

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
D.B. DOE,

Plaintiff,

-against-

THE GOVERNING BODY OF JEHOVAH'S WITNESSES;
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW
YORK; CHRISTIAN CONGREGATION OF JEHOVAH'S
WITNESSES; and JOHN AND JANE DOES 1-75, whose
identities are presently unknown to Plaintiff, in their official
and individual capacities,

Defendants.
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Plaintiff designates Kings County
as the place of trial.

Index No.:

SUMMONS

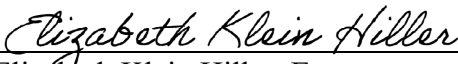
The basis of the venue is as the
location of a substantial part of the
events or omissions giving rise to
the claims and the principal place
of business of at least one
Defendant.

To the above-named Defendants:

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(s) within 20 days after 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); and in case of your failure to appeal
or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: June 16, 2026
New York, NY

THE ZALKIN LAW FIRM, LLP


Elizabeth Klein Hiller, Esq.
Attorneys for Plaintiff D.B. DOE
305 Broadway, 7th Floor
New York, NY 10007
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Defendants' addresses:

THE GOVERNING BODY OF JEHOVAH'S WITNESSES
1 Kings Drive
Tuxedo Park, NY 10987

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK
100 Watchtower Drive
Patterson, NY 12563

CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES
675 Red Mills Road
Wallkill, NY 12589

JOHN AND JANE DOES 1-75
Addresses Unknown

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
D.B. DOE,

Plaintiff,

Index No.:

-against-

VERIFIED COMPLAINT

THE GOVERNING BODY OF JEHOVAH'S WITNESSES;
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW
YORK; CHRISTIAN CONGREGATION OF JEHOVAH'S
WITNESSES; and JOHN AND JANE DOES 1-75, whose
identities are presently unknown to Plaintiff, in their official
and individual capacities,

Defendants.

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Plaintiff, D.B. Doe (hereinafter, "PLAINTIFF"), by her attorneys, THE ZALKIN LAW
FIRM, LLP, upon information and belief and at all times hereinafter mentioned, respectfully
alleges as follows:

PRELIMINARY STATEMENT

1. Sexual abuse of minors participating in religious organizational activities is a well-known problem that religious organizations have been aware of for decades. Despite widespread reports, investigations, and demands for reform, religious organizations allowed a culture of abuse to continue. As a result, children continued to be the victims of child sexual abuse by church appointed individuals.

2. PLAINTIFF is one such victim, who was groomed and repeatedly sexually abused by an Elder of her local Jehovah's Witness congregation. The sexual abuse took place in Brooklyn, New York, as well as in another state.

3. This Complaint is filed pursuant to the Victims of Gender-Motivated Violence Protection Law, N.Y.C. Admin. Code § 10-1101, *et seq.*, because it pertains to intentional or

negligent acts or omissions by a person for physical, psychological, or other injuries suffered as a result of at least one crime of violence motivated by gender, which occurred in New York City.

4. On January 9, 2022, an amendment to the Victims of Gender-Motivated Violence Protection Law, under N.Y.C. Admin. Code § 10-11-1, *et. seq.*, was enacted by the New York City Council. This law allows survivors of gender-motivated violence whose claims were previously time-barred to file a lawsuit against their abusers and institutions that directed, enabled, participated in, and/or conspired to commit a crime of violence motivated by gender during a two-year “look-back-period” and extends the original statutory filing period to nine years. The two-year look back window took effect on March 1, 2023. The new amendment temporarily lifts the statute of limitations on civil cases involving gender-based violence. During the look-back window, victims and survivors of violence perpetrated on the basis of gender can recover damages from their abusers, even if it has been years or decades since the assault(s). This look-back window closes February 28, 2025. Accordingly, Plaintiff’s action is timely, and it is properly filed under New York N.Y.C. Admin Code § 10-1101, *et seq.*, (Victims of Gender-Motivated Violence Protection Law).

5. On January 29, 2026, another amended version of the Victims of Gender-Motivated Violence Protection Law was enacted providing for explicit retroactive application to enabling conduct that occurred prior to January 9, 2022. N.Y.C. Admin. Code § 10-1104.1. The 2026 amendment created another look-back window which opened on January 29, 2026, and is scheduled to close on July 29, 2027. The amendment also specifically provides that any potential plaintiff who had filed during the earlier look-back window could amend or refile. Accordingly, Plaintiff’s action is timely, and it is properly filed under New York N.Y.C. Admin Code § 10-1104.1.

6. As set forth in greater detail below, PLAINTIFF asserts claims for Violation of the Victims of Gender-Motivated Violence Protection Law, negligence, negligent hiring, retention, training and supervision, intentional infliction of emotional distress, and sexual assault and battery.

7. PLAINTIFF seeks compensatory and punitive damages for the injuries she has suffered, as well as reasonable attorneys' fees and the costs and disbursements of bringing this action.

JURISDICTION AND VENUE

8. This Court has jurisdiction pursuant to Civil Practice Law and Rules ("CPLR") § 301 as Defendants' principal places of business are in New York and because the unlawful conduct complained of herein occurred in New York.

9. Venue is proper pursuant to CPLR § 503 because at the time of the acts giving rise to the unlawful conduct complained of herein, Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK's (hereinafter, "WATCHTOWER") principal office and place of business was in Kings County, State of New York, and the unlawful conduct complained of herein occurred in Kings County.

BACKGROUND

10. PLAINTIFF was born in 1980.

11. PLAINTIFF is a resident of the State of Montana.

12. Defendant WATCHTOWER was and is a not-for-profit religious corporation, organized and existing under and by virtue of the laws of the State of New York.

13. At the time of the acts giving rise to the causes of action alleged in this Complaint, Defendant WATCHTOWER's principal office and place of business was in the County of Kings, State of New York. WATCHTOWER is a citizen and resident of the State of New York.

14. Defendant WATCHTOWER's certificate of incorporation lists Kings County as the location of its principal office.

15. Defendant WATCHTOWER's certificate of incorporation lists Kings County as its principal place of business.

16. Defendant THE GOVERNING BODY OF JEHOVAH'S WITNESSES (hereinafter, "GOVERNING BODY") was and is a religious body with a with a separate existence, and at all relevant times comprised an unincorporated association under New York law. On information and belief, the membership of GOVERNING BODY has changed over the years, but the entity that is GOVERNING BODY has maintained a perpetual existence.

17. Defendant GOVERNING BODY is comprised of eleven members. GOVERNING BODY does not claim to have a formal president or secretary.

18. Defendant GOVERNING BODY does have a coordinator that was formerly referred to as a chairman. On information and belief, the chairman of GOVERNING BODY is the functional equivalent to a president or secretary in a secular unincorporated association.

19. The coordinator of Defendant GOVERNING BODY rotates on a yearly basis in alphabetical order.

20. The current members of Defendant GOVERNING BODY are KENNETH E. COOK, JR.; GAGE FLEEGLE; SAMUEL FREDERICK HERD; GEOFFREY WILLIAM JACKSON; JODY JEDELE; MARK STEPHEN LETT; GERRIT LÖSCH; JACOB RUMPH; D. MARK SANDERSON; DAVID H. SPLANE; and JEFFREY WINDER. GOVERNING BODY does not publicly disclose its current coordinator. The following eleven paragraphs are alleged in the alternative.

21. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019,

is D. MARK SANDERSON.

22. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is DAVID HOWARD SPLANE.

23. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is KENNETH E. COOK, JR.

24. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is SAMUEL FREDERICK HERD.

25. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is GEOFFREY WILLIAM JACKSON.

26. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is MARK STEPHEN LETT.

27. The current coordinator of Defendant GOVERNING BODY, as of October 1, 2019, is GERRIT LÖSCH.

28. The current coordinator of Defendant GOVERNING BODY, as of January 18, 2023, is GAGE FLEEGLE.

29. The current coordinator of Defendant GOVERNING BODY, as of January 18, 2023, is JEFFREY WINDER.

30. The current coordinator of Defendant GOVERNING BODY, as of October 5, 2024, is JODY JEDELE.

31. The current coordinator of Defendant GOVERNING BODY, as of October 5, 2024, is JACOB RUMPH.

32. At the time of the acts giving rise to the causes of action alleged in this Complaint, GOVERNING BODY's principal office and place of business was in the County of Kings, State

of New York.

33. Defendant CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES (hereinafter, "CCJW") was and is a not-for-profit religious corporation organized and existing under and by virtue of the laws of the State of New York.

34. In or about April of 2001, Defendant CCJW assumed from Defendant WATCHTOWER the obligation to operate the Service Department of the United States Branch of Jehovah's Witnesses and became WATCHTOWER's successor in interest.

35. Defendant JOHN AND JANE DOES 1-25, whose names are presently unknown, were members of and officials of Defendant WATCHTOWER.

36. Defendant JOHN AND JANE DOES 26-50, whose names are presently unknown, were members of and officials of Defendant CCJW.

37. Defendant JOHN AND JANE DOES 51-75, whose names are presently unknown, were members and officials of Defendant GOVERNING BODY.

38. At all times relevant herein, Preston Green (hereinafter, "GREEN") was an Elder in the Sherwood Park Congregation of Jehovah's Witnesses (hereinafter, "CONGREGATION"), located in Philadelphia, Pennsylvania. At the time of the wrongful conduct complained of herein, GREEN was, by virtue of his appointment as an Elder at CONGREGATION, an agent of Defendants WATCHTOWER, CCJW and GOVERNING BODY, and was at all times alleged herein acting within the scope of his employment or agency in performing duties for, and on behalf of, CONGREGATION and Defendants WATCHTOWER, CCJW and GOVERNING BODY. At CONGREGATION, he had regular and frequent contact with children who attended CONGREGATION, a circumstance of which CONGREGATION and Defendants WATCHTOWER, CCJW and GOVERNING BODY had notice. PLAINTIFF is also of the

information and belief that CONGREGATION and Defendants WATCHTOWER, CCJW and GOVERNING BODY knew, or should have known, that GREEN committed acts of sexual abuse against children, including PLAINTIFF, and further that CONGREGATION and Defendants WATCHTOWER, CCJW and GOVERNING BODY concealed from PLAINTIFF their knowledge of GREEN's sexually abusive behavior, as well as their own negligent wrong-doing as more fully set forth below.

39. Each Defendant is the agent, servant and/or employee of other Defendants, and each Defendant was acting within the course and scope of his, her or its authority as an agent, servant and/or employee of the other Defendants. The Defendants, and each of them, are individuals, corporations, partnerships and other entities which engaged in, joined in and conspired with the other wrongdoers in carrying out the tortious and unlawful activities described in this Complaint, and the Defendants, and each of them, ratified the acts of the other Defendants as described in this Complaint.

40. Upon information and belief, the organizational structure of the Jehovah's Witnesses is hierarchical in nature. At all times relevant, the organizational head of the Jehovah's Witnesses was and is Defendant GOVERNING BODY. Authority flows downward from Defendant GOVERNING BODY to the local level of the organization, which is made up of congregations. Defendant GOVERNING BODY is comprised of a fluctuating number of elders.

41. Upon information and belief, at all times prior to April of 2001, defendant WATCHTOWER operated the Service Department of the United States Branch of Jehovah's Witnesses. Through the Service Department, defendant WATCHTOWER implemented the policies and procedures promulgated by defendant GOVERNING BODY. On a day-to-day basis, defendant WATCHTOWER exercised control over the running of the local congregations.

42. Upon information and belief, in April of 2001, Defendant CCJW assumed control of the Service Department. At the time of that assumption of control, CCJW paid no consideration to Defendant WATCHTOWER, and the Service Department did not change location, staffing, or operation. CCJW continues to operate the Service Department and is WATCHTOWER'S successor in operating the Service Department.

43. Upon information and belief, prior to April of 2001, Defendant WATCHTOWER published a series of handbooks that were distributed to elders and kept secret from other Jehovah's Witnesses and the public. These handbooks provided instruction to elders regarding day-to-day administration of the organization such as the scheduling of congregation meetings, as well as more specific instruction regarding how to respond to allegations of wrongdoing, including child molestation, when to convene a judicial committee and how to handle the procedure.

44. Upon information and belief, prior to April of 2001, Defendant WATCHTOWER provided periodic instruction to local congregations through letters addressed to All Bodies of Elders. These letters have covered a broad spectrum of topics ranging from standardizing the recordkeeping practices of all congregations, establishing procedures for ordering literature from WATCHTOWER or remitting payments, handling administrative and procedural matters involving day-to-day congregation operations as well as specific instructions on how to respond to wrongdoing within the congregation, including child molestation. Effective during Spring of 2001, Defendant CCJW assumed operation of the Service Department, including responsibility for disseminating some of these policy letters.

45. Upon information and belief, Defendant WATCHTOWER through its Writing Department, and prior to April of 2001 through the Service Department, researchers, writes, approves, publishes and distributes its own materials for distribution to actual and prospective

Jehovah's Witnesses and for recruitment purposes. Defendant WATCHTOWER also reviews recommendations of prospective elders or ministerial servants. Defendant WATCHTOWER directly appoints circuit and district overseers, whose responsibilities are to monitor the function of the Jehovah's Witness religion at the congregation, circuit and district levels to ensure directives and policies from Defendants WATCHTOWER and GOVERNING BODY are being followed and correctly implemented. It is Defendant GOVERNING BODY who has final approval of these recommendations. Effective April of 2001, Defendant CCJW assumed responsibility for the review of recommendations of prospective elders and ministerial servants through its assumption of the Service Department.

46. Upon information and belief, prior to April of 2001, Defendant WATCHTOWER established processes for the discipline of members accused of wrongdoing and received and kept records of determinations of disfellowship (similar to excommunication; now referred to as removal) of any Jehovah's Witness, or of reproof of individuals (similar to public or private censure) who have been appointed by Defendants WATCHTOWER and GOVERNING BODY as ministerial servants or elders. Since April of 2001, Defendant CCJW assumed responsibility for these actions.

47. Upon information and belief, above the congregation level is the circuit. Circuits are generally comprised of 18 to 24 congregations, though this number is variable. The circuit is staffed by a circuit overseer and/or a substitute circuit overseer. Circuit overseers and substitute circuit overseers are directly appointed by Defendants WATCHTOWER and GOVERNING BODY.

48. Upon information and belief, circuit overseers are sometimes referred to as traveling overseers because they travel from one congregation within their circuit to another. The

circuit overseer generally visits each congregation within his circuit twice yearly. During the circuit overseer's visit to a congregation, the circuit overseer meets with the elders of the congregation, conferences about the overall function of the congregation and problems occurring in the congregation generally, and specific issues of wrongdoing, including allegations of child molestation by a congregant. The circuit overseer also participates in field service and observes and reports upon the functioning of the congregation.

49. Upon information and belief, the circuit overseer also meets with the elders for the purpose of discussing the men in the congregation, and whether they meet the requirements for appointment as ministerial servants or elders. During this discussion, the circuit overseer helps the elders arrive at recommendations to Defendant WATCHTOWER for appointments as ministerial servants and elders in the congregation. Prior to April of 2001, the circuit overseer prepared a report of his time at each congregation and submitted that to Defendant WATCHTOWER. Since April of 2001, the circuit overseer's report was sent to Defendant CCJW.

50. At the local level members of the Jehovah's Witnesses are divided into congregations. Congregations are run on a daily basis by a body of elders. The number of elders in a given congregation fluctuates depending on the size and needs of the congregation, as well as the number of qualified men in the congregation. Women cannot be elders.

51. Upon information and belief, elders are responsible for the daily operations and governance of the local congregation. The elders are the highest authority at the congregational level and direct door-to-door preaching activities, select potential candidates for becoming ministerial servants and elders, organize weekly church meetings, determine whether an individual is suitable for representing the church in the community by becoming a publisher, handle finances for the local congregation, and determine the guilt, repentance and punishment of church members

who commit wrongdoing.

52. Upon information and belief, to be appointed as an elder, a person must be a ministerial servant in good standing or have served as an elder in another congregation. The body of elders of the local congregation identifies potential candidates and determines whether they are suitable, and if they live their life in accordance with appropriate morals and organizational standards. Once a candidate has been identified by the local elders, a recommendation is made by the circuit overseer to Defendant WATCHTOWER. Defendants WATCHTOWER and GOVERNING BODY have the ultimate authority as to whether a candidate is approved and becomes an elder. After its creation in Spring of 2001, Defendant CCJW took over Defendant WATCHTOWER's responsibility for the appointment of elders.

53. Upon information and belief, male baptized publishers who meet certain requirements may be appointed as "ministerial servants." Ministerial servants serve the congregation and aid the elders in their responsibilities and take on leadership roles in the absence of an elder. To be appointed as a ministerial servant, a person must be a publisher in good standing. The body of elders of the local congregation identifies potential candidates, and in concert with the circuit overseer, determines whether they are suitable, and if they live their life in accordance with appropriate morals. Once a candidate has been identified by the local elders, a recommendation is made to Defendant WATCHTOWER. Defendants WATCHTOWER and GOVERNING BODY have the ultimate authority as to whether a candidate is approved and becomes a ministerial servant. After its creation in Spring of 2001, Defendant CCJW took over Defendant WATCHTOWER's responsibility for the appointment of ministerial servants.

54. Membership in the Jehovah's Witnesses is strictly regulated and monitored. A person can attend open meetings at the Kingdom Hall for years and not be a member of the

congregation. When a person expresses interest in becoming a member of the Jehovah's Witnesses, he or she begins a period of bible study with a baptized member of the congregation. The aspirant also engages in self-study during this period of time.

55. After months of study a person may become an unbaptized publisher. To become an unbaptized publisher, the aspirant must make application to the congregation's body of elders. Such a person must be approved by the body of elders, who will consider whether the aspirant exhibits sufficient knowledge of the beliefs and organization of the Jehovah's Witnesses for approval as a publisher. The elders will also vet the morals and ethics of the aspirant to determine if he or she meets the standards for inclusion as a member of the Jehovah's Witness organization.

56. Once a person is approved as an unbaptized publisher, he or she is authorized to represent the Jehovah's Witnesses, and the specific congregation, in the community. An unbaptized publisher is authorized to engage in field service, which is the centerpiece of Jehovah's Witness marketing, fundraising and recruiting activities. Field service involves the door-to-door proselytizing for which Jehovah's Witnesses are most recognizable.

57. Upon information and belief, By participating in field service, an unbaptized publisher is authorized by the congregation and by the Jehovah's Witness organization to distribute Jehovah's Witness literature to members of the community, to accept donations on behalf of the organization, and to invite prospective members to attend open congregation meetings at the Kingdom Hall as a means of recruitment. The literature distributed during field service is written, printed and published by Defendant WATCHTOWER or one of its related corporations.

58. Upon information and belief, at all times prior to April of 2001, each publisher was instructed by the congregation, as directed by Defendant WATCHTOWER, on how to become more effective at placing literature, receiving donations and enticing non-members to attend public

congregation meetings or begin a bible study. Each congregation holds multiple meetings each week that are designed to make publishers more effective in their oral presentation during field service. Since April 2001, Defendant CCJW has assumed Defendant WATCHTOWER's responsibilities for improving publisher's presentations.

59. Once a person is approved to become a publisher he or she is expected to keep track of the hours spent in service. Forms are submitted monthly to the congregation detailing the number of hours spent in field service. Records of these hours are kept by the congregation for each publisher within the congregation. Additional forms are submitted to the congregation secretary for each "bible study" conducted by a publisher during the month. Failure to submit such field service records for multiple consecutive months can lead to a publisher being designated as "irregular" or "inactive" which results in lowered status within the congregation.

60. After several additional months of study, an unbaptized publisher may seek to become a baptized publisher. Baptism as one of Jehovah's Witnesses is considered an ordination as a minister of the Jehovah's Witnesses. To be approved for baptism an applicant must be tested and approved by elders of the local congregation. During the testing the applicant is asked dozens of oral questions relating to the teachings of the Jehovah's Witnesses as well as the organizational structure of the Jehovah's Witness organization, which the applicant must answer adequately prior to being approved for baptism.

61. Baptized publishers may make a greater commitment by pledging to spend a specified number of hours in service for a period of time. Such publishers are referred to as "pioneers." There are multiple degrees associated with being a pioneer. An auxiliary pioneer is a baptized publisher that applies to the congregation's elders to perform a certain number of hours of service during a one-month period of time. The congregation elders will consider the

application and have discretion to either accept the application or reject the application.

62. Upon information and belief, a regular pioneer is a baptized publisher that pledges to spend a specified number of hours in service each month for one year. To become a regular pioneer an applicant gains the recommendation of the congregation's elders who in turn submit that recommendation for approval by Defendant WATCHTOWER. Defendant WATCHTOWER then considers the application and has the discretion to accept or reject the application. Since April of 2001, Defendant CCJW has assumed responsibility for considering and approving or rejecting applications to serve as a regular pioneer.

63. Upon information and belief, publishers submit to the domination and control of the Jehovah's Witness organization. As that relates to Jehovah's Witness-related events, the organization monitors each publisher's field service and bible study records, standardizes methods to be used during proselytizing activities, provides the only approved literature to be distributed during field service, directs where publishers will perform field service, controls access to sought after positions as regular or auxiliary pioneers, and determines appointments as ministerial servants, elders and circuit overseers. The organization also dictates and implements the Jehovah's Witness practice of shunning, which involves isolating and not interacting with members that have been disfellowshipped/removed or have voluntarily left the church.

64. In addition to regulating all aspects of a publisher's participation in Jehovah's Witness events, baptized publishers submit to the organization's control in all other aspects of their lives. Personal grooming, appearance and dress are regulated by the congregation, as are a publisher's use of alcohol, tobacco, or drugs. A publisher's illegal sexual conduct, such as childhood sexual abuse occurring away from Jehovah's Witness locations and events, as well as legal sexual conduct occurring in the privacy of a person's home are subject to regulation and the

imposition of punishment by the congregation.

65. Congregants are encouraged to bring problems to the elders to be resolved rather than to seek intervention from outside of the Jehovah's Witness organization. In practice, when a congregant commits an act of wrongdoing, such as the sexual abuse of a child, that matter must be brought to an elder to be resolved. Jehovah's Witness policy requires elders to investigate such a claim. If there are two witnesses to the wrongdoing, or if the accused confesses his wrongdoing, a judicial committee will be convened. If there are not at least two witnesses and the accused denies the wrong, then the accused is determined to be innocent and treated as such and no corrective, protective or punitive action is taken by the congregation.

66. If a judicial committee is convened, the two original elders that investigated the wrongdoing will be joined by a third, who will hear the case and impose punishment on the wrongdoer. Possible outcomes of a judicial committee range from private reproof to public reproof, to disfellowship/removal. Private reproof is a private censorship of the wrongdoer that generally results in a limitation of the wrongdoer's privileges to engage in field service for a short period of time. No announcement is made to the congregation when a wrongdoer is subject to private reproof. In cases of public reproof an announcement is made to the congregation that the individual has been reproofed by a judicial committee and found to be repentant. Restrictions can be imposed as in cases of private reproof.

67. Disfellowship/removal is expulsion from the congregation. When a wrongdoer is disfellowshipped/removed, an announcement is made to the congregation that the wrongdoer is no longer one of Jehovah's Witnesses, but no details are given regarding the nature of the wrongdoing. A person who is disfellowshipped/removed/ can seek reinstatement into the congregation by written request to the Elders.

68. In March of 1997, Defendant WATCHTOWER disseminated a letter to all of the Bodies of Elders in United States congregations seeking information on men who then served, or had previously served, in any appointed position (e.g., elder, ministerial servant, regular pioneer) and were also known to have engaged in child molestation. The letter required each of nearly 14,000 congregations to prepare a report answering approximately a dozen questions with details of each such case and send the letter to Defendant WATCHTOWER's Service Department.

69. In July of 1998, Defendant WATCHTOWER sent a follow up letter to each United States congregation, reminding those bodies of elders of the need to send the reports and possible legal consequences of appointing a known child molester to a position of trust, such as an elder or ministerial servant.

70. Upon information and belief, the responsive reports were received by the Service Department and kept by Defendants WATCHTOWER and GOVERNING BODY. The letters evidenced the breadth of a problem that was well-known to Defendants WATCHTOWER and GOVERNING BODY: child molestation within the Jehovah's Witnesses. Despite receiving these reports, Defendants WATCHTOWER and GOVERNING BODY did not promulgate new or effective policies for preventing or responding to child molestation. Nor did Defendants WATCHTOWER and GOVERNING BODY implement any form of effective procedures for educating children and adult members of the risk of child molestation within the Jehovah's Witnesses, how to identify warning signs of molestation, or how to avoid dangerous situations. As of its formation in Spring of 2001, Defendant CCJW assumed operation of the Service Department, gained possession and knowledge of the molestation reports, and received any new reports of molestation by Jehovah's Witnesses.

71. Notwithstanding the reports received in response to the March 1997 and July 1998

letters which continue to be sent to this day, Defendants WATCHTOWER and GOVERNING BODY left intact a longstanding Jehovah's Witness policy dating to a July 1989 policy letter that required elders to frustrate law enforcement efforts to investigate child molestation, and to contact Defendant WATCHTOWER's Legal Department about child abuse allegations instead of cooperating with law enforcement or reporting child molestation allegations to the police. Similarly, victims were still to be discouraged from seeking any form of therapy where Jehovah's Witness molestations may be disclosed to non-members. Despite being staffed with ministers, Defendant WATCHTOWER's Service Department has never made a mandated child abuse report to law enforcement.

72. The policies on child molestation promulgated by Defendants WATCHTOWER and GOVERNING BODY through the secret elder handbooks and confidential policy letters were not divulged to Jehovah's Witness members. Through this required secrecy surrounding the general risk of child molestation by Jehovah's Witnesses, Defendants WATCHTOWER and GOVERNING BODY intentionally concealed the threat of child molestation within the Jehovah's Witnesses from their members. And, through these policies of non-reporting to law enforcement and non-cooperation with criminal child molestation investigations, Defendants WATCHTOWER and GOVERNING BODY protected accused and admitted child molesters from criminal prosecution and thereby increased the risk of molestation of unsuspecting minors who were not informed of the risk of molestation within the religion.

73. On information and belief, PLAINTIFF's family were members of CONGREGATION where they met GREEN who was an Elder at CONGREGATION. At the time, GREEN and his wife, Joan, would go over to PLAINTIFF's family's house to help look after PLAINTIFF and her siblings, specifically during times when PLAINTIFF's sibling who had Down

Syndrome required extra care from her parents. GREEN and other Elders were also present in PLAINTIFF's home to ensure that care for PLAINTIFF's sibling conformed with the proscribed practices of the Jehovah's Witnesses.

74. Based on information and belief, Joan had been assigned by CONGREGATION Elders to help PLAINTIFF's family care for her sibling.

75. Beginning in or around 1985, when PLAINTIFF was 5 years old, GREEN began sexually abusing PLAINTIFF. The sexual abuse consisted of GREEN fondling PLAINTIFF's genitals, GREEN forcing PLAINTIFF to fondle his genitals, GREEN digitally penetrating PLAINTIFF's vagina, and GREEN forcing PLAINTIFF to orally copulate him. This abuse typically occurred on a weekly basis and typically occurred at GREEN's home and/or PLAINTIFF's home.

76. On at least five separate occasions, GREEN took PLAINTIFF to the world headquarters of the Jehovah's Witnesses, known as Bethel. At all times relevant herein, Bethel was located in Brooklyn, New York. PLAINTIFF was not accompanied by her parents on these trips.

77. On every occasion that GREEN brought PLAINTIFF to Bethel, he committed the aforementioned sexual abuse on Bethel property.

78. On information and belief, Defendants WATCHTOWER and GOVERNING BODY knew that GREEN was bringing PLAINTIFF, a minor of the opposite sex not related to GREEN, to Bethel unaccompanied by her parents.

79. In or around 1988, PLAINTIFF's father became an Elder at CONGREGATION. Also, around that time, GREEN's abuse of Plaintiff stopped.

80. In or around 1992, when Plaintiff was twelve (12) years old, she began the process

of becoming baptized within the Jehovah's Witnesses.

81. As part of the process of becoming baptized, PLAINTIFF revealed GREEN's abuse of her to the Elders at CONGREGATION at the time. In response, the ELDERS commanded PLAINTIFF not to tell anyone about the abuse.

FIRST CAUSE OF ACTION
VIOLATION OF THE VICTIMS OF GENDER-MOTIVATED VIOLENCE
PROTECTION LAW
(Against ALL Defendants)

82. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

83. GREEN committed, directed, enabled, participated in, and/or conspired in the commission of crimes of violence motivated by gender under the Gender Motivated Violence Prevention Act, N.Y.C. Admin. Code § 10-1101, et seq. ("GMVA").

84. By failing to take action to prevent PLAINTIFF from being subjected to repeated violent acts by GREEN, including sexual abuse and molestation by Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 committed, directed, enabled, participated in, and/or conspired in the commission of crimes of violence motivated by gender under the GMVA.

85. GREEN's repeated violent acts against PLAINTIFF, including sexual assaults, constituted misdemeanors and/or felonies under state and/or federal law. The abuse committed while PLAINTIFF was a child are sexual offenses as defined by New York Penal Law § 130.

86. The requirement that these crimes of violence be committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim's gender is satisfied in part because GREEN assaulted PLAINTIFF without her consent, which she lacked capacity to give due to her minority. Gender animus inheres when consent is absent.

87. GREEN's sexual abuse and molestation of PLAINTIFF presented a serious risk of physical injury to her, including risk of injury to her genitals and risk of sexually-transmitted infection.

88. Upon information and belief, prior to and during GREEN's sexual abuse of PLAINTIFF, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew of the substantial risk of gender-motivated violence, including sexual abuse, of minors by its members in appointed positions, such as elders.

89. Upon information and belief, prior to and during GREEN's sexual abuse of PLAINTIFF, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew or should have known of GREEN's propensities to sexually abuse minors and/or of the sexual abuse of PLAINTIFF.

90. The aforementioned occurrences of gender-motivated violence were caused by the negligence, omissions, carelessness, recklessness, and the willful, wanton, reckless and grossly negligent conduct of Defendants and their agents, servants, and/or employees.

91. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damages as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and that PLAINTIFF as a result has become and will continue to be obligated to expend sums of money for medical expenses for treatment of said maladies.

92. As a result of Defendants' unlawful conduct, PLAINTIFF suffered damages in an amount to be determined at trial and pursuant to the fee-shifting provision of the GMVA.

93. That by reason of the foregoing, Defendants are also liable to PLAINTIFF for punitive and exemplary damages.

SECOND CAUSE OF ACTION
NEGLIGENT SUPERVISION
(Against ALL Defendants)

94. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

95. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 owed PLAINTIFF a duty of reasonable care to protect PLAINTIFF from injury.

96. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 owed PLAINTIFF a duty of care because Defendants had a special relationship with PLAINTIFF.

97. On information and belief, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and/or DOES 1-75 owned, operated, and controlled Bethel.

98. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew, or reasonably should have known, of GREEN's propensity to sexually abuse minors.

99. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew, or reasonably should have known, that minors traveling to Bethel with adult elders of the opposite sex unaccompanied by the minor's parents presented a risk of sexual abuse.

100. GREEN was appointed by Defendants WATCHTOWER and GOVERNING BODY and was an Elder from the time PLAINTIFF was 5 years old until she was 8 years old, from approximately 1985 to 1988.

101. When GREEN brought PLAINTIFF to Bethel, he was agent of Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 and was acting within the

course and scope of his authority as a WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's agent.

102. GREEN continued acting as an agent of Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 through the entire period during which GREEN sexually abused PLAINTIFF.

103. GREEN used his position of trust and authority vested in him by Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 for the purpose of sexually abusing PLAINTIFF.

104. By accepting PLAINTIFF, a minor, onto Bethel property without her parents present, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 had a duty to exercise the same degree of care and supervision over PLAINTIFF as a reasonably prudent parent would have exercised under the same circumstances.

105. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 failed to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.

106. During all material times, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 owed a duty to PLAINTIFF to take reasonable steps to protect PLAINTIFF from GREEN's sexual criminal acts.

107. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 had a duty to properly supervise GREEN as their agent because of their duty of care to PLAINTIFF.

108. The sexual abuse of PLAINTIFF by GREEN was foreseeable.

109. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew or should have known of GREEN's propensity to sexually abuse minors.

110. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 negligently failed to adequately implement a reasonable or effective supervisory system, plan, protocol or procedure for supervising its agents at Bethel to prevent inappropriate, offensive, sexual and/or abuse of unaccompanied minors by their agents.

111. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 negligently failed to supervise unaccompanied minors at Bethel, including PLAINTIFF.

112. PLAINTIFF was injured by Defendants WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's failure to provide PLAINTIFF the supervision of a parent of ordinary prudence under the same circumstances.

113. The injuries to PLAINTIFF were a foreseeable consequence of Defendants WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's negligent failure to supervise GREEN and PLAINTIFF.

114. PLAINTIFF's injuries were caused by or contributed to by the carelessness, recklessness and the grossly negligent conduct of Defendants WATCHTOWER, CCJW, GOVERNING BODY, and/or DOES 1-75 their agents, servants and/or employees, in failing to properly and adequately supervise the conduct of GREEN as it related to PLAINTIFF.

115. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 were wanton, reckless, and deliberately indifferent to abuse of PLAINTIFF by GREEN.

116. Defendants WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's disregard of PLAINTIFF's rights in permitting GREEN to sexually abuse PLAINTIFF multiple times, after they knew or should have known that GREEN was sexually abusing PLAINTIFF, rises to the level of willful and/or reckless disregard of PLAINTIFF's rights.

117. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75

consciously disregarded a substantial and unjustifiable risk of harm to PLAINTIFF when they permitted GREEN to be alone with PLAINTIFF at Bethel.

118. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including, but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, some or all of these injuries are of a permanent and lasting nature, and PLAINTIFF has become, and will continue to be, obligated to expend sums of money for medical expenses.

119. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 are liable to PLAINTIFF for punitive and exemplary damages.

120. Pursuant to CPLR § 1603, the foregoing cause of action is exempt from the operation of CPLR § 1601 by reason of one or more of the exemptions provided in CPLR § 1602, including but not limited to, CPLR § 1602(7).

121. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

THIRD CAUSE OF ACTION
NEGLIGENT HIRING AND RETENTION
(Against ALL Defendants)

122. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

123. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 were negligent in appointing and retaining GREEN as their agent.

124. Prior to GREEN's abuse of PLAINTIFF, Defendants WATCHTOWER, CCJW,

GOVERNING BODY, and DOES 1-75 had actual and/or constructive notice that GREEN posed a danger to children and should not have been permitted to engage in Jehovah's Witness' activities in close proximity to children, including PLAINTIFF.

125. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 failed to perform an appropriate inquiry into GREEN's background prior to appointing him to a position where he would have access to children, including PLAINTIFF.

126. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 breached their duty of care and were careless and negligent in failing to conduct a reasonable, careful and prudent investigation into GREEN's background, and had they done so, they would have discovered that GREEN should not have been appointed to a position of trust and confidence with children.

127. Defendants WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's duty of care to PLAINTIFF included a duty not to retain an agents like GREEN who used his position to harm minor members such as PLAINTIFF.

128. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew or should have known that GREEN was grooming PLAINTIFF for the purpose of sexually abusing her and failed to take any steps to stop the abuse or prevent harm to PLAINTIFF.

129. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew or should have known that GREEN was sexually abusing PLAINTIFF.

130. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 knew or should have known of GREEN's propensity to sexually abuse minors with whom he came in contact.

131. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75

negligently retained GREEN as their agent despite such knowledge.

132. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 are liable to PLAINTIFF as a result of their recklessness, official tolerance and deliberate indifference to the harm caused to PLAINTIFF by GREEN.

133. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 were wanton, reckless, and deliberately indifferent to abuse of PLAINTIFF by GREEN.

134. Defendants WATCHTOWER's, CCJW's, GOVERNING BODY's, and DOES 1-75's disregard of PLAINTIFF's rights in permitting GREEN to sexually abuse PLAINTIFF multiple times on the grounds of Bethel, after they knew or should have known that GREEN was sexually abusing PLAINTIFF, rises to the level of willful and/or reckless disregard of PLAINTIFF's rights.

135. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 consciously disregarded a substantial and unjustifiable risk of harm to PLAINTIFF when they permitted GREEN to be alone with PLAINTIFF and transport her to and from Bethel.

136. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including, but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, some or all of these injuries are of a permanent and lasting nature, and PLAINTIFF has become, and will continue to be, obligated to expend sums of money for medical expenses.

137. By reason of the foregoing, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 are liable to PLAINTIFF for punitive and exemplary damages.

138. Pursuant to CPLR § 1603, the foregoing cause of action is exempt from the

operation of CPLR § 1601 by reason of one or more of the exemptions provided in CPLR § 1602, including but not limited to, CPLR § 1602(7).

139. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

FOURTH CAUSE OF ACTION
NEGLIGENT FAILURE TO WARN, TRAIN, OR EDUCATE RELATING
TO SEXUAL ABUSE
(Against ALL Defendants)

140. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

141. Defendants WATCHTOWER, CCJW, GOVERNING BODY, DOES 1-75, and their agents, servants and employees owed a duty of care to PLAINTIFF as more fully alleged above. That duty included the duty to train and educate employees, volunteers, and/or agents and establish adequate and effective policies and procedures calculated to detect, prevent and address inappropriate behavior committed by any of its members, but especially its appointed elders.

142. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 did not establish effective training and education programs, policies and procedures for their employees, volunteers, and agents calculated to detect, prevent and address the problem of sexually inappropriate behavior committed within their institution.

143. In failing to establish such training and education programs, policies and procedures for employees, volunteers, and agents, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 failed to exercise the degree of care that a reasonably prudent organization, and/or parent would have exercised under similar circumstances.

144. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 had

a duty to train and educate its members, including PLAINTIFF and her family, on sexually inappropriate behavior and conduct, including grooming, and to establish effective policies and procedures to address said problems.

145. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 did not train and educate PLAINTIFF or her family on the problem of sexually inappropriate behavior and conduct and did not establish effective policies and procedures to address said problems.

146. In failing to establish such training and education programs, policies and procedures for minors like PLAINTIFF, Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 failed to exercise the degree of care that a reasonably prudent organization, and/or parent would have exercised under similar circumstances.

147. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 are liable to PLAINTIFF as the result of their negligent failure to establish effective training and education programs, policies and procedures for their administrators, teachers and employees calculated to detect and prevent inappropriate employee behavior and conduct, including employee-student boundary violations, sexually inappropriate employee behavior and conduct, and the sexual abuse of students by employees.

148. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 are also liable to PLAINTIFF for their failure to train and educate PLAINTIFF as a student on the problem of inappropriate employee behavior and conduct, including employee-student boundary violations, sexually inappropriate employee behavior and conduct, and the sexual abuse of students by employees and to establish effective policies and procedures to address said problems.

149. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75 were wanton, reckless, officially tolerant and deliberately indifferent by their failure to develop

such effective training and education programs, policies and procedures for employees, administrators and students.

150. Defendants WATCHTOWER, CCJW, GOVERNING BODY, and DOES 1-75, their agents, servants and employees were negligent, careless and reckless and acted willfully, wantonly and were grossly negligent in failing to establish adequate and effective professional training and education programs and procedures for their employees calculated to prevent abuse of youth.

151. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including, but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, some or all of these injuries are of a permanent and lasting nature, and PLAINTIFF has become, and will continue to be, obligated to expend sums of money for medical expenses.

152. By reason of the foregoing, Defendants are liable to PLAINTIFF for punitive and exemplary damages.

153. Pursuant to CPLR § 1603, the foregoing cause of action is exempt from the operation of CPLR § 1601 by reason of one or more of the exemptions provided in CPLR § 1602, including but not limited to, CPLR §§ 1602(7) and 1602(11).

154. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

FIFTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Against WATCHTOWER, CCJW, and DOES 1-50)

155. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained

in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

156. Defendants WATCHTOWER, CCJW, and DOES 1-50 knew, or in the exercise of reasonable care, should have known that their acts and omissions as described in this complaint would result in serious emotional distress to PLAINTIFF.

157. Defendants WATCHTOWER, CCJW, and DOES 1-50 acted with willful, wanton, reckless, intentional, and deliberate disregard for the likelihood that PLAINTIFF would suffer severe emotional distress as a direct and proximate result of the sexual abuse she endured.

158. The conduct of Defendants WATCHTOWER, CCJW and DOES 1-50 as alleged above was extreme and outrageous and went beyond all bounds of decency.

159. As a direct and proximate result of defendants' acts and omissions, PLAINTIFF suffered severe emotional distress.

160. By reason of the foregoing conduct by Defendants WATCHTOWER, CCJW, and DOES 1-50, PLAINTIFF suffered sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

161. As a result of the conduct by Defendants WATCHTOWER, CCJW, and DOES 1-50, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

162. By reason of the foregoing, Defendants WATCHTOWER, CCJW and DOES 1-50 are also liable to PLAINTIFF for punitive and exemplary damages.

163. The foregoing cause of action is exempt from the operation of CPLR § 1601 by reason of one or more of the exemptions provided in CPLR § 1602, including, but not limited to,

CPLR §§§ 1602(2)(iv), 1602(7) and 1602(11).

164. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

SIXTH CAUSE OF ACTION
SEXUAL ABUSE AND BATTERY
(Against WATCHTOWER, CCJW, and DOES 1-50)

165. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in preceding paragraphs of this Complaint inclusive with the same force and effect as if fully set forth herein.

166. Each respective instance of GREEN's sexual misconduct and inappropriate physical contact with PLAINTIFF constitutes battery.

167. Defendants WATCHTOWER, CCJW, and DOES 1-50, by their intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted GREEN.

168. Defendants WATCHTOWER, CCJW, and DOES 1-50, by failing to respond to his sexual abuse of PLAINTIFF once they learned of GREEN's sexual abuse of PLAINTIFF, WATCHTOWER, CCJW, and DOES 1-50 ratified GREEN's sexual abuse of PLAINTIFF.

169. Defendants WATCHTOWER, CCJW, and DOES 1-50, by actively concealing GREEN's sexual abuse of PLAINTIFF and by requiring PLAINTIFF to actively conceal her sexual abuse, WATCHTOWER, CCJW, and DOES 1-50 ratified GREEN's sexual abuse of PLAINTIFF.

170. By declining to contact law enforcement about GREEN's molestation of PLAINTIFF and others, and by protecting sexual offenders such as GREEN from detection or punishment, Defendants WATCHTOWER, CCJW, and DOES 1-50 thereby ratified the sexual

molestation of PLAINTIFF and others.

171. By reason of the foregoing conduct by Defendants WATCHTOWER, CCJW, and DOES 1-50, PLAINTIFF suffered sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

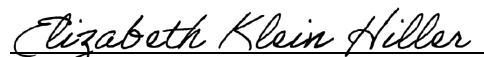
172. As a result of the conduct by Defendants WATCHTOWER, CCJW, and DOES 1-50, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

173. By reason of the foregoing, Defendants WATCHTOWER, CCJW, and DOES 1-50 are also liable to PLAINTIFF for punitive and exemplary damages.

WHEREFORE, PLAINTIFF demands judgment, respectively, against the designated Defendants on each of the First, Second, Third, Fourth, Fifth, and Sixth Causes of Action in a sum that exceeds the jurisdictional limits of all lower courts, including compensatory and punitive damages, together with interest, costs and disbursements pursuant to the causes of action herein.

Dated: June 16, 2026
New York, NY

THE ZALKIN LAW FIRM, LLP



Elizabeth Klein Hiller, Esq.

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STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

VERIFICATION BY ATTORNEY

ELIZABETH KLEIN HILLER, an attorney being duly admitted before the courts of the State of New York, hereby affirms the following under penalties of perjury:

That she is an attorney for the PLAINTIFF in the above-entitled action with offices located at 305 Broadway, 7th Floor, New York, New York 10007; that she has read the foregoing VERIFIED COMPLAINT and knows the contents thereof; that the same is true to her knowledge, except as to the matters stated to be alleged upon information and belief, and that as to those matters she believes them to be true.

That the reason why this verification is made by deponent instead of PLAINTIFF is because PLAINTIFF is not within the County of New York where deponent has her office. Deponent further says that the grounds of her belief as to all matters in the VERIFIED COMPLAINT not stated to be upon her knowledge are based upon conversations with the PLAINTIFF and other writings relevant to this action.

Dated: June 16, 2026
New York, NY

THE ZALKIN LAW FIRM, LLP


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