have read the foregoing complaint and know the contents thereof; upon information and belief, the contents are true. The grounds for my belief are oral and written statements of plaintiff and documents in her file related to this matter. This verification is made pursuant to CPLR § 3020(d)(3) because plaintiff is not in the county where counsel's office is located.

Dated: Brooklyn, New York  
March 15, 2024

  
Julia Elmaleh-Sachs