

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

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ABDULLAH ISLAMOVIC,

Plaintiff,

-against-

DARUL-ULOOM AL-MADANIA, INC. AND JOHN  
DOES 1-5,

Defendants.

-----X

TO THE ABOVE-NAMED DEFENDANT:

You are hereby summoned and required to serve upon Plaintiff's attorney an answer to the complaint in this action within 20 days after the service of this summons, exclusive of the day of service, or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, NY  
May 17, 2021

The Law Firm of Andrew M. Stengel, P.C.  
Cooper Erving & Savage LLP  
*Attorneys for Plaintiff Abdullah Islamovic*



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SUPREME COURT OF THE STATE OF NEW YORK  
ERIE COUNTY

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ABDULLAH ISLAMOVIC,

Plaintiff,

-against-

DARUL-ULOOM AL-MADANIA, INC., AND JOHN  
DOES 1-5,

Defendants.

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Index No.

**VERIFIED COMPLAINT**

Jury Trial Demanded

**NATURE OF ACTION**

1. Pursuant to CPLR § 214-g, New York’s Child Victims Act (the “CVA”), Plaintiff brings this revival action to vindicate his rights. The CVA historically opened a period for victims and survivors of childhood sexual abuse in the State of New York to pursue claims that would otherwise be untimely.

2. Plaintiff Abdullah Islamovic is a 33-year-old resident of Ontario, Canada.

3. From or about 1999 to or about 2001 Plaintiff attended the 5th, 6th and 7th grades, and lived, at Defendant Darul-Uloom Al-Madania Inc.’s Boys School in Buffalo, New York, during the academic years.

4. During his time as a student from the approximate ages of 11 to 13 years old, Plaintiff was sexually molested and abused by an adult school teacher (“Teacher Doe”) who was employed by Defendant Darul-Uloom Al-Madania Inc.’s Boys School.

5. Teacher Doe began sexually molesting Plaintiff in the bathroom of Darul-Uloom Al-Madania Inc.’s mosque.

6. While Plaintiff attended and was under the care of Defendant Darul-Uloom Al-Madania Inc., Teacher Doe was promoted to the head of the boys' dormitory, which gave Teacher Doe increased access to Plaintiff.

7. Defendant Teacher Doe was the head of the boys' dormitory, he sexually molested and abused Plaintiff on approximately ten occasions.

8. The sexual molestation and abuse of Plaintiff was so obvious and pervasive that Plaintiff's fellow students teased him about the sexual molestation and abuse by Teacher Doe.

9. As a result of the sexual molestation and abuse, Plaintiff has suffered severe psychological and emotional trauma and he has been diagnosed with anxiety disorder and he has symptoms that are consistent with post-traumatic stress disorder.

#### **PARTIES, JURISDICTION AND VENUE**

10. Plaintiff Abdullah Islamovic is a citizen of Canada and at all relevant times to this complaint, he was living in Buffalo, New York, in the care and custody of Darul-Uloom Al-Madania Inc. and its Boys School.

11. At all times relevant, and to the present day, Darul-Uloom Al-Madania Inc. is and was a domestic religious corporation organized under Article 9 of the Religious Corporation Law of the State of New York that offers Islamic education to students from kindergarten to 10th grade. Darul-Uloom Al-Madania Boys School is owned, operated and controlled by Defendant Darul-Uloom Al-Madania Inc.

12. Defendant John Doe 1 ("Teacher Doe") is the individual who committed the illegal, heinous and immoral acts described herein that give rise to Plaintiff's allegations.

13. Defendants John Doe 2-5 are fictitious names intended to represent the names of any and all employees, contractors, or other organizations or persons who should have done something to stop or prevent the abuse.

14. This Court has jurisdiction over the subject matter of this action and the parties pursuant to CPLR 301.

15. This Court has jurisdiction over this action because the amount of damages Plaintiff seeks exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

16. Venue is proper in Erie County pursuant to CPLR 503 because Defendant Darul-Uloom Al-Madania Inc.'s principal office is located in Erie County and/or resides in Erie County and/or a substantial part of the events giving rise to the claims occurred in Erie County.

#### **CHILD VICTIMS ACT**

17. Each of Plaintiff's causes of action is timely pursuant to New York's Child Victims Act (CPLR § 214-g), which was enacted on February 14, 2019. Plaintiff alleges that Defendants committed intentional or negligent acts or omissions that resulted in Plaintiff suffering physical, psychological or other injuries or conditions as a direct and proximate result of conduct that constitutes sexual offenses committed against a child less than 18 years of age, as defined in Article 130 of the New York State Penal Law. This action is commenced within the time limits of CPLR § 214-g.

#### **JURY DEMAND**

18. Plaintiff demands a trial by jury on all issues so triable.

#### **FACTUAL ALLEGATIONS**

19. At all times relevant and material hereto, Defendant Darul-Uloom Al-Madania,

Inc. was responsible for providing for the care, protection and safety of students enrolled and living at and within its Boys School in Buffalo, New York.

20. At all times relevant and material hereto, Teacher Doe was on the staff of, acted as an agent and served as an employee of Defendant Darul-Uloom Al-Madania, Inc. and worked at the Boys School that Plaintiff attended.

21. From or about November 1999 to or about July 2001, from the approximate ages of 11 to 13 years old, Plaintiff was a student at the Boys School of Defendant Darul-Uloom Al-Madania, Inc. where he attended the 5th, 6th and 7th grades.

22. At all relevant times throughout the academic year Plaintiff lived at the school located in Buffalo, New York.

23. At all relevant times, administrators and employees of Darul-Uloom Al-Madania, Inc. fostered a culture of physical abuse and secrecy by regularly beating students, which included the use of weapons to inflict pain and injury.

24. Administrators and employees of Darul-Uloom Al-Madania, Inc. also authorized students to inflict physical abuse on fellow students.

25. A custodian at Darul-Uloom Al-Madania, Inc., who was an adult and weighed approximately 300 pounds, punched Plaintiff in the chest because Plaintiff possessed a toaster in the dormitory.

26. Plaintiff complained to his parents about the physical assault by the custodian and in turn Plaintiff's parents complained to school Vice Principal Mansoor Memon ("Memon").

27. After the complaint by Plaintiff's parents, Memon called Plaintiff into his office where he physically assaulted Plaintiff with a hockey stick as punishment for complaining to his

parents about the prior physical assault.

28. Following Memon's assault on Plaintiff, the school custodian regularly assaulted Plaintiff without justification.

29. In or about the winter of 1999 to 2000, when Plaintiff was approximately 11 years old in the 5th grade, an adult teacher ("Teacher Doe") at Darul-Uloom Al-Madania, Inc. brought Plaintiff into the bathroom inside a mosque located at 182 Sobieski Street in Buffalo where Teacher Doe fondled Plaintiff's penis.

30. Beginning in or about spring 2000, Teacher Doe was promoted to oversee the Boys School dormitory located at 921 Sycamore Street in Buffalo where Plaintiff slept when he attended school.

31. From or about March 2000 to July 2001, when Plaintiff was approximately 11 and 12 years old, he was sexually molested by Teacher Doe in his bed at night when Teacher Doe would fondle Plaintiff's genitals with his hands.

32. The sexual abuse of Plaintiff by Teacher Doe was so pervasive and obvious that Plaintiff's classmates openly teased him about the sexual abuse.

33. The acts of Teacher Doe against Plaintiff constitute the crimes of Sexual Abuse in the First Degree, Penal Law § 130.65(1), Sexual Abuse in the Second Degree, Penal Law § 130.60(2), Sexual Abuse in the Third Degree, Penal Law § 130.55, and Forcible Touching, Penal Law § 130.55(1), and attempts to commit all of the foregoing, against Plaintiff.

34. Plaintiff has been diagnosed with anxiety disorder and he has symptoms that are consistent with post-traumatic stress disorder.

35. Darul-Uloom Al-Madania, Inc. either failed to perform a background check on or otherwise vet Teacher Doe prior to hiring him, or it did so and ignored the results.

36. Upon information and belief, Darul-Uloom Al-Madania, Inc. never vetted Teacher Doe by checking his references, criminal record, prior complaints, clearances, proof of education, or New York State teaching registration/license.

37. Members of Defendant Darul-Uloom Al-Madania, Inc.'s administration and faculty oversaw, supervised, and directed the manner in which Teacher Doe engaged with students.

38. Upon information and belief, Defendant Darul-Uloom Al-Madania, Inc. relied upon its agents, employees and/or staff to ensure the safety and maintenance of the school premises and, in particular, the Boys School.

39. Upon information and belief, Defendant Darul-Uloom Al-Madania, Inc. did not have any security to protect students and/or minors, like Plaintiff, from harm.

40. Defendant Darul-Uloom Al-Madania, Inc. intentionally put Teacher Doe in direct contact with minor children including Plaintiff.

41. Teacher Doe used his position at Defendant Darul-Uloom Al-Madania, Inc. to sexually exploit Plaintiff.

42. Teacher Doe sexually abused Plaintiff inside of Defendant Darul-Uloom Al-Madania, Inc.'s facilities.

43. Members of Defendant Darul-Uloom Al-Madania, Inc.'s administration and faculty facilitated the sexual abuse of Plaintiff by promoting Teacher Doe to oversee the boys' dormitory.

44. Defendant Darul-Uloom Al-Madania, Inc. intentionally increased Teacher Doe's direct contact with minor children including Plaintiff.

45. Upon information and belief, members of Defendant Darul-Uloom Al-Madania, Inc.'s administrators condoned and/or covered up Teacher Doe's unlawful sexual acts.

46. Upon information and belief, Teacher Doe molested other students at Darul-Uloom Al-Madania.

47. Upon information and belief, it was well known among the students and employees and staff that Teacher Doe was sexually inappropriate with students, including Plaintiff.

48. Upon information and belief, students knew that if they reported the sexual abuse to Darul-Uloom Al-Madania's officials, they would be punished with physical assaults and nothing would be done to stop the abuse from occurring.

49. The administrators of Defendant Darul-Uloom Al-Madania, Inc. had the legal and moral responsibility to prevent Teacher Doe from sexually molesting Plaintiff and had the legal and moral responsibility to stop Teacher Doe from molesting Plaintiff.

50. Darul-Uloom Al-Madania, Inc. had the legal and moral responsibility to manage, supervise, control and direct their employees, including Teacher Doe, and to prevent them from harming the students including Plaintiff entrusted to their care.

51. Teacher Doe was a brazen pedophile and Defendant Darul-Uloom Al-Madania, Inc. knew or should have known about the sexual molestation of Plaintiff.

52. Defendant Darul-Uloom Al-Madania, Inc. failed to properly monitor Teacher Doe or otherwise supervise their interactions with students including Plaintiff.

**FIRST CAUSE OF ACTION:  
(Negligent Hiring/Retention/Supervision/Direction)**

53. Plaintiff repeats and realleges each and every allegation set forth above as if fully



set forth herein.

54. Darul-Uloom Al-Madania, Inc., at all relevant times, indicated to its students and to the parents of students that minor children would be physically safe in the presence of their teachers at Darul-Uloom Al-Madania, Inc.

55. Darul-Uloom Al-Madania, Inc. entered into an express and/or implied duty to provide that when Plaintiff was a minor and left in the presence of teachers, that he would be kept reasonably safe and not be sexually abused.

56. Darul-Uloom Al-Madania, Inc. owed a duty of care to all minor persons, including the Plaintiff, who was likely to come in contact with Teacher Doe to ensure that he did not use his assigned positions to injure minors by sexual assault, sexual abuse or sexual contact in violation of the laws of the State of New York.

57. Darul-Uloom Al-Madania, Inc. knew or should have known of Teacher Doe's propensity for conduct which caused Plaintiff's injuries prior to, or at the time, that he sexually abused Plaintiff.

58. The sexual abuse of children by Teacher Doe was a foreseeable result of Darul-Uloom Al-Madania, Inc.'s negligence. Darul-Uloom Al-Madania, Inc.'s negligence lies in, among other things, having placed Teacher Doe in a position to cause foreseeable harm, harm which would have been spared, had it taken reasonable care in making appropriate decisions respecting the hiring and retention of Teacher Doe.

59. Darul-Uloom Al-Madania, Inc. negligently hired, retained, directed, oversaw, and supervised Teacher Doe and knew or should have known that he posed a threat of sexual abuse to children and that their conduct did not comport with regular and customary teaching practices at Darul-Uloom Al-Madania, Inc.

60. Upon information and belief, Darul-Uloom Al-Madania, Inc. did not provide a minimum or adequate training to Teacher Doe regarding the care of children, including Plaintiff, within his control.

61. At all relevant times, Darul-Uloom Al-Madania, Inc. was willful, wanton, reckless, malicious and/or outrageous in its disregard for the rights and safety of the Plaintiff.

62. As a direct and proximate result of Darul-Uloom Al-Madania, Inc.'s conduct, Plaintiff sustained and will continue to sustain damages.

63. As a direct result of the foregoing, Plaintiff was injured solely and wholly as a result of the negligence, carelessness, and recklessness of Darul-Uloom Al-Madania, Inc. and/or its agents, servants, employees, without any negligence on the part of the Plaintiff contributing thereto.

64. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**SECOND CAUSE OF ACTION:  
(Negligence)**

65. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

66. At all relevant times, Teacher Doe was under the supervision, employ, direction and/or control of Darul-Uloom Al-Madania, Inc.

67. Darul-Uloom Al-Madania, Inc. owed a duty to protect its students, including Plaintiff, lawfully within the school's premises, from Teacher Doe's propensity to molest children. Darul-Uloom Al-Madania, Inc. knew, or was negligent in not knowing, that Teacher Doe posed a threat of sexual abuse to children. Darul-Uloom Al-Madania, Inc. also failed to take appropriate measures to evaluate Teacher Doe's employment and fitness at the time he was allowed to teach

and thereafter remain at the school.

68. Teacher Doe's conduct was undertaken and/or enabled during the course and/or within the scope of their employment, appointment, assignment, and/or agency with Darul-Uloom Al-Madania, Inc. At all relevant times, Darul-Uloom Al-Madania, Inc. failed to have appropriate procedures in place for students or faculty to report sexual abuse.

69. Darul-Uloom Al-Madania, Inc. also failed to adequately supervise Teacher Doe and permitted him to go into rooms alone with Plaintiff.

70. During the time of the sexual abuse alleged herein, while lawfully upon Defendant's premises, Plaintiff was caused to be repeatedly injured solely and wholly due to the negligence and carelessness of Darul-Uloom Al-Madania, Inc.

71. As a direct and proximate result of Darul-Uloom Al-Madania, Inc.'s conduct, Plaintiff sustained and will continue to sustain damages.

72. As a direct result of the foregoing, Plaintiff was injured solely and wholly as a result of the negligence, carelessness, and recklessness of Darul-Uloom Al-Madania, Inc. and/or its agents, servants, employees, without any negligence on the part of the Plaintiff contributing thereto.

73. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**THIRD CAUSE OF ACTION:  
(Breach of Non-Delegable Duty)**

74. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

75. Plaintiff, as a minor, was placed in the care and supervision of Darul-Uloom Al-Madania, Inc. for the purpose of, among other things, providing him with a safe environment to participate in educational, religious, youth, and recreational activities.

76. There existed a non-delegable duty of trust between Plaintiff and Darul-Uloom Al-Madania, Inc.

77. Darul-Uloom Al-Madania, Inc. was in the best position to prevent Teacher Doe from sexually abusing children under its care, to learn of the sexual abuse, to stop it, and to take prompt action so that Plaintiff could receive the proper therapy to address what had happened to him. Such prompt steps would have prevented the abuse from occurring and/or mitigated the extent of life suffering that Plaintiff has endured.

78. Darul-Uloom Al-Madania, Inc. breached its non-delegable duty to Plaintiff by not firing Teacher Doe, letting Teacher Doe abuse Plaintiff, failing to recognize that Teacher Doe was abusing Plaintiff, and/or turning a blind eye to it.

79. During the time of the sexual abuse alleged herein, while lawfully upon Defendant's premises, Plaintiff was caused to be repeatedly injured solely and wholly due to the negligence and carelessness of Darul-Uloom Al-Madania, Inc.

80. As a direct and proximate result of Darul-Uloom Al-Madania, Inc.'s conduct, Plaintiff sustained and will continue to sustain damages.

81. As a direct result of the foregoing, Plaintiff was injured solely and wholly as a result of the negligence, carelessness, and recklessness of Darul-Uloom Al-Madania, Inc. and/or its agents, servants, employees, without any negligence on the part of the Plaintiff contributing thereto.

82. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**FOURTH CAUSE OF ACTION:  
(Breach of Fiduciary Duty)**

83. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

84. Plaintiff's parents entrusted Darul-Uloom Al-Madania, Inc. to supervise and protect their minor child while he was at school. During such time, Darul-Uloom Al-Madania, Inc. assigned Teacher Doe as Plaintiff's teacher and the head of Plaintiff's dormitory. At all times, Teacher Doe was under the supervision and control of Darul-Uloom Al-Madania, Inc.

85. Darul-Uloom Al-Madania, Inc. failed to monitor Teacher Doe or otherwise supervise Teacher Doe's interactions with students including Plaintiff.

86. There existed a relationship of trust, confidence and reliance between Darul-Uloom Al-Madania, Inc. and Plaintiff.

87. This relationship was based on the entrustment that Darul-Uloom Al-Madania, Inc. would properly care for and supervise minor children in its presence, custody and control.

88. Darul-Uloom Al-Madania, Inc. was required to act in the best interests of Plaintiff and to protect him due to his infancy and vulnerability.

89. Based upon the fiduciary relationship, Darul-Uloom Al-Madania, Inc. was entrusted with the wellbeing, care, and safety of Plaintiff and assumed a duty to act in his best interests while he was at school.

90. Darul-Uloom Al-Madania, Inc. breached its fiduciary duty to Plaintiff.

91. Darul-Uloom Al-Madania, Inc.'s conduct was willful, wanton, reckless, malicious

and outrageous in its disregard for the rights and safety of Plaintiff.

92. As a direct and proximate result of Darul-Uloom Al-Madania, Inc.'s conduct, Plaintiff sustained and will continue to sustain damages.

93. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**FIFTH CAUSE OF ACTION:  
(Negligent Infliction of Emotional Distress)**

94. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

95. As set forth above, Darul-Uloom Al-Madania, Inc.'s acted in a negligent and/or grossly negligent manner.

96. Darul-Uloom Al-Madania Inc. had the power, ability, authority, and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Teacher Doe.

97. Despite Darul-Uloom Al-Madania Inc.'s knowledge, power, and duty, Darul-Uloom Al-Madania, Inc. negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Teacher Doe sexually abusing Plaintiff.

98. Darul-Uloom Al-Madania, Inc.'s acts and omissions endangered Plaintiff's safety and well-being and caused him to suffer, inter alia, fear, anxiety, shame, humiliation, physical and emotional pain.

99. As a direct and proximate cause of Darul-Uloom Al-Madania, Inc.'s conduct, Plaintiff suffered severe damages including but not limited to physical, mental and emotional distress.

100. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**SIXTH CAUSE OF ACTION:  
(Breach of Duty *In Loco Parentis*)**

101. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

102. While he was a minor, Plaintiff was entrusted by his parents to the control, custody and supervision of Darul-Uloom Al-Madania, Inc. During that time, Darul-Uloom Al-Madania, Inc. placed Plaintiff in contact with Teacher Doe, who repeatedly molested him.

103. Darul-Uloom Al-Madania, Inc. knew or should have known that Teacher Doe were molesting Plaintiff

104. Darul-Uloom Al-Madania, Inc. owed a duty to the students, including Plaintiff, entrusted to it to act in loco parentis and to prevent foreseeable and known injuries.

105. Darul-Uloom Al-Madania, Inc.'s supervision and protection of Plaintiff at school fell far below that of a parent of ordinary prudence placed in the same situation and armed with the same information.

106. At all times material hereto, Darul-Uloom Al-Madania, Inc.'s actions were willful, wanton, malicious, reckless, negligent, grossly negligent and/or outrageous in their disregard for the rights and safety of Plaintiff.

107. As a direct result of Darul-Uloom Al-Madania, Inc.'s actions, Plaintiff has suffered injuries and damages described herein.

108. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff

for compensatory damages and for punitive damages, together with interests and costs.

**SEVENTH CAUSE OF ACTION:  
(Intentional Infliction of Emotional Distress)**

109. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

110. Darul-Uloom Al-Madania, Inc. engaged in reckless, extreme, and outrageous conduct by providing Teacher Doe with access to children, including Plaintiff, despite knowing that they would likely use their position to sexually abuse them, including Plaintiff.

111. Darul-Uloom Al-Madania, Inc.'s conduct was so shocking and outrageous that it exceeds the reasonable bounds of decency as measured by what the average member of the community would tolerate and demonstrates an utter disregard by it of the consequences that would follow.

112. As a result of this reckless, extreme, and outrageous conduct, Teacher Doe gained access to Plaintiff and sexually assaulted and abused him.

113. Darul-Uloom Al-Madania knew that this reckless, extreme, and outrageous conduct would inflict severe emotional and psychological distress, including personal physical injury, on others, and Plaintiff did in fact suffer severe emotional and psychological distress and personal physical injury as a result, including severe mental anguish, humiliation, and emotional physical distress.

114. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**EIGHTH CAUSE OF ACTION:  
(Vicarious Liability in Respondeat Superior)**

115. Plaintiff repeats and realleges each and every allegation set forth above as if fully



set forth herein.

116. Darul-Uloom Al-Madania, Inc. staffed the Boys' School at Darul-Uloom Al-Madania to educate, care for, and monitor the children enrolled thereat, including Plaintiff.

117. Darul-Uloom Al-Madania, Inc. is and was vicariously liable in respondeat superior to Plaintiff for Teacher Doe's foregoing unlawful conduct in that the sexual abuse of Plaintiff by Teacher Doe was reasonably foreseeable by Darul-Uloom Al-Madania, Inc. and occurred within the general scope of employment.

118. Darul-Uloom Al-Madania, Inc. is and was vicariously liable in respondeat superior to Plaintiff for Teacher Doe's foregoing unlawful conduct given prior instances of similar conduct by Teacher Doe, other employees, agents and/or servants, as well as Darul-Uloom Al-Madania, Inc.'s failure to respond accordingly, such unlawful conduct was reasonably foreseeable and occurred within the general scope of the Darul-Uloom Al-Madania, Inc.'s business in that due to prior known instances of similar conduct on the part of Teacher Doe, the herein actions of same could have been reasonably foreseen by the Darul-Uloom Al-Madania, Inc.

119. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**NINTH CAUSE OF ACTION:  
(Inadequate Security)**

120. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

121. Darul-Uloom Al-Madania, Inc. negligently failed to provide adequate security to Plaintiff while Plaintiff was lawfully within the Boys' School at Darul-Uloom Al-Madania and

while Darul-Uloom Al-Madania, Inc. had knowledge of its employee's, Teacher Doe, propensities for the type of behavior which resulted in Plaintiff's injuries in this action.

122. Darul-Uloom Al-Madania, Inc. negligently failed to safeguard Plaintiff, a minor.

123. Darul-Uloom Al-Madania, Inc. knew or should have known of their employee's, Teacher Doe, propensities for the conduct that caused Plaintiff's injuries and negligently failed to take reasonable measures to protect and provide security to the Plaintiff.

124. That as a result of the foregoing, Plaintiff was seriously and permanently injured.

125. Said occurrences and the resulting injuries to Plaintiff were caused solely and wholly by reason of the negligence and carelessness of Darul-Uloom Al-Madania, Inc. in their ownership, operation, management, maintenance, control, security and supervision of the Boys' School at Darul-Uloom Al-Madania and employees therewithin.

126. As a result of the foregoing, Plaintiff was injured solely and wholly as a result of the negligence, carelessness, and recklessness of Darul-Uloom Al-Madania, Inc. without any negligence on the part of the Plaintiff contributing thereto.

127. By reason of the foregoing, Darul-Uloom Al-Madania, Inc. is liable to Plaintiff for compensatory damages and for punitive damages, together with interests and costs.

**DAMAGES DEMAND**

WHEREFORE, PLAINTIFF demands judgment against Defendant Darul-Uloom Al-Madania, Inc. in the sum of no less than \$10,000,000 in compensatory damages, plus punitive damages, interest, costs, disbursements, and attorneys' fees together with such other and further relief as the Court deems just and proper.

Dated: New York, New York  
May 17, 2021

Respectfully submitted,



Andrew M. Stengel  
*Attorneys for Plaintiff*

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**VERIFICATION**

Abdullah Islamovic, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

  
Abdullah Islamovic

Sworn to before me this  
17<sup>th</sup> day of May 2021.

  
Notary Public

**KATHERINE E. MAYO**  
Notary Public-State of New York  
No. 02MA6382918  
Qualified in Kings County  
Commission Expires Nov. 5, 2022

Notarization made pursuant to Executive Order 202.7.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

-----X

ABDULLAH ISLAMOVIC,

Plaintiff,

Index No.

-against-

DARUL-ULOOM AL-MADANIA, INC. AND JOHN  
DOES 1-5,

-----X

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SUMMONS AND VERIFIED COMPLAINT

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Pursuant to 22 NYCRR 130-1.1, the undersigned, attorneys admitted to practice in the courts of New York State, certify that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: May 17, 2021



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