

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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AMALA MUHAMMED REDD,

Plaintiff,

-against-

BROOKLYN FRIENDS SCHOOL, JOHN AND JANE
DOE 1-30, MEMBERS OF THE BOARD OF
TRUSTEES OF BROOKLYN FRIENDS SCHOOL, in
their official and individual capacities, whose identities
are presently unknown to plaintiff, NEW YORK
MONTHLY MEETING, JOHN AND JANE DOE 31-60,
MEMBERS OF THE BOARD OF TRUSTEES OF NEW
YORK MONTHLY MEETING, in their official and
individual capacities, whose identities are presently
unknown to plaintiff, NEW YORK QUARTERLY
MEETING, JOHN AND JANE DOE 61-90, MEMBERS
OF THE BOARD OF TRUSTEES OF NEW YORK
QUARTERLY MEETING, in their official and individual
capacities, whose identities are presently unknown to
plaintiff and JESUS FLORES,

Defendants.

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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 the 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 appear or answer, judgment will be taken against you by default for the relief demanded

Plaintiff designates
Kings County as the
place of trial

Index No.

SUMMONS

Plaintiff resides at
40 W. 120th Street
New York, New York

The basis of venue is CPLR
§503(a) - a substantial part of the
events or omissions giving rise to
the claims occurred within Kings
County

in the complaint.

Dated: New York, New York
October 3, 2019

THE ZALKIN LAW FIRM, P.C.
Attorneys for Plaintiff

By: 

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By: 

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Defendants' addresses:

Brooklyn Friends School
375 Pearl Street
Brooklyn, NY 11201

Board of Trustees -
Brooklyn Friends School

New York Monthly Meeting
Brooklyn, NY

Board of Trustees -
New York Monthly Meeting

New York Quarterly Meeting
Brooklyn, NY

Board of Trustees -
New York Quarterly Meeting

Jesus Flores
Address unknown

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
Amala Muhammed Redd,

Plaintiff,

Index No.
Date Filed:

-against-

VERIFIED COMPLAINT

BROOKLYN FRIENDS SCHOOL, JOHN AND JANE
DOE 1-30, MEMBERS OF THE BOARD OF TRUSTEES
OF BROOKLYN FRIENDS SCHOOL, in their official and
individual capacities, whose identities are presently
unknown to Plaintiff, NEW YORK MONTHLY MEETING,
JOHN AND JANE DOE 31-60 MEMBERS OF THE BOARD
OF TRUSTEES OF NEW YORK MONTHLY MEETING,
In their official and individual capacities, whose identities
Are presently unknown to Plaintiff, NEW YORK QUARTERLY
MEETING, JOHN AND JANE DOE 61-90, MEMBERS OF
THE BOARD OF TRUSTEES OF NEW YORK QUARTERLY
MEETING, in their official and individual capacities, whose
identities are presently unknown to Plaintiff, and JESUS FLORES,

Defendants.
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Plaintiff, Amala Muhammed Redd, by her attorneys, THE ZALKIN LAW FIRM, P.C.
and BARASCH McGARRY SALZMAN & PENSON, upon information and belief and
at all times hereinafter mentioned, respectfully alleges as follows:

JURISDICTION AND VENUE

1. This action is timely commenced pursuant to the New York State Child Victims Act, dated February 14, 2019, and CLPR § 214-g.
2. This Court has jurisdiction pursuant to CPLR § 301 as Defendants' principal places of business are in New York and because the unlawful conduct complained of herein occurred in New York.
3. Venue is proper pursuant to CPLR § 503 because Kings County is the principal

place of business of Defendant BROOKLYN FRIENDS SCHOOL.

4. In addition, all of the events giving rise to this action occurred in Kings County.

AS AND FOR A FIRST CAUSE OF ACTION:

NEGLIGENT SUPERVISION

5. The Plaintiff, Amala Muhammed Redd (hereinafter "Plaintiff"), was born on February 17, 1972. She is a resident of the state of New York.
6. Plaintiff attended BROOKLYN FRIENDS SCHOOL from approximately 1979 through 1990, when she graduated from twelfth grade.
7. Defendant BROOKLYN FRIENDS SCHOOL was and is a private, non-profit corporation doing business in Kings County, New York.
8. Founded in 1867, BROOKLYN FRIENDS SCHOOL is a college preparatory school for learners from two years old through twelfth grade.
9. Defendant NEW YORK MONTHLY MEETING is at all material times an entity of unknown business structure, that nonetheless holds itself out as an entity, doing business in Kings County, New York.
10. Defendant NEW YORK QUARTERLY MEETING is at all material times a corporation, doing business in New York County, New York.
11. JOHN AND JANE DOE 1-30, whose names are presently unknown, were members of the BROOKLYN FRIENDS SCHOOL Board of Trustees.
12. The Board of Trustees was and is responsible for the operation of BROOKLYN FRIENDS SCHOOL, including setting high-level policies, supporting, hiring, and evaluating the Head of School, supporting and planning for the school's future, leading the school's financial support, and evaluating the school's performance.

13. JOHN AND JANE DOE 31-60, whose names are presently unknown, were members of the NEW YORK MONTHLY MEETING Board of Trustees.
14. The Board of Trustees have been the directors of the corporation and have been responsible for providing oversight in regard to the staffing and operation of the NEW YORK MONTHLY MEETING.
15. JOHN AND JANE DOE 61-90, whose names are presently unknown, were members of the NEW YORK QUARTERLY MEETING Board of Trustees.
16. The Board of Trustees have been the directors of the corporation and have been responsible for providing oversight in regard to the staffing and operation of the NEW YORK QUARTERLY MEETING.
17. Defendant JESUS FLORES (hereinafter "FLORES") was hired by BROOKLYN FRIENDS SCHOOL and worked as a janitor in or around the 1981-1982, and 1982-1983 school years.
18. When FLORES met Plaintiff, he was an employee and agent of BROOKLYN FRIENDS SCHOOL acting within the course and scope of his authority as a BROOKLYN FRIENDS SCHOOL employee.
19. FLORES continued acting as an employee and agent of BROOKLYN FRIENDS SCHOOL through the entire period when FLORES sexually abused Plaintiff.
20. Commencing in or around the first semester of the 1981-1982 school year, FLORES began a process of grooming Plaintiff with the goal of sexually abusing her.
21. The grooming included but was not limited to an escalating pattern of sexual abuse accompanied by FLORES giving Plaintiff special attention, calling her out

- of class, and giving her candy, chips or other food.
22. The grooming included FLORES coming to Plaintiff's classes and removing her from class under the pretext that Plaintiff was needed elsewhere or had received a telephone call.
 23. Upon information and belief, Plaintiffs' teachers readily permitted FLORES, a custodian, to remove Plaintiff from classes with no proof to support his justifications that Plaintiff was needed elsewhere.
 24. Plaintiff was molested and raped on these occasions.
 25. This above-mentioned grooming behavior - particularly removing Plaintiff from class - was done in the presence of or within the observation of BROOKLYN FRIENDS SCHOOL employees.
 26. Between in or around the first semester of the 1981-1982 school year, FLORES sexually abused Plaintiff. The sexual abuse included but was not limited to, FLORES openly kissing Plaintiff on school grounds, instructing Plaintiff in how to perform oral sex on FLORES, Plaintiff complying with FLORES' demands to perform oral sex on FLORES, forcible intercourse between FLORES and Plaintiff, and FLORES raping Plaintiff in a sports closet at BROOKLYN FRIENDS SCHOOL. Plaintiff estimates the abuse occurred over the course of several months between second and third grade.
 27. FLORES'S acts committed against Plaintiff while she was a child are sexual offenses as defined by New York Penal Law 130.
 28. After several occasions when FLORES had removed Plaintiff from her class, Plaintiff's third grade teacher concluded that it was strange for a custodian to

- remove a student from class and stopped allowing FLORES to take Plaintiff.
29. Plaintiff's gym teacher continued to allow FLORES to access Plaintiff and remove her from gym class. Plaintiff continued to be molested and was raped on these occasions.
 30. To avoid continued sexual misconduct by FLORES, Plaintiff began hurting herself, such as biting her lip until it bled or banging her arm into a wall, so that she could be excused from gym class.
 31. Eventually, a teacher from the BROOKLYN FRIENDS SCHOOL, Todd Jackson, found FLORES molesting Plaintiff.
 32. Jackson took Plaintiff to the principal's office to report the abuse to the office secretary.
 33. The school called Plaintiff's mother and law enforcement.
 34. Plaintiff was not the only BROOKLYN FRIENDS SCHOOL student FLORES abused.
 35. During all material times herein, when Plaintiff was enrolled in school and communicating and otherwise interacting with FLORES, she was entrusted by her parent to the care of all Defendants and during such periods the Defendants were acting in the capacity of *in loco parentis* because Defendants assumed custody and control over her as a minor child and as a student at the school.
 36. FLORES used his position of trust and authority vested in him by the Defendants for the purpose of sexually abusing Plaintiff.
 37. The sexual abuse of Plaintiff by FLORES was foreseeable.
 38. Defendants had the duty to exercise the same degree of care and supervision over

the students including Plaintiff under their control as a reasonably prudent parent would have exercised under the same circumstances.

39. Defendants had a duty of care to protect the safety and welfare of Plaintiff as a student at BROOKLYN FRIENDS SCHOOL.
40. Defendants owed a duty to Plaintiff to provide a safe and nurturing educational environment, where she would be protected from staff like FLORES who were under the employment and control of the Defendants.
41. During FLORES's employment by BROOKLYN FRIENDS SCHOOL and while Plaintiff was a student in BROOKLYN FRIENDS SCHOOL's care, Defendants failed to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.
42. During all material times, BROOKLYN FRIENDS SCHOOL owed a duty to Plaintiff to take reasonable steps to protect Plaintiff from FLORES'S sexual criminal acts.
43. Defendants had a duty to properly supervise FLORES as their employee and because of their duty of care to Plaintiff.
44. Defendants knew or should have known of FLORES's propensity to sexually abuse minor students.
45. Defendants should have recognized that FLORES'S interest in Plaintiff was inappropriate, and the janitor should not have been permitted to remove Plaintiff from class.
46. Defendants negligently failed to adequately implement a reasonable or effective supervisory system, plan, protocol or procedure for supervising personnel so as to

prevent inappropriate, offensive, sexual and/or abuse of students by BROOKLYN FRIENDS SCHOOL employees.

47. Defendants negligently failed to supervise its students, including the Plaintiff.
48. Plaintiff was injured by Defendants' failure to provide Plaintiff the supervision of a parent of ordinary prudence under the same circumstances.
49. The injuries to Plaintiff were a foreseeable consequence of Defendants' negligent failure to supervise FLORES and Plaintiff.
50. Plaintiff's injuries were caused by or contributed to by the carelessness, recklessness and the grossly negligent conduct of the Defendants, their agents, servants and/or employees, in failing to properly and adequately supervise the conduct of FLORES as it related to the Plaintiff.
51. Defendants were wanton, reckless, and deliberately indifferent to abuse of Plaintiff by FLORES.
52. 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.
53. Defendants are liable to Plaintiff for punitive and exemplary damages.
54. 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).

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

AS AND FOR A SECOND CAUSE OF ACTION:

NEGLIGENT HIRING AND RETENTION

56. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
57. Defendants were negligent in hiring FLORES.
58. Prior to FLORES's abuse of Plaintiff, defendants had actual and/or constructive notice that FLORES posed a danger to children, and should not have been permitted to work in close proximity to children, including the Plaintiff.
59. Defendants failed to perform an appropriate inquiry into FLORES's background prior to hiring him to work in a position where he would have access to children, including the Plaintiff.
60. Defendants breached its duty of care and was careless and negligent in failing to conduct a reasonable, careful and prudent investigation into the past work history of FLORES, and had it done so, it would have discovered that FLORES should not be hired for a position in a school and should not be placed in a position of trust and confidence with children.
61. Defendants' duty of care to the Plaintiff included a duty not to retain an employee like FLORES who used his position to harm students such as Plaintiff.
62. Defendants knew or should have known that FLORES 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.

63. Defendants knew or should have known that FLORES was sexually abusing Plaintiff.
64. Defendants knew or should have known of FLORES's propensity to sexually abuse minor students with whom he came in contact.
65. Defendants should have terminated FLORES's employment.
66. Defendants negligently failed to terminate FLORES's employment.
67. Defendants are liable to Plaintiff as a result of their recklessness, official tolerance and deliberate indifference to the harm caused to Plaintiff by FLORES.
68. 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.
69. By reason of the foregoing, Defendants are liable to Plaintiff for punitive and exemplary damages.
70. 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).
71. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION:

**NEGLIGENT FAILURE TO TRAIN TEACHERS AND ADMINISTRATORS RELATED
TO SEXUAL ABUSE AND TRAIN STUDENTS RELATING TO SEXUAL ABUSE**

72. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
73. Defendants, 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 and administrators and establish adequate and effective policies and procedures calculated to detect, prevent and address inappropriate employee behavior and conduct including employee-student boundary violations, sexually inappropriate employee behavior and conduct and the sexual abuse of students by employees for the purpose of preventing the sexual abuse of students like Plaintiff.
74. Defendants did not establish effective training and education programs, policies and procedures for their administrators, teachers and employees calculated to detect, prevent and address the problem of the inappropriate employee behavior and conduct including employee-student boundary violations, sexually inappropriate employee behavior and conduct and the sexual abuse of students by employees.
75. In failing to establish such training and education programs, policies and procedures for employees and administrators, Defendants failed to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.

76. Defendants had a duty to train and educate students including Plaintiff on 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.
77. Defendants did not train and educate Plaintiff 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 did not establish effective policies and procedures to address said problems.
78. In failing to establish such training and education programs, policies and procedures for students like Plaintiff, Defendants failed to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.
79. Defendants 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.
80. Defendants 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.

81. Defendants 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.
82. Defendants, 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.
83. 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.
84. By reason of the foregoing, Defendants are liable to Plaintiff for punitive and exemplary damages.
85. 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).
86. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FOURTH CAUSE OF ACTION:

NEGLIGENT FAILURE TO PROVIDE A SAFE AND SECURE ENVIRONMENT

87. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
88. During all material times, BROOKLYN FRIENDS SCHOOL owed a duty to Plaintiff as a student, to be reasonably alert to threats to her safety posed by its employees and to protect her from such threats.
89. By virtue of both their duty of care to Plaintiff and the positions of authority and influence they exercised over her, Defendants had a duty to Plaintiff to provide her a reasonably safe and secure environment at BROOKLYN FRIENDS SCHOOL.
90. Defendants failed to provide a reasonably safe environment to Plaintiff by failing to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances.
91. As a result, Defendants are liable to Plaintiff for their negligent failure to provide a reasonably safe and secure environment.
92. Defendants were wanton, reckless, officially tolerant and deliberately indifferent by their failure to provide Plaintiff with a safe and secure environment at the BROOKLYN FRIENDS SCHOOL.
93. 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.

94. By reason of the foregoing, Defendants are liable to Plaintiff for punitive and exemplary damages.
95. 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).
96. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FIFTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

97. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
98. Defendants 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.
99. Defendants 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.
100. Defendants' conduct as alleged above was extreme and outrageous, and went beyond all bounds of decency.
101. As a direct and proximate result of defendants' acts and omissions, Plaintiff

suffered severe emotional distress.

102. As a result of defendants' conduct, Plaintiff has and will become obligated to expend sums of money for medical treatment.
103. By reason of the foregoing, defendants are also liable to Plaintiff for punitive and exemplary damages.
104. 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).
105. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A SIXTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

106. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
107. Defendants knew, or in the exercise of reasonable care should have known, that their acts and omissions would result in serious emotional distress to Plaintiff.
108. Defendants, in hiring and retaining FLORES to work in close proximity to children, including plaintiff, had a duty to ensure that FLORES did not pose a threat of harm to plaintiff.
109. Defendants negligently and carelessly breached that duty in disregard for the likelihood that Plaintiff would suffer severe emotional distress as a direct result.
110. As a direct and proximate result of defendants' negligence as described above, Plaintiff suffered severe emotional distress.

111. As a result of defendants' conduct, Plaintiff has and will become obligated to expend sums of money for medical treatment.
112. By reason of the foregoing, defendants are also liable to Plaintiff for punitive and exemplary damages.
113. 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).
114. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A SEVENTH CAUSE OF ACTION

SEXUAL ABUSE AND BATTERY

115. Plaintiff repeats and realleges the above paragraphs of this Complaint as if fully set forth herein.
116. Each instance of FLORES'S sexual misconduct and inappropriate physical contact with Plaintiff constitutes a battery.
117. Defendant FLORES is liable to plaintiff for sexual abuse and battery of Plaintiff, as set forth in the foregoing paragraphs.
118. Defendants by their intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report or investigate, aided and abetted FLORES.
119. 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

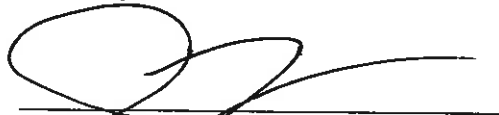
caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, some or all of these injuries are of a permanent and lasting nature, and Plaintiff has become, and will continue to be, obligated to expend sums of money for medical expenses.

120. By reason of the foregoing, defendants are also liable to Plaintiff for punitive and exemplary damages.
121. 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).
122. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, the Plaintiff demands judgment against the Defendants, together with compensatory and punitive damages, and the interest, costs and disbursements pursuant to the causes of action herein.

Dated: October 2, 2019
New York, New York

THE ZALKIN LAW FIRM, P.C.
Attorneys for Plaintiff



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