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SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK
-----X
ALON ALEXANDER, OREN ALEXANDER, and TAL ALEXANDER,

Plaintiffs,

COMPLAINT

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-against-

KORANGY PUBLISHING, INC., d/b/a THE REAL DEAL,

Defendant.
Σ

Plaintiffs, Alon Alexander ("Alon"), Oren Alexander ("Oren"), and Tal Alexander ("Tal") (collectively, "Plaintiffs" and the "Alexanders"), by and through their counsel, Meister Seelig & Fein PLLC, as and for their Complaint against Defendant Korangy Publishing, Inc., *d/b/a* The Real Deal ("Defendant" and "TRD"), assert and allege as follows:

NATURE OF THE ACTION

- 1. Plaintiffs bring this action for damages arising out of Defendant's misuse of its media platform publishing defamatory statements and perpetuating false accusations against Plaintiffs resulting in significant damages, which have accrued and continue to accrue.
- 2. As described in greater detail *infra*, seemingly motivated by a desire to: (a) shamelessly grab clicks and boost revenue in order to salvage its stale and stagnating media content; and (b) retaliate against public figures who had in recent years spurned entreaties for content and coverage, TRD intentionally and recklessly published a series of false and misleading stories accusing the Alexanders of rape and sexual abuse.
- 3. As discussed below, TRD refused to consider or publish anything that called into question its false narrative.
 - 4. TRD's unlawful conduct was knowing, malicious, willful and wanton and/or

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showed a reckless disregard for the Alexanders' rights, which has caused, and continues to cause them to suffer permanent and irreparable harm to their professional and personal reputations.

- 5. TRD's persistent smear campaign and reckless disregard for the truth is based upon actual malice and belies its empty assertions to "bring transparency to a misunderstood industry." 1
- 6. TRD has reported on allegations lodged against the Alexanders while knowing they were false or having reason to know they were false due to their possession, review and analysis of documentary evidence that refuted the defamatory statements that they consciously published.
- 7. Far from fair, full, or balanced reporting, TRD, motivated by a desire to harm the Alexanders and propagate untrue stories to grab clicks and boost revenue, has refused to publish readily available beneficial information related to the Alexanders' and has refrained from doing so in an effort to push their subscribers to view the Alexanders negatively.

PARTIES

- 8. Plaintiff Alon is, and at all relevant times herein was, an individual residing in the County of Miami-Dade, State of Florida.
- 9. Plaintiff Oren is, and at all relevant times herein was, an individual residing in the County of Miami-Dade, State of Florida.
- Plaintiff Tal is, and at all relevant times herein was, an individual residing in the 10. County of Miami-Dade, State of Florida.
- 11. TRD is, and at all relevant times herein was, a New York corporation with its principal place of business in New York, New York.

JURISDICTION AND VENUE

This Court has jurisdiction over Defendant pursuant to Civil Practice Law and 12.

¹ X (Twitter) Homepage: The Real Deal.

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Rules ("CPLR") § 301 in that it is a domestic corporation duly existing under and by virtue of the

laws of the State of New York and has its principal place of business located at 450 West 31st

Street, 4th Floor, New York, New York 10001.

13. Venue properly lies in the New York County pursuant to CPLR § 503(c) since

Defendant's principal office is located within New York County.

FACTUAL ALLEGATIONS

14. From approximately 2008 to 2024, Plaintiffs Oren and Tal Alexander worked in

the real estate industry, working their way up from the bottom to eventually selling homes worth

hundreds of millions of dollars all around the globe. Together, Plaintiffs Oren and Tal formed the

Alexander Team (the "Alexander Team") under the Doulgas Elliman umbrella, where they were

top earners for the company on a yearly basis.

15. The Alexander Team focused on several areas of real estate, including, but not

limited to luxury resale properties consisting of cooperatives, condominiums, single-family

homes, estates and townhouses throughout the United States. The Alexander Team was unique in

that it handled and assisted its clients with everything from development, raising capital and

investment, as well as marketing efforts.

16. On three separate occasions, the Wall Street Journal lauded the Alexander Team as

the number one team in the United States, recognizing their ability to close some of the most high-

profile sales in luxury real estate, which encompassed complex transactions with prominent

clients.

17. In 2022, after countless awards, accolades, and accomplishments,² Plaintiffs Oren

and Tal decided to pivot from a traditional brokerage house and founded a boutique, white glove

² In 2019, the Alexander Team brokered the largest residential sale in United States history.

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brokerage service firm.

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18. Plaintiffs Oren and Tal eventually founded Official Partners, LLC ("Official

Partners"), solidifying their unparalleled service in the luxury real estate market.

19. At this point, it was undeniable and widely agreed-upon that Plaintiffs Oren and

Tal were two of the most prominent real estate brokers in the United States and had reached the

pinnacle of success within this highly competitive industry.

A. The Real Deal.

> 20. TRD is a real estate media publication.

21. Amir Korangy ("Korangy") is the Founder and Publisher of TRD and started the

company in 2003, which now employs approximately 60 - 80 employees.

22. According to Sky Advertising, Inc., TRD's content, widely followed by real estate

professionals, generates approximately 3.2 million monthly consumers in both print and digital,

and is commonly posted to their website and social media platforms (Instagram, X formerly known

as Twitter, YouTube, Facebook, and LinkedIn).³

23. To maintain and grow its subscriber base, TRD, similar to many other media

publications, must ensure their content captures viewers' attention. As outlined *infra*, TRD's

fixation on being the first to "report" on "breaking news" related to the Alexanders led TRD to

publish articles with reckless disregard for the truth. Over the past few years, TRD's reporting has

strayed from real estate reporting and drifted into the territory of gossip, rumors, and opinion

pieces, losing its credibility in the industry.

Sadly, this incessant desire to chase after subscriptions, maintain social media 24.

engagement and retain advertisers has caused TRD to prioritize profits over credibility and quality.

³ Sky Advertising Data.

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25. Further, influenced by the Alexanders competitors, TRD has abandoned any semblance of neutral reporting and instead published defamatory articles about the Alexanders.

- 26. In turn, TRD's months-long smear campaign against the Alexander Team drove their entire book of business into the hands of those very competitors who have sponsored and promoted TRD's false publications.
- 27. In addition to appearing its advertisers, TRD has also profited from their misleading assertions, running a knowingly false series of stories in an effort to gain additional subscribers.
- 28. Not surprisingly, TRD has faced serious backlash online due to its regression from reporting on legitimate real estate news to becoming a glorified tabloid.
- 29. TRD has developed a brazen reputation through their failure to thoroughly investigate potentially topical events, electing instead to publish content without the requisite scrutiny.
- 30. TRD has repeatedly failed to accurately report on issues regarding the Alexanders, causing readers to draw unwarranted and false conclusions about the Alexanders.

B. The Real Deal and Amir Korangy's Relationship with the Alexanders.

- 31. For well over a decade, Korangy has relied upon the Alexander Team as a credible resource for inside scoops, valuable information and insight regarding market trends that may not have been widely available to the public.
- 32. Given the Alexander Team's prominence in the real estate industry, they developed relationships with not only Korangy but other members of TRD, including, but not limited to Katherine Kallergis ("Kallergis") and Sheridan Wall ("Wall").
 - 33. Kallergis and Wall are TRD reporters, who work under the direction of Korangy.
 - 34. Kallergis and Wall, together and individually, have published multiple articles

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about the Alexanders.

35. In fact, Kallergis utilized the Alexander Team as a valued resource to gather inside

information regarding potentially newsworthy real estate content.

36. However, even though the Alexander Team formed a connection with TRD, they,

unlike many other brokers in the industry, were not advertisers on their platform and therefore did

not directly contribute to TRD's revenue.

37. Throughout their long-standing relationship, TRD never questioned the integrity of

the Alexander Team and, in fact, gave them a stage to discuss complex real estate matters.

38. The Alexander Team headlined conferences for TRD, which was an uncommon

dynamic in the industry.

39. Gestures of this magnitude were not afforded to everyone in the real estate

profession and certainly would not be offered to individuals who would bring the events into

disrepute.

40. TRD used the Alexander Team's insight to publish dozens of articles (without

hesitation) and willingly gave them the spotlight to share their sapience on the real estate industry,

all actions that contradict the narrative that Plaintiffs were well known immoral individuals.

41. Up and until June 8, 2024, TRD never once raised a concern about Plaintiffs' social

lives.

42. Indeed, Korangy often frequented the same events as the Alexanders, and they were

associated with a similar social network.

43. In fact, in his capacity as Founder and Publisher of TRD, Korangy consistently

attended Douglas Elliman ceremonies, as well as events hosted by Plaintiffs Oren and Tal in both

their personal and professional capacities, habits and behavior that belie the false headlines TRD

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published in its months long smear campaign.

44. When faced with the decision to properly investigate incredulous/unsubstantiated claims or run a malicious and unverified story knowing it would increase revenue and viewership,

TRD chose profits over the truth.

45. Instead of conducting any semblance of a credible investigation or corroborating

and verifying the information pled within a meritless lawsuit against Plaintiffs, TRD thought only

about its own bottom line.

46. Instead of including the myriad of factual, documented material exonerating the

Alexanders, TRD relied only on one incredible source.

47. TRD's content was stagnant and taking the initiative to publish salacious headlines

at a relentless pace about Plaintiffs provided the perfect opportunity to captivate their bored

audience and appeal to a new audience interested in gossip, even if it meant continuing to sacrifice

their credibility by recklessly disregarding the truth.

48. TRD needed to attract new audience members to increase its paid subscriptions

year after year, which is the key valuation of a media company, and the Alexanders were TRD's

perceived ticket to an influx of subscribers in the age of viral social media clickbait.

C. The Real Deal's Articles Lacked Substantiation and Omitted Critical Evidence.

49. On March 8, 2024, Kate Whiteman also known as, Kaitie Louiss ("Whiteman")

filed a civil complaint against Plaintiffs Alon and Oren related to allegations that stemmed from a

purported incident on May 26, 2012 (the "Whiteman Complaint").

50. On June 8, 2024, TRD published an article about the Whiteman Complaint (the

"June 8 Article"). Exhibit A.

51. TRD proudly boasted that they were the *first* to report on these unfounded

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allegations.

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- 52. TRD however failed to report that they were in direct contact with Plaintiff Oren leading up to the publication of the June 8 Article and received exculpatory information that contradicted the pertinent alleged assertions by Whiteman (the "Relevant Correspondence").
- 53. Notably, the information provided by Plaintiff Oren directly contradicted the article ultimately published by TRD.
- 54. Specifically, Plaintiff Oren provided the Relevant Correspondence to Korangy and Kallergis on June 4, 2024, and from then through June 8, 2024, Plaintiff Oren regularly communicated with Korangy and Kallergis over the phone and via text message to address the unfounded allegations made against him and Plaintiff Alon.
- 55. Korangy was aware of the Relevant Correspondence far ahead of the June 8 Article publication and had every opportunity to investigate further as no legitimate pending deadline existed.
- 56. At one point, Korangy was intrigued enough to make inquiries with several individuals with personal knowledge related to the Relevant Correspondence transmitted by Whiteman as he recognized the clear, underlying credibility issues with her shakedown attempts.



- 57. Make no mistake about it, TRD was in possession of the Relevant Correspondence, which provided more than enough reason to doubt the credibility of Whiteman.
 - 58. At worst, it provided Korangy with more than enough credible, documented

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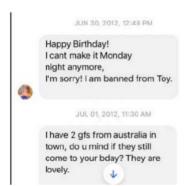
materials to include in his initial article so that TRD's readers would be able to read and assess a fair and neutral report of Whiteman's claim. Regrettably, Korangy failed to do so.

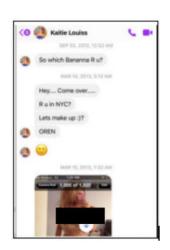
- 59. In sum and substance, over the course of 2.5 years, Whiteman sent consistent unsolicited messages and nude photographs before and after the allegations outlined in the Whiteman Complaint, a fact that TRD was aware of and refused to acknowledge in the June 8 Article.
- 60. As provided within the Relevant Correspondence to TRD by Plaintiff Oren, Whiteman contacted him on April 13, 2012.

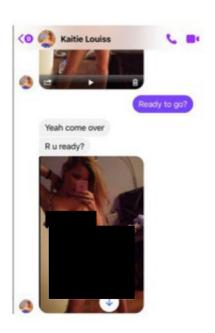


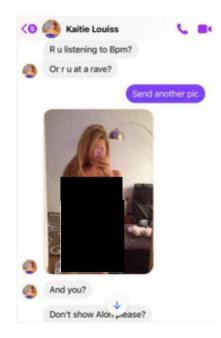
61. After the alleged incident outlined in the Whiteman Complaint, Whiteman proceeded to send unsolicited messages which directly contradicted allegations that she stayed in bed for months and very rarely left her home due to extreme depression, anxiety, and fear for her own safety.

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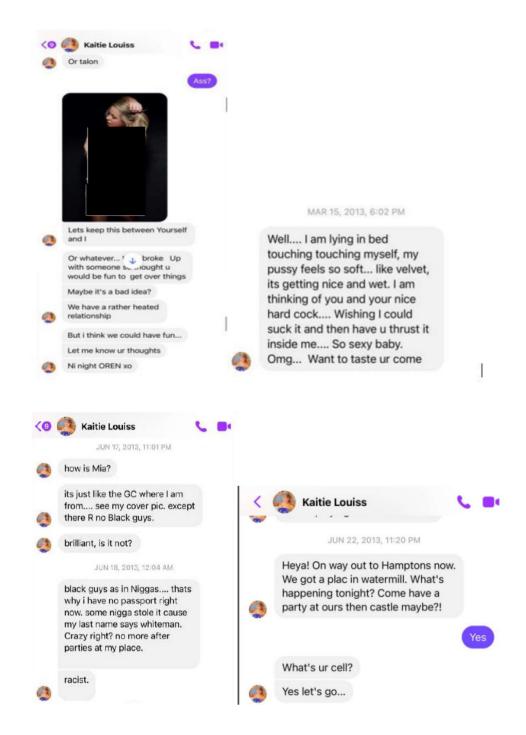




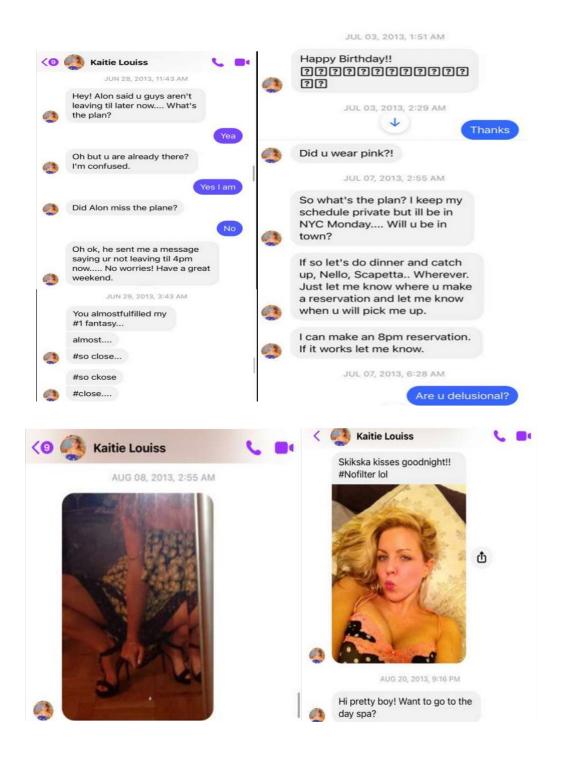




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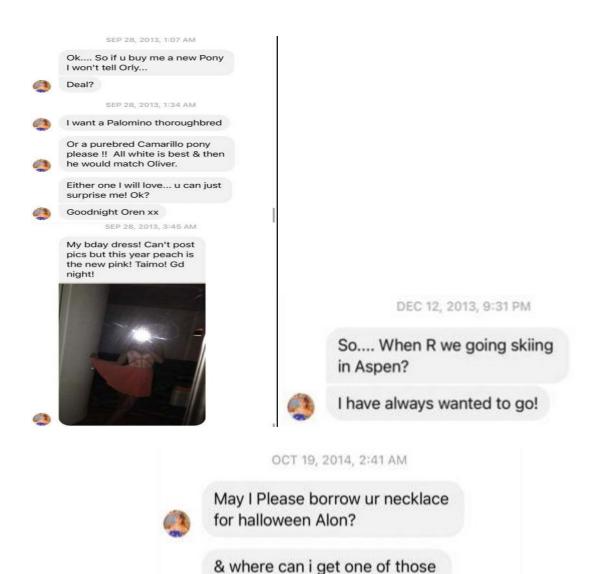


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62. TRD was in possession of the Relevant Correspondence, which dispute the allegations that supporting the June 8 Article.

little hats? I'll bedazzle it with

Im going as Jewish Barbie Fyi

crystals

- 63. Upon information and belief, TRD had no contact with Whiteman, did not reach out to her for comment, and at no time received any corroborating information from her.
 - 64. In addition to ignoring the Relevant Correspondence in the June 8 Article, TRD

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further sought to exaggerate and sensationalize its false story by trying to portray Whiteman as someone younger than the Alexanders. Meanwhile, as TRD knew, Whiteman was seven (7) years

older than the Alexanders.

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TRD had ample time to review and analyze the veracity of the Relevant 65.

Correspondence, but elected not to do so.

There was no reasonable urgency to publish the June 8 Article. 66.

Indeed, several months had already passed by without a single article on the 67.

Whiteman lawsuit.

68. TRD had a duty to investigate and report in a fair and true fashion—yet it decided

to turn a blind eye to any evidence that would undermine its false narrative TRD desperately sought

to promote in order to gain readers and subscribers.

69. TRD had an obligation to publish a substantially accurate report on all the

information available to it and it failed to do so, especially considering that the Relevant

Correspondence cuts directly against the allegations giving rise to the June 8 Article. TRD ignored

its obligations.

70. TRD had every reason to know Whiteman's claims were incredulous and lacked

any merit, as reflected in the Relevant Correspondence.

71. Destroying the Alexanders reputation was a sure-fire way to increase TRD

subscriptions and help TRD's paid advertisers that are known competitors to the Alexander Team.

72. TRD knew the June 8 Article headline, "LAWSUITS ACCUSE TOP BROKER

OREN ALEXANDER, TWIN BROTHER OF RAPE" would make them money hand over fist

and simply did not care about reporting all the facts at their disposal.

73. Notably, there was a continuous point of contention between the Alexanders and

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TRD insomuch as the Alexanders did not advertise their services on TRD's publications; therefore, no financial connection existed between the parties, which turned TRD's reporting into a business decision instead of credible journalism. Make no mistake about it, TRD had long sought the

Alexanders business, which never materialized.

74. TRD refused to let facts get in the way of an opportunity to make millions of dollars

profiting off printing false allegations against the Alexanders.

75. TRD knew the June 8 Article was based upon uncorroborated and unfounded

allegations fraught with inconsistencies and failed to instruct their journalists to conduct a

legitimate investigation into the fabrications, even after being provided with the Relevant

Correspondence, which would cause any rationale individual, let alone an investigative journalist,

to raise concerns over the veracity of the Whiteman Complaint.

76. Irrespective of the truth, TRD intentionally pushed and published its false

narrative against the Alexanders.

77. For example, in a February 18, 2025, article TRD mentioned an incident in Miami

that allegedly took place on March 28, 2018, the same date Oren and Tal were in New York City

to accept an award (commonly referred to as an "Ellie") for their work at Douglas Elliman—an

event TRD attended.

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mage ID: 2847765 er, Dottie Herman

78. Any level of due diligence would have revealed to TRD that the statements it published were demonstrably false. TRD, however, failed to take any investigative measures before making publishing its false story about the Alexanders.

D. The Real Deal Acted with Malice.

- 79. In recent years TRD has not only made it their mission to destroy the Alexanders but has also sought recognition for its false reporting.
- 80. Upon information and belief, TRD submitted an application to be recognized at the Esserman-Knight Journalism Awards ceremony for their supposed "reporting" on the Alexanders.
- 81. As such, three journalists from TRD were given an honorable mention for their work related to "The Fall of the Alexander Brothers," which "highlights exemplary investigative and public service reporting that exposes injustice, amplifies community voices and holds power to account in South Florida."

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- 82. Shockingly, TRD's three journalists can be seen smiling ear to ear while accepting their "award," for false reporting on innocent individuals simply to advance their careers.
- 83. TRD purposefully avoided the truth and passed judgment before any lawful determination has been made regarding the Alexanders.
- 84. Notably, TRD has jumped at the opportunity to publish any and all allegations against the Alexanders but have failed to report on the eight (8) civil dismissals they have received.
- 85. TRD's obsession with the Alexanders is also exhibited in its relentless coverage of them and desire to force negative and false content down its readers and followers' throats until they have no choice but to believe it. Upon information and belief, since June 2024, TRD has addressed the Alexanders over one hundred (100) times in various publications, social media posts, podcasts, etc.
- 86. On March 6, 2025, while hosting his YouTube series *Coffee Talk*, during an interview of an unrelated guest, Korangy strangely tried to insert the Alexanders into the discussion, which the guest did not entertain.
 - 87. Unsatisfied with the guest's response, Korangy doubled down and tried to elicit a

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sensational quote, which again fell flat as the guest stated that these allegations were "not

something that was known in the industry." 4

88. Korangy wanted nothing more than for another person to call the Alexanders

monsters as well, which did not happen during the aforesaid March 6, 2025, interview.

89. Korangy also welcomed opportunities to comment on the allegations from the

perspective of an interviewee.

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90. Specifically, Korangy misinformed Vanity Fair about the correspondence between

Oren and himself leading up to the June 8 Article.

91. Korangy falsely claimed to Vanity Fair that Plaintiff Oren threatened him and TRD

by claiming "he would encourage the site's advertisers to leave..." ⁵

AS AND FOR THE FIRST CAUSE OF ACTION

(Defamation)

92. Plaintiffs repeat and reallege each and every allegation as stated in the above

paragraphs as if fully set forth herein.

93. As discussed above, TRD knowingly published and/or made false statements about

Plaintiffs, including but not limited to: (i) asserting in its June 8 Article that the Plaintiffs had raped

Whiteman; and (ii) claiming Plaintiff Oren threatened TRD on March 6, 2025, when no such

statement or conversation ever took place between Plaintiff Oren and Defendant (collectively, the

"Defamatory Statements"). These statements of fact by TRD are all false.

94. TRD publicly made, published, caused to be published, and/or participated in the

publication of these false statements knowing their actions would result in further publication and

spreading of these false and defamatory statements of fact about Plaintiffs. As a reasonably

⁴ Coffee Talk: Eleonora Srugo Interview.

⁵ Vanity Fair Article.

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foreseeable, and intended, result of their conduct, TRD repeated and amplified these false and defamatory statements.

95. TRD intentionally made false statements of fact and false statements that conveyed

a false meaning about Plaintiffs. The statements TRD published in the June 8 Article about

Plaintiffs are reasonably understood to state that Plaintiffs engaged in improper and/or illegal

conduct in violation of law.

96. The defamatory meaning of their false and implied statements of facts are apparent

from the face of the statements themselves.

97. TRD further acted with intentional disregard and/or gross negligence ignoring

undisputed exculpatory evidence that conclusively demonstrated that the statement made by TRD

and published in the June 8 Article were false.

98. The statements constitute defamation per se in that they impute criminal activity by

Plaintiffs and tend to injure Plaintiffs in their trade, business and/or profession and/or their fitness

to duly and faithfully deliver and/or render goods and/or services.

99. The statements are not and never were privileged.

To the extent the statements were privileged, TRD was and is no longer afforded 100.

that protection given the exculpatory evidence properly produced to TRD ahead of its publication.

101. TRD had no basis on which to believe the statements it made were true, and indeed

knew them to be false, and continued to publish the statements withstanding that knowledge.

102. TRD took no steps to assess or investigate the truth of the defamatory statements

despite having obvious reasons to doubt the veracity of its statements.

Moreover, TRD published the statements in a manner to create a false inference. 103.

104. TRD published the Defamatory Statements in a grossly irresponsible manner

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without due consideration for the standards of information gathering and dissemination ordinarily

followed by responsible professionals.

105. TRD failed to rely upon a credible source.

106. While proof of damage is not required, the statements have caused Plaintiffs to

suffer damage to their reputation, business interests and/or prospective economic opportunities.

TRD published the statements to third parties with the foreseeable and intended 107.

result of maligning Plaintiffs' reputation and destroying their ability to continue working in their

respective professions as they were each largely predicated upon relationships with other

professionals that are now irreparable.

108. TRD's conduct was made knowingly, maliciously, willfully and wantonly, such

that Plaintiffs are entitled to an award of punitive damages.

109. As a direct and proximate result of TRD's false and defamatory statements and

publications, Plaintiffs have suffered significant general, actual, consequential, and special

damages, including, without limitation, impairment of reputation and standing in the community

and in their profession, personal humiliation, mental anguish and suffering, emotional distress,

anxiety, lost earnings, and other pecuniary loss.

As a result of TRD's conduct, Plaintiffs are entitled to an award of compensatory

and punitive damages in an amount to be determined at trial but not less than \$500,000,000.00.

WHEREFORE, Plaintiffs Alon Alexander, Oren Alexander and Tal Alexander demand

judgment against TRD as follows:

On the First Cause of Action, a judgment for Defamation in an amount to be (a)

determined at trial, but believed to be no less than \$500,000,000.00 plus statutory interest and

punitive damages;

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> an award of interest, costs and disbursements including reasonable attorneys' fees; (b) and

granting such other and further relief as the Court deems just, proper, and equitable. (c)

Dated: New York, New York November 3, 2025

MEISTER SEELIG & FEIN PLLC

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By: /s/ Kevin Hutzel Kevin M. Hutzel, Esq. Gaddi Goren, Esq. Attorneys for Plaintiffs 125 Park Avenue, 7th Floor New York, New York 10017 kmh@msf-law.com gg@msf-law.com (646) 273-8208