

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

-----X
JOHN DOE, Infant,
By his Father and Legal Guardian, JOHN DOE 2,

Index No. 030965/2014

Plaintiff,

Date Purchased:

-against-

Plaintiff designates
ROCKLAND COUNTY
as place of trial

The basis of the venue
is Plaintiff's residence.

CAMP DORA GOLDING, ALEXANDER GOLD,
Individually and collectively as Co-Owners, Directors,
and Employees of Camp Dora Golding;
CHISDAI BEN-PORAT, Individually and as
Employee of Camp Dora Golding,

Defendants.

AMENDED SUMMONS

-----X
TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the Amended Complaint in this action and to serve a copy of your answer or, if the Amended Complaint is not served with this Amended Summons, to serve a Notice of Appearance on the Plaintiff's attorneys within twenty (20) days after the service of this Amended Summons, exclusive of the day of service or within thirty (30) days after the completion of service where service is made in any other manner than by personal delivery within the State. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Amended Complaint.

ROCKLAND COUNTY is designated as the place of trial on the basis that the Plaintiff's residence is situated therein.

Dated: Nanuet, New York
March 12, 2014

Yours, etc.,

CONDON & ASSOCIATES, PLLC

By: s/Brian K. Condon
 Brian K. Condon

Attorneys for Plaintiff
55 Old Turnpike Road, Suite 502
Nanuet, New York 10954
(845) 627-8500

TO: Matthew Flanagan, Esq.
Catalano Gallardo & Petropoulous, L.L.P.
Attorneys for Defendants
Camp Dora Golding and Alexander Gold
100 Jericho Quadrangle, Suite 326
Jericho, New York 11753

Chisdai Ben-Porat
c/o Monroe County Correctional Facility
4250 Manor Drive
Stroudsburg, Pennsylvania 18360-9415

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

-----X
JOHN DOE, Infant,
By his Father and Legal Guardian, JOHN DOE 2,

Index No. 030965/2014

Plaintiff,

-against-

AMENDED COMPLAINT

CAMP DORA GOLDING, ALEXANDER GOLD,
Individually and collectively as Co-Owners, Directors,
and Employees of Camp Dora Golding;
CHISDAI BEN-PORAT, Individually and as
Employee of Camp Dora Golding,

Defendants.

-----X
Plaintiff, JOHN DOE 2 ("Plaintiff"), as Father and Legal Guardian of JOHN DOE ("John Doe"), by and through his attorneys, CONDON & ASSOCIATES, PLLC, as and for his Amended Complaint, alleges upon knowledge, information, and/or belief as follows:

PRELIMINARY STATEMENT

1. Plaintiff commences this action, on behalf of his infant child, John Doe, pursuant to New York Civil Practice Law and Rules § 1201, for, *inter alia*, assault, battery, and negligence against the Defendants under New York law and seeks compensatory and punitive damages, as well as such other and further relief as the Court deems just and proper.

2. John Doe, a minor child, was both sexually assaulted by his camp counselor, Defendant CHISDAI BEN-PORAT, and also witnessed Ben-Porat sexually assault another camper, while attending Defendant CAMP DORA GOLDING.

THE PARTIES

3. Plaintiff resides in the County of Rockland, State of New York.
4. John Doe is a minor child, residing in the County of Rockland, State of New York.
5. Defendant CAMP DORA GOLDING (the "Camp") is, upon information and belief, a domestic not-for-profit corporation with its business office address located in Kings County at 5515 New Utrecht Avenue, Brooklyn, New York 11219 and its camp address located in Monroe County, State of Pennsylvania, at 418 Craigs Meadow Road, East Stroudsburg, Pennsylvania 18301.
6. Defendant ALEXANDER GOLD ("Gold") is, upon information and belief, a resident of the State of New York and was, at all relevant times mentioned hereinafter, the Executive Director and/or employee of the Camp.
7. Defendant CHISDAI BEN-PORAT ("Ben-Porat") is, upon information and belief, a citizen of Canada and was, at all relevant times mentioned hereinafter, an employee and camp counselor at the Camp.

FACTUAL BACKGROUND

8. The Camp is an Orthodox residential summer camp for boys located in Monroe County, Pennsylvania. The Camp advertises a "magnificent property and impressive facilities" with superb athletic and learning programs, with a goal that "every camper leaves his activity with more friends and feeling better about himself."
9. Each summer, the Camp hosts six hundred (600) male campers. The Camp has a sister camp, Camp Dina, located approximately one mile away in Monroe County.
10. All of the campers that attend the sleep-away camp are under the age of eighteen (18) and are therefore minors under the law.

11. At all relevant times mentioned hereinafter, John Doe was twelve (12) years old.
12. The complained of behavior herein occurred during the summer of 2013, particularly July 2013.
13. This was the first time that John Doe attended summer camp at the Camp.
14. During the time when John Doe and other children attended the Camp, the Camp and Gold were *in loco parenti* and were thereby required to provide adequate supervision at all times for the minor children entrusted to their care.
15. Two weeks into the summer camp season, in or around the early morning hours of 12:30 A.M. on Thursday, July 11, 2013, John Doe was lying on the top bunk of his bunk bed, which is located in the bunk known as "Bunk 23," playing a game on his iPod Touch.
16. Normally, John Doe would be fast asleep at this point of the night, but Bunk 23 had a substitute counselor staying in the Bunk. The assigned counselor to John Doe's Bunk was out for the night, as the Camp allowed counselors to, once per week, have leave from the Camp for a night to themselves to go out.
17. At this point in time, the substitute counselor was not in the Bunk.
18. At this point in time, Ben-Porat entered into Bunk 23. Ben-Porat was the counselor assigned to Bunk 25.
19. The Camp's policy, upon information and belief, is that camp counselors are prohibited from entering bunks to which they were not assigned.
20. Thus, Ben-Porat was violating Camp policy by entering into Bunk 23, John Doe's bunk.

21. Upon entering Bunk 23, Ben-Porat approached the bunk of John Doe's fellow camper and bunk mate, who, like John Doe, is a minor. With this, Ben-Porat picked the camper up out of his bunk while he was sleeping, which woke up the camper.

22. John Doe witnessed Ben-Porat stand behind said camper, place his pelvis up against said camper's buttocks, and proceed rub and grind against the camper. During this entire time, Ben-Porat was singing with the camper.

23. John Doe recorded this incident using his smart phone device.

24. When Ben-Porat had finished with this camper, he then approached John Doe's bunk.

25. Upon arriving at the edge of John Doe's bunk, as John Doe was pretending to be asleep on the top bunk, Ben-Porat caressed the side of John Doe's neck down toward John Doe's collar bone.

26. With this, Ben-Porat moved toward the front door of Bunk 23 and looked outside to see if anyone was approaching the Bunk.

27. Ben-Porat then returned to the side of John Doe's bunk.

28. At this point, Ben-Porat reached down the back of John Doe's pants to touch and caress John Doe's buttocks.

29. Immediately, John Doe, having been awake this whole time, jumped up from his bunk and landed on his feet on the floor beside his bunk.

30. John Doe saw Ben-Porat standing there and told Ben-Porat that he, John Doe, thinks he lost a game to his iPod Touch. In reality, John Doe was trying to buy himself some time to get away from Ben-Porat.

31. John Doe could visibly see that Ben-Porat was aroused, and his penis was erect.

32. Therefore, in efforts to stall and evade Ben-Porat, John Doe darted underneath his bunk to pretend like he was searching for his lost game. Although Ben-Porat tried to grab and reach for John Doe underneath the bunk, John Doe remained thereunder.

33. While John Doe was still under the bunk bed “searching” for the lost game, the substitute counselor for Bunk 23 entered the Bunk.

34. With this, Ben-Porat immediately darted out of the Bunk.

35. The substitute counselor did not ask the campers in Bunk 23 what had happened and if they had interacted with Ben-Porat.

36. That night, John Doe could not sleep at all. Because the Camp offices were closed at that hour of the night, he would have to wait until 9:00 A.M. to report to Defendant Gold and/or other directors what had transpired with Ben-Porat in Bunk 23.

37. Thus, at 9:00 A.M., John Doe went to the offices to speak with someone and report last night’s incidents. No one would permit John Doe to call his parents until he spoke with Gold.

38. Over the course of the summer months, Gold would be at Camp Dina in the mornings and Camp Dora Golding in the afternoons.

39. Therefore, John Doe awaited Gold’s arrival at the Camp that morning.

40. When Gold arrived, John Doe went into Gold’s office to speak with him about what had happened. At first, John Doe was hesitant to divulge the incidents, but he decided to tell Gold everything.

41. After John Doe finished explaining everything to Gold, Gold told John Doe to “go outside and play” and that Gold would “take care of everything.”

42. On Thursday, July 11, 2013 at approximately 5:20 P.M., John Doe's mother received a telephone call from Gold, during which he stated that "nothing has happened to your son," but that the Camp was "investigating an issue" that happened last night.

43. Because it was out of the ordinary for the Camp to contact campers' parents on a whim like this, Plaintiff and his wife immediately got in their car and drove out to the Camp. While driving to the Camp, Plaintiff placed a call to the New York State Police to inform them that an incident had occurred at the Camp and may have involved John Doe.

44. When Plaintiff and his wife arrived at the Camp at around 7:00 P.M., Plaintiff spoke with John Doe on the basketball courts, away from anyone else, at which point John Doe told Plaintiff what Ben-Porat did last night.

45. Plaintiff thereafter spoke to the police officer that arrived. The police officer interviewed John Doe, did not ask to interview any other campers, went to Bunk 23 to see the scene of the incidents, despite Gold's protests to the officer doing so, and did not, at that point, arrest Ben-Porat. The police officer then left.

46. To date, upon requesting the report written by the police officer during his interview with John Doe, the state police alleges that the report does not exist and cannot produce the same.

47. Plaintiff also spoke to Gold. Gold claimed that he called child services at approximately 5:50 P.M. Child services never went to the Camp to investigate the incidents involving Ben-Porat.

48. After Plaintiff spoke to Gold, another director, counselor, and/or employee approached Plaintiff and handed him a piece of paper. On the piece of paper, it was written that Ben-Porat would be getting on a bus at 9:30 P.M. that would depart from New York and head to Canada.

49. Upon receiving this information, Plaintiff called the police back to the Camp, informing them that the Camp was facilitating Ben-Porat in fleeing to Canada that night.

50. When the police arrived at the Camp, at approximately 8:30 P.M., the police arrested Ben-Porat. The following morning, Friday, July 12, 2013, Ben-Porat was arraigned.

51. Plaintiff and his wife contacted a therapist, with whom they are familiar from Monsey, New York, who informed them that they should only remove John Doe from the Camp if John Doe asks to leave with them. Otherwise, if they remove him from the Camp, John Doe may be challenged in trying to cope and work through the devastation of the incident with Ben-Porat.

52. Therefore, because John Doe did not ask to leave with his parents, John Doe remained at the Camp.

53. Plaintiff and his wife left that evening and went home to Rockland County, New York.

54. Thereafter, prior to the arrival of the weekend, Gold approached John Doe and told him not to disclose anything that had happened to him and his fellow camper. Instead, the "story" that Gold told John Doe to "stick to" was that the police were called to the Camp for a "stolen iPod."

55. Later in the week, Gold called Plaintiff, asking if he could help bring a counselor to the Camp from Monsey, New York on Sunday, July 15, 2013. Plaintiff agreed that he would do so.

56. On Sunday, Plaintiff and his wife picked up the nineteen (19) year old counselor in Monsey to bring him to the Camp. During the car ride to the Camp, Plaintiff asked the counselor questions about becoming a counselor for the Camp. The counselor informed Plaintiff that he was a "replacement" counselor for a counselor who "just quit his position," assumably Ben-Porat's replacement. This new counselor did not know of what had happened just the week prior, and he certainly did not realize that he was getting a ride to the Camp from the Plaintiff's parents.

57. Plaintiff continued to question the replacement counselor, asking whether or not he had to go through any training to become a counselor. The new counselor replied that he had not.

58. When asked by Plaintiff if the counselor had been informed of and trained on the rules and regulations of the Camp with respect to relations with campers, especially sexual relations, the replacement counselor replied that he did not have any training like that whatsoever and had never even been a counselor before.

59. Upon arriving at the Camp, Plaintiff and his wife surprised Gold by appearing in his office to discuss last week's incidents with Ben-Porat, John Doe, and John Doe's fellow camper.

60. Gold was at a loss for words. After the incidents, the Camp and Gold did not implement any reactionary precautions and/or remedies for the campers, staff, and families of campers. Therapists were not made available to the children. None of the campers' parents were informed of the ongoing investigations and the arrest of Ben-Porat.

61. Instead, it was Sunday evening - close to 100 hours after the incidents took place - and Gold still had not written a letter to the campers' parents to inform them of what had occurred.

62. In front of Plaintiff and his wife, Gold picked up the telephone and called, upon information and belief, the Camp's lawyer. While on the telephone with the attorney, Plaintiff and

his wife witnessed Gold ask what he should write in the letter and what he should tell the parents of the campers.

63. A letter to the campers' parents was finally sent out on Sunday night via e-mail. A copy of the e-mail from Gold is annexed hereto as Exhibit "A".

64. In that letter, Gold does not reveal the specifics of what took place, but instead states that the incident concerned "improper contact with a camper" and that the Camp had "no reason to believe that any other campers were involved or in any way affected."

65. However, that was a blatant lie because, as stated above, there was another victim of Ben-Porat's conduct in addition to John Doe.

66. Again, Plaintiff and his wife refrained from removing John Doe from the Camp because John Doe did not ask his parents to do so.

67. Within a week of the incidents taking place, another employee of the Camp, a rabbi, chased after John Doe while he was on the grounds playing with his fellow campers, grabbed hold of John Doe, and in front of other campers, screamed at the John Doe saying, "We do not need you to be here! You better leave and never come back!"

68. John Doe attended the Camp for the rest of summer, luckily without further incident.

69. However, John Doe was now a completely different boy from that which he was prior to the incident with Ben-Porat.

70. Thereafter, Plaintiff, his wife, and John Doe realized that, as a result of Ben-Porat's sexual advances not only on John Doe, but also on his fellow campers, John Doe was suffering physical, emotional, and psychological injuries.

71. Since leaving the Camp and beginning the school year, John Doe has been under the care of a female therapist at least two times per week. Each session with the therapist costs approximately One Hundred Seventy Five and 00/100 (\$175.00) dollars.

72. In order to keep the sessions interesting and allow John Doe to feel more comfortable, the therapist takes John Doe out to eat or to a park rather than containing him in an office.

73. Despite the therapy sessions each week, John Doe is now exhibiting extreme overprotectiveness of his younger brothers, especially his nine (9) year old brother.

74. When he and his family attend synagogue, or goes anywhere as a family for that matter, John Doe keeps his younger brother in sight at all times, and if anyone approaches his younger brother to speak to him, John Doe immediately rushes to his side, grabs him, and pulls him away from the situation.

75. Neither John Doe nor Plaintiff has been contacted by the Camp since John Doe's departure at the end of the summer. Campers that wish to attend the Camp are required to submit their application and deposit by December of the preceding summer camp season; yet, John Doe has not been asked to return to the Camp and has not received any communications whatsoever from the Camp and/or its employees.

76. John Doe is now trying to prepare for his Bar Mitzvah, which is quickly approaching in early April 2014. However, John Doe cannot focus while he is studying. He is always thinking about what happened to him last summer.

77. One night in particular, John Doe began crying hysterically, in the presence of his tutor and parents, when studying at home. When asked why he was so upset, John Doe recounted the incident from last summer and became further angry and vengeful, hoping that he would never again have to encounter Ben-Porat.

78. In school, his teachers are keeping a watchful eye over him. While neither John Doe nor Plaintiff has explained to the school what exactly happened last summer, the teachers and staff can see that John Doe is not the same boy he was last year in school. What they see now is a young boy, who unexpectedly suffers from outbursts of angry, despair, and hostility.

79. The staff at John Doe's school inform Plaintiff and his wife weekly of his progress and behavior. Plaintiff and his wife are especially worried about John Doe lashing out or coming to the defense of another student, should John Doe suspect that a fellow classmate is in trouble.

80. As a result of the inappropriate contact by Ben-Porat, John Doe has suffered severe and serious mental anguish, pain and suffering, emotional distress, embarrassment and humiliation, and has been under the care of mental health professionals for treatment.

AS AND FOR A FIRST CAUSE OF ACTION
AGAINST DEFENDANT BEN-PORAT
(Assault)

81. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs "1" through "80" as if fully set forth herein.

82. Ben-Porat physically contacted John Doe, a minor child, by engaging in inappropriate touchings and behaviors with John Doe.

83. As a result of said physical contact, John Doe was in imminent apprehension of harmful contact by Ben-Porat.

84. As a result of the foregoing, John Doe has suffered physical, emotional, and psychological damages.

AS AND FOR A SECOND CAUSE OF ACTION
AGAINST DEFENDANT BEN-PORAT
(Battery)

85. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs “1” through “84” as if fully set forth herein.

86. Ben-Porat contacted John Doe’s body by reaching his hand down John Doe’s pants and then grabbing and slapping John Doe’s buttocks.

87. Said physical and bodily contact with John Doe was offensive.

88. Without John Doe’s consent, Ben-Porat intended to make said contact.

89. As a result of the foregoing, John Doe has suffered physical, emotional, and psychological damages.

AS AND FOR A THIRD CAUSE OF ACTION
AGAINST DEFENDANT BEN-PORAT
(Intentional Infliction of Emotional Distress)

90. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs “1” through “89” as if fully set forth herein.

91. Ben-Porat intentionally and/or recklessly engaged in extreme and outrageous behavior when he touched John Doe, a minor child, offensively and inappropriately.

92. Ben-Porat intentionally and/or recklessly engaged in extreme and outrageous behavior when he picked up a minor camper out of his bunk one night, while the camper was sleeping, stood behind the camper, and pressed his pelvis up against the camper’s buttocks, and proceeded to rub and grind against the camper and touch him in a sexually inappropriate manner

93. As a result of the foregoing, John Doe suffered extreme physical, emotional, and psychological damages, for which he has been under the care of mental health specialists.

AS AND FOR A FOURTH CAUSE OF ACTION
AGAINST DEFENDANTS CAMP AND GOLD
(Respondeat Superior)

94. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs "1" through "93" as if fully set forth herein.

95. The Camp entered into an agreement with John Doe's family to care for John Doe while he was attending the Camp without the presence of his guardians.

96. At the time of Ben-Porat's assaults on the campers, Ben-Porat was acting as an agent and employee of the Camp and under its auspices and control and Gold was the Executive Director of the Camp.

97. As a result of the foregoing, the Camp is responsible and vicariously liable for the personal torts committed by Ben-Porat upon any campers enrolled in the Camp's care, including John Doe.

AS AND FOR A FIFTH CAUSE OF ACTION
AGAINST DEFENDANTS CAMP AND GOLD
(Negligence)

98. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs "1" through "97" as if fully set forth herein.

99. Defendants owed John Doe a duty to provide adequate and appropriate supervision of its employees, counselors, and campers to ensure that none of their employees engaged in unbecoming and inappropriate behavior with the campers in their care.

100. Based upon the fact that counselors, including Ben-Porat, were required to sleep in the cabins with their campers, Defendants were on notice that campers were at risk of inappropriate physical and/or sexual abuse from Defendants' counselors and/or other employees.

101. Despite this knowledge, information, and/or belief, Defendants herein did not take adequate measures to ensure the safety of the campers entrusted to their care.

102. Defendants breached the duty they owed to John Doe because John Doe was assaulted by Ben-Porat and further witnessed Ben-Porat's assault of a fellow camper.

103. Defendants' breach directly and proximately caused the damages sustained by John Doe.

104. As a result of the foregoing, John Doe suffered serious physical, emotional, and psychological damages while attending the Camp and under its sole care as well as after John Doe left the Camp.

AS AND FOR A SIXTH CAUSE OF ACTION
AGAINST DEFENDANTS CAMP AND GOLD
(Negligent Hiring, Retention, and Supervision)

105. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs "1" through "104" as if fully set forth herein.

106. Upon information and belief, for the past five (5) summers, there have been incidents of sexual abuse and molestation of campers at the Camp. Yet, nothing ever results from the investigations, and the Camp continues to cover up these scandals.

107. Upon further information and belief, Ben-Porat attended a yeshiva in Far Rockaway, New York, where the yeshiva was well aware that Ben-Porat had issues of sexual abuse and molestation and had displayed excessive affection toward young boys.

108. Based upon the fact that incidents of sexual relations and/or abuse had previously occurred at the Camp and the fact that Ben-Porat had a prior history of unlawful sexual propensities and would be stationed in a capacity that would require his close interaction with young boys in their bunks, the Camp and Gold knew or should have known that Ben-Porat had a propensity for the conduct which caused the injuries herein.

109. Upon seeking out Ben-Porat as an employee and counselor for the Camp, who would have access to campers' bunks throughout the entire summer, the Camp and Gold knew of facts that would lead a reasonably prudent person in the position of the Camp and its directors to investigate Ben-Porat.

110. Instead, the Camp and Gold continued to make it a policy to have an adult counselor sleep in the bunks with the campers, despite the previous scandals and issues involving unlawful sexual relations between counselors and minor campers.

111. The fact is that the Camp and/or Gold facilitated Ben-Porat acquiring a bus ticket on the night of the investigations so that he could flee to Canada that night and avoid prosecution.

112. Said Defendants were further negligent in their supervision of their camp counselors, in particular Ben-Porat.

113. Defendants negligently supervised Defendant Ben-Porat in his capacity as employee and/or counselor for the Camp because Defendants had a duty to supervise the employees acting within and under their auspices and control, and Defendants knew or should have known of Ben-Porat's propensity to commit the acts complained of herein.

114. The improper, sexually inappropriate, and tortious conduct of Ben-Porat occurred in a bunk at the Camp, an environment created by said Defendants, thereby facilitating the unlawful sexual misconduct pursued by Ben-Porat against minor campers.

115. Defendants unreasonably exposed these minor campers to the risk of sexual misconduct and inappropriate behaviors without observation, detection, or repercussion.

116. Additionally, the Camp and Gold attempted to help Ben-Porat flee to Canada when the allegations of sexual assaults of the campers surfaced.

117. Said Defendants negligently discharged their duties to ensure the safety of the minor campers under their custody and care while attending the sleep-away camp.

118. As a result of this negligent supervision, said Defendants failed to adequately screen and supervise Ben-Porat to ensure that inappropriate sexual assaults and other unwelcome behaviors were not engaged in by Ben-Porat and/or other employees.

119. Upon further information and belief, the Camp is not a member of the American Camp Association (the "ACA"). The ACA helps member camps go beyond the basic requirements for health, cleanliness, and food services into specific areas of programming, including camp staff from director through counselors, emergency management plans, administration of camp operation, program quality, and the safety of the campers and staff. Additionally, the ACA conducts its own accreditation investigations of the member camps, which includes a staff screening system involving criminal background checks.

120. Because the Camp failed to become a member of the ACA, it has thus failed to adopt the best practices in camp administration and did not have policies and practices in place that would have ensured the safety and health of the campers.

121. As a direct and proximate result of said failure, John Doe was subjected to the incidents described above.

122. As a result of the foregoing, John Doe suffered physical, emotional, psychological, and economic damages.

AS AND FOR A SEVENTH CAUSE OF ACTION
AGAINST DEFENDANTS CAMP AND GOLD
(Negligent Infliction of Emotional Distress)

123. Plaintiff repeats, reiterates, and realleges the allegations set forth in Paragraphs “1” through “122” as if fully set forth herein.

124. Defendants breached the duty they owed John Doe by creating a foreseeable risk of the behavior complained of herein by requiring counselors to sleep in the cabins with the minor campers, thereby exposing the minor campers, like John Doe herein, to the sexual misconduct of counselors, like Ben-Porat.

125. As a result of the foregoing, John Doe suffered physical, emotional, psychological, and economic damages, for which he has been under the care of mental health specialists.

[intentionally left blank]

WHEREFORE, Plaintiff, JOHN DOE 2, as Father and Legal Guardian of John Doe, demands judgment against Defendants as follows:

- A. On the First, Second, Third, Fourth, Fifth, Sixth, and Seventh Causes of Action, an amount which is unknown at this time and which shall be determined at trial;
- B. Compensatory damages, including, but not limited to, any and all costs relating to John Doe's care by a mental health specialist;
- C. Punitive damages;
- D. Costs, interest, and disbursements, including reasonable attorney's fees; and
- E. Such other and further relief as the Court deems just, proper, and equitable.

Dated: Nanuet, New York
March 12, 2014

CONDON & ASSOCIATES, PLLC

By: s/Brian K. Condon
 Brian K. Condon

Attorneys for Plaintiff
55 Old Turnpike Road, Suite 502
Nanuet, New York 10954
(845) 627-8500 telephone
(845) 627-8507 facsimile
brian@condonlawoffices.com

Exhibit "A"

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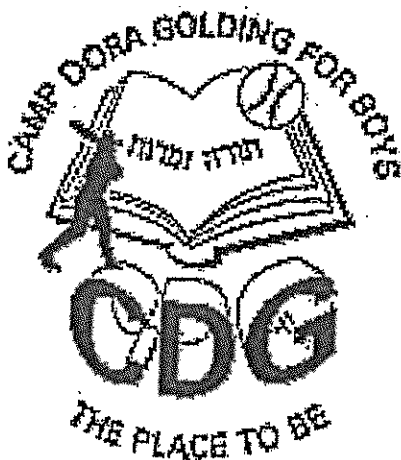
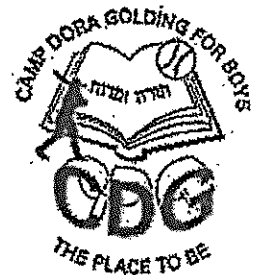
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July 15, 2013

Is Camp Dora Golding Telling The Truth About Alleged Abuse?

"I am writing to inform you of an incident that took place in camp this past Thursday concerning improper contact with a camper. Fortunately, I was immediately notified by the camper. My senior staff and I immediately launched our established plan-of-action which included safeguarding the affected camper, preventing the staff member from leaving camp premises, verifying the facts, and notifying law enforcement and the affected camper's parents."



Originally published at 10:13 pm CDT 7-14-2013

Camp Dora Golding sent the following email to parents about the alleged abuse at the camp.

The abuse took place Wednesday night, the arrest was made Thursday, the arraignment was Friday morning, news reports began being published locally on Friday and nationally by Failedmessiah.com Saturday night.

The camp's email was sent out Sunday night:

Dear Parents,

Camp Dora Golding works year-round to ensure a fun-filled, memorable summer for each of our over 1000 campers. We work equally hard to ensure their safety and security.

I am writing to inform you of an incident that took place in camp this past Thursday concerning improper contact with a camper. Fortunately, I was immediately notified by the camper. My senior staff and I immediately launched our established plan-of-action which included safeguarding the affected camper, preventing the staff member from leaving camp premises, verifying the facts, and notifying law enforcement and the affected camper's parents.

Within several hours, the staff member was arrested by the authorities and taken off camp grounds. We are of course completely cooperating with the authorities to assist their investigation in every possible way.

At this point, we have no reason to believe that any other campers were involved or in any way affected. We are in consultation with leading mental health professionals and social service agencies, and prepared to offer appropriate support and counseling to our staff, campers and parents, if needed. Through this consultation, it was decided not to alarm over 600 unknowing campers. Certainly, if you feel the need to speak to your son to allay your fears, we can have him call you.

For more than a decade, (even before recently publicized stories of abuse in the Orthodox community), our staff orientation included specific training to deal with improper contact and conduct between staff and campers. We have a zero tolerance policy towards any improper behavior and, as demonstrated by recent events, are ready to follow through whenever necessary. I am proud of my staff, which acted quickly, properly and responsibly.

Our established action plan includes contacting all our campers' parents as soon as possible, however, before our earliest opportunity to properly do so; the incident was reported in a local Pennsylvania newspaper and quickly spread online. We regret that some parents had to learn of this story from media and online sources before hearing it directly from the camp.

If further relevant information becomes available, we will share it with you to the greatest extent possible. I am well aware that such incidents tend to generate rumors and unintended inaccuracies. Should you have any questions or concerns, I welcome the discussion, and ask that you feel free to contact me directly.

Sincerely,

Alex Gold

Based on what I reported earlier today, what Alex Gold did not tell parents is that the camp tried to send the counselor, Chisdai Ben-Porat (pictured at right), who committed the alleged sexual abuse home to Canada.

When police were notified by a person who is not a camp employee that the camp was helping the counselor flee, they returned and arrested the counselor.

Also note that while Gold says that the camp "immediately launched our established plan-of-action which included safeguarding the affected camper, preventing the staff member from leaving camp premises, verifying the facts, and notifying law enforcement and the affected camper's parents" after being told about the alleged abuse, he does not specify when the parents were notified or how long it took the camp to call police after it was told about the alleged

abuse.

As of this morning, I've been told the alleged victim's parents had not yet been told the alleged abuse took place.

Past that, to wait 3 1/2 days to tell parents about the alleged abuse is, I think, inexcusable. On that basis alone, I would pull any children in my care out of that camp immediately.

Related Posts:

[Counselor Allegedly Molests Boy In Orthodox Sleepover Camp.](#)

[Camp Allegedly Tried To Help Counselor Flee Abuse Charges.](#)



You might also like:

Camp Dora Golding Abuse Video Update	Disturbing, Horrific Video Of Camp Dora Golding Child Sex...	Another Alleged Perp, 3 To 5 More Alleged Victims, At Camp ...
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Linkwithin

Posted at 12:00 AM in [Crime, etc., MO & Chardal, Pedophilia & Related Crimes](#) | [Permalink](#)

Comments

You can follow this conversation by subscribing to the [comment feed](#) for this post.

The letter sounds like the camp administrators are trying to cover their rear ends once the story of abused was made public. If I am correct, in an earlier FM post comment, a camper's mother wrote that she had received no notification of the incident.

Posted by: [Bas Melech](#) | [July 14, 2013 at 10:43 PM](#)

I am anxiously awaiting Voice Of Truth's brilliant and insightful comments on this post.

Posted by: [RWisler](#) | [July 14, 2013 at 11:44 PM](#)

Shmarya, the email might as well have been titled "Dear Mr Rosenberg and other members of the media"

I'm presuming you tried to contact the camp for comment. No response before they sent this to parents?

Posted by: [Eli, what me messiah?](#) | [July 15, 2013 at 02:33 AM](#)

I am disappointed that you have been reporting this story without having verified your information. As a Dora Golding parent, you set in even more fear among us parents than we already had from your morning post when you posted your second post yesterday regarding the camp allegedly trying to help the counselor escape to Canada and saying that the parents reported the incident, there was a video, etc. You state that, "As of this morning, I've been told the alleged victim's parents had not yet been told the alleged abuse took place." I spoke to Alex Gold on Sunday morning and he told me that the parents were informed within hours of the incident, that they came up to camp, and that their son was signed up to stay for the entire summer and still plans on staying. He also said that he, Alex Gold, reported the incident to the police. It is possible that he is not being 100% straight, I am no fool, but you are reporting information based on "what you have been told", without explaining where you are getting it from, and that does not seem at all responsible to me. We are panicked enough about the situation as it is, please make sure your sources are accurate before posting information on the internet and freaking us out even more.



NYSCEF - Rockland County Supreme Court

Confirmation Notice

This is an automated response for Supreme Court / Court of Claims cases. The NYSCEF site has received your electronically filed document(s) for:

John Doe INFANT et al - v. - Camp Dora Golding et al

030965/2014

Documents Received

Doc #	Document Type	Motion #	Date Received
5	AMENDED SUMMONS		03/12/2014 09:28 AM
6	AMENDED COMPLAINT		03/12/2014 09:28 AM

Filing User

Name: **BRIAN K CONDON**
 Phone: **845-627-8500**
 Fax #:
 E-mail Address: **brian@condonlawoffices.com**
 Work Address: **55 Old Turnpike Road, Suite 502
 Nanuet, NY 10954**

E-mail Notifications

An e-mail notification regarding this filing has been sent to the following address(es) on 03/12/2014 09:28 AM:

CONDON, BRIAN K - brian@condonlawoffices.com

NOTE: If submitting a working copy of this filing to the court, you must include as a notification page firmly affixed thereto a copy of this Confirmation Notice.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

-----X
JOHN DOE, Infant,
By his Father and Legal Guardian, JOHN DOE 2,

Index No. 030965/2014

Plaintiff,

-against-

CAMP DORA GOLDING, ALEXANDER GOLD,
Individually and collectively as Co-Owners, Directors,
and Employees of Camp Dora Golding;
CHISDAI BEN-PORAT, Individually and as
Employee of Camp Dora Golding,

Defendants.

-----X

**NOTICE OF COMMENCEMENT OF ACTION
SUBJECT TO MANDATORY ELECTRONIC FILING**

PLEASE TAKE NOTICE that the matter captioned above, which has been commenced by filing of the accompanying documents with the County Clerk, is subject to mandatory electronic filing pursuant to Section 202.5-bb of the Uniform Rules for the Trial Courts. This notice is being served as required by Subdivision (b) (3) of that Section.

The New York State Courts Electronic Filing System ("NYSCEF") is designed for the electronic filing of documents with the County Clerk and the court and for the electronic service of those documents, court documents, and court notices upon counsel and self-represented parties. Counsel and/or parties who do not notify the court of a claimed exemption (see below) as required by Section 202.5-bb(e) must immediately record their representation within the e-filed matter on the Consent page in NYSCEF. Failure to do so may result in an inability to receive electronic notice of document filings.

Exemptions from mandatory e-filing are limited to: 1) attorneys who certify in good faith that they lack the computer equipment and (along with all employees) the requisite knowledge to comply; and 2) self-represented parties who choose not to participate in e-filing. For additional information about electronic filing, including access to Section 202.5-bb, consult the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center at 646-386-3033 or efile@courts.state.ny.us

Dated: Nanuet, New York
March 13, 2014

s/Brian K. Condon
Brian K. Condon, Esq.
CONDON & ASSOCIATES, PLLC
Attorneys for Plaintiff
55 Old Turnpike Road, Suite 502
Nanuet, New York 10954
(845) 627-8500 phone
(845) 627-8507 facsimile
brian@condonlawoffices.com