

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

**SUMMONS**

-----X  
JANE DOE,

Index No.

Plaintiff,

Plaintiff designates Kings  
County as place of trial.

-against-

ANONYMOUS #1, an individual, and  
ANONYMOUS #2-4, corporate entities,

The basis of venue is the  
defendant's addresses, 1994  
Coney Island Ave., Brooklyn,  
NY 11229

Defendants.

ANONYMOUS #2-4,  
corporate entities,

-----X

**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 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 in the complaint.

Dated: New York, New York  
October 22, 2020

Yours, etc.  
Jane Doe  
*Pro Se*  
69 Charles St, Apt.  
NY, NY 10591  
Tel: (917) 601-7137

By: Jane Doe  
JANE DOE  
janedoeprotects@gmail.com

To:  
Defendants' Addresses:  
ANONYMOUS #1, an individual,  
1994 Coney Island Ave. Brooklyn,  
NY 11229  
ANONYMOUS #2-4, corporate  
entities,  
1945 EAST 14TH STREET  
BROOKLYN, NEW YORK, 11229

ANONYMOUS #2-4, corporate entities,  
1994 Coney Island Ave.  
Brooklyn, NY 11229  
ANONYMOUS #2-4, corporate entities,  
1945 EAST 14TH STREET  
BROOKLYN, NEW YORK, 11229

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
JANE DOE,

Plaintiff,

-against-

ANONYMOUS #1, an individual, and ANONYMOUS #2-4,  
corporate entities,

Defendants.

-----X  
Plaintiff, JANE DOE, appearing *pro se*, complaining of the defendants herein, respectfully

alleges upon information and belief as follows:

**COMPLAINT**

Index No.

**NATURE OF THE ACTION**

1. This is the case of JANE DOE (“DOE”), who was subjected to sexual abuse by the defendant, ANONYMOUS #1, an individual, (“ANONYMOUS #1”), when she visited the wellness office of ANONYMOUS #2-4, corporate entities. The sickening incident took place under the guise of “wellness treatments,” which the plaintiff later learned was neither necessary nor otherwise indicated. Rather, it was simply an opportunity for the predator, ANONYMOUS #1, to subject the plaintiff to shocking and disgraceful acts of sexual abuse.

2. Ms. DOE has had to endure the humiliation and feeling of abuse and helplessness as a result of being molested by ANONYMOUS #1. This incident has been very distressful to Ms. DOE, who relives it frequently, alternatively with sadness and anger. She has also feared that she would be harmed by ANONYMOUS #1 if she reported the incident to the police. Ms. DOE is frequently troubled by intrusive thoughts of the molestation, and she continues to try to heal to date.

3. Ms. DOE brings this lawsuit to protect her rights, to make sure that nobody else has to endure abuse at the hands of ANONYMOUS #1.

**THE PARTIES**

4. Plaintiff DOE resides in the County of Westchester, State of New York.
5. Upon information and belief, at all times mentioned defendant ANONYMOUS #1 is a resident of the County of Kings, State of New York.
6. Upon information and belief, at all times mentioned defendant ANONYMOUS #1 is an advanced certified user of wellness and FDA regulated devices known as BioWell and Ondamed, who resides in the State of New York, and who practiced – and still practices -- as energy healer, mindfulness, and wellness coach in the County of Kings, in the City and State of New York.
7. At all times mentioned, defendant ANONYMOUS #2-4, corporate entities is a domestic business corporation that maintains an office at 1994 Coney Island Ave., Brooklyn, NY 11229 or 1945 EAST 14TH STREET, Brooklyn, NY 11229 which provides care for clients, including the plaintiff DOE, and holds itself out to be an office that provides legitimate wellness advice, treatment, consultation, and services.
8. At all times mentioned, defendant ANONYMOUS #1 was an employee of defendant ANONYMOUS #2-4, corporate entities.
9. At all times mentioned, defendant ANONYMOUS #1 was an agent, servant, and/or contractor of defendant ANONYMOUS #2-4, corporate entities.
10. At all times mentioned, defendant ANONYMOUS #1 and defendant ANONYMOUS #2-4, acted in concert with one another such that each was responsible for the acts of the other.
11. At all times mentioned, DOE was a client of both ANONYMOUS #1 and ANONYMOUS #2-4.
12. At all times mentioned, DOE trusted the defendants ANONYMOUS #1 and Anonymous #2-4 to provide legitimate wellness advice, treatment, consultation, and services in accordance with standards of such facilities in the community.

**FACTS**

13. ANONYMOUS #2-4 advertises as a “boutique quantum healing practice,” which has “a culture based on lifelong practitioner-client relationship, compassion, and delivering highest quality clean eating, energy healing, and mindfulness exercise care available.”

14. ANONYMOUS #1 holds himself out to the public as reiki master and wellness expert who provides “Nutrition-Coaching-Exercise-Mindfulness.”

15. On or about October 18, 2019, the plaintiff DOE presented to ANONYMOUS #1 and ANONYMOUS #2-4 for wellness treatments, including the use of the BioWell and the Ondamed devices.

16. During this first visit, on or about October 18, 2020, ANONYMOUS #1 appeared to be rendering services that were appropriate and those that she expected to received.

17. On or about October 23, 2019, and on a subsequent visit, ANONYMOUS #1, under the guise of providing legitimate wellness services, touched the plaintiff in a manner that she neither wanted nor otherwise sought. The defendant ANONYMOUS #1 told her that she must be nude for purposes of resonance. Then, specifically, the defendant ANONYMOUS #1 touched the plaintiff’s vaginal area, breasts, buttocks, anus, and positioned himself atop her. Further, while she was unclothed for the purpose of receiving wellness treatments that ANONYMOUS #1 told her were necessary, ANONYMOUS #1 kissed the plaintiff in her genital area. During these sessions he also took out his penis and propositioned the plaintiff for sexual intercourse.

**AS AND FOR A FIRST CAUSE OF ACTION  
AGAINST DEFENDANTS ANONYMOUS #1 and ANONYMOUS #2-4: NEGLIGENCE**

18. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 17 inclusive with the same force and effect as though all were set forth more fully at length herein.

19. At all times mentioned herein, defendants ANONYMOUS #2-4 and ANONYMOUS #1,

and/or their agents, servants, employees, and contractors owed their clients, including DOE, a duty of care to keep them safe from sexual assault, sexual battery, assault, battery, misconduct, and other harms that ultimately befell DOE.

20. The defendant ANONYMOUS #2-4 had a duty to conduct its hiring practices, supervise those whom it did hire, and prevent known risks of harm and otherwise act in a manner that would not permit retention of those who may pose such risks of harm or act harmfully.

21. The defendant ANONYMOUS #2-4 knew or should have known of the vicious propensities of the defendant ANONYMOUS #1, as well as his prior bad acts, including those that made the sort of conduct that caused the harms here foreseeable.

22. The defendant ANONYMOUS #2-4 was negligent in hiring, supervising, and retaining its personnel, including ANONYMOUS #1, who was careless, unskillful, negligent, reckless, and acted in a willful and want manner, and who did not possess the requisite knowledge and skill of people caring for those who seek medical and quantum mindfulness energy healing treatment in the community.

23. At all times mentioned herein, defendants ANONYMOUS #2-4 and ANONYMOUS #1, and/or their agents, servants, employees, and contractors breached the above-stated duty in a negligent, reckless, and willful and wanton manner, and caused DOE to be sexually assaulted, sexually battered, assaulted, battered, and subject to misconduct and other harms.

24. The defendants ANONYMOUS #2-4 and ANONYMOUS #1 knew or reasonably should have known that the failure to properly act would and did proximately result in causing the plaintiff to suffer severe emotional distress.

25. The defendants had the power, ability, authority, and duty to stop the improper conduct that resulted in the harm to the plaintiff DOE and/or to intervene to prevent or prohibit said conduct.

26. Despite said knowledge, power, and duty, the defendants negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in the harm to the plaintiff DOE or otherwise protect him.

27. As a direct and proximate result of the negligence of ANONYMOUS #2-4 and ANONYMOUS #1, the, plaintiff DOE was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, nightmares, insomnia, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not as yet been ascertained.

28. By reason of the foregoing, the plaintiff DOE is entitled to compensatory damages from the defendants in such sums a jury would find just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from the defendants in such sums as a jury would find just and appropriate to deter the defendants and others from future similar misconduct.

29. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION  
AGAINST DEFENDANT ANONYMOUS #1: SEXUAL  
BATTERY**

30. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 29 inclusive with the same force and effect as though all were set forth more fully at length herein.

31. The defendants and their agents' barbaric acts against plaintiff DOE amounted to harmful and offensive contacts to the plaintiff's person, all of which were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

32. Such acts were of a sexual nature and were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

33. As a direct and proximate result of the sexual battery by ANONYMOUS #1, the plaintiff

DOE was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, nightmares, insomnia, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been ascertained.

34. As a direct and proximate result of the sexual battery by ANONYMOUS #1, the plaintiff DOE has incurred expenses and other economic damages, and continues to be suffering and in pain, and will now be obligated to expend sums of money for care and attention in an effort to be cured of her harms and losses, and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation. DOE was unable, and continues to be unable to pursue her usual activities, all due to her psychological and emotional injuries and damage.

35. By reason of the foregoing, the plaintiff DOE is entitled to compensatory damages from the defendants in such sums a jury would find just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from the defendants in such sums as a jury would find just and appropriate to deter the defendants and others from future similar misconduct.

36. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**AS AND FOR A THIRD CAUSE OF ACTION  
AGAINST DEFENDANT ANONYMOUS #1: SEXUAL ASSAULT**

37. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 36 inclusive with the same force and effect as though all were set forth more fully at length herein.

38. The defendants and their agents' barbaric acts against plaintiff DOE amounted to a series of events creating a reasonable apprehension in plaintiff of immediate harmful and offensive sexual contacts to plaintiff's person, all of which were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

39. Such acts were of a sexual nature and were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

40. As a direct and proximate result of the sexual assault by ANONYMOUS #1, the plaintiff DOE was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, nightmares, insomnia, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been ascertained.

41. As a direct and proximate result of the sexual assault by ANONYMOUS #1, the plaintiff DOE has incurred expenses and other economic damages, and continues to be suffering and in pain, and will now be obligated to expend sums of money for care and attention in an effort to be cured of her harms and losses, and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation. DOE was unable, and continues to be unable to pursue her usual activities, all due to her psychological and emotional injuries and damage.

42. By reason of the foregoing, the plaintiff DOE is entitled to compensatory damages from the defendants in such sums a jury would find just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from the defendants in such sums as a jury would find just and appropriate to deter the defendants and others from future similar misconduct.

43. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**AS AND FOR A FOURTH CAUSE OF ACTION  
AGAINST DEFENDANT ANONYMOUS #1: BATTERY**

44. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 43 inclusive with the same force and effect as though all were set forth more fully at length herein.

45. The defendants and their agents' barbaric acts against plaintiff DOE amounted to

harmful and offensive contacts to the plaintiff's person, all of which were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

46. Such acts were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

47. As a direct and proximate result of the battery by ANONYMOUS #1, the plaintiff DOE was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, nightmares, insomnia, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been ascertained.

48. As a direct and proximate result of the battery by ANONYMOUS #1, the plaintiff DOE has incurred expenses and other economic damages, and continues to be suffering and in pain, and will now be obligated to expend sums of money for care and attention in an effort to be cured of her harms and losses, and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation. DOE was unable, and continues to be unable to pursue her usual activities, all due to her psychological and emotional injuries and damage.

49. By reason of the foregoing, the plaintiff DOE is entitled to compensatory damages from the defendants in such sums a jury would find just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from the defendants in such sums as a jury would find just and appropriate to deter the defendants and others from future similar misconduct.

50. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**AS AND FOR A FIFTH CAUSE OF ACTION AGAINST  
DEFENDANT ANONYMOUS #1: ASSAULT**

51. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 50 inclusive with the same force and effect as though all were set

forth more fully at length herein.

52. The defendants and their agents' barbaric acts against plaintiff DOE amounted to a series of events creating a reasonable apprehension in plaintiff of immediate harmful and offensive contacts to plaintiff's person, all of which were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

53. Such acts were done intentionally by the defendants to the plaintiff without the plaintiff's consent.

54. As a direct and proximate result of the assault by ANONYMOUS #1, the plaintiff DOE was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, nightmares, insomnia, mental anguish, and/or physical manifestations thereof, and other losses, all of which have not yet been ascertained.

55. As a direct and proximate result of the assault by ANONYMOUS #1, the plaintiff DOE has incurred expenses and other economic damages, and continues to be suffering and in pain, and will now be obligated to expend sums of money for care and attention in an effort to be cured of her harms and losses, and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation. DOE was unable, and continues to be unable to pursue her usual activities, all due to her psychological and emotional injuries and damage.

56. By reason of the foregoing, the plaintiff DOE is entitled to compensatory damages from the defendants in such sums a jury would find just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from the defendants in such sums as a jury would find just and appropriate to deter the defendants and others from future similar misconduct.

57. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**AS AND FOR A SIXTH CAUSE OF ACTION AGAINST DEFENDANT ANONYMOUS #1:  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

58. Plaintiff DOE repeats and realleges each and every allegation of the complaint in paragraphs numbered 1 through 57 inclusive with the same force and effect as though all were set forth more fully at length herein.

59. The defendant ANONYMOUS #1 engaged in outrageous conduct towards the plaintiff, DOE, with the intention to cause, or with reckless disregard of the probability of causing the plaintiff to suffer severe emotional distress.

60. The defendant ANONYMOUS #1 committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring the plaintiff DOE from an improper and evil motive amounting to malice and conscious disregard of the plaintiff's rights, entitling the plaintiff to recover punitive damages in amounts to be proven at trial. The sum of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

**ARTICLE 16 ALLEGATIONS**

61. This action falls within one or more of the exceptions set forth in CPLR 1602, and as such the defendants are jointly and severally liable pursuant to the exceptions set forth in Article 16 of the CPLR.

62. Pursuant to CPLR 1602(2)(iv), all defendants to actions arising from the same set of facts are jointly and severally liable for all of plaintiff's damages, including but not limited to plaintiff's non-economic loss, irrespective of the provisions of CPLR 1601, by reason of the fact that defendants owed the plaintiff a non-delegable duty of care.

63. Pursuant to CPLR 1602(5), all defendants to actions arising from the same set of facts

are jointly and severally liable for all of plaintiff's damages, including but not limited to plaintiff's non-economic loss, irrespective of the provisions of CPLR 1601, by reason of the fact that this is an action requiring proof of intent.

64. Pursuant to CPLR 1602(7), all defendants to actions arising from the same set of facts are jointly and severally liable for all of plaintiff's damages, including but not limited to plaintiff's non-economic loss, including but not limited to plaintiff's non-economic loss, irrespective of the provisions of CPLR 1601, by reason of the fact that defendants acted with reckless disregard for the safety of others.

65. Pursuant to CPLR 1602(11), all defendants to actions arising from the same set of facts are jointly and severally liable for all of plaintiff's damages, including but not limited to plaintiff's non-economic loss, including but not limited to plaintiff's non-economic loss, irrespective of the provisions of CPLR 1601, by reason of the fact that defendants acted knowingly or intentionally, and in concert, to cause the acts or failures upon which liability is based.

WHEREFORE, the plaintiff JANE DOE (a client of the defendants whose name is known but withheld due to the nature of the claims herein), demands judgment against ANONYMOUS #1 and ANONYMOUS #2-4, corporate entities, on all causes of action in an amount which exceeds the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this action, together with punitive damages to the extent allowable by law, interest, costs and disbursements of this action.

Dated: New York, New York  
October 22, 2020

Yours, etc.  
Jane Doe  
*Pro Se*  
69 Charles St, #1  
New York, NY 10014  
Tel: (917) 601-7137

By: Jane Doe

JANE DOE  
janedoeprotects@gmail.com