

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
AMALIA S. PALADINO,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

Index No.: 151711/20

CLAUDIA COJOCARU,

Defendant.

-----X

Plaintiff, AMALIA S. PALADINO, by their attorneys, WEITZPASCALE, complaining of the Defendant, CLAUDIA COJOCARU, respectfully alleges, upon information and belief, the following:

1. At all times hereinafter mentioned, Plaintiff, AMALIA S. PALADINO, was a resident of the State of New Jersey, County of Hudson.

2. At all times hereinafter mentioned, Defendant, CLAUDIA COJOCARU, was a resident of the State of Maryland, County of Cecil, City of Perryville.

3. At all times hereinafter mentioned, Defendant, CLAUDIA COJOCARU, was a resident of the State of Pennsylvania, County and City of Philadelphia.

4. Defendant is not entitled to invoke the limited liability provisions of CPLR Article 16 as this lawsuit falls within one or more of the exceptions set forth in CPLR Section 1602.

5. A Supplemental Summons with Notice was personally served on Defendant, CLAUDIA COJOCARU, at her residence at 904 Dickinson Street, Floor 2, Philadelphia, PA 19147 on June 8, 2020 and service was completed on June 9, 2020. *See,*

New York State Courts Electronic Filing System (“NYSCEF”) Doc. Nos. 3 and 4.

6. A Notice of Appearance and Demand for a Complaint was electronically filed on June 29, 2020. *See*, NYSCEF Doc. No. 5.

7. At all times hereinafter mentioned, the City University of New York (hereinafter referred to as “CUNY”) John Jay College of Criminal Justice (hereinafter referred to as “John Jay”) was an educational institution located in the State of New York, County and City of New York.

8. At all times hereinafter mentioned, Plaintiff was an undergraduate student at CUNY John Jay from 2003 to 2007.

9. At all times hereinafter mentioned, in 2007 Plaintiff received her Bachelors of Arts in Forensic Psychology from CUNY John Jay.

10. At all times hereinafter mentioned, Plaintiff was a graduate student at CUNY John Jay from 2007 to 2019.

11. At all times hereinafter mentioned, in 2011 Plaintiff received her Masters in Criminal Justice from CUNY John Jay.

12. At all times hereinafter mentioned, in 2019 Plaintiff received her Ph.D in Criminal Justice from The Graduate Center at CUNY.

13. At all times hereinafter mentioned, Plaintiff was an adjunct professor in the Sociology department at CUNY John Jay from 2010 to present.

14. At all times hereinafter mentioned, Plaintiff was an adjunct professor in the Psychology department at CUNY John Jay from 2017 to 2020.

15. Prior to April 6, 2018 Plaintiff, AMALIA S. PALADINO, by good conduct,

industry, and ability, had attained an excellent reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics.

16. At all times hereinafter mentioned, Defendant, CLAUDIA COJOCARU, was an undergraduate student at CUNY John Jay from 2012 to 2014.

17. At all times hereinafter mentioned, Defendant, CLAUDIA COJOCARU, was an adjunct professor in the Anthropology department at CUNY John Jay from 2017 to December 2018 when she was transferred to the Psychology department until the end of the Spring 2019 semester.

18. At all times hereinafter mentioned, the telephone number, "(718) 813-5739", was owned by Defendant, CLAUDIA COJOCARU.

19. At all times hereinafter mentioned, the telephone number, "(718) 813-5739", was used by Defendant, CLAUDIA COJOCARU.

20. At all times hereinafter mentioned, the telephone number, "(718) 813-5739", was registered to Defendant, CLAUDIA COJOCARU.

21. At all times hereinafter mentioned, the Google email ("Gmail") account, ms.bufnitza@gmail.com, was owned by Defendant, CLAUDIA COJOCARU.

22. At all times hereinafter mentioned, the Gmail account, "*ms.bufnitza@gmail.com*", was used by Defendant, CLAUDIA COJOCARU.

23. At all times hereinafter mentioned, the Gmail account, "*ms.bufnitza@gmail.com*", was registered to Defendant, CLAUDIA COJOCARU.

24. At all times hereinafter mentioned, the CUNY John Jay email account, ccojocarujjay.cuny.edu, was owned by Defendant, CLAUDIA COJOCARU.

25. At all times hereinafter mentioned, the CUNY John Jay email account, "*ccojocarujjay.cuny.edu*", was used by Defendant, CLAUDIA COJOCARU.

26. At all times hereinafter mentioned, the CUNY John Jay email account, "*ccojocarujjay.cuny.edu*", was registered to Defendant, CLAUDIA COJOCARU.

27. At all times hereinafter mentioned, the CUNY John Jay email account, "*ccojocarujjay.cuny.edu*", was assigned to Defendant, CLAUDIA COJOCARU.

28. At all times hereinafter mentioned, the username, "Schrödinger's Criminologist @anarkriminology" (hereinafter referred to as "@anarkriminology"), on the social media network known as Twitter, was owned by Defendant, CLAUDIA COJOCARU.

29. At all times hereinafter mentioned, the username, "@anarkriminology", on the social media network known as Twitter, was used by Defendant, CLAUDIA COJOCARU.

30. At all times hereinafter mentioned, the username, "@anarkriminology", on the social media network known as Twitter, was registered to Defendant, CLAUDIA COJOCARU.

31. At all times hereinafter mentioned, Naomi Haber was an undergraduate student at CUNY John Jay from 2013 to 2018.

32. At all times hereinafter mentioned, the username, "@naomi_haber", on the social media network known as Twitter, is owned by Naomi Haber.

33. At all times hereinafter mentioned, the username, “@naomi_haber”, on the social media network known as Twitter, is used by Naomi Haber.

34. At all times hereinafter mentioned, the username, “@naomi_haber”, on the social media network known as Twitter, is used by Naomi Haber.

(A)

DEFENDANT’S APRIL 6, 2018 EMAIL

35. On or about April 6, 2018, and at all times herein mentioned, Defendant, CLAUDIA COJOCARU, attempted to dissuade Dr. Anthony Marcus (“Marcus”), a member of Plaintiff’s dissertation committee, and Plaintiff’s colleague and co-author, Dr. Amber Horning-Ruf (“Horning-Ruf”), from including Plaintiff in a panel at the 18th Annual Conference of the European Society of Criminology which was held between August 29, 2018 and September 1, 2018 in Sarajevo, Bosnia-Herzegovina.

36. On or about April 6, 2018, at approximately 7:58 p.m., Defendant, CLAUDIA COJOCARU, transmitted an electronic mail communication (“email”) to Dr. Marcus, a member of Plaintiff’s dissertation committee, and Plaintiff’s colleague and co-author, Dr. Horning-Ruf, which stated “**Amalia is an abolitionist. She will be in her element there. She is a pathological liar, abusive, and delusional. What more can one hope for?**” A true and correct copy of the April 6, 2018 Email is annexed hereto as **Exhibit “A”** and incorporated herein by reference. (emphasis added).

37. On April 6, 2018, and at all times herein mentioned, the term “Abolitionist” refers to individuals who wish to abolish sex work.

38. On April 6, 2018, and at all times herein mentioned, Defendant, CLAUDIA COJOCARU, used the term “Abolitionist” to describe people whose ideology countered that of the research group Plaintiff belonged to.

(B)

DEFENDANT’S NOVEMBER 29, 2018 TEXT MESSAGES

39. On or about November 29, 2018, Defendant, CLAUDIA COJOCARU, sent her former fiancé, Mark Johnson, the following text messages:

Ric and Anthony may have killed a sex worker in Atlantic City and the others covered it up[.] ... Ric promised everyone involved great rewards. It’s sickening[.] He promised Leo a PhD[.] ... And Amalia and the others too[.] ... Yeah, but the “Atlantic City study” was what legitimized their claims. Now, I pointed out all the flaws[.] The data is faked[.] And those fucks used me to manufacture validity[.] This is a huge fucking scandal[.] ... Yeah[.] It was a cult[.] Not only they invented the data, but that girl was murdered[.] After Anthony had an “intimate interview and friendship” with her[.] She was killed 1 week after Ric made Anthony break it off. Ric and Anthony had sex with underage sex workers in the motel, then they paid them 20 dollars each and interviewed them. Then they used me and my work and my experiences to validate that shit[.] To justify that murder. I’m sick to my stomach[.] ... Amalia, Amber, Robert Riggs, Leo, ric [sic], Anthony, and so many others were in on it. Anthony told me[.] Amalia told me[.]

A true and correct copy of the November 29, 2018 Text Messages are annexed hereto as **Exhibit “B”** and incorporated herein by reference. (emphasis added).

40. In the messages above, the person Defendant, CLAUDIA COJOCARU, refers to as “Ric” is Dr. Ric Curtis (“Curtis”).

41. In the messages above, the person Defendant, CLAUDIA COJOCARU, refers to as “Anthony” is Dr. Anthony Marcus.

42. In the messages above, the person Defendant, CLAUDIA COJOCARU, refers to as “Leo” is Leonardo Dominguez (“Dominguez”).

43. In the messages above, the person Defendant, CLAUDIA COJOCARU, refers to as “Amber” is Dr. Amber Horning-Ruf.

(C)

**DEFENDANT’S EMAIL EXCHANGES WITH SPRINGER
FROM DECEMBER 6, 2018 THROUGH JANUARY 22, 2019**

44. On December 8, 2015 Springer International Publishing, a subsidiary of Springer Nature America, Inc. (“Springer”), published the book *Ethical Concerns in Research on Human Trafficking* which contained chapters written by academic researchers.¹

45. Chapter 13, *Walking the Tightrope: Ethical Dilemma of Doing Fieldwork with Youth in US Sex Markets*, was written by Plaintiff and Dr. Horning-Ruf.² A true and correct copy of *Ethical Concerns in Research on Human Trafficking, Chapter 13*, is annexed hereto as **Exhibit “C”** and incorporated herein by reference.

46. In response to a Subpoena *Duces Tecum*, on March 18, 2020 Springer provided emails Defendant, CLAUDIA COJOCARU, sent to Dina Siegel (“Siegel”) and Roos de Wildt (“de Wildt”), the editors of *Ethical Concerns in Research on Human Trafficking* between December 6, 2018 and January 22, 2019. Annexed hereto as **Exhibit “D”** are true

¹ Dina Siegel, et ano., *Ethical Concerns in Research on Human Trafficking* [2015].

² *Ethical Concerns in Research on Human Trafficking: Walking the Tightrope: Ethical Dilemma of Doing Fieldwork with Youth in US Sex Markets*, Ch. 13 at 205.

and correct copies of the Defendant's Email Exchanges with Springer which are incorporated herein by reference.

47. On or about December 6, 2018, Defendant, CLAUDIA COJOCARU, sent an email to Ms. Siegel and Ms. de Wildt stating the following:

My name is Claudia Cojocaru, and, until April this year, I worked with Anthony Marcus and Ric Curtis.

I am writing to you to give you the opportunity to discreetly address Amalia Paladino and Amber Horning's plagiarism in the chapter "Walking the Tightrope: Ethical Dilemmas in Doing Fieldwork with Youth in US Sex Markets", you and Roos DeWildt [sic] published in a 2015/2016 edited volume titled "Ethical Concerns in Research on Human Trafficking". I am reaching out to find a solution in an attempt to avoid Paladino's and Horning's public shaming, as they may be willing to see this as an opportunity to change their ways. I am certain that you did not know that the individuals mentioned are the subjects of several investigations, as outlined in this report "John Jay Professors face Allegations of Drug Sales and Sexual Misconduct"
<https://www.nytimes.com/2018/09/22/nyregion/john-jay-professors-allegations.html>.

Please see below an excerpt from a report I am currently in the process of filing with US authorities, which is part of a larger investigation in the conduct of Richard Curtis and Anthony Marcus, and of their known associates. **This excerpt details how Anthony Marcus, Richard Curtis, Amalia Paladino, and Amber Horning, under the pretenses of "peer reviewing" and "supervising" my writing, had shamelessly and recklessly plagiarized my work in an effort to legitimize The "Atlantic City Study", a deeply problematic study ridden with ethical violations and falsified data.** Note that my work was already developed on the Bakhtin's framework of "carnavalesque" in 2014. My notes show I started working on that sometime in May 2014, if not earlier. **Paladino and Horning began working on their paper heavily much later, once Ric Curtis and Amalia got access to my Google docs.**

Needless to say, the actions Amber Horning and Amalia Paladino engaged in are reprehensible and deserve to be held accountable for what they did. However, given the gravity of these actions, I am unwilling to have anything I worked on associated with them, or my experiences and research used to legitimize their conduct.

Please do not hesitate to contact me if you need additional details.

Excerpt outlining plagiarism:

“... [sic] Not only I provided my editing and analytical skills, but my ideas and intellectual property were routinely plagiarized and taken from me without permission.

Here’s an example:

See, Exhibit “D”, Page 3. (emphasis added).

 Claudia.docx
48K

Bufnitza <ms.bufnitza@gmail.com>
To: Anthony Marcus <amarcus@jjay.cuny.edu>

Fri, Oct 24, 2014 at 11:03 PM

Hi Anthony,
I finally managed to see the comments and changes. Thank you for taking time to do that. I appreciate it. I don't normally like to talk about how I feel, but I think I misunderstood how much of my own feelings I was supposed to put in there, or how much focus on the personal experience I was to depict. Since I never wrote a report from the field, I kind of did what I saw in Ric's report. I feel bad I put all that in there, it probably looks like a very angry and codependent venting fuck show- excuse my language. I wasn't certain about the circus, but I do see the point you make. I also have the analysis Bakhtin wrote about the carnivalesque and laughter on Rabelais's Gargantua and Pantagruel, there are some things there that would connect with the idea of circus. I am getting pretty insecure about it (writing) though, if you think I am wasting your time, please do tell me, I prefer to know where I stand- I am quite oblivious to anything and I tend to get confused if I don't have a certain level of certainty. I am trying really hard to come close to normal behavior, but sometimes I miss.
Thank you,

Claudia

<https://mail.google.com/mail/u/0/?ik=d1d408c0cc&view=pt&search=...msg-f%3A1482936179076173431&siml=msg-f%3A1482960568153103608> Page 2 of 5

See, Exhibit “D”, Page 4. (emphasis supplied).

As evident from the above pictured email, I was already writing about these issues in 2014; I spoke at length about these analyses with Anthony Marcus and Ric Curtis. Unbeknownst to me, **Amalia Paladino, Anthony Marcus and Ric Curtis were more interested in appropriating my work**

than treating me like a colleague, or affording me the basic respect any human being deserves. I came across the book chapter presented here by accident, and I realized that **Amalia Paladino and Amber Horning were equally involved in plagiarism, as evident from the following example.** This book chapter was published in 2016, and both authors, Amalia Paladino, and Amber Horning have been on Ric Curtis' and Anthony Marcus' team for much longer than I was, as they both worked on the now infamous "Atlantic City study". **Amalia was my best friend when she and Anthony Marcus appropriated work I did.** Amber Horning almost became my dissertation adviser had I accepted to enroll in the PhD program at UMASS Lowell. Incidentally, **the chapter featured here is about the "Atlantic City study", and it is but one way that my experiences and my work have been used to validate and justify the problematic aspects of that study, while concurrently advancing the careers of the researchers involved.**

See, Exhibit "D", Page 4. (emphasis supplied).

**Chapter 13
Walking the Tightrope: Ethical Dilemmas
of Doing Fieldwork with Youth in US Sex
Markets**

Amber Horning and Amalia Paladino



The Sex Market as “Carnavalesque” and Colliding Worlds

Doing fieldwork in “unofficial” contexts such as sex marketplaces creates a feeling that everything is questionable, yet acceptable. This uncertainty results in cognitive dissonance, where researchers question their actions or inactions. This is how we operationalize our “missteps.” We engaged in ethnography and what Holstein

A. Horning (✉)

William Paterson University, Department of Sociology, 300 Pompton Rd. Wayne,
NJ 07470, USA
e-mail: ahorning@jjay.cuny.edu

A. Paladino

Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice,
Social Networks Research Group, 619 W. 54th St., 7th Floor, New York, NY 10019, USA
e-mail: apaladino@jjay.cuny.edu

© Springer International Publishing Switzerland 2016

205

D. Siegel, R. de Wildt (eds.), *Ethical Concerns in Research on Human Trafficking*,
Studies of Organized Crime 13, DOI 10.1007/978-3-319-21521-1_13

In this chapter, we explored how we traversed the ‘carnavalesque’ atmosphere of underground sex markets. This term was claimed by Mikhail Bakhtin (1984) and depicts ‘unofficial’ worlds where if you are not looking from the vantage point of a ‘world turned upside down,’ you may see nebulous rules, loose social boundaries and changeable hierarchies. We used this concept to examine how we approached ethical dilemmas in doing fieldwork with young sex workers and pimps. While we kept a foot in both ‘unofficial’ and ‘official’ worlds, we approached the dilemmas with the view of a ‘world turned upside down.’ We critically explored the more relevant concept of exploitation, especially coercion, in light of the idea that sex market involved youth are inherently exploited due to age related constrained agency e.g., immaturity, naiveté or traumatic upbringings (Dank, 2011; Lloyd, 2011). The themes of constrained agency manifested in unexpected ways that is in ways that were alternative to how some scholars and the public culturally and socially construct their lives. Further, we examined themes of constraint in the contexts of the sex market, the licit market and the research sphere, which are worlds that can collide, but also hold important intersections. As researchers, we walked the moral/ethical line of doing fieldwork with young participants and we also illustrated the balancing act involved in near missteps.

See, Exhibit “D”, Pages 5-6. (emphasis supplied).

48. The example Defendant, CLAUDIA COJOCARU, provided to Ms. Siegel and Ms. de Wildt was an October 24, 2014 email she sent to Dr. Marcus where she highlighted the following sentence she presumably believes was plagiarized: “I also have the analysis Bakhtin wrote about the carnivalesque and laughter on Rabelais’s *Gargantua and Pantagruel*, there are some things there that would connect with the idea of the circus.”

See, Exhibit “D”, Page 4. (emphasis added).

49. Mikhail Bakhtin was a “Russian literary theorist and philosopher of language whose wide-ranging ideas significantly influenced Western thinking in cultural

history, linguistics, literary theory, and aesthetics” who lived from 1895 to 1975 and who is frequently cited in a myriad of subjects.³

50. Based on the email Defendant, CLAUDIA COJOCARU, sent Ms. Siegel and Ms. de Wildt on December 6, 2018, it is clear that Defendant’s believes that because she once wrote a single sentence in an email stating that she has “the analysis [another person] wrote”, she now owns the rights to this now unoriginal thought and anyone who discusses this other person’s work without giving her credit has committed plagiarism.

51. On or about December 19, 2018, Ms. Siegel responded to Defendant, CLAUDIA COJOCARU, by email, acknowledging receipt of Defendant’s December 6, 2018 email referenced above. *See*, Exhibit “D”, Pages 3-4.

52. Unable to find any published evidence to support Defendant’s claim of plagiarism, on or about January 4, 2019, Ms. Siegel sent Defendant, CLAUDIA COJOCARU, a follow-up email where she asked Defendant if she had any evidence to support her claim and stated the following:

I checked in with the publisher, and they were not able to find any published evidence to support the claim of plagiarism. Do you have any evidence (for example a draft article or chapter you authored) of which segments ended up in the published book chapter?

See, Exhibit “D”, Page 2. (emphasis added).

53. On or about January 4, 2019, at approximately 5:58 p.m., Defendant, CLAUDIA COJOCARU, responded to Ms. Siegel’s email, copying Ms. de Wildt and

³ *See*, Encyclopedia Britannica, Mikhail Bakhtin [<https://www.britannica.com/biography/Mikhail-Bakhtin>] [Note: Free Version].

Springer Senior Editor, Katherine Chabalko (“Chabalko”), at Ms. Chabalko’s Springer email address, stating the following:

Thank you for your email. **I’m sorry to hear that the evidence is not enough- [sic] according to the US Office of Research Integrity, the evidence I provided is consistent with “the appropriation of another person’s ideas, processes, results, or words without giving appropriate credit.” . [sic] Note that it is not necessary to have the work published, as plagiarism comes in many forms. Of course, there is other evidence, but I will take this matter to my attorneys, and they will decide what to do regarding this, and other instances of plagiarism.** Dr. Siegel, thank you for your consideration in this matter. **I wanted to try addressing this issue informally, and as discreetly as possible, mainly because I once considered the people involved friends;** however, since this is not an option, I will take it through formal channels. Again, I appreciate your time and help.

See, Exhibit “D”, Page 2. (emphasis added).

54. On or about January 4, 2019, at approximately 6:00 p.m., Defendant, CLAUDIA COJOCARU, then forwarded the above email the above referenced January 4, 2019 email to Ms. Chabalko. *See*, Exhibit “D”, Page 2.

55. Still unable to identify any evidence of plagiarism, on or about January 4, 2019, Ms. Chabalko responded to Defendant, CLAUDIA COJOCARU, by email, acknowledging receipt of Defendant’s December 6, 2018 and January 4, 2019 emails referenced above, asking her to provide any evidence, even unpublished evidence, to support her claim and stated the following:

My name is Katie Chabalko, and I am the Senior Editor for Social and Behavioral Sciences here at Springer. I am also copying in Judith Newlin, who is currently managing our program in Criminology. Through Dina Siegel, **we have received your claim of plagiarism, regarding the chapter**

“Walking the Tightrope: Ethical Dilemmas of Doing Fieldwork with Youth in US Sex Markets” by Amber Horning and Amalia Paladino in the book *Ethical Concerns in Research on Human Trafficking*, edited by Dina Siegel and Roos DeWildt. As mentioned in the note below, our Research Integrity team is looking into this claim.

They were not able to find any evidence of plagiarism in published works, and asked whether there was any evidence in an unpublished work (such as a draft article or chapter, for example). Your note below seems to indicate that you have such materials. If so, if you can send that to me, that would be very helpful for them to continue their examination of this matter. Springer is a member of COPE (Committee on Publication Ethics). Per the COPE guidelines, **our next step is to go to the authors with this claim and any examples you provide, and ask the authors for an explanation. While we would not disclose your identity directly, it’s possible they may be able to figure it out themselves from the information provided.** This is the only step we can take to move the case forward on our side, but it may be inevitable that this will expose you as the source of the complaint. So, before doing so, **I want to ask if this is okay with you.**

I will await a further response from you.

See, Exhibit “D”, Pages 1-2. (emphasis added).

56. In response to Ms. Chabalko’s notification that they were unable to identify any evidence of plagiarism and request that she provide *any possible evidence* to support her claim, even a draft of an unpublished work, Defendant, CLAUDIA COJOCARU, stated the following:

Thank you for the email. As I relayed to Dr. Siegel in our correspondence, I only contacted Dr. Siegel as a courtesy, before I pass the matter to my attorneys to file official complaints. **Because I was recently informed that Horning and Paladino were warned about this situation,** I prefer to have my attorneys address this matter through formal channels.

See, Exhibit "D", Page 1. (emphasis added).

(D)

DEFENDANT'S MARCH 11, 2019 TEXT MESSAGES

57. On or about March 11, 2019, Defendant, CLAUDIA COJOCARU, sent her former fiancé, Mark Johnson, the following text messages:

Amalia filed a complaint against me lol[.]

It was shut down, but yeah.

Are you still friends with her on Facebook?

I deactivated my account[.]

True and correct copies of the March 11, 2019 Text Messages between Defendant and Mr. Johnson are annexed hereto as **Exhibit "E"** and incorporated herein by reference.

58. In the messages above, the person Defendant, CLAUDIA COJOCARU, refers to as "Amalia" is Plaintiff, AMALIA S. PALADINO.

59. After Mr. Johnson confirmed that he was still friends with Plaintiff on Facebook Defendant sent him additional text messages about Plaintiff wherein she stated the following:

She plagiarized one of my papers[.]

I was so disappointed when I realized that[.]

So I contacted the editor to take it down[.]

She retaliated[.]

See, Exhibit "E", Page 1. (emphasis added).

(E)

DEFENDANT'S JUNE 21, 2019 TO JUNE 22, 2019 TWEETS

60. On or about June 5, 2019, Bob Herbst, Esq., an attorney representing Ric Curtis, sent a letter to the CUNY John Jay community outlining the defenses to allegations Defendant, CLAUDIA COJOCARU, and Ms. Haber, had leveled against Dr. Curtis. Annexed hereto as **Exhibit "F"** is a true and correct copy of Mr. Herbst's letter with the relevant exhibits and incorporated herein by reference.⁴

61. In Mr. Herbst's letter he stated the following:

After [Dr. Curtis] fully cooperated with the District Attorney, presenting the same detailed defense and evidence of fabrication, conspiracy and motive that [they] later presented to President Mason's Title IX investigator, the District Attorney declined to credit any of the allegations against Ric Curtis, and closed his investigation without bringing any charges.

See, Exhibit "F", Page 1.

62. Mr. Herbst further stated that "[a]ccording to the [CUNY John Jay] Administration's very brief 'Notice of Outcome' correspondence, **the Administration's investigator could not substantiate any of the complainants' allegations of rape, attempted rape, sexual assault, and sexual violence.** None of those lurid allegations were found to be credible." *See*, Exhibit "F", Page 2. (emphasis supplied).

63. Mr. Herbst's letter further informed the CUNY John Jay community "of some of the evidence of fabrication, and motive to fabricate, which [was] presented to the

⁴ This exhibit, and the relevant exhibits annexed thereto, have been collectively Bates numbered for reference.

District Attorney and the Administration's investigator[.]” See, Exhibit “F”, Page 3.

64. According to Mr. Herbst's letter:

The evidence of fabrication includes the following:

- a. Cojocarú sent a text message to Amalia Paladino on June 18, 2018, attempting to persuade her to join in suing John Jay, writing that she has been planning to do so for two years. See *Exhibit A*.⁵
- b. On Jan. 26, 2017, Cojocarú sent an Instant Message to Amalia [Paladino] that Haber was going to fabricate that “Ric was running a sex trafficking ring,” and that Haber “always fabricates.” See *Exhibit B*.⁶ Less than two years later, both Cojocarú and Haber made exactly that fabricated allegation against Prof. Curtis. That was 2.5 years after he had supposedly started raping, and assaulting, and sexually harassing them.

See, Exhibit “F”, Page 3.

...

- g. Instant Messages among Cojocarú, Haber, Cojocarú's boyfriend Sebastian Hoyos-Torres, and Lambros Comitas and Ansley Hamid at Columbia Teachers College, reveal that they all conspired together to fabricate allegations of “predatory conduct,” culminating in this shared Message: “we may not need to bother about exposing Ric's lack of academic credentials, or his fraudulent scheming to get them, if we nail him on unprofessional, predatory conduct, that'll do.” See *Exhibit H*.⁷

See, Exhibit “F”, Page 5.

⁵ “Exhibit A” to Mr. Herbst's June 5, 2019 letter can be found on page 16 of Exhibit “F”. It can also be found within Exhibit “K” to this Complaint.

⁶ “Exhibit B” to Mr. Herbst's June 5, 2019 letter can be found on pages 17-27 of Exhibit “F”. It can also be found within Exhibit “I” to this Complaint.

⁷ “Exhibit H” to Mr. Herbst's June 5, 2019 letter can be found on page 44 of Exhibit “F”. It can also be found within Exhibit “K” to this Complaint.

65. Mr. Herbst further provided a section titled "Why They Did It" where he provided the following:

Substantial evidence demonstrates that both women had motives to fabricate these false charges against Ric and others, and that they have done so (1) **for financial reasons, laying the predicate for a lawsuit** against John Jay, (2) because **they aspired to become leaders of the #MeToo movement**, (3) because they came to believe that **Prof. Curtis was not sufficiently supportive of their efforts** (a) to get into a PhD program, and (b) to teach, and be properly compensated for teaching, at the College, and (4) to foreclose the **College's decision not to reappoint Cojocarú as an adjunct**. This evidence includes Cojocarú's communications indicating that she believes herself to be such a leader, and one referring to Haber as wanting to be a "survivor leader," *see Exhibit B* above, as well as the following:

See, Exhibit "F", Page 6. (emphasis added).

...

- h. On May 4, 2018, shortly after sending these emails where Anthony and Ric are identified as enemies, Cojocarú sent Amalia Paladino the conspiratorial Hamid-Haber-Comitas-Sebastian communication mentioned above, attempting to recruit Amalia to their conspiracy. It is quite possible that Cojocarú thought at that time that Teachers College was her last chance for admission to a PhD program, and she found willing partners with the two professors there who bore a 20-year-old grudge against Ric.
- i. In June 2018, Amalia Paladino emailed Prof. Curtis that Cojocarú was making really serious allegations against him, including that he tried to pimp Cojocarú and Haber out. *See Exhibit P.*⁸ This is exactly what Cojocarú had told Amalia back in January 2017 that Haber was attempting to fabricate.

⁸ "Exhibit P" to Mr. Herbst's June 5, 2019 letter can be found on page 44 of Exhibit "F". It can also be found within Exhibit "K" to this Complaint.

See, Exhibit "F", Page 7.

66. On, and between, June 21, 2019 and June 22, 2019, Defendant, CLAUDIA COJOCARU, published statements in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.⁹ A true and correct copy of the relevant Twitter statements ("Tweets") are attached hereto as **Exhibit "G"** and incorporated herein by reference.¹⁰

67. On, and between, June 21, 2019 and June 22, 2019, Defendant, CLAUDIA COJOCARU, published the following statements in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community under her pseudonymous username "@anarkriminology" on the social media network known as Twitter:

Last year, [@naomi_haber](#) and I filed [#TitleIX](#) complaints with John Jay College, something that has been in the news then, and a couple of weeks ago. During this time, we both received threats; I was attacked and stalked; my home was broken into; I was ostracized at work. [#MeToo](#)

See, Exhibit "G", Page 1.

...

Schrödinger's Criminologist @anarkriminology • Jun 21, 2019
3. I recently was shown a number of letters sent to the whole John Jay community, **in which supporters of these professors compiled a number of decontextualized statements, half-truths, and even lies**, seeking to exonerate the respondents by discrediting [@naomi_haber](#) & I. [#MeToo](#)

⁹ The Tweet also consisted of twenty-seven (27) reply Tweets by Defendant to her original Tweet.

¹⁰ This Exhibit has been Bates numbered for reference.

Schrödinger's Criminologist @anarkriminology • Jun 21, 2019
5. Interestingly enough, the "evidence" brought to the claim that [@naomi_haber](#) and I "hatched a conspiracy" is made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity. These probably amount to a couple of felonies if pursued.

See, Exhibit "G", Page 2. (emphasis added).

...

Schrödinger's Criminologist @anarkriminology • Jun 22, 2019
19b. In short, he can do nothing wrong. To establish that, these letters proceed to profile [@naomi_haber](#) & I as these angry, money hungry, media controlling, manipulative con-artists by...revealing (decontextualized) conversations in which I say terrible things about Naomi.

See, Exhibit "G", Page 9. (emphasis added).

...

Schrödinger's Criminologist @anarkriminology • Jun 22, 2019
19j. To make this [#antisemitic](#) canard stick, a conversation is quickly doctored to make believe that [@naomi_haber](#) & I [sic] were after \$ rather than justice, and quickly included in a malicious complaint, one of the many ridiculous complaints filed against us (per the letters) [#MeToo](#)

Schrödinger's Criminologist @anarkriminology • Jun 22, 2019
19k. Complaint goes nowhere, so doctored discussion is then spread around touted as "proof" of our "cunning greed". If 1 was to look closer and ask for context, 1 would see that this wasn't about [@naomi_haber](#) & I but about another victim suing. We only wanted to escape. [#MeToo](#)

See, Exhibit "G", Page 12. (emphasis added).

(Intentionally Left Blank)

(E)

DEFENDANT'S JULY 30, 2019 TWEET

68. On or about July 30, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Atlantic City Study under her pseudonymous username “@anarkriminology” on the social media network known as Twitter. A true and correct copy of the Tweet is attached hereto as **Exhibit “H”** and incorporated herein by reference.¹¹

69. On or about July 30, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Atlantic City Study and research team under her pseudonymous username “@anarkriminology” on the social media network known as Twitter:

Schrödinger’s Criminologist @anarkriminology • Jul 30, 2019
Replying to @anarkriminology @Coyoteri and 7 others
Is this how you choose to represent the interests of “youths involved in the sex trade”? **By defending “academics” who engaged in abusing vulnerable youth? There was even an investigation into that shit study, yet no mention of it in your blogpost. Why not?**

See, Exhibit “H”, Page 12. (emphasis added).

(Intentionally Left Blank)

¹¹ This Exhibit has been Bates numbered for reference.

DEFENDANT, CLAUDIA COJOCARU, WAS MOTIVATED BY GREED, MALICE, AND ACTUAL MALICE TO UNDERMINE AND MALIGN PLAINTIFF'S CREDIBILITY FOR HER OWN PERSONAL PROFIT AND TO CONCEAL HER LACK OF RESEARCH CREDENTIALS

70. As expounded upon below, in and about December 2014, Defendant, CLAUDIA COJOCARU, began making defamatory and/or negligent false statements to third parties that Plaintiff is violent, callous, reckless, dishonest, and unethical.

71. As expounded upon below, in and about May 2018, Defendant, CLAUDIA COJOCARU, began making defamatory and/or negligent false statements to third parties that Plaintiff had sexual relations with her advisor and other CUNY John Jay professors, suggesting Plaintiff is a sexually promiscuous substance abuser, plagiarizes others work, fabricates data, and helped cover up violent crimes, including the killing and/or murder of an underage sex worker during a federally funded study in exchange for Plaintiff's Ph.D.

72. Defendant, CLAUDIA COJOCARU, made these defamatory and/or negligent false statements in anticipation that Plaintiff would present evidence contradicting her and Naomi Haber's claims against male professors which she asserted to Plaintiff would be fabricated.

73. Defendant, CLAUDIA COJOCARU, further made these defamatory and/or negligent false statements that Plaintiff was also victim whose testimony should be presumed biased in favor of her purported abusers.

74. Defendant, CLAUDIA COJOCARU, sent the April 6, 2018 email, the November 29, 2018 text message exchange, the email exchanges between December 6,

2018 and January 22, 2019, the March 11, 2019 text messages, and the Tweets on June 21, 2019, June 22, 2019, and July 30, 2019 to undermine and malign Plaintiff's credibility.

75. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because she had made admissions to Plaintiff that she had been planning to frame John Doe and Dr. Curtis for over two (2) years and Plaintiff knew she lacked the academic credentials to be an ethnographer and an expert in sex trafficking research.

76. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide evidence against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York.

77. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide admissible evidence against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York.

78. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide testimony against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York.

79. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide evidence and testimony

against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York which would contradict the claims COJOCARU and Ms. Haber were asserting therein.

80. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide evidence and testimony against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York which would refute the claims COJOCARU and Ms. Haber were asserting therein.

81. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide evidence and testimony against Defendant and her co-plaintiff, Ms. Haber, in a civil lawsuit they filed against four (4) CUNY John Jay professors in the United States District Court for the Southern District of New York which would demonstrate that the claims COJOCARU and Ms. Haber were asserting therein were false.

82. Defendant, CLAUDIA COJOCARU, acted with malice when she undermined and maligned Plaintiff's credibility because she was motivated to harm Plaintiff for her own profit.

83. Defendant, CLAUDIA COJOCARU, acted with malice when she undermined and maligned Plaintiff's credibility because she was motivated to harm Plaintiff for her own benefit.

84. Defendant, CLAUDIA COJOCARU, acted with actual malice when she undermined and maligned Plaintiff's credibility because she was motivated to harm Plaintiff for her own profit.

85. Defendant, CLAUDIA COJOCARU, acted with actual malice when she undermined and maligned Plaintiff's credibility because she was motivated to harm Plaintiff for her own benefit.

(A)

COJOCARU'S Lack of Research Credentials

86. Defendant, CLAUDIA COJOCARU, claims to be an ethnographer and expert in sex trafficking research, who collected data in Japan in an auto-ethnographic research study.

87. Defendant, CLAUDIA COJOCARU, alleges she was a sex trafficking victim in Japan, and that such experience is just as, if not more, valid than the claims made by the scientific community.

88. While helping Defendant, CLAUDIA COJOCARU, with writing her resume in or about August 2014, it became clear to Plaintiff that Defendant had no research experience.

89. While helping Defendant, CLAUDIA COJOCARU, with writing her resume in or about August 2014, Defendant began searching for any sort of experience she could add and claimed that she "rescued" girls while she was in Japan.

90. Defendant, CLAUDIA COJOCARU, in August 2014, told Plaintiff that Defendant was closely tied to various gangs, including the Yakuza, in Japan and was friends with a woman who trafficked girls.

91. Plaintiff told Defendant, CLAUDIA COJOCARU, she could say that she started a nonprofit, but to speak minimally about it since she had no evidence to support her claims of “rescuing” girls in Japan, and her alleged methods were criminal.

92. Plaintiff thereafter helped Defendant, CLAUDIA COJOCARU, write her abstract for a human trafficking conference, however, the abstract was rejected.

93. After receiving notice that her application to the Criminal Justice Masters Program at CUNY John Jay had been rejected, Defendant, CLAUDIA COJOCARU, began writing a paper in the office space Plaintiff gave her.

94. Defendant, CLAUDIA COJOCARU, in February 2015, stated to Plaintiff that she needed to frame her experiences as “observations” due to Dr. Marcus’ feedback on the paper she wanted published in his journal.

95. Defendant, CLAUDIA COJOCARU, was finally admitted to the Masters Program in Criminal Justice at Rutgers University in 2015.

96. While at Rutgers, Defendant, CLAUDIA COJOCARU, began lashing out at anyone she believed had slighted and/or disadvantaged her, and publicly taunted, with Ms. Haber, female professors or minority status.

97. Among Defendant’s complaints in 2016 and 2017 against members of the Rutgers faculty were allegations of inhuman treatment, harassment, bullying, stalking, exploitation, plagiarism, obstruction of academic freedom, boundary violations,

ensorship, discrimination, gender discrimination, hostility, symbolic violence, gaslighting, insults, passive aggressive attacks, labeling, grade penalization, unexplained grading criteria, retaliation, and more. *See*, Exhibit “F”, Pages 28-43.

98. Defendant further alleged that the Rutgers Department Chair had exposed her to “relentless ... sexual harassment” (by an interviewee), and of being “rather dull and overly compliant, rejecting creativity and intellectual inquiry in favor of safety and redundancy,” and of showing favoritism to other students. *See*, Exhibit “F”, Pages 28-43.

99. These allegations against the Rutgers faculty came after faculty members began to claim that Defendant’s auto-ethnography was “illegitimate and unethical” and needed to be “verified”.

(B)

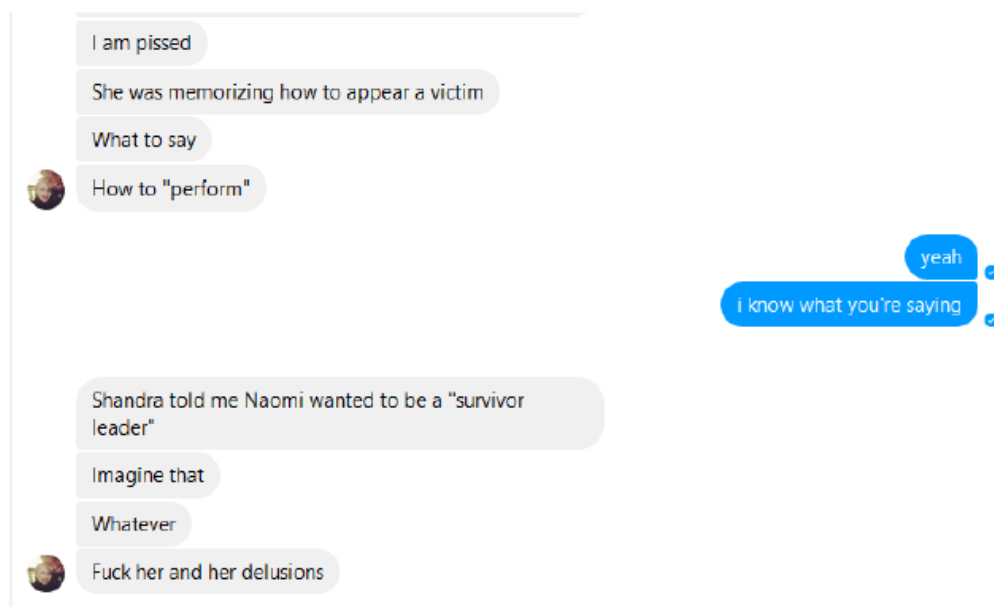
**COJOCARU’S Admission that
Naomi Haber Always Fabricates Allegations**

100. On January 26, 2017 Plaintiff and Defendant engaged in an instant message conversation on Facebook Messenger. Annexed hereto as **Exhibit “I”** is a true and correct copy of the instant message conversation on Facebook Messenger between Plaintiff and Defendant on January 26, 2017.¹²

101. During the conversation, which is also reproduced below, Defendant stated that Ms. Haber had been attending sex worker abolitionist group meetings and was **“memorizing how to appear [like] a victim ... [w]hat to say ... [h]ow to ‘perform’ ...**

¹² In the imbedded screen shots Defendant’s statements are on the left in grey with black text and Plaintiff’s are on the right in blue with white text.

[because] Naomi wanted to be a 'survivor leader[.]'



See, Exhibit "I", Page 11.

102. As is also reproduced below, Defendant then stated that Ms. Haber's plan was to allege that COJOCARU, or Dr. Curtis, or someone else, was going to sex traffic her and that while Defendant was in prison Ms. Haber would tell her story of how she was manipulated.

A screenshot of a text message conversation. The messages are as follows:

- Well, it was going to be like this - i was going to traffic her
- Or Ric
- Or whomever
- And while I was going to prison or whatever, she was going to tell her story of how she fell for my manipulative shit
- I can't make this stuff up

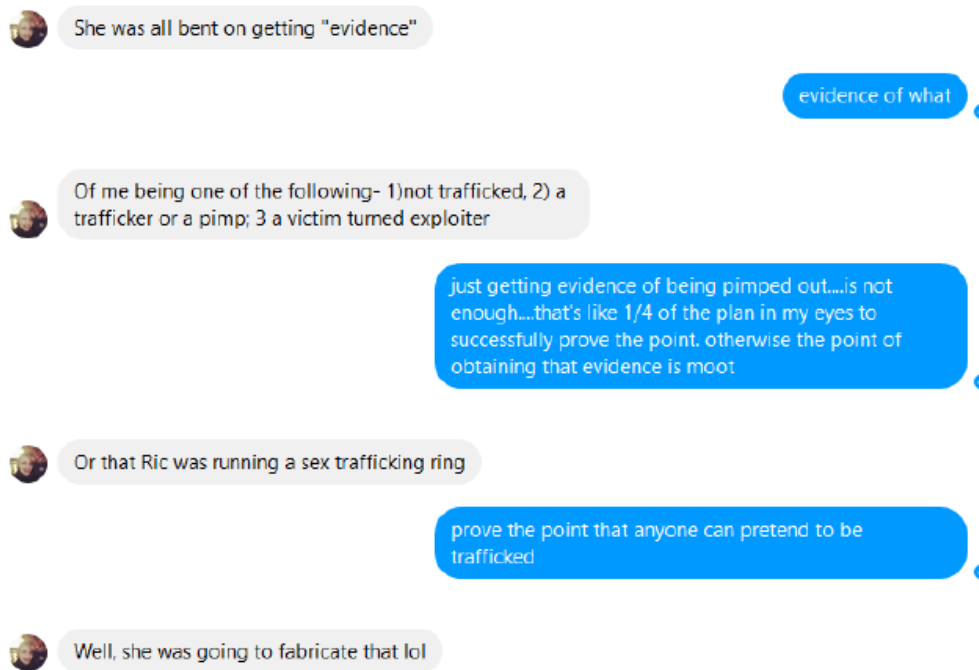
See, Exhibit "I", Page 12.

103. Defendant further claimed that Ms. Haber was "scheming" to convince

others that COJOCARU was a sex trafficker, that Defendant and Ms. Haber were in a relationship, and that Ms. Haber had told “people [COJOCARU] was abusive and [she] was forcing [Ms. Haber] to do stuff[.]” *See*, Exhibit “I”, Page 13.

104. Defendant further claimed that Ms. Haber was “bent on getting ‘evidence’” proving that COJOCARU had (a) never been a victim of sex trafficking, (b) been a sex trafficker or pimp herself, (c) a victim turned exploiter, or (d) that Dr. Curtis was running a sex trafficking ring. *See*, Exhibit “I”, Page 15.

105. Defendant further admitted, which is also reproduced below, that “[Ms. Haber] was going to fabricate” her story that she was a sex trafficking victim.



See, Exhibit “I”, Page 15. (emphasis added).

106. When Plaintiff asked Defendant why Ms. Haber would fabricate such a story, COJOCARU admitted, as is also reproduced below, that “[Naomi Haber] always fabricates ... [t]o get attention[.]”

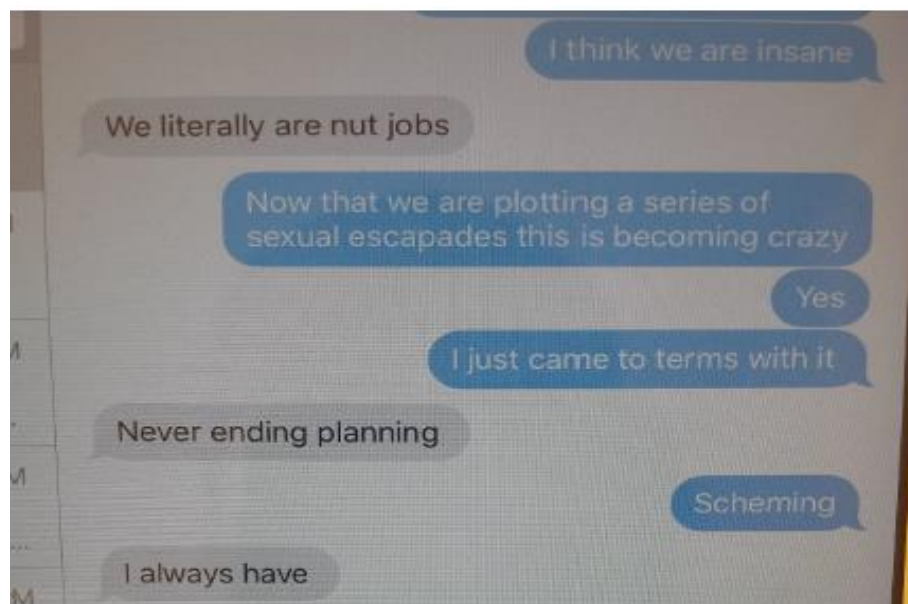
why fabricate?

She always fabricates
To get attention

See, Exhibit "I", Page 16. (emphasis added).

107. This is consistent with a Facebook Messenger conversation Defendant, CLAUDIA COJOCARU, and Ms. Haber had on October 7, 2015 where they discussed Defendant's plan to seduce various professors at an upcoming academic conference. See, Exhibit "J".¹³

108. Towards the end of the conversation, as is also reproduced below, Ms. Haber stated "[w]e literally are nut jobs[.]" to which Defendant, CLAUDIA COJOCARU, responded "[n]ow that we are plotting a series of sexual escapades this is becoming crazy[.] Yes[.] I just came to terms with it[.]"



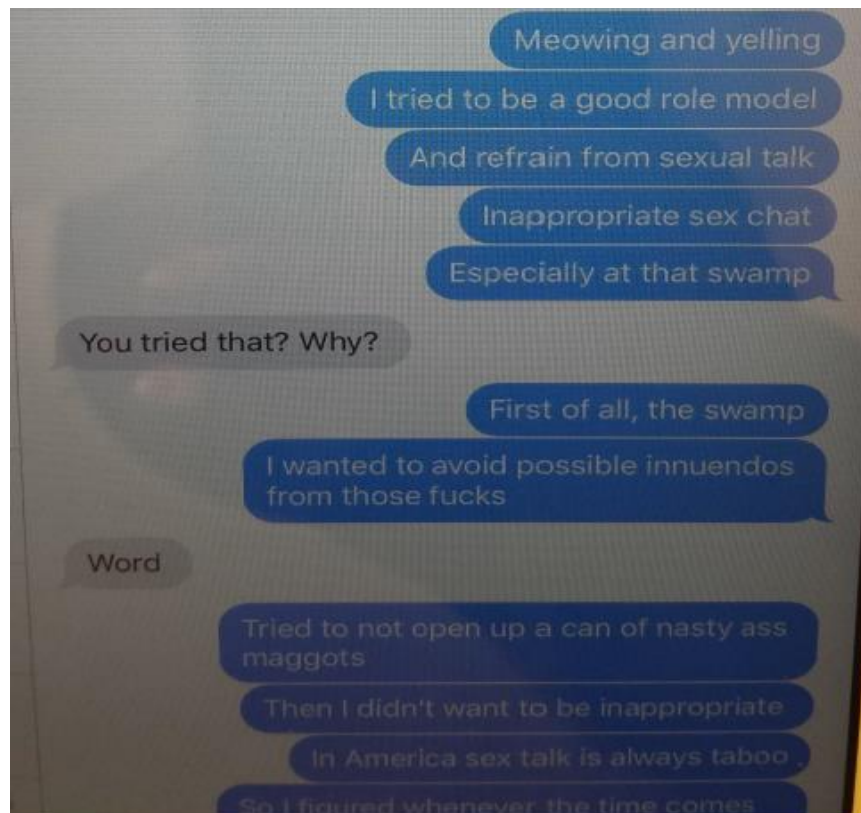
¹³ In the imbedded screen shots Defendant's statements are on the right in blue with white text and Ms. Haber's are on the left in gray with black text.

See, Exhibit "J", Page 11. (emphasis added).

109. As set forth above regarding their planned sexual escapades, Ms. Haber stated that they have "[n]ever ending planning" to do, to which Defendant responds that it is "Scheming". See, Exhibit "J", Page 11. (emphasis added).

110. As set forth above, in response to Defendant's correcting her that it is never ending "Scheming", Ms. Haber stated "I always have". See, Exhibit "J", Page 11. (emphasis added).

111. Defendant, CLAUDIA COJOCARU, then, as is also reproduced below, told Ms. Haber **that she has refrained from talking about sex in "the swamp" because it would be deemed inappropriate**, and then stated "**...I figured whenever the time comes**".



See, Exhibit "J", Page 11. (emphasis added).

112. Less than two (2) years after the January 26, 2017 Facebook Messenger conversation, Defendant, CLAUDIA COJOCARU, and Naomi Haber made exactly that fabricated allegation against Drs. Curtis, Marcus, Barry Spunt ("Spunt"), Mr. Dominguez, and CUNY John Jay.

(C)

**COJOCARU'S Scheme to Frame
a CUNY Adjunct Professor in 2014**

113. On April 10, 2014 Plaintiff confided to Defendant, CLAUDIA COJOCARU, that approximately one and one-half weeks earlier she had an unpleasant sexual encounter with John Doe,¹⁴ a then-adjunct at CUNY John Jay.

114. At that time Plaintiff informed Defendant, CLAUDIA COJOCARU, that she had not spoken to any of her CUNY John Jay advisors or administrators about the encounter with John Doe.

115. Defendant, CLAUDIA COJOCARU, responded by insisting that Plaintiff had been wronged and that she would avenge Plaintiff by setting John Doe up for a false rape allegation.

116. Defendant, CLAUDIA COJOCARU, stated "[l]et's frame [John Doe]."

117. Having only recently met Defendant, CLAUDIA COJOCARU, and because Defendant made the statement in such an exaggerated way, Plaintiff believed Ms.

¹⁴ The real name of John Doe is withheld to protect his privacy and the privacy of others.

COJOCARU was joking and did not believe she actually wanted to frame or set up John Doe for a false rape claim.

118. Despite not believing she was serious, Plaintiff affirmatively told Defendant, CLAUDIA COJOCARU, that she refused to take part in such a scheme.

119. Defendant, CLAUDIA COJOCARU, stated she would frame and/or set-up John Doe for a false rape claim on Plaintiff's behalf without her help.

120. Defendant, CLAUDIA COJOCARU, stated she would frame and/or set-up John Doe for a false rape claim on Plaintiff's behalf without her consent.

121. Plaintiff again told Defendant, CLAUDIA COJOCARU, to respect her privacy and to not share with anyone what Plaintiff had told her in confidence.

122. In the Fall of 2014 Defendant, CLAUDIA COJOCARU, became increasingly friendly with John Doe, even embracing and flirting with him.

123. Despite becoming increasingly friendly with John Doe, Defendant, CLAUDIA COJOCARU, continued telling Plaintiff she was only trying to get close to John Doe to frame him on Plaintiff's behalf.

124. Plaintiff continued telling Defendant, CLAUDIA COJOCARU, to stop joking and that she did not want to be associated with a false rape complaint in any way.

(Intentionally Left Blank)

(D)

**Cojocarú's Fraudulent Title IX Complaint to
Fabricate a History that Dr. Curtis had not
Previously Escalated Sexual Assault Claims**

125. In or about early March 2015 Plaintiff informed Dr. Curtis that she believed that John Doe had been "creeping out" Plaintiff's research assistant, Jane Doe.¹⁵

126. Dr. Curtis then escalated the matter to Dr. Marcus, then Chair of the Anthropology department.

127. Both Dr. Curtis and Dr. Marcus acted immediately on the claim and spoke with Jane Doe.

128. After speaking with Jane Doe, Dr. Marcus personally escorted John Doe out of the CUNY John Jay 54th Street research offices, the area commonly referred to as the "Swamp," in homage to the television series M.A.S.H.

129. After escorting John Doe from the premises Dr. Marcus encouraged Plaintiff to come forward about any other issues or concerns related to John Doe.

130. Contrary to Defendant's allegations in her Title IX Complaint, and subsequent federal lawsuit, Dr. Curtis and Dr. Marcus had demonstrated they effectively handled Jane Doe's complaints.

(Intentionally Left Blank)

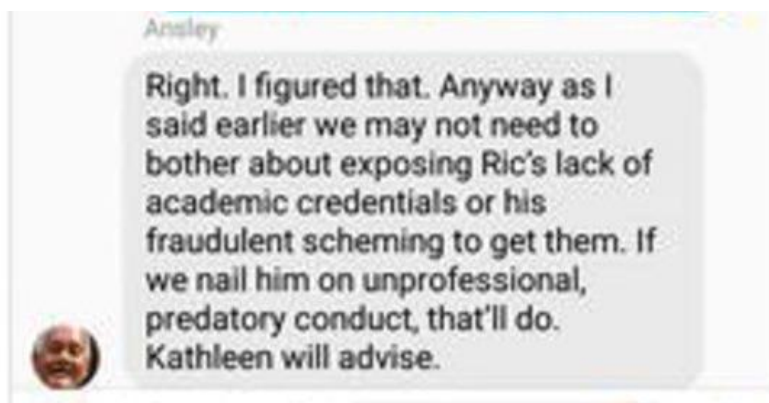
¹⁵ Jane Doe's real name is withheld to protect her privacy and the privacy of others.

(E)

**Cojocarú's Scheme to Frame Four
CUNY Professors for Personal Profit**

131. On or about June 18, 2018 Defendant, CLAUDIA COJOCARU, shared screenshots of a group Facebook Messenger conversation between COJOCARU, Naomi Haber, Sebastian Hoyos (Defendant's boyfriend and current Ph.D student at CUNY John Jay), Lambros Comitas, and an unidentified "assistant," and Ansley Hamid, which occurred on or about on May 4, 2018. Annexed hereto as **Exhibit "K"** are true and accurate copies of the June 18, 2018 conversation between Plaintiff and Defendant.¹⁶

132. As reproduced below, the conversation centered on conspiring to get Dr. Ric Curtis fired on a technicality.



See, Exhibit "K", Page 2.

133. As demonstrated above, Ansley Hamid suggests that Ric could be accused of having false credentials, but he adds, "as I said earlier, we may not need to bother

¹⁶ In the imbedded screen shots Defendant's statements are on the left in grey with black text and Plaintiff's are on the right in blue with white text, however, in the shared Facebook Messenger screenshots inside that conversation Defendant's statements are on the right in blue with white text and Ansley Hamid, Lambros Comitas, and an unidentified "assistant" are on the left in grey with black text. The messages discussing unrelated individuals and a minor have been redacted pursuant to 22 NYCRR § 202.5(e).

about exposing Ric's lack of academic credentials or his fraudulent scheming to get them. **If we nail him on unprofessional predatory conduct, that'll do.**" *See*, Exhibit "K", Page 2. (emphasis added).

134. During that Facebook Messenger conversation conversation Defendant, CLAUDIA COJOCARU, discusses bringing claims against CUNY John Jay and Dr. Curtis and affirmatively stated, **"I've been planning this for two years."** *See*, Exhibit "K", Page 27. (emphasis added).

135. Seeking another co-conspirator, Defendant, CLAUDIA COJOCARU, then asks Plaintiff **"[a]re you sure you don't want to sue CUNY? lol ... Just asking lmao"**. *See*, Exhibit "K", Page 29. (emphasis added).

136. Plaintiff again told Defendant, CLAUDIA COJOCARU, that she would not be involved these claims. *See*, Exhibit "K", Page 29.

(F)

**New York County District Attorney Declines to Prosecute
Curtiz, Marcus, Spunt, and Dominguez for the Allegations
COJOCARU Made in her False Criminal Complaint**

137. Upon information and belief, in or about October 2018 Defendant, CLAUDIA COJOCARU, and Naomi Haber met with representatives of the New York City Police Department's Special Victims Unit, the New York County District Attorney's sex crimes unit, and the New York State Inspector General's Office regarding allegations of, among other things, rape, sexual abuse, sex trafficking, and sexual harassment they

were asserting against Ric Curtis, Anthony Marcus, Leonardo Dominguez, and Barry Spunt.

138. Upon information and belief, Defendant, CLAUDIA COJOCARU, and Naomi Haber lodged criminal complaints, based on their false, fabricated, and malicious accusations of, among other things, rape, sexual abuse, sex trafficking, and sexual harassment, with the New York City Police Department, the New York County District Attorney, and the New York State Inspector General.

139. The investigation conducted by those law enforcement agencies concluded with no charges being filed against Drs. Curtis, Marcus, Spunt, and Mr. Dominguez.

(G)

**COJOCARU and Haber's Federal
Lawsuit Based on Fabricated Claims**

140. On or about June 10, 2019 Defendant, CLAUDIA COJOCARU, and Naomi Haber filed a lawsuit in the United States District Court for the Southern District of New York ("SDNY") under the caption *Claudia Cojocarum and Naomi Haber v. City University of New York d/b/a John Jay College of Criminal Justice, Ric Curtis, Anthony Marcus, Leonardo Dominguez and Barry Spunt, all in their individual and professional capacities*, which was assigned SDNY Civil Case No. 19-cv-5428 (AKH).¹⁷

141. Claudia Cojocarum and Ms. Haber later filed an Amended Complaint in the federal action on February 6, 2020.¹⁸

¹⁷ See, *Cojocarum, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 1.

¹⁸ See, *Cojocarum, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 62.

142. The federal lawsuit alleged that Ric Curtis, Anthony Marcus, Leonardo Dominguez, and Barry Spunt had subjected Claudia Cojocar and Ms. Haber to, among other things, rape, sexual abuse, sex trafficking, and sexual harassment.

143. In their respective answers to the Amended Complaint, Dr. Curtis, Mr. Dominguez, and Dr. Spunt denied COJOCARU and Ms. Haber's allegations and brought counterclaims against them for defamation, libel, and slander *per se* in connection with an interview they gave to the *New York Post* which resulted in an article published on September 22, 2018.

144. The September 22, 2018 article was titled "College professors allegedly sold drugs, 'pimped' out students."

145. The September 22, 2018 article contained many of the same accusations as those in the Amended Complaint, including that professors sexually assaulted COJOCARU and Ms. Haber and encouraged them to have sex with other professors.

146. The counterclaims assert that Claudia Cojocar and Ms. Haber initiated sexual conversations with professors, that Claudia Cojocar has a long history of making complaints about others in academia, and that plaintiffs had ulterior motives to fabricate allegations.

147. The counterclaims against COJOCARU and Ms. Haber for defamation, libel, and slander *per se* in connection with the *New York Post* interview, which resulted in the September 22, 2018 article, survived Cojocar and Haber's motion to dismiss.¹⁹

¹⁹ See, *Cojocar, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 99.

148. Dr. Curtis also brought a counterclaim for tortious interference with contract which similarly survived the same motion to dismiss.

AS AND FOR A FIRST CAUSE OF ACTION
NEGLIGENCE
April 6, 2018 Email

149. As set forth above, on or about April 6, 2018, at approximately 7:58 p.m., Defendant, CLAUDIA COJOCARU, transmitted an email to Dr. Marcus, a member of Plaintiff's dissertation committee, and Plaintiff's colleague and co-author, Dr. Horning-Ruf, which stated as follows:

Amalia is an abolitionist. She will be in her element there.
She is a pathological liar, abusive, and delusional. What more can one hope for?

See, Exhibit "A". (emphasis added).

150. On April 6, 2018 Defendant, CLAUDIA COJOCARU, transmitted the above-mentioned false statements from her Gmail account, *ms.bufnitza@gmail.com*, to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

151. On April 6, 2018 Defendant, CLAUDIA COJOCARU, transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, from her Gmail account, *ms.bufnitza@gmail.com*, to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

152. On April 6, 2018 Defendant, CLAUDIA COJOCARU, transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, from her Gmail account, *ms.bufnitza@gmail.com*, to the CUNY John Jay email addresses

used by Drs. Marcus and Horning-Ruf with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

153. On April 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

154. On April 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

155. On April 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

156. On April 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

157. On April 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

158. On April 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

159. On April 6, 2018 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-

mentioned false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

160. On April 6, 2018 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

161. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

162. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

163. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

164. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

165. On April 6, 2018 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

166. On April 6, 2018 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

167. On April 6, 2018 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff to the CUNY John Jay email addresses used by Drs. Marcus and Horning-Ruf.

168. As a direct result and proximate cause of the false statements transmitted on April 6, 2018 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

169. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on April 6, 2018 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability,

honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

170. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A SECOND CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
April 6, 2018 Email

171. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

172. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the April 6, 2018 email.

173. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the April 6, 2018 email constitutes negligent conduct on the part of said Defendant.

174. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the April 6, 2018 email constitutes a negligent violation of a statutory standard of conduct.

175. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the April 6, 2018 email constitutes a Negligent

Infliction of Emotional Distress.

176. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

177. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A THIRD CAUSE OF ACTION
PRIMA FACIE TORT
April 6, 2018 Email

178. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

179. The conduct by Defendant, CLAUDIA COJOCARU, on April 6, 2018 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

180. The conduct by Defendant, CLAUDIA COJOCARU, on April 6, 2018 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

181. On April 6, 2018 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to

Plaintiff.

182. The conduct by Defendant, CLAUDIA COJOCARU, on April 6, 2018 towards Plaintiff was without excuse or justification.

183. The conduct by Defendant, CLAUDIA COJOCARU, on April 6, 2018 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

184. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on April 6, 2018 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

185. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FOURTH CAUSE OF ACTION
NEGLIGENCE
November 29, 2018 Text Messages

186. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

187. As set forth above, on or about November 29, 2018, beginning at approximately 10:40 p.m., Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Mark Johnson text messages from her cellular telephone number "(718) 813-5739" which included false allegations related to a federally funded study to estimate the number of commercially sexually exploited children

throughout the United States. *See*, Exhibit “B”.

188. The study began with a pilot study in Atlantic City (“Atlantic City Study”).

189. Dr. Ric Curtis and Dr. Anthony Marcus were the Principal Investigators of the Atlantic City Study.

190. Plaintiff, AMALIA S. PALADINO, was a field researcher in the Atlantic City Study.

191. The text messages that Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Mark Johnson from her cellular telephone number “(718) 813-5739” on or about November 29, 2018 falsely alleged that during the Atlantic City Study:

- (a) Dr. Ric Curtis and Dr. Anthony Marcus had sex with underage sex workers in a motel, then paid them twenty (\$20.00) dollars each, and thereafter interviewed them;
- (b) Dr. Anthony Marcus had an “intimate interview and friendship” with a sex worker, alluding that it was sexual in nature;
- (c) Dr. Ric Curtis forced Dr. Marcus to break-off the relationship with the above referenced sex worker;
- (d) Dr. Ric Curtis and Dr. Anthony Marcus killed and/or murdered a sex worker;
- (e) researchers in the Study covered up the killing and/or murder of the aforementioned sex worker;
- (f) researchers were promised great rewards for covering up the killing and/or murder;
- (g) Leonardo Dominguez was promised a Ph.D as his

- reward for covering up the killing and/or murder;
- (h) Plaintiff was promised a Ph.D as her reward for covering up the killing and/or murder;
 - (i) the Study was flawed;
 - (j) research data obtained from the Study was faked and/or invented;
 - (k) the Study's Principal Investigators and researchers used Defendant's work and experiences to manufacture its validity;
 - (l) the Study's Principal Investigators and researchers used Defendant's work and experiences to justify killing and/or murdering the sex worker;
 - (m) the Study's Principal Investigators and researchers were part of a cult;
 - (n) Plaintiff was "in on" the killing and/or murder and cover-up;
 - (o) Dr. Anthony Marcus was "in on" the killing and/or murder and cover-up;
 - (p) Dr. Amber Horning-Ruf was "in on" the killing and/or murder and cover-up;
 - (q) Robert Riggs was "in on" the killing and/or murder and cover-up;
 - (r) Dr. Anthony Marcus told Defendant about the killing and/or murder and cover-up;
 - (s) Plaintiff told Defendant about the killing and/or murder and cover-up;
 - (t) other unidentified people told Defendant about the killing and/or murder and cover-up; and
 - (u) the Study is a huge scandal.

See, Exhibit “B,” Pages 4-7.

192. More specifically, on or about November 29, 2018, at approximately 10:57 p.m., Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Mark Johnson the following text message from her cellular telephone number “(718) 813-5739” related to the Atlantic City Study:

**Ric and Anthony may have killed a sex worker
in Atlantic City and the others covered it up[.]**

See, Exhibit “B,” Page 4. (emphasis added).

193. More specifically, on or about November 29, 2018, at 10:59 p.m., Defendant, CLAUDIA COJOCARU, further negligently published and/or electronically transmitted to Mark Johnson the following text messages from her cellular telephone number “(718) 813-5739” related to the Atlantic City Study:

Ric promised everyone involved great rewards.

It’s sickening[.]

He promised Leo a PhD[.]

And Amalia and the others too[.]

See, Exhibit “B,” Pages 4-5. (emphasis added).

194. More specifically, on or about November 29, 2018, between 11:03 and 11:04 p.m., Defendant, CLAUDIA COJOCARU, further negligently published and/or electronically transmitted to Mark Johnson the following text messages from her cellular telephone number “(718) 813-5739” related to the Atlantic City Study:

Yeah, but the "Atlantic City study" was what legitimized their claims.

Now, I pointed out all the flaws[.]

The data is faked[.]

And those fucks used me to manufacture validity[.]

This is a huge fucking scandal[.]

See, Exhibit "B," Pages 5-6. (emphasis added).

195. More specifically, on or about November 29, 2018, between 11:05 and 11:10 p.m., Defendant, CLAUDIA COJOCARU, further negligently published and/or electronically transmitted to Mark Johnson the following text messages from her cellular telephone number "(718) 813-5739" related to the Atlantic City Study:

It was a cult[.]

Not only they invented the data, but that girl was murdered[.]

After Anthony had an "intimate interview and friendship" with her[.]

She was killed 1 week after Ric made Anthony break it off.

Ric and Anthony had sex with underage sex workers in the motel, then they paid them 20 dollars each and interviewed them.

Then they used me and my work and my experiences to validate that shit[.]

To justify that murder. I'm sick to my stomach[.]

**Amalia, Amber, Robert Riggs, Leo, ric [sic],
Anthony, and so many others were in on it.**

Anthony told me[.]

Amalia told me[.]

It took a few years, but it all fell into place[.]

**I got information from so many different
people.**

See, Exhibit "B," Pages 6-7. (emphasis added).

196. Each and every one of the above referenced allegations about the Atlantic City Study are false.

197. On November 29, 2018 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her cellular telephone number "(718) 813-5739", to the cellular telephone number used by Mark Johnson.

198. On November 29, 2018 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her cellular telephone number "(718) 813-5739", to the cellular telephone number used by Mark Johnson with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

199. On November 29, 2018 Defendant, CLAUDIA COJOCARU, had a duty to

act with reasonable care toward the persons, assets, and reputations of others.

200. On November 29, 2018 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff to Mark Johnson.

201. On November 29, 2018 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

202. On November 29, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

203. On November 29, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

204. On November 29, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

205. On November 29, 2018 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

206. On November 29, 2018 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

207. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

208. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

209. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

210. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant,

CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

211. On November 29, 2018 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

212. On November 29, 2018 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

213. On November 29, 2018 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Mark Johnson.

214. As a direct result and proximate cause of the false statements transmitted on November 29, 2018 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

215. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on November 29, 2018 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and

writing and/or book offers, all to Plaintiff's damage.

216. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FIFTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
November 29, 2018 Text Messages

217. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

218. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the November 29, 2018 text messages.

219. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the November 29, 2018 text messages constitutes negligent conduct on the part of said Defendant.

220. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the November 29, 2018 text messages constitutes a negligent violation of a statutory standard of conduct.

221. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the November 29, 2018 text messages constitute a Negligent Infliction of Emotional Distress.

222. As a result of these negligent violations and actions by Defendant,

CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

223. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A SIXTH CAUSE OF ACTION
PRIMA FACIE TORT
November 29, 2018 Text Messages

224. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

225. The conduct by Defendant, CLAUDIA COJOCARU, on November 29, 2018 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

226. The conduct by Defendant, CLAUDIA COJOCARU, on November 29, 2018 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

227. On November 29, 2018 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

228. The conduct by Defendant, CLAUDIA COJOCARU, on November 29, 2018

towards Plaintiff was without excuse or justification.

229. The conduct by Defendant, CLAUDIA COJOCARU, on November 29, 2018 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

230. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on November 29, 2018 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

231. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A SEVENTH CAUSE OF ACTION
NEGLIGENCE
December 6, 2018 Email to Springer

232. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

233. As set forth above, on or about December 6, 2018, Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Dina Siegel and Roos de Wildt, the editors of *Ethical Concerns in Research on Human Trafficking*, from “ccojocar@jjay.cuny.edu”, the CUNY John Jay email address used by and assigned to Defendant. See, Exhibit “D”, Pages 3-5.

234. The email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Ms. Siegel and Ms. de Wildt from her CUNY John

Jay email address, "ccojocar@jjay.cuny.edu", on or about December 6, 2018 falsely alleged the following statements:

I am writing to you to give you the opportunity to discreetly address Amalia Paladino and Amber Horning's plagiarism in the chapter "Walking the Tightrope: Ethical Dilemmas in Doing Fieldwork with Youth in US Sex Markets", you and Roos DeWildt [sic] published in a 2015/2016 edited volume titled "Ethical Concerns in Research on Human Trafficking". I am reaching out to find a solution in an attempt to avoid Paladino's and Horning's public shaming, as they may be willing to see this as an opportunity to change their ways. I am certain that you did not know that the individuals mentioned are the subjects of several investigations, as outlined in this report "John Jay Professors face Allegations of Drug Sales and Sexual Misconduct"
<https://www.nytimes.com/2018/09/22/nyregion/john-jay-professors-allegations.html>.

Please see below an excerpt from a report I am currently in the process of filing with US authorities, which is part of a larger investigation in the conduct of Richard Curtis and Anthony Marcus, and of their known associates. **This excerpt details how Anthony Marcus, Richard Curtis, Amalia Paladino, and Amber Horning, under the pretenses of "peer reviewing" and "supervising" my writing, had shamelessly and recklessly plagiarized my work in an effort to legitimize The "Atlantic City Study", a deeply problematic study ridden with ethical violations and falsified data.** Note that my work was already developed on the Bakhtin's framework of "carnavalesque" in 2014. My notes show I started working on that sometime in May 2014, if not earlier. **Paladino and Horning began working on their paper heavily much later, once Ric Curtis and Amalia got access to my Google docs.**

Needless to say, the actions Amber Horning and Amalia Paladino engaged in are reprehensible and deserve to be held accountable for what they did. However, given the gravity of these actions, I am unwilling to have anything I worked on associated with them, or my experiences and research used to legitimize their conduct.

Excerpt outlining plagiarism:

“... Not only I provided my editing and analytical skills, but **my ideas and intellectual property were routinely plagiarized and taken from me without permission.**

Here’s an example:

See, Exhibit “D”, Page 3. (emphasis added).

235. The example, or purported evidence, Defendant, CLAUDIA COJOCARU, provided to Ms. Siegel and Ms. de Wildt was an October 24, 2014 email she sent to Dr. Marcus where she highlighted the following sentence she presumably believes was plagiarized: *“I also have the analysis Bakhtin wrote about the carnivalesque and laughter on Rabelais’s Gargantua and Pantagruel, there are some things there that would connect with the idea of the circus.”* See, Exhibit “D”, Page 4. (emphasis added).

236. The email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted to Dina Siegel and Roos de Wildt from her CUNY John Jay email address, “ccojocar@jjay.cuny.edu”, on or about December 6, 2018 further falsely alleged the following statements:

As evident from the above pictured email, I was already writing about these issues in 2014; I spoke at length about these analyses with Anthony Marcus and Ric Curtis. Unbeknownst to me, **Amalia Paladino, Anthony Marcus and Ric Curtis were more interested in appropriating my work than treating me like a colleague, or affording me the basic respect any human being deserves.** I came across the book chapter presented here by accident, and I realized that **Amalia Paladino and Amber Horning were equally involved in plagiarism, as evident from the following example.** This book chapter was published in 2016, and both authors, Amalia Paladino, and Amber Horning have been on Ric Curtis’ and Anthony Marcus’ team for much longer than I was, as they both worked on the now infamous “Atlantic

City study". **Amalia was my best friend when she and Anthony Marcus appropriated work I did.** Amber Horning almost became my dissertation adviser had I accepted to enroll in the PhD program at UMASS Lowell. Incidentally, **the chapter featured here is about the "Atlantic City study", and it is but one way that my experiences and my work have been used to validate and justify the problematic aspects of that study, while concurrently advancing the careers of the researchers involved.**

See, Exhibit "D", Page 4. (emphasis added).

237. Defendant, CLAUDIA COJOCARU, followed the above negligently published false statements with the first paragraph from the abstract of the twenty-nine (29) page chapter Drs. Horning-Ruf and Paladino published from which Defendant alleges the following were plagiarized:

... we explored how we traversed the 'carnavalesque' atmosphere of underground sex markets. This term was claimed by Mikhail Bakhtin (1984) and depicts 'unofficial' worlds where if you are not looking from the vantage point of a 'world turned upside down,' you may see nebulous rules, loose social boundaries and changeable hierarchies. We used this concept to examine how we approached ethical dilemmas in doing fieldwork with young sex workers and pimps. While we kept a foot in both 'unofficial' and 'official' worlds, we approached the dilemmas with the view of a 'world turned upside down.'

See, Exhibit "D", Page 4. (emphasis supplied).

238. Aside from the words "Bakhtin" and "carnavalesque", there is nothing which can even be considered appropriated or plagiarized from the single sentence Defendant sent Dr. Marcus in the October 24, 2014.

239. At no time prior to October 24, 2014 had Defendant, CLAUDIA COJOCARU, ever discussed her "ideas" on the analysis Mikhail Bakhtin wrote, or

Bakhtin in general, with Plaintiff or Dr. Horning-Ruf.

240. Contrary to Defendant's allegations to Springer, Plaintiff and Dr. Horning-Ruf had been using Mikhail Bakhtin's work as early as June 13, 2014 as demonstrated in the combined emails annexed hereto as **Exhibit "L"**.²⁰

241. On June 19, 2014 Dr. Horning-Ruf emailed Plaintiff a track-change copy of their chapter which included the abstract Defendant alleges was plagiarized from the email she sent Dr. Marcus over five (5) months later.²¹

242. In the draft Dr. Horning-Ruf transmitted on June 19, 2014 the abstract was written as follows:

... we explore how we traversed the **carnavalesque atmosphere (Bakhtin, XXXX) of underground sex markets**, including its horrors. There is an academic debate about whether youth involved in sex for pay are innherently commercially sexually exploited due to age-related constrained agency (Dank, 2011; more). We discuss the overt and hidden dimensions of this constraint, which manifested during the countless hours of observing and interviewing these young people. We explore walking the moral/ethical line of doing research with young participants and the dangers involved in near missteps, and the social and cultural processes involved in these scenarios.

See, Exhibit "L", Page 3. (italics removed, bold added).

243. Other references to Mikhail Bakhtin are found in the emails between Plaintiff and Dr. Horning-Ruf on June 19, 2014,²² June 21, 2014,²³ June 23, 2014,²⁴ June 24,

²⁰ *See*, Exhibit "L", Page 2.

²¹ *See*, Exhibit "L", Page 3.

²² *See*, Exhibit "L", Page 12.

²³ *See*, Exhibit "L", Page 13.

²⁴ *See*, Exhibit "L", Page 16.

2014,²⁵ and demonstrated in an email thread with Ms. de Wildt.²⁶

244. Further, Drs. Horning-Ruf and Paladino had already submitted a draft of their work, including their analysis of Mikhail Bakhtin's work, to Springer by July 29, 2014, nearly three (3) months before Defendant, CLAUDIA COJOCARU, even mentioned that she had read the analysis Mikhail Bakhtin wrote. *See*, Exhibit "L", Page 19.

245. Each and every one of the above referenced allegations related to plagiarism and the Atlantic City Study are false.

246. On December 6, 2018 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Dina Siegel and Roos de Wildt.

247. On December 6, 2018 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Dina Siegel and Roos de Wildt with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

248. On December 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty to act

²⁵ *See*, Exhibit "L", Page 17.

²⁶ *See*, Exhibit "L", Page 18.

with reasonable care toward the persons, assets, and reputations of others.

249. On December 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, to Dina Siegel and Roos de Wildt.

250. On December 6, 2018 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

251. On December 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

252. On December 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

253. On December 6, 2018 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

254. On December 6, 2018 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

255. On December 6, 2018 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

256. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

257. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

258. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

259. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant,

CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

260. On December 6, 2018 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

261. On December 6, 2018 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

262. On December 6, 2018 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel and Roos de Wildt.

263. As a direct result and proximate cause of the false statements transmitted on December 6, 2018 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

264. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on December 6, 2018 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional

abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

265. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR AN EIGHTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
December 6, 2018 Email to Springer

266. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

267. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the December 6, 2018 email.

268. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the December 6, 2018 email constitutes negligent conduct on the part of said Defendant.

269. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the December 6, 2018 email constitutes a negligent violation of a statutory standard of conduct.

270. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing

and/or electronically transmitting the December 6, 2018 email constitutes a Negligent Infliction of Emotional Distress.

271. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

272. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A NINTH CAUSE OF ACTION
PRIMA FACIE TORT
December 6, 2018 Email to Springer

273. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

274. The conduct by Defendant, CLAUDIA COJOCARU, on December 6, 2018 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

275. The conduct by Defendant, CLAUDIA COJOCARU, on December 6, 2018 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

276. On December 6, 2018 Defendant, CLAUDIA COJOCARU, negligently

caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

277. The conduct by Defendant, CLAUDIA COJOCARU, on December 6, 2018 towards Plaintiff was without excuse or justification.

278. The conduct by Defendant, CLAUDIA COJOCARU, on December 6, 2018 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

279. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on December 6, 2018 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

280. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A TENTH CAUSE OF ACTION
NEGLIGENCE
January 4, 2019 Email to Springer

281. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

282. On or about January 4, 2019, Dina Siegel sent Defendant, CLAUDIA COJOCARU, email stating that Springer was unable to find any published evidence to support Defendant's claim of plagiarism and requested that Defendant provide any

evidence to support her claim that Plaintiff and Dr. Horning-Ruf had plagiarized her work. See, Exhibit "D", Page 2.

283. Specifically, on January 4, 2019, Ms. Siegel stated the following:

I checked in with the publisher, and they were not able to find any published evidence to support the claim of plagiarism. Do you have any evidence (for example a draft article or chapter you authored) of which segments ended up in the published book chapter?

See, Exhibit "D", Page 2. (emphasis added).

284. Despite being affirmatively told that there was no evidence of plagiarism, Defendant was undeterred.

285. On or about January 4, 2019, at approximately 5:58 p.m., Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted a response to Ms. Siegel's January 4, 2019 email, copying Ms. de Wildt and Springer Senior Editor, Katherine Chabalko, at Ms. Chabalko's Springer email address from "*cjojocar@jjay.cuny.edu*", the CUNY John Jay email address used by and assigned to Defendant, falsely stating the following:

Thank you for your email. **I'm sorry to hear that the evidence is not enough- [sic] according to the US Office of Research Integrity, the evidence I provided is consistent with "the appropriation of another person's ideas, processes, results, or words without giving appropriate credit."** . [sic] Note that **it is not necessary to have the work published, as plagiarism comes in many forms. Of course, there is other evidence, but I will take this matter to my attorneys, and they will decide what to do regarding this, and other instances of plagiarism.** Dr. Siegel, thank you for your consideration in this matter. **I wanted to try addressing this issue informally, and as discreetly as possible, mainly because I once considered the**

people involved friends; however, since this is not an option, I will take it through formal channels. Again, I appreciate your time and help.

See, Exhibit “D”, Page 2. (emphasis added).

286. On or about January 4, 2019, at approximately 6:00 p.m., Defendant, CLAUDIA COJOCARU, then transmitted the above referenced January 4, 2019 email to Ms. Chabalko. *See*, Exhibit “D”, Page 2.

287. In the January 4, 2019 email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted in response to Ms. Siegel’s January 4, 2019 email, copying Ms. de Wildt and Ms. Chabalko, continued alleging that her ideas had been plagiarized by Plaintiff.

288. In the January 4, 2019 email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted in response to Ms. Siegel’s January 4, 2019 email, copying Ms. de Wildt and Ms. Chabalko stated “**[o]f course, there is other evidence**” her ideas had been plagiarized by Plaintiff. *See*, Exhibit “D”, Page 2. (emphasis added).

289. In the January 4, 2019 email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted in response to Ms. Siegel’s January 4, 2019 email, copying Ms. de Wildt and Ms. Chabalko, she further stated that there are “**other instances of plagiarism**” of her ideas by Plaintiff. *See*, Exhibit “D”, Page 2. (emphasis added).

290. Despite being asked for evidence to support her plagiarism allegations, Defendant, CLAUDIA COJOCARU, provided none.

291. Despite affirmatively stating that she has evidence to support her plagiarism claims, Defendant, CLAUDIA COJOCARU, provided none.

292. Moreover, as demonstrated above, Plaintiff and Dr. Horning-Ruf had been using Mikhail Bakhtin's work as early as June 13, 2014 over four (4) months before Defendant sent the email mentioning she had an analysis of Bakhtin on October 24, 2014. *See*, Exhibit "L".

293. Each and every one of the above referenced allegations related to plagiarism and the Atlantic City Study are false.

294. On January 4, 2019 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

295. On January 4, 2019 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Dina Siegel, Roos de Wildt, and Katherine Chabalko with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

296. On January 4, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

297. On January 4, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

298. On January 4, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

299. On January 4, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

300. On January 4, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

301. On January 4, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

302. On January 4, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study

which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

303. On January 4, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

304. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

305. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

306. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false

statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

307. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

308. On January 4, 2019 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

309. On January 4, 2019 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

310. On January 4, 2019 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Dina Siegel, Roos de Wildt, and Katherine Chabalko.

311. As a direct result and proximate cause of the false statements transmitted on January 4, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the

community has been damaged.

312. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on January 4, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

313. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR AN ELEVENTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
January 4, 2019 Email to Springer

314. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

315. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the January 4, 2019 email.

316. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the January 4, 2019 email constitutes negligent conduct on the part of said Defendant.

317. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the January 4, 2019 email constitutes a negligent violation of a statutory standard of conduct.

318. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the January 4, 2019 email constitutes a Negligent Infliction of Emotional Distress.

319. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

320. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A TWELFTH CAUSE OF ACTION
PRIMA FACIE TORT
January 4, 2019 Email to Springer

321. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

322. The conduct by Defendant, CLAUDIA COJOCARU, on January 4, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

323. The conduct by Defendant, CLAUDIA COJOCARU, on January 4, 2019

towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

324. On January 4, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

325. The conduct by Defendant, CLAUDIA COJOCARU, on January 4, 2019 towards Plaintiff was without excuse or justification.

326. The conduct by Defendant, CLAUDIA COJOCARU, on January 4, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

327. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on January 4, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

328. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A THIRTEENTH CAUSE OF ACTION

NEGLIGENCE

January 22, 2019 Email to Springer

329. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

330. On or about January 14, 2019, Katherine Chabalko sent Defendant, CLAUDIA COJOCARU, an email stating that Springer was unable to find any evidence to support Defendant's claim of plagiarism and requested that Defendant provide any evidence, even unpublished evidence, to support her claim that Plaintiff and Dr. Horning-Ruf had plagiarized her work. *See*, Exhibit "D", Pages 1-2.

331. Specifically, on January 14, 2019, Ms. Chabalko stated the following:

... we have received your claim of plagiarism, regarding the chapter "Walking the Tightrope: Ethical Dilemmas of Doing Fieldwork with Youth in US Sex Markets" by Amber Horning and Amalia Paladino in the book *Ethical Concerns in Research on Human Trafficking*, edited by Dina Siegel and Roos DeWildt. As mentioned in the note below, **our Research Integrity team is looking into this claim.**

They were not able to find any evidence of plagiarism in published works, and asked whether there was any evidence in an unpublished work (such as a draft article or chapter, for example). **Your note below seems to indicate that you have such materials. If so, if you can send that to me, that would be very helpful for them to continue their examination of this matter.** Springer is a member of COPE (Committee on Publication Ethics). Per the COPE guidelines, **our next step is to go to the authors with this claim and any examples you provide, and ask the authors for an explanation.** While we would not disclose your identity directly, it's possible they may be able to figure it out themselves from the information provided. **This is the only step we can take to move the case forward on our side, but it may be inevitable that this will expose you as the source of the complaint. So, before doing so, I want to ask if this is okay with you.**

I will await a further response from you.

See, Exhibit "D", Pages 1-2. (emphasis added).

332. Despite being again affirmatively told that there was no evidence of

plagiarism, Defendant continued to be undeterred.

333. On or about January 22, 2019, at approximately 8:43 p.m., Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted a response to Ms. Chabalko's January 14, 2019 email, copying Ms. Siegel, Ms. de Wildt, and Springer Criminology Program Manager, Judith Newlin ("Newlin"), at Ms. Newlin's Springer email address from "ccojocar@jjay.cuny.edu", the CUNY John Jay email address used by and assigned to Defendant, falsely stating the following:

Thank you for the email. As I relayed to Dr. Siegel in our correspondence, I only contacted Dr. Siegel as a courtesy, before I pass the matter to my attorneys to file official complaints. **Because I was recently informed that Horning and Paladino were warned about this situation, I prefer to have my attorneys address this matter through formal channels.**

See, Exhibit "D", Page 1. (emphasis added).

334. In the January 22, 2019 email Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted in response to Ms. Chabalko's January 14, 2019 email, copying Ms. Siegel, Ms. de Wildt, and Ms. Newlin, Defendant continued alleging that her ideas had been plagiarized by Plaintiff and "**[she had been] recently informed that Horning[-Ruf] and Paladino were warned about this situation**".

See, Exhibit "D", Page 1. (emphasis added).

335. Upon information and belief "this situation" Defendant, CLAUDIA COJOCARU, is referring to in her January 22, 2019 email is her allegations of plagiarism to Springer.

336. Defendant's allegation in the January 22, 2019 email negligently published and/or electronically transmitted in response to Ms. Chabalko's January 14, 2019 email, copying Ms. Siegel, Ms. de Wildt, and Ms. Newlin, where Defendant, CLAUDIA COJOCARU, states that "[she had been] recently informed that Horning[-Ruf] and Paladino were warned about this situation", avers and/or implies to the readers that she had recently learned Dr. Horning-Ruf and Plaintiff had been reprimanded for the claimed plagiarism. *See*, Exhibit "D", Page 1.

337. Defendant's allegation in the January 22, 2019 email negligently published and/or electronically transmitted in response to Ms. Chabalko's January 14, 2019 email, copying Ms. Siegel, Ms. de Wildt, and Ms. Newlin, where Defendant, CLAUDIA COJOCARU, states that "[she had been] recently informed that Horning[-Ruf] and Paladino were warned about this situation", avers and/or implies to the readers that she had recently learned that investigation had concluded that Dr. Horning-Ruf and Plaintiff had plagiarized Defendant warranting a warning and/or reprimand. *See*, Exhibit "D", Page 1.

338. No investigation ever substantiated Defendant's allegations that either Plaintiff, or Dr. Horning-Ruf plagiarized any of Defendant's work, writing, and/or ideas.

339. Neither Plaintiff, nor Dr. Horning-Ruf, were reprimanded for the unsupported and unsubstantiated false allegations of plagiarism Defendant made to Springer.

340. Despite being asked for evidence to support her plagiarism claims, Defendant, CLAUDIA COJOCARU, provided none.

341. Despite stating that she has evidence to support her plagiarism claims, Defendant, CLAUDIA COJOCARU, provided none.

342. Moreover, as demonstrated above, Plaintiff and Dr. Horning-Ruf had been using Mikhail Bakhtin's work as early as June 13, 2014. *See*, Exhibit "D".

343. Each and every one of the above referenced allegations by Defendant related to plagiarism and the Atlantic City Study are false.

344. On January 22, 2019 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

345. On January 22, 2019 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Atlantic City Study which is publicly linked to Plaintiff, from her CUNY John Jay email address, "*ccojocar@jjay.cuny.edu*", to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

346. On January 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

347. On January 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act

with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

348. On January 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

349. On January 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

350. On January 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

351. On January 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

352. On January 22, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt,

and Judith Newlin.

353. On January 22, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

354. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

355. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

356. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly

linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

357. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

358. On January 22, 2019 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

359. On January 22, 2019 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

360. On January 22, 2019 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, to Katherine Chabalko, Dina Siegel, Roos de Wildt, and Judith Newlin.

361. As a direct result and proximate cause of the false statements transmitted on January 22, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

362. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on January 22, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

363. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FOURTEENTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
January 22, 2019 Email to Springer

364. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

365. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the January 22, 2019 email.

366. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the January 22, 2019 email constitutes negligent conduct on the part of said Defendant.

367. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in

publishing and/or electronically transmitting the January 22, 2019 email constitutes a negligent violation of a statutory standard of conduct.

368. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the January 22, 2019 email constitutes a Negligent Infliction of Emotional Distress.

369. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

370. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FIFTEENTH CAUSE OF ACTION
PRIMA FACIE TORT
January 22, 2019 Email to Springer

371. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

372. The conduct by Defendant, CLAUDIA COJOCARU, on January 22, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

373. The conduct by Defendant, CLAUDIA COJOCARU, on January 22, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social

justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

374. On January 22, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

375. The conduct by Defendant, CLAUDIA COJOCARU, on January 22, 2019 towards Plaintiff was without excuse or justification.

376. The conduct by Defendant, CLAUDIA COJOCARU, on January 22, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

377. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on January 22, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

378. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A SIXTEENTH CAUSE OF ACTION
LIBEL PER SE
March 11, 2019 Text Messages

379. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

380. On or about March 11, 2019, Defendant, CLAUDIA COJOCARU, published and/or electronically transmitted false and defamatory text messages from her cellular telephone number “(718) 813-5739” to the cellular telephone number used by Mark Johnson, wherein she falsely alleged “**Amalia filed a complaint against me lol [sic] ... [but] [i]t was shut down, but yeah.**” *See*, Exhibit “E”, Page 1. (emphasis added).

381. After making the March 11, 2019 false statement that Plaintiff had filed a complaint against Defendant which was “shut down”, Defendant, CLAUDIA COJOCARU, published and/or electronically transmitted a text message to Mr. Johnson asking “[a]re you still friends with [Amalia] on [F]acebook”. *See*, Exhibit “E”, Page 1.

382. On or about March 11, 2019, after Mr. Johnson confirmed that he and Plaintiff were “still friends”, Defendant, CLAUDIA COJOCARU, published and/or electronically transmitted false and defamatory text messages from her cellular telephone number “(718) 813-5739” to the cellular telephone number used by Mark Johnson, wherein she falsely stated that Plaintiff “**plagiarized one of my papers ... [s]o I contacted the editor to take it down ... [s]he retaliated**”. *See*, Exhibit “E”, Page 1. (emphasis added).

383. The defamatory statements, which were published to Mr. Johnson by text message by Defendant, CLAUDIA COJOCARU, on March 11, 2019, makes a false and disparaging statement about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging Plaintiff plagiarized work she published in an academic publication.

384. The above-mentioned statements are false and defamatory.

385. The above-mentioned statements published by Defendant, CLAUDIA COJOCARU, through text messages to Mr. Johnson from her cellular telephone number “(718) 813-5739” constitute Libel *Per Se* in that they negatively reflect upon and disparage Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging Plaintiff plagiarized work she published in an academic publication.

386. The above-mentioned statement published by Defendant, CLAUDIA COJOCARU, through text messages to Mr. Johnson from her cellular telephone number “(718) 813-5739” are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy.

387. Since Defendant, CLAUDIA COJOCARU, published the false and defamatory statements through her text messages to Mr. Johnson from her cellular telephone number “(718) 813-5739”, her libelous statements have been viewed by at least one third-party.

388. Since Defendant, CLAUDIA COJOCARU, published the defamatory statements through text messages to Mr. Johnson from her cellular telephone number “(718) 813-5739” her libelous *per se* statements have been published to a third-party.

389. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

390. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

391. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

392. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

393. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

394. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

395. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

396. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

397. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

398. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

399. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A SEVENTEENTH CAUSE OF ACTION
DISPARAGEMENT
March 11, 2019 Text Messages

400. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

401. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she published plagiarized work in an academic publication, in statements she published

and/or electronically transmitted through text messages to Mark Johnson from her cellular telephone number “(718) 813-5739” when she stated that Plaintiff, AMALIA S. PALADINO, “**filed a complaint against me lol [sic] ... [but] [i]t was shut down,**” and that Plaintiff “**plagiarized one of my papers ... [s]o I contacted the editor to take it down ... [s]he retaliated**”. *See*, Exhibit “E.” (emphasis added).

402. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

403. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

404. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

405. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant’s publication of the false and/or recklessly made statements on or about March 11, 2019.

406. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

407. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR AN EIGHTEENTH CAUSE OF ACTION
NEGLIGENCE
March 11, 2019 Text Messages

408. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

409. As set forth above, on or about March 11, 2019, beginning at approximately 5:20 p.m., Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted from her cellular telephone number “(718) 813-5739” to the cellular telephone number used by Mark Johnson statements alleging that Plaintiff “**plagiarized one of [her] papers**” and admitting that “[she] **contacted the editor to take it down**”. *See*, Exhibit “E”.

410. Each and every one of the above referenced allegations of plagiarism are false.

411. On March 11, 2019 Defendant, CLAUDIA COJOCARU, negligently published and/or electronically transmitted the above-mentioned false statements about and referring to Plaintiff, AMALIA S. PALADINO, from her cellular telephone number “(718) 813-5739”, to the cellular telephone number used by Mark Johnson with the knowledge that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

412. On March 11, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

413. On March 11, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements

she transmitted about and referring to Plaintiff to Mark Johnson.

414. On March 11, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she transmitted about and referring to Plaintiff, to Mark Johnson.

415. On March 11, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

416. On March 11, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and referring to Plaintiff, to Mark Johnson.

417. On March 11, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, to Mark Johnson.

418. On March 11, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, to Mark Johnson.

419. On March 11, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to transmitting the above-mentioned false statements about and referring to Plaintiff, to Mark Johnson.

420. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she transmitted about and

referring to Plaintiff, to Mark Johnson.

421. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she transmitted about and referring to Plaintiff, to Mark Johnson.

422. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, to Mark Johnson.

423. Prior to transmitting the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, to Mark Johnson.

424. On March 11, 2019 Defendant, CLAUDIA COJOCARU, negligently transmitted the above-mentioned false statements about and referring to Plaintiff, to Mark Johnson.

425. On March 11, 2019 Defendant, CLAUDIA COJOCARU, recklessly transmitted the above-mentioned false statements about and referring to Plaintiff, to Mark Johnson.

426. On March 11, 2019 Defendant, CLAUDIA COJOCARU, carelessly transmitted the above-mentioned false statements about and referring to Plaintiff, to

Mark Johnson.

427. As a direct result and proximate cause of the false statements transmitted on March 11, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

428. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on March 11, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

429. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A NINETEENTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
March 11, 2019 Text Messages

430. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

431. On or about March 11, 2019, Defendant, CLAUDIA COJOCARU, published and/or electronically transmitted text messages to Mark Johnson falsely stating that

Plaintiff “**plagiarized one of [her] papers**” and admitting that “[**she**] **contacted the editor to take it down**” from her cellular telephone number “(718) 813-5739”. *See*, Exhibit “E”, Page 1. (emphasis added).

432. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the March 11, 2019 text messages to Mark Johnson constituted an Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

433. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

434. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A TWENTIETH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
March 11, 2019 Text Messages

435. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

436. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the March 11, 2019 text messages.

437. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the March 11, 2019 text messages constitutes negligent conduct on the part of said Defendant.

438. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the March 11, 2019 text messages constitutes a negligent violation of a statutory standard of conduct.

439. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the March 11, 2019 text messages constitute a Negligent Infliction of Emotional Distress.

440. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

441. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

(Intentionally Left Blank)

AS AND FOR A TWENTY-FIRST CAUSE OF ACTION
PRIMA FACIE TORT
March 11, 2019 Text Messages

442. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

443. The conduct by Defendant, CLAUDIA COJOCARU, on March 11, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

444. The conduct by Defendant, CLAUDIA COJOCARU, on March 11, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

445. On March 11, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

446. The conduct by Defendant, CLAUDIA COJOCARU, on March 11, 2019 towards Plaintiff was without excuse or justification.

447. The conduct by Defendant, CLAUDIA COJOCARU, on March 11, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

448. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on March 11, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

449. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been

damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A TWENTY-SECOND CAUSE OF ACTION

LIBEL

June 21, 2019 Tweet (Reply Tweet "3")

450. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

451. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false and defamatory statements related to the communications Plaintiff provided:

3. I recently was shown a number of letters sent to the whole John Jay community, **in which supporters of these professors compiled a number of decontextualized statements, half-truths, and even lies**, seeking to exonerate the respondents by discrediting [@naomi_haber](#) & I. [#MeToo](#)

See, Exhibit "G", Page 2, Reply Tweet "3". (emphasis added).

452. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 21, 2019, make false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar.

453. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter on June 21, 2019, makes false and disparaging statements about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified communications and records and calling her a liar.

454. The above-mentioned statements are false and defamatory.

455. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy constituting Libel.

456. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

457. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

458. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

459. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

460. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

461. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

462. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

463. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

464. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

465. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

466. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

467. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A TWENTY-THIRD CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 21, 2019 Tweet (Reply Tweet "3")

468. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

469. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

470. Defendant's interference with Plaintiff's business and professional relations

was made with malice.

471. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

472. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

473. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified communications and records and is a liar, when she publicly stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were **"compiled [of] a number of decontextualized statements, half-truths, and even lies"**. See, Exhibit "G", Page 2, Reply Tweet "3". (emphasis added).

474. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff's damage.

475. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff,

AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff's damage.

476. The average revenue earned per class taught is \$5,702.40.

477. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff's damage.

478. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

479. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount to be determined at trial but which should not be less SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION
DISPARAGEMENT
June 21, 2019 Tweet (Reply Tweet "3")

480. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

481. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified communications and records and calling her a liar, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were **"compiled [of] a number of decontextualized statements, half-truths, and even lies"**. *See*, Exhibit "G", Page 2, Reply Tweet "3". (emphasis added).

482. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

483. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

484. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

485. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant's publication of the false and/or recklessly made statements on or about June 21, 2019.

486. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

487. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR TWENTY-FIFTH CAUSE OF ACTION
NEGLIGENCE
June 21, 2019 Tweet (Reply Tweet "3")

488. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

489. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false statements related to the communications Plaintiff provided:

3. I recently was shown a number of letters sent to the whole John Jay community, **in which supporters of these professors compiled a number of decontextualized statements, half-truths, and even lies**, seeking to exonerate the respondents by discrediting [@naomi_haber](#) & I. **#MeToo**

See, Exhibit "G", Page 2, Reply Tweet "3". (emphasis added).

490. On June 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

491. On June 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, falsely attacking Plaintiff’s ethics, honesty, truthfulness, and calling her a liar.

492. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

493. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

494. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

495. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

496. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to

act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

497. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

498. On June 21, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

499. On June 21, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

500. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

501. Prior to publishing the above-mentioned false statements it was reasonably

foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

502. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

503. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

504. On June 21, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

505. On June 21, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

506. On June 21, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

507. As a direct result and proximate cause of the false statements published on June 21, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

508. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on June 21, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff’s damage.

509. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

(Intentionally Left Blank)

AS AND FOR A TWENTY-SIXTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "3")

510. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

511. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter a defamatory statement alleging that the communications were "decontextualized statements, half-truths, and even lies," falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar. *See*, Exhibit "G", Page 2, Reply Tweet "3".

512. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "3" on June 21, 2019 on the social media network known as Twitter constituted the Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

513. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress,

the after effects of which will remain with Plaintiff permanently.

514. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "3")

515. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

516. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting Reply Tweet "3" on June 21, 2019.

517. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "3" on June 21, 2019 constitutes negligent conduct on the part of said Defendant.

518. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "3" on June 21, 2019 constitutes a negligent violation of a statutory standard of conduct.

519. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "3" on June 21, 2019 constitutes a Negligent Infliction of Emotional Distress.

520. As a result of these negligent violations and actions by Defendant,

CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

521. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A TWENTY-EIGHTH CAUSE OF ACTION
PRIMA FACIE TORT
June 21, 2019 Tweet (Reply Tweet "3")

522. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

523. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

524. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

525. On June 21, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

526. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019

towards Plaintiff was without excuse or justification.

527. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

528. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on June 21, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

529. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A TWENTY-NINTH CAUSE OF ACTION
LIBEL PER SE
June 21, 2019 Tweet (Reply Tweet "5")

530. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

531. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false and defamatory statements related to the communications Plaintiff provided:

5. Interestingly enough, the “evidence” brought to the claim that [@naomi_haber](#) and I “hatched a conspiracy” **is made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity. These probably amount to a couple of felonies if pursued.**

See, Exhibit “G”, Page 2, Reply Tweet “5”. (emphasis added).

532. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter on June 21, 2019, makes false and disparaging statements falsely attacking Plaintiff’s ethics, honesty, truthfulness, and calling her a liar and a criminal.

533. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter on June 21, 2019, makes a false and disparaging statement about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified communications and records and committed multiple felonies.

534. The above-mentioned statements are false and defamatory.

535. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter constitute Libel *Per Se* in that it negatively reflects upon and disparages Plaintiff’s professional abilities as an academic, teacher, and author

including her skill, professionalism, temperament, ability, honesty, and ethics alleging she she falsified communications and records.

536. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter further constitute Libel *Per Se* in that they allege that Plaintiff has committed multiple crimes, felonies included.

537. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy.

538. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

539. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

540. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

541. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

542. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

543. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

544. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

545. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

546. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

547. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

548. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

549. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A THIRTIETH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 21, 2019 Tweet (Reply Tweet "5")

550. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

551. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

552. Defendant's interference with Plaintiff's business and professional relations

was made with malice.

553. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

554. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

555. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified communications and records and is a liar, when she publicly stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were **"made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity."** See, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

556. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter further falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified communications and records and is a

criminal, when she publicly stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were "**probably amount to a couple of felonies if pursued.**" See, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

557. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff's damage.

558. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff's damage.

559. The average revenue earned per class taught is \$5,702.40.

560. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff's damage.

561. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus

responsible for punitive damages in an amount to be determined at trial.

562. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount to be determined at trial but which should not be less SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A THIRTY-FIRST CAUSE OF ACTION
DISPARAGEMENT
June 21, 2019 Tweet (Reply Tweet "5")

563. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

564. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified communications and records and calling her a liar, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were **"made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity."** See, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

565. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified communications and records and asserting she is a criminal, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications falsified and **"probably amount to a couple of felonies if pursued."** See, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

566. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

567. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

568. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

569. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant's publication of the false and/or recklessly made statements on or about June 21, 2019.

570. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

571. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR A THIRTY-SECOND CAUSE OF ACTION
NEGLIGENCE
June 21, 2019 Tweet (Reply Tweet "5")

572. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

573. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false statements related to the communications Plaintiff provided:

5. Interestingly enough, the "evidence" brought to the claim that [@naomi_haber](#) and I "hatched a conspiracy" **is made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity. These probably amount to a couple of felonies if pursued.**

See, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

574. On June 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

575. On June 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, falsely attacking Plaintiff’s ethics, honesty, truthfulness, and calling her a liar and a criminal.

576. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

577. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

578. On June 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

579. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

580. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to

act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

581. On June 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

582. On June 21, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

583. On June 21, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

584. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

585. Prior to publishing the above-mentioned false statements it was reasonably

foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

586. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

587. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

588. On June 21, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

589. On June 21, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

590. On June 21, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

591. As a direct result and proximate cause of the false statements published on June 21, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

592. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on June 21, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff’s damage.

593. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

(Intentionally Left Blank)

AS AND FOR A THIRTY-THIRD CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "5")

594. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

595. On or about June 21, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter a defamatory statement that the communications were **"made up [sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity ... probably amount[ing] to a couple of felonies if pursued[,]"** falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar and a criminal. *See*, Exhibit "G", Page 2, Reply Tweet "5". (emphasis added).

596. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "5" on June 21, 2019 on the social media network known as Twitter constituted the Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

597. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great

embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

598. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A THIRTY-FOURTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "5")

599. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

600. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting Reply Tweet "5" on June 21, 2019.

601. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "5" on June 21, 2019 constitutes negligent conduct on the part of said Defendant.

602. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "5" on June 21, 2019 constitutes a negligent violation of a statutory standard of conduct.

603. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "5" on June 21, 2019 constitutes a

Negligent Infliction of Emotional Distress.

604. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

605. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A THIRTY-FIFTH CAUSE OF ACTION
PRIMA FACIE TORT
June 21, 2019 Tweet (Reply Tweet "5")

606. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

607. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

608. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

609. On June 21, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to

Plaintiff.

610. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was without excuse or justification.

611. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

612. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on June 21, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

613. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A THIRTY-SIXTH CAUSE OF ACTION

LIBEL

June 22, 2019 Tweet (Reply Tweet "19b")

614. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

615. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the

following false and defamatory statements related to the communications Plaintiff provided:

19b. In short, he can do nothing wrong. To establish that, these letters proceed to profile [@naomi_haber](#) & I as these angry, money hungry, media controlling, manipulative con-artists by...**revealing (decontextualized) conversations in which I say terrible things about Naomi.**

See, Exhibit "G", Page 9, Reply Tweet "19b". (emphasis added).

616. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar.

617. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified communications and records and calling her a liar.

618. The above-mentioned statements are false and defamatory.

619. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy constituting Libel.

620. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

621. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

622. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

623. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

624. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

625. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

626. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

627. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

628. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

629. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

630. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

631. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A THIRTY-SEVENTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19b")

632. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

633. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

634. Defendant's interference with Plaintiff's business and professional relations was made with malice.

635. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

636. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

637. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified communications and records and is a liar, when she publicly

stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were **"revealing (decontextualized) conversations in which I say terrible things about Naomi."** See, Exhibit "G", Page 9, Reply Tweet "19b". (emphasis added).

638. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff's damage.

639. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff's damage.

640. The average revenue earned per class taught is \$5,702.40.

641. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff's damage.

642. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus

responsible for punitive damages in an amount to be determined at trial.

643. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount to be determined at trial but which should not be less SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A THIRTY-EIGHTH CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19b")

644. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

645. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified communications and records and calling her a liar, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were "**revealing (decontextualized) conversations in which I say terrible things about Naomi.**" See, Exhibit "G", Page 9, Reply Tweet "19b". (emphasis added).

646. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

647. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

648. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

649. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant's publication of the false and/or recklessly made statements on or about June 22, 2019.

650. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

651. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR A THIRTY-NINTH CAUSE OF ACTION
NEGLIGENCE
June 22, 2019 Tweet (Reply Tweet "19b")

652. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

653. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false statements related to the communications Plaintiff provided:

19b. In short, he can do nothing wrong. To establish that, these letters proceed to profile [@naomi_haber](#) & I as these angry, money hungry, media controlling, manipulative con-artists by...**revealing (decontextualized) conversations in which I say terrible things about Naomi.**

See, Exhibit "G", Page 9, Reply Tweet "19b". (emphasis added).

654. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

655. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar.

656. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

657. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with

reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

658. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

659. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

660. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

661. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

662. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

663. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise

reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

664. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

665. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

666. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

667. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements

about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

668. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

669. On June 22, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

670. On June 22, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

671. As a direct result and proximate cause of the false statements published on June 22, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

672. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on June 22, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability,

honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

673. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FORTIETH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19b")

674. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

675. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter a defamatory statement that the communications were "revealing (decontextualized) conversations" falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar. *See*, Exhibit "G", Page 9, Reply Tweet "19b".

676. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "19b" on June 22, 2019 on the social media network known as Twitter constituted the Intentional Infliction of Emotional

Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

677. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

678. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FORTY-FIRST CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19b")

679. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

680. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting Reply Tweet "19b" on June 22, 2019.

681. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19b" on June 22, 2019 constitutes negligent conduct on the part of said Defendant.

682. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19b" on June 22, 2019 constitutes a negligent violation of a statutory standard of conduct.

683. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "19b" on June 22, 2019 constitutes a Negligent Infliction of Emotional Distress.

684. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

685. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FORTY-SECOND CAUSE OF ACTION
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19b")

686. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

687. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

688. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019

towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

689. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

690. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was without excuse or justification.

691. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

692. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on June 22, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

693. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

(Intentionally Left Blank)

AS AND FOR A FORTY-THIRD CAUSE OF ACTION
LIBEL PER SE
June 22, 2019 Tweet (Reply Tweet "19j")

694. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

695. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false and defamatory statements related to the communications Plaintiff provided:

19j. To make **this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I [sic] were after \$ rather than justice**, and quickly included in a malicious complaint, one of the many ridiculous complaints filed against us (per the letters) #MeToo

See, Exhibit "G", Page 12, Reply Tweet "19j". (emphasis added).

696. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness,, calling her a liar, and stating that she was motivated by antisemitism to falsify the communications.

697. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the

social media network known as Twitter on June 22, 2019, makes false and disparaging statements about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified evidence because she is an anti-semite, and calling her a liar.

698. The above-mentioned statements are false and defamatory.

699. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter constitute Libel *Per Se* in that being falsely identified as an anti-semite negatively reflects upon and disparages Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics.

700. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

701. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

702. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

703. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

704. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

705. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

706. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

707. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

708. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

709. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

710. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

711. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FORTY-FOURTH CAUSE OF ACTION
LIBEL
June 22, 2019 Tweet (Reply Tweet "19j")

712. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

713. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous

username “@anarkriminology” on the social media network known as Twitter the following false and defamatory statements related to the communications Plaintiff provided:

19j. To make **this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I [sic] were after \$ rather than justice**, and quickly included in a malicious complaint, one of the many ridiculous complaints filed against us (per the letters) #MeToo

See, Exhibit “G”, Page 12, Reply Tweet “19j”. (emphasis added).

714. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements falsely attacking Plaintiff’s ethics, honesty, truthfulness,, calling her a liar, and stating that she was motivated by antisemitism to falsify the communications.

715. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified evidence because she is an anti-Semite, and calling her a liar.

716. The above-mentioned statements are false and defamatory.

717. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the

social media network known as Twitter are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy constituting Libel.

718. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

719. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

720. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

721. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

722. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

723. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth

and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

724. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

725. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

726. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

727. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

728. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her

profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

729. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FORTY-FIFTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19j")

730. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

731. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

732. Defendant's interference with Plaintiff's business and professional relations was made with malice.

733. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

734. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

735. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament,

ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified evidence because she is an anti-Semite, and calling her a liar, when she publicly stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were "[t]o make **this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I [sic] were after \$ rather than justice**". See, Exhibit "G", Page 12, Reply Tweet "19j". (emphasis added).

736. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff's damage.

737. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff's damage.

738. The average revenue earned per class taught is \$5,702.40.

739. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff's damage.

740. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

741. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount to be determined at trial but which should not be less SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A FORTY-SIXTH CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19j")

742. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

743. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified evidence because she is an anti-Semite, and calling her a liar, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her

interests, that the communications were falsified “[t]o make **this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I [sic] were after \$ rather than justice**”. *See*, Exhibit “G”, Page 12, Reply Tweet “19j”. (emphasis added).

744. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

745. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

746. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

747. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant’s publication of the false and/or recklessly made statements on or about June 22, 2019.

748. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

749. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR A FORTY-SEVENTH CAUSE OF ACTION
NEGLIGENCE
June 22, 2019 Tweet (Reply Tweet "19j")

750. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

751. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false statements related to the communications Plaintiff provided:

19j. To make **this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I [sic] were after \$ rather than justice**, and quickly included in a malicious complaint, one of the many ridiculous complaints filed against us (per the letters) #MeToo

See, Exhibit "G", Page 12, Reply Tweet "19j". (emphasis added).

752. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

753. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty,

truthfulness,, calling her a liar, and stating that she was motivated by antisemitism to falsify the communications.

754. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

755. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

756. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

757. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

758. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

759. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

760. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

761. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

762. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

763. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

764. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements

about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

765. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

766. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

767. On June 22, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

768. On June 22, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

769. As a direct result and proximate cause of the false statements published on June 22, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the

community has been damaged.

770. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on June 22, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff's damage.

771. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FORTY-EIGHTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19j")

772. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

773. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter a defamatory statement that the communications were "doctored to make believe that

[Naomi Haber and Defendant] were after [money] rather than justice,” and which were motivated by antisemitism and falsely attacking Plaintiff’s ethics, honesty, truthfulness, and calling her a liar. *See*, Exhibit “G”, Page 12, Reply Tweet “19j”.

774. On or about June 22, 2019, in response to Mr. Herbst’s June 5, 2019 letter to the CUNY John Jay community, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” the motivation to “doctor” the aforementioned communications was antisemitism, thereby falsely alleging that Plaintiff was and an anti-semite and attacking Plaintiff’s ethics, honesty, truthfulness, and calling her a liar. *See*, Exhibit “G”, Page 12, Reply Tweet “19j”.

775. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet “19j” on June 22, 2019 on the social media network known as Twitter constituted the Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

776. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

777. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits

of all lower courts.

AS AND FOR A FORTY-NINTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19j")

778. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

779. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting Reply Tweet "19j" on June 22, 2019.

780. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19j" on June 22, 2019 constitutes negligent conduct on the part of said Defendant.

781. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19j" on June 22, 2019 constitutes a negligent violation of a statutory standard of conduct.

782. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "19j" on June 22, 2019 constitutes a Negligent Infliction of Emotional Distress.

783. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress,

the after effects of which will remain with Plaintiff permanently.

784. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FIFTIETH CAUSE OF ACTION
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19j")

785. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

786. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

787. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

788. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

789. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was without excuse or justification.

790. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

791. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on June 22, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

792. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FIFTY-FIRST CAUSE OF ACTION
LIBEL

June 22, 2019 Tweet (Reply Tweet "19k")

793. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

794. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter the following false and defamatory statements related to the communications Plaintiff provided:

19k. Complaint goes nowhere, **so doctored discussion is then spread around touted as "proof" of our "cunning greed"**. If I was to look closer and ask for context, I would see that this wasn't about [@naomi_haber](#) & I but about another victim suing. We only wanted to escape. [#MeToo](#)

See, Exhibit "G", Page 12, Reply Tweet "19k". (emphasis added).

795. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness,, calling her a liar, and stating that she falsified evidence.

796. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on June 22, 2019, makes false and disparaging statements about the professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics of Plaintiff, AMALIA S. PALADINO, alleging she falsified evidence and calling her a liar.

797. The above-mentioned statements are false and defamatory.

798. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter are false and defamatory and expose Plaintiff, AMALIA S. PALADINO, to public hatred, contempt, ridicule, disgrace, and obloquy constituting Libel.

799. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

800. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

801. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

802. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

803. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

804. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

805. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth

and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

806. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

807. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

808. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

809. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

810. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

(Intentionally Left Blank)

AS AND FOR A FIFTY-SECOND CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19k")

811. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

812. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

813. Defendant's interference with Plaintiff's business and professional relations was made with malice.

814. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

815. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

816. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff falsified communications and records and is a liar, when she publicly stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were

“doctored discussion is then spread around touted as “proof” of our “cunning greed”.

See, Exhibit “G”, Page 12, Reply Tweet “19k”. (emphasis added).

817. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff’s damage.

818. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff’s damage.

819. The average revenue earned per class taught is \$5,702.40.

820. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff’s damage.

821. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

822. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount to be determined at trial but which should not be less

SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A FIFTY-THIRD CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19k")

823. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

824. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics alleging she falsified evidence and calling her a liar, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, that the communications were "**doctored discussion is then spread around touted as "proof" of our "cunning greed"**". See, Exhibit "G", Page 12, Reply Tweet "19k". (emphasis added).

825. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

826. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

827. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

828. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant's publication of the false and/or recklessly made statements on or about June 22, 2019.

829. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

830. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR A FIFTY-FOURTH CAUSE OF ACTION
NEGLIGENCE
June 22, 2019 Tweet (Reply Tweet "19k")

831. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

832. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous

username “@anarkriminology” on the social media network known as Twitter the following false statements related to the communications Plaintiff provided:

19k. Complaint goes nowhere, **so doctored discussion is then spread around touted as “proof” of our “cunning greed”**. If I was to look closer and ask for context, I would see that this wasn't about [@naomi_haber](#) & I but about another victim suing. We only wanted to escape. #MeToo

See, Exhibit “G”, Page 12, Reply Tweet “19k”. (emphasis added).

833. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

834. On June 22, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness,, calling her a liar, and stating that she falsified evidence.

835. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

836. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

837. On June 22, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to

disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

838. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

839. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

840. On June 22, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

841. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

842. On June 22, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

843. Prior to publishing the above-mentioned false statements it was reasonably

foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

844. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

845. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

846. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

847. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her

pseudonymous username “@anarkriminology” on the social media network known as Twitter.

848. On June 22, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

849. On June 22, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

850. As a direct result and proximate cause of the false statements published on June 22, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

851. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on June 22, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff’s damage.

852. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been

damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FIFTY-FIFTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19k")

853. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

854. On or about June 22, 2019, in response to Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter a defamatory statement that the communications consisted of "doctored discussion ... as 'proof' of [their] 'cunning greed,'" falsely attacking Plaintiff's ethics, honesty, truthfulness, and calling her a liar. *See*, Exhibit "G", Page 12, Reply Tweet "19k".

855. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "19k" on June 22, 2019 on the social media network known as Twitter constituted the Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

856. As a result of these willful and wanton violations and actions by Defendant,

CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

857. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FIFTY-SIXTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19k")

858. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

859. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting Reply Tweet "19k" on June 22, 2019.

860. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19k" on June 22, 2019 constitutes negligent conduct on the part of said Defendant.

861. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "19k" on June 22, 2019 constitutes a negligent violation of a statutory standard of conduct.

862. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing

and/or electronically transmitting Reply Tweet "19k" on June 22, 2019 constitutes a Negligent Infliction of Emotional Distress.

863. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

864. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FIFTY-SEVENTH CAUSE OF ACTION
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19k")

865. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

866. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

867. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

868. On June 22, 2019 Defendant, CLAUDIA COJOCARU, negligently caused,

or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

869. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff was without excuse or justification.

870. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

871. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on June 22, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

872. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A FIFTY-EIGHTH CAUSE OF ACTION
LIBEL PER SE
July 30, 2019 Tweet

873. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

874. On or about July 30, 2019, in response to to another Twitter user about the Atlantic City Study, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as

Twitter the following false and defamatory statements related to the communications Plaintiff provided:

Schrödinger's Criminologist @anarkriminology • Jul 30, 2019
Replying to [@anarkriminology](#) [@Coyoteri](#) and 7 others
Is this how you choose to represent the interests of "youths involved in the sex trade"? **By defending "academics" who engaged in abusing vulnerable youth? There was even an investigation into that shit study**, yet no mention of it in your blogpost. Why not?

See, Exhibit "H", Page 12. (emphasis added).

875. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on July 30, 2019, makes false and disparaging statements about the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff's professionalism, ability, honesty, and ethics in her allegations that the **"academics' [who performed the study] engaged in abusing vulnerable youth"**. See, Exhibit "H", Page 12. (emphasis added).

876. The defamatory statements, which were publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter on July 30, 2019, makes further false and disparaging statements about the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff's professionalism, ability, honesty, and ethics in her allegations that there was **"even an investigation into that shit study,"** without acknowledging that the investigation concluded without any findings of criminal conduct or misconduct and

was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought.

877. The above-mentioned statements are false and defamatory.

878. The above-mentioned statements publicly published by Defendant, CLAUDIA COJOCARU, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter constitute Libel *Per Se* in that being falsely identified as an academic who engaged in abusing vulnerable youth negatively reflects upon and disparages Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics.

879. Since Defendant, CLAUDIA COJOCARU, publicly published the false and defamatory statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, her libelous statements have been viewed by multiple unique Twitter users.

880. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above knowing that they were false and without any reasonable basis and/or fact to make such statements.

881. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

882. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

883. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

884. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with malice.

885. As the defamatory statements described above made by Defendant, CLAUDIA COJOCARU, were made knowing that they were false and without any reasonable basis and/or fact to make such statements, with reckless disregard for truth and/or falsity, that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements, they were made with actual malice.

886. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been injured.

887. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation among her peers and her community has been damaged.

888. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

889. As a direct and proximate result of the defamatory statements published by Defendant, CLAUDIA COJOCARU, Plaintiff's good name and reputation in her profession and trade as an academic, teacher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

890. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A FIFTY-NINTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
July 30, 2019 Tweet

891. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

892. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, and author resulting in the damage of business and professional relations.

893. Defendant's interference with Plaintiff's business and professional relations

was made with malice.

894. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

895. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

896. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff abused vulnerable youth, when she publicly stated about the Atlantic City Study which is publicly linked to Plaintiff, that the **“academics’ [who performed the study] engaged in abusing vulnerable youth”**. See, Exhibit “H”, Page 12. (emphasis added).

897. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's potential colleagues and students on notice that Plaintiff's professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics are poor, below the standard of care, and/or are substandard, and that Plaintiff engaged in criminal conduct and/or wrongdoing when she publicly stated about the Atlantic City Study which is publicly linked to Plaintiff, that there was **“even an investigation into that shit study,”** without acknowledging that the

investigation concluded without any findings of criminal conduct or misconduct and was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit “H”, Page 12. (emphasis added).

898. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased, all to Plaintiff’s damage.

899. As a result of the malicious and intentional infliction of harm without excuse or justification, Defendant, CLAUDIA COJOCARU, caused upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, the number of classes Plaintiff was teaching decreased by three (3), to date, all to Plaintiff’s damage.

900. The average revenue earned per class taught is \$5,702.40.

901. As a result of the malicious and intentional infliction of harm without excuse or justification, upon Plaintiff, AMALIA S. PALADINO, with the intent to cause injury, Defendant, CLAUDIA COJOCARU, has caused Plaintiff to sustain SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20) in lost income, to date, all to Plaintiff’s damage.

902. Plaintiff, AMALIA S. PALADINO, respectfully submit that in making the injurious, false, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

903. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been

damaged in an amount to be determined at trial but which should not be less SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), and for punitive damages in an amount to be determined at trial against Defendant.

AS AND FOR A SIXTIETH CAUSE OF ACTION
DISPARAGEMENT
July 30, 2019 Tweet

904. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

905. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff's professionalism, ability, honesty, and ethics when alleging that Plaintiff abused vulnerable youth, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated that the "'academics' [who performed the study] engaged in abusing vulnerable youth". See, Exhibit "H", Page 12. (emphasis added).

906. Defendant, CLAUDIA COJOCARU, published further false and disparaging statements about the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff's professionalism, ability, honesty, and ethics when alleging that Plaintiff engaged in criminal conduct and/or wrongdoing, in statements she publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when she stated in her allegations that there was "**even an**

investigation into that shit study,” without acknowledging that the investigation concluded without any findings of criminal conduct or misconduct and was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit “H”, Page 12. (emphasis added).

907. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

908. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

909. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

910. Plaintiff, AMALIA S. PALADINO, suffered special damages and harm to her reputation and good will among family, peers, colleagues, and their community resulting from Defendant’s publication of the false and/or recklessly made statements on or about July 30, 2019.

911. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

912. Further, Plaintiff, AMALIA S. PALADINO, respectfully submits that in making the false, reckless, defamatory, and disparaging statements, Defendant, CLAUDIA COJOCARU, acted with malice, actual malice, oppression, or fraud, and is thus responsible for punitive damages in an amount to be determined at trial.

AS AND FOR A SIXTY-FIRST CAUSE OF ACTION
NEGLIGENCE
July 30, 2019 Tweet

913. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

914. On or about July 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter the following false statements about the Atlantic City Study:

Schrödinger’s Criminologist @anarkriminology • Jul 30, 2019
Replying to [@anarkriminology](#) [@Coyoteri](#) and 7 others
Is this how you choose to represent the interests of “youths involved in the sex trade”? **By defending “academics” who engaged in abusing vulnerable youth? There was even an investigation into that shit study**, yet no mention of it in your blogpost. Why not?

See, Exhibit “H”, Page 12. (emphasis added).

915. On July 30, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

916. On July 30, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, attacking Plaintiff’s professionalism, ability, honesty,

and ethics, when falsely alleging that Plaintiff abused vulnerable youth.

917. On July 30, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to the Atlantic City Study which is publicly linked to Plaintiff, thereby attacking Plaintiff, AMALIA S. PALADINO, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, attacking Plaintiff’s professionalism, ability, honesty, and ethics, when falsely alleging that Plaintiff engaged in criminal conduct and/or wrongdoing by asserting there was an investigation into the Atlantic City Study without informing readers of her Tweet that the investigation concluded without any findings of criminal conduct or misconduct and was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought.

918. On July 30, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

919. On July 30, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

920. On July 30, 2019 Defendant, CLAUDIA COJOCARU, had a duty of care to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

921. On July 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to

act with reasonable care toward the persons, assets, and reputations of others.

922. On July 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

923. On July 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

924. On July 30, 2019 Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

925. On July 30, 2019 Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements prior to publishing the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

926. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others in statements she published about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network

known as Twitter.

927. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer irreparable harm and damages if Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to to the Atlantic City Study which is publicly linked to Plaintiff, thereby referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

928. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

929. Prior to publishing the above-mentioned false statements it was reasonably foreseeable that Plaintiff would suffer harm and damages if Defendant, CLAUDIA COJOCARU, failed to exercise reasonable care to verify the accuracy of the statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

930. On July 30, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

931. On July 30, 2019 Defendant, CLAUDIA COJOCARU, recklessly published

the above-mentioned false statements about and referring to Plaintiff, and the Atlantic City Study which is publicly linked to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

932. On July 30, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

933. As a direct result and proximate cause of the false statements published on July 30, 2019 Defendant, CLAUDIA COJOCARU, the good name and personal and professional reputation of Plaintiff, AMALIA S. PALADINO, among her peers and the community has been damaged.

934. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on July 30, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, and author including her skill, professionalism, temperament, ability, honesty, and ethics, and will greatly deter the obtaining of teaching positions, research based job offers, research grants, prospective research partners, and writing and/or book offers, all to Plaintiff’s damage.

935. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A SIXTY-SECOND CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
July 30, 2019 Tweet

936. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

937. On or about July 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter a defamatory statement that Plaintiff, AMALIA S. PALADINO, abused vulnerable youth when she stated about the Atlantic City Study that the **“academics’ [who performed the study] engaged in abusing vulnerable youth”** falsely attacking Plaintiff’s professionalism, ability, honesty, and ethics. *See*, Exhibit “H”, Page 12.

938. On or about July 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter a defamatory statement that Plaintiff, AMALIA S. PALADINO, engaged criminal conduct and/or wrongdoing, when she stated about the Atlantic City Study that there was **“even an investigation into that shit study,”** without informing readers of her Tweet that the investigation concluded without any findings of criminal conduct or misconduct and was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit “H”, Page 12. (emphasis added).

939. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in her Tweet on July 30, 2019 on the social media

network known as Twitter constituted the Intentional Infliction of Emotional Distress as it is so outrageous in character and so extreme in degree as to exceed all possible bounds of decency it is intolerable in the eyes of a civilized community and caused Plaintiff to suffer extreme emotional distress.

940. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

941. By reason of the foregoing Intentional Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A SIXTY-THIRD CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
July 30, 2019 Tweet

942. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

943. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting her Tweet on July 30, 2019.

944. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting her Tweet on July 30, 2019 constitutes

negligent conduct on the part of said Defendant.

945. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting her Tweet on July 30, 2019 constitutes a negligent violation of a statutory standard of conduct.

946. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting her Tweet on July 30, 2019 constitutes a Negligent Infliction of Emotional Distress.

947. As a result of these negligent violations and actions by Defendant, CLAUDIA COJOCARU, Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, has been unable to enjoy life and has been forced to undergo and suffer severe strain and stress, the after effects of which will remain with Plaintiff permanently.

948. By reason of the foregoing Negligent Infliction of Emotional Distress Plaintiff has been damaged in an amount which exceeds the monetary jurisdiction limits of all lower courts.

AS AND FOR A SIXTY-FOURTH CAUSE OF ACTION
PRIMA FACIE TORT
July 30, 2019 Tweet

949. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

950. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

951. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff was willful and without reasonable or probable cause or legal or social justification, and with the specific and deliberate intent of demeaning and injuring the Plaintiff and others.

952. On July 30, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

953. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff was without excuse or justification.

954. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

955. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on July 30, 2019 Plaintiff has suffered damages and endured great embarrassment, mental and emotional anguish, and harm to her reputation, the after effects of which will remain with Plaintiff permanently.

956. By reason of the foregoing, Plaintiff, AMALIA S. PALADINO, has been damaged in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York.

WHEREFORE, Plaintiff, AMALIA S. PALADINO, demand judgment against Defendant, CLAUDIA COJOCARU, as follows:

(a) in the FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(b) in the SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(c) in the THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(d) in the FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(e) in the FIFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(f) in the SIXTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(g) in the SEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(h) in the EIGHTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(i) in the NINTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(j) in the TENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(k) in the ELEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(l) in the TWELFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(m) in the THIRTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(n) in the FOURTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(o) in the FIFTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(p) in the SIXTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(q) in the SEVENTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(r) in the EIGHTEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York; and

(s) in the NINETEENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(t) in the TWENTIETH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(u) in the TWENTY-FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(v) in the TWENTY-SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(w) in the TWENTY-THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(x) in the TWENTY-FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(y) in the TWENTY-FIFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(z) in the TWENTY-SIXTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(aa) in the TWENTY-SEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(bb) in the TWENTY-EIGHTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(cc) in the TWENTY-NINTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(dd) in the THIRTIETH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(ee) in the THIRTY-FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ff) in the THIRTY-SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(gg) in the THIRTY-THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(hh) in the THIRTY-FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ii) in the THIRTY-FIFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(jj) in the THIRTY-SIXTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(kk) in the THIRTY-SEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED

SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(ll) in the THIRTY-EIGHTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(mm) in the THIRTY-NINTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(nn) in the FORTIETH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(oo) in the FORTY-FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(pp) in the FORTY-SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(qq) in the FORTY-THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(rr) in the FORTY-FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ss) in the FORTY-FIFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(tt) in the FORTY-SIXTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(uu) in the FORTY-SEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(vv) in the FORTY-EIGHTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ww) in the FORTY-NINTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(xx) in the FIFTIETH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(yy) in the FIFTY-FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(zz) in the FIFTY-SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(aaa) in the FIFTY-THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(bbb) in the FIFTY-FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ccc) in the FIFTY-FIFTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ddd) in the FIFTY-SIXTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(eee) in the FIFTY-SEVENTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(fff) in the FIFTY-EIGHTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(ggg) in the FIFTY-NINTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York, but in no event less than SEVENTEEN THOUSAND ONE HUNDRED SEVEN DOLLARS and TWENTY CENTS (\$17,107.20), plus punitive damages in an amount to be determined at trial;

(hhh) in the SIXTIETH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(iii) in the SIXTY-FIRST CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(jjj) in the SIXTY-SECOND CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(kkk) in the SIXTY-THIRD CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(lll) in the SIXTY-FOURTH CAUSE OF ACTION in an amount which exceeds the monetary limits of all courts having jurisdiction save the Supreme Court of the State of New York;

(mmm) together with statutory pre-judgment interest, costs, disbursements of this action, and all further and additional relief as this Honorable Court deems just, proper and equitable.

Dated: Mineola, New York
July 17, 2020

Yours, etc.

WEITZPASCALE



By: ANDREW L. WEITZ
Attorneys for Plaintiff
AMALIA S. PALADINO
221 Mineola Boulevard
Mineola, New York 11501
Tel: (516) 280-4716
Fax: (516) 710-7838

To: Wigdor LLP
Attorneys for Defendant
CLAUDIA COJOCARU
85th Fifth Avenue
New York, New York 10003
Tel: (212) 257-6800
Fax: (212) 257-6845

Exhibit "A"

Verizon LTE 12:19 64%

< news 1 of 2

From: [Claudia Cojocaru](#) >

To: ahorning@jjay.cuny.edu >

Hide



Cc: [Anthony Marcus](#) >

Re: news

April 6, 2018 at 19:58

Found in Inbox

Correction: "unethical".

Amalia is an abolitionist. She will be in her element there. She is a pathological liar, abusive and delusional. What more can one hope for?

C

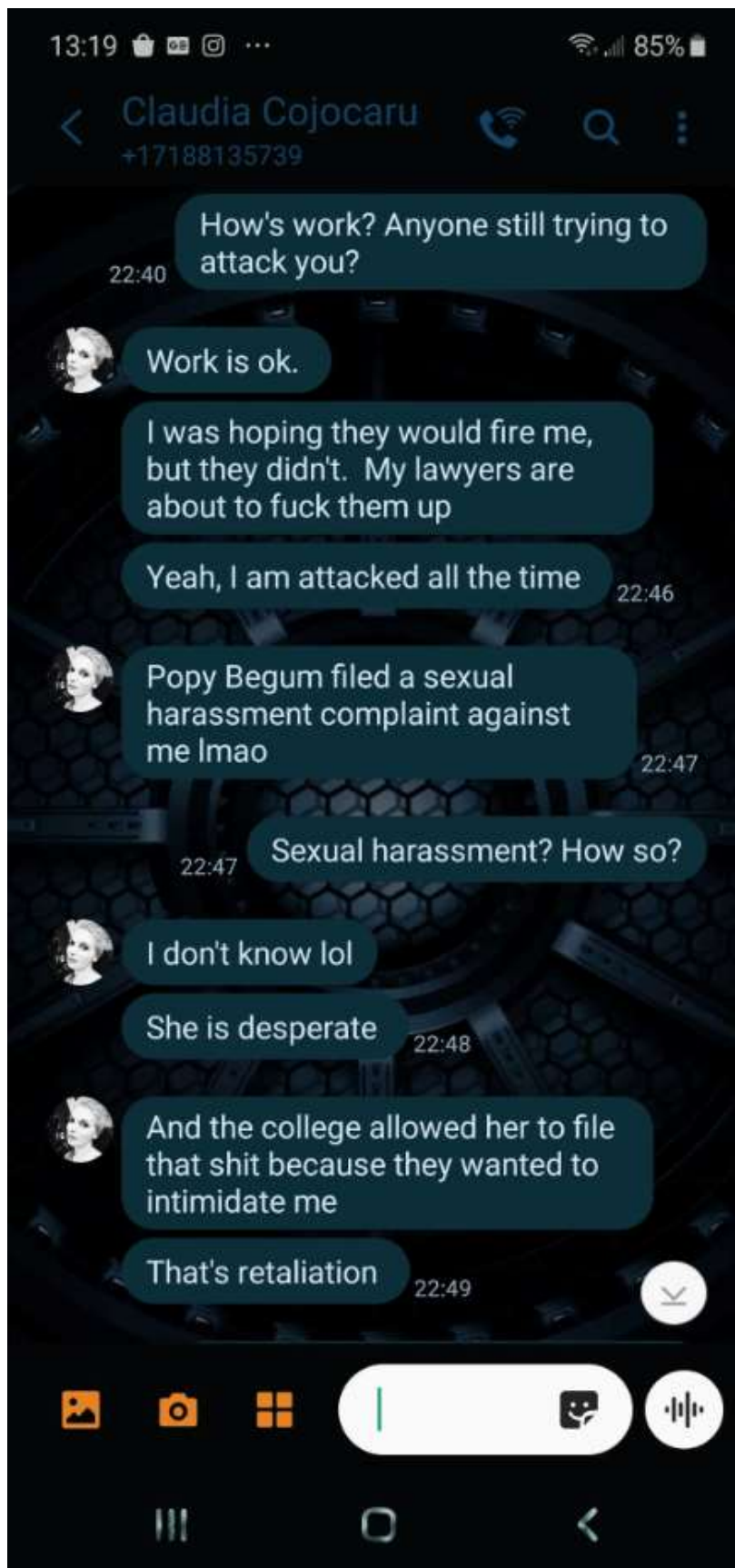
On Fri, Apr 6, 2018, 7:56 PM Claudia Cojocaru <ms.bufnitza@gmail.com> wrote:
Hey Anthony, it looks like Barb Brents and Jody Miller have an ongoing psychotic episode in which they imagine that if they tell enough people how "ubethical" I am, I will eventually get tired of trying to go to get a Ph.D.. do you happen to know anything about it? A mutual "friend" happened to have also implicated you and Ric in this conspiratorial clusterfuck. I think this is worth investigating further, particularly given the ethical issues surrounding such behavior.

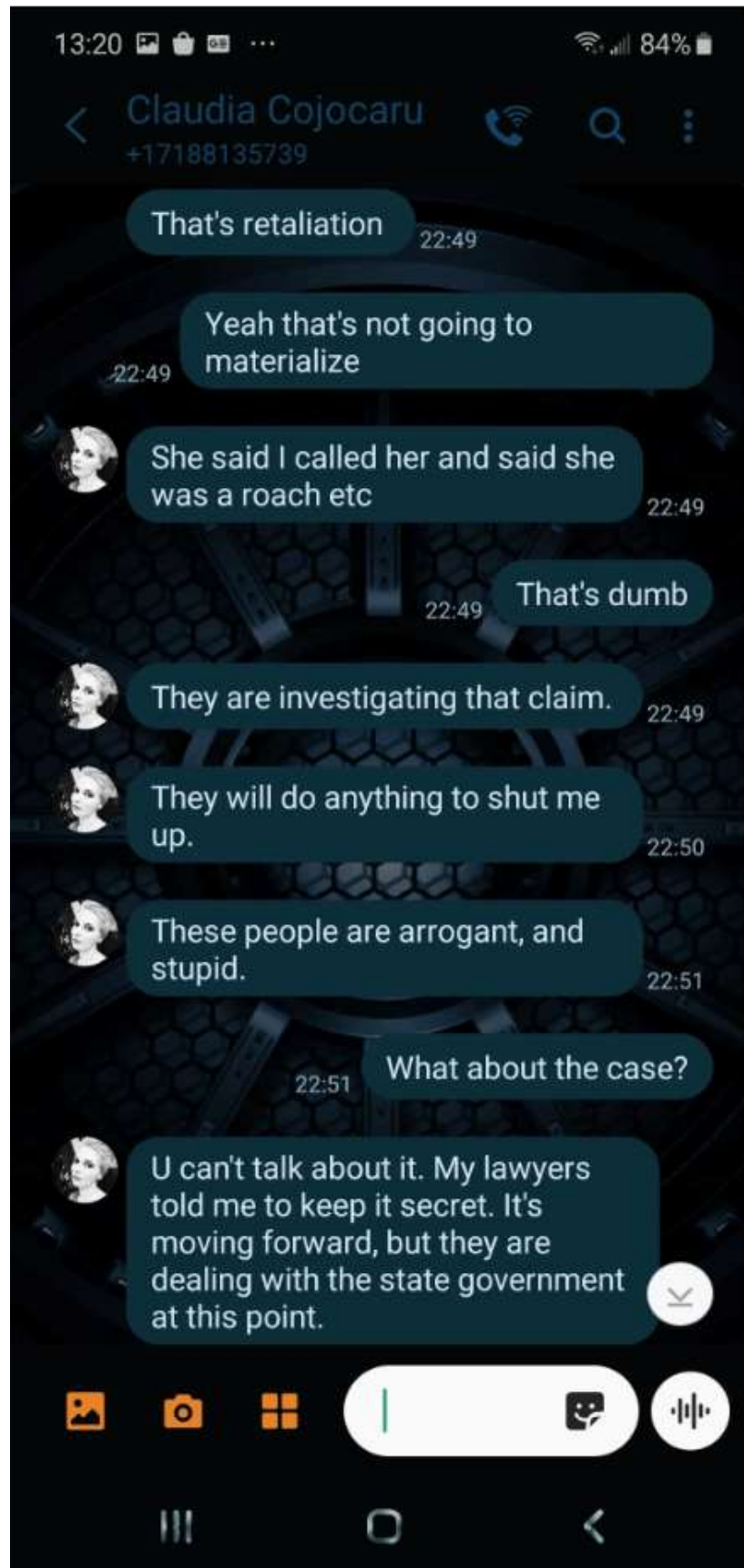
C

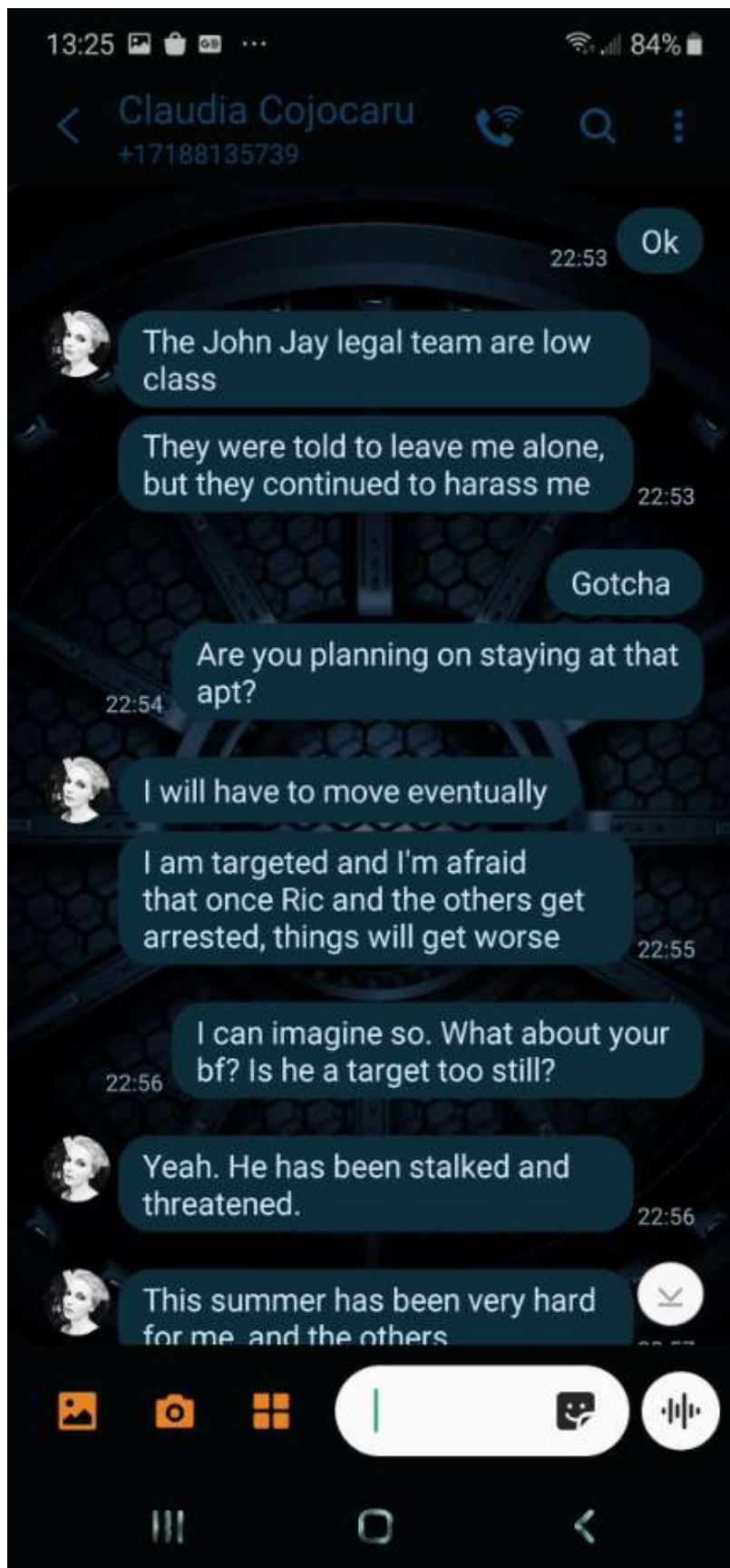
On Fri, Apr 6, 2018, 7:18 PM Amber Horning <ahorning@jjay.cuny.edu> wrote:

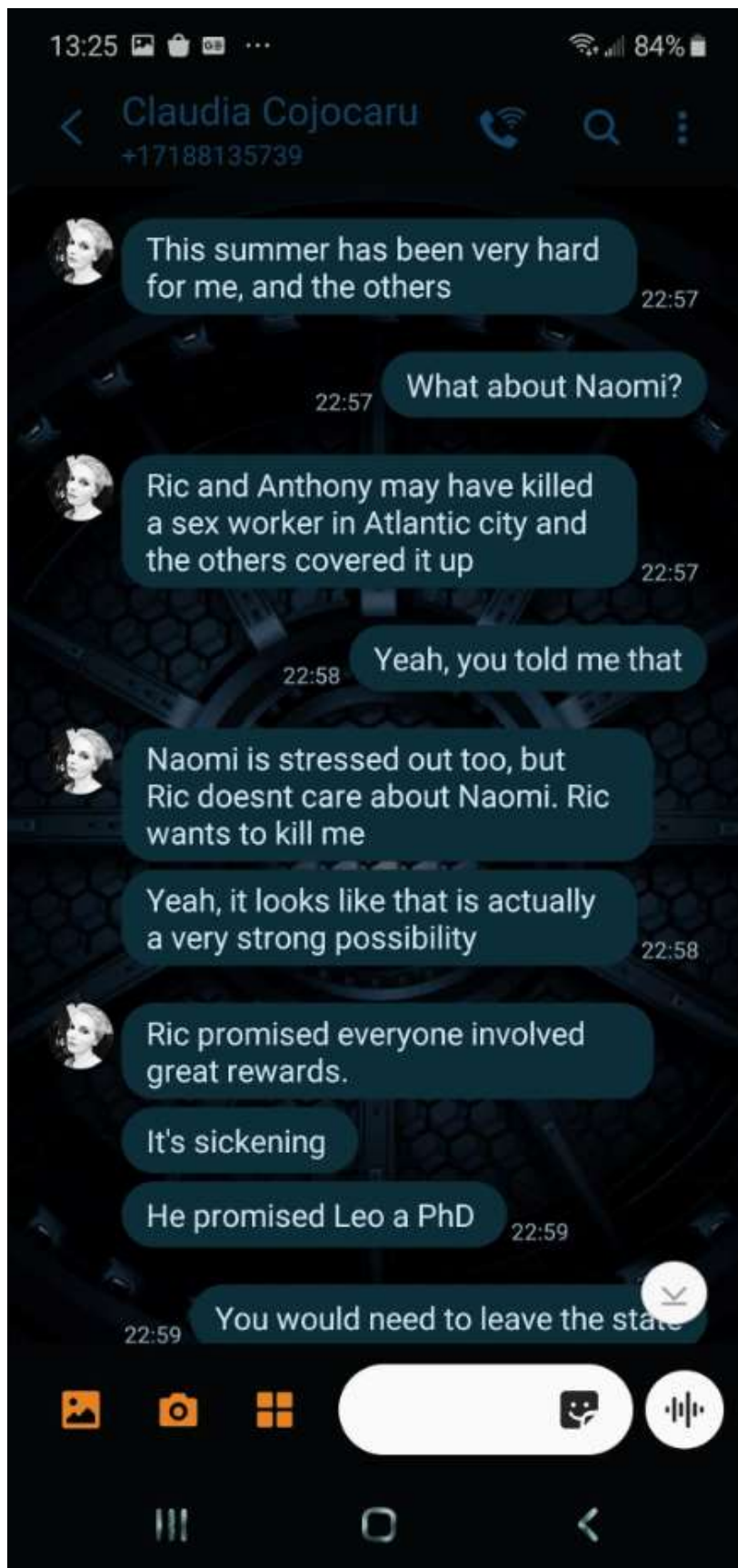
I see what you mean about Silicon Valley -San Jose kind of stinks. Crim people would also be more excited -like it is so cutting edge to them-lol. It just works so well the refugee piece

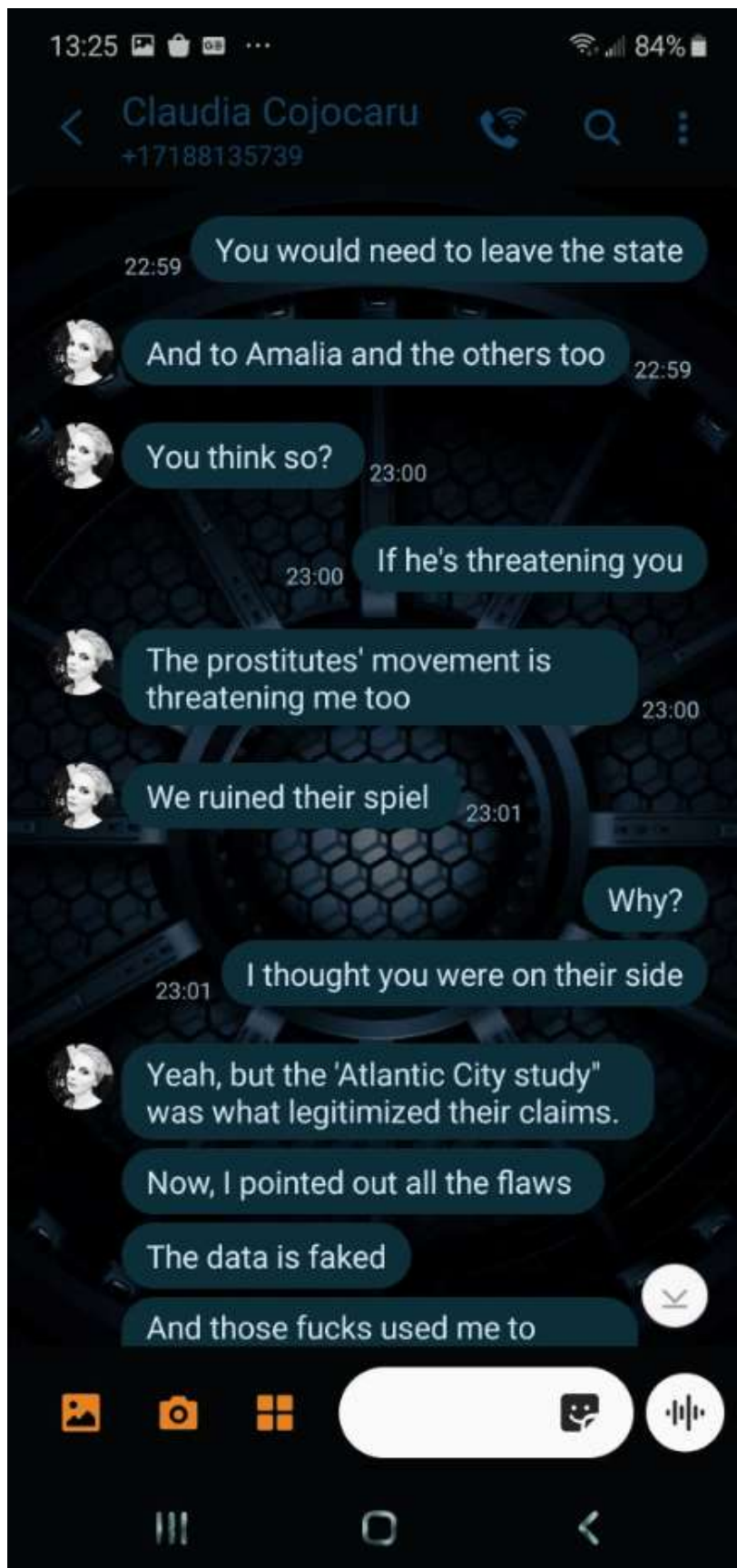
Exhibit "B"

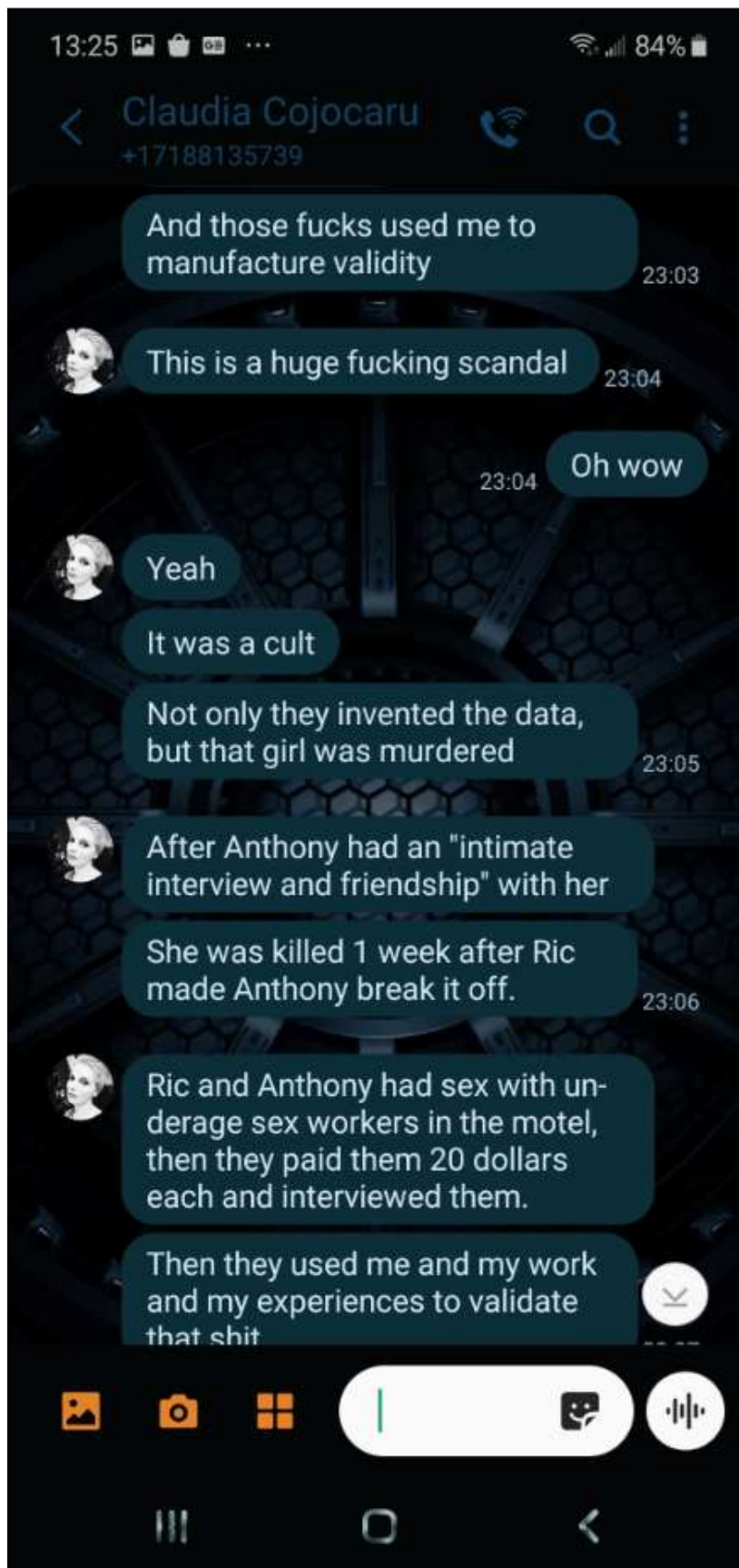


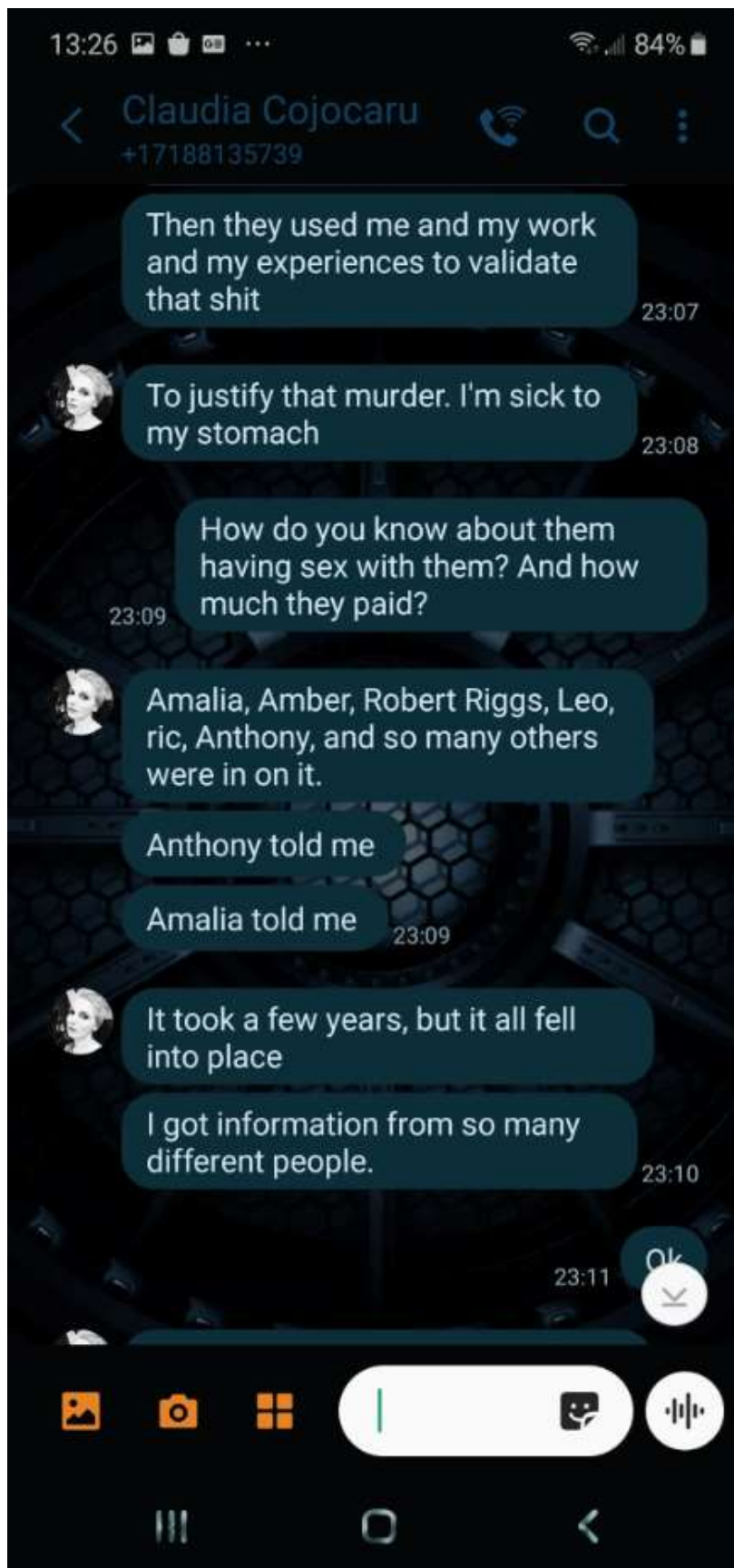












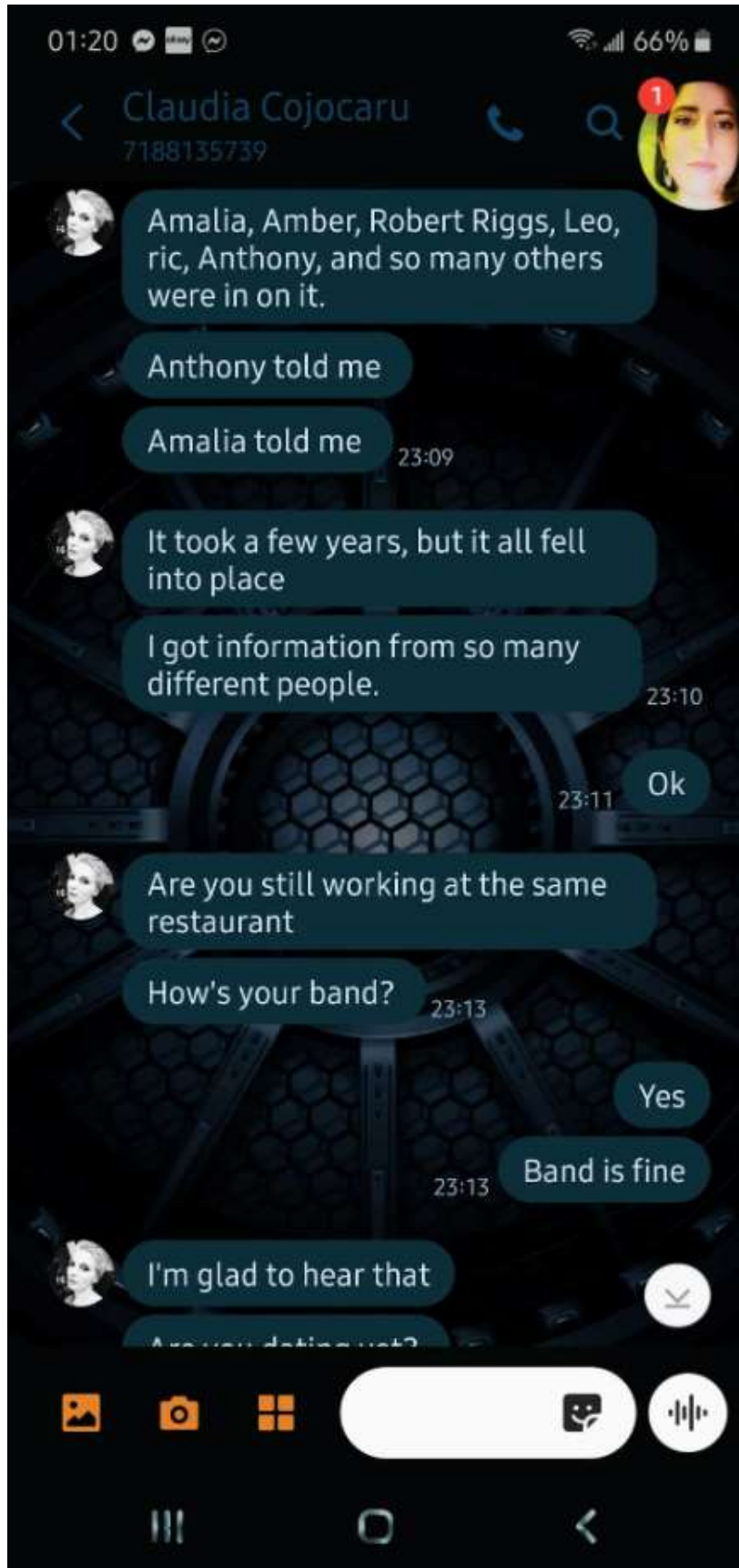


Exhibit "C"

Studies of Organized Crime 13

Dina Siegel
Roos de Wildt *Editors*

Ethical Concerns in Research on Human Trafficking

 Springer

Reference: Horning, A., & Paladino, A. Walking the tightrope: Ethical dilemmas doing fieldwork with youth in US commercial sex markets. In D. Siegal and R. de Wildt (Eds.), *Ethical issues of researching human trafficking*. Springer (forthcoming).



Walking the tightrope: Ethical dilemmas of doing fieldwork with youth in US sex markets

Amber Horning¹ and Amalia Paladino²

¹ Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice, Social Networks Research Group, 619 W. 54th St/, 7th Floor, New York, NY 10019, USA
ahorning@jjay.cuny.edu

² Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice, Social Networks Research Group, 619 W. 54th St/, 7th Floor, New York, NY 10019, USA
apaladino@jjay.cuny.edu

In this chapter, we explored how we traversed the ‘carnavalesque’ atmosphere of underground sex markets. This term was claimed by Mikhail Bakhtin (1984) and depicts ‘unofficial’ worlds where if you are not looking from the vantage point of a ‘world turned upside down,’ you may see nebulous rules, loose social boundaries and changeable hierarchies. We used this concept to examine how we approached ethical dilemmas in doing fieldwork with young sex workers and pimps. While we kept a foot in both ‘unofficial’ and ‘official’ worlds, we approached the dilemmas with the view of a ‘world turned upside down.’ We critically explored the more relevant concept of exploitation, especially coercion, in light of the idea that sex market involved youth are inherently exploited due to age related constrained agency e.g., immaturity, naiveté or traumatic upbringings (Dank, 2011; Lloyd, 2011). The themes of constrained agency manifested in unexpected ways that is in ways that were alternative to how some scholars and the public culturally and socially construct their lives. Further, we examined themes of constraint in the contexts of the sex market, the licit market and the research sphere, which are worlds that can collide, but also hold important intersections. As researchers, we walked the moral/ethical line of doing fieldwork with young participants and we also illustrated the balancing act involved in near missteps.

The findings are based on our fieldwork experiences in Atlantic City, New Jersey and New York City sex markets (2010-2013). We chose the initial concepts of constraint and constrained agency based on our fieldwork in Atlantic City and developed these using the more recent research on New York City sex markets. The study in Atlantic City was ethnographic and included interviews with more than 150 young sex workers (2010-2011). The first New York City study involved 85 in-situ interviews with male pimps/traffickers in Harlem housing projects (2011-2012). The young pimps worked with similarly aged sex workers, often legally classifying them as traffickers. In the second NYC study, 19 female and 15 male-to-female transgender street sex workers, many of whom were under the age of 21, were interviewed extensively about their life experiences (2012-2013).

The sex market as ‘carnavalesque’ and colliding worlds

Doing fieldwork in ‘unofficial’ contexts such as sex marketplaces creates a feeling that everything is questionable, yet acceptable. This uncertainty results in cognitive dissonance, where researchers question their actions or inactions. This is how we operationalize our ‘missteps.’ We engaged in ethnography and what Holstein and Gubrium (1995) termed ‘active interviewing,’ where objectivity and social distance are not desirable options and participants are viewed as agentic beings. We use the image of the tightrope to show that we are included in the context and to emphasize that our ‘missteps’ may influence outcomes in both ‘unofficial’ and ‘official’ worlds. For

instance, our decisions may impact the lives of young participants and have personal and professional repercussions through official bodies, e.g., government and academia.

Oftentimes, outsiders construct the social worlds of pimps and sex workers, sex traffickers and the sex trafficked, as spaces where sexual activities are always transgressions, relationships are destructive, and their everyday behaviors are deemed morally questionable and wrongly celebrated. Mikhail Bakhtin, in *Rabelais and His World*, described the notion of ‘carnavalesque’ as a ‘world turned upside down.’ In Bakhtin’s critical analysis of Rabelais, he deconstructed his use of ‘carnival folk culture’ that included the medieval carnival and the ‘culture of the marketplace,’ describing them as “escapes from the usual ‘official’ way of life (1984:7-8).” The accomplishment of escaping everyday constraints is obtained through the carnival’s or ‘fair’s’ nebulous rules and accompanying social disorder, with an emphasis on bodily pleasures. Part of the ‘disorder’ includes inverted social positions and jumbled social boundaries, where ‘fools become philosophers’ and it can be socially acceptable to slap the king. This social chaos makes the ‘fair’ confusing to outsiders.

In the sex trade, schoolyard peers can be pimps, boyfriends can be daddies, strangers can be mommies, wealthy clients can be beggars, and social networks can equal orgies or dollar signs. Many of us unknowingly live in other variations of ‘worlds upside turned down,’ but the exchange/benefit (through money or resources) for sex is often illegal, and so this ‘fair’ is viewed by outsiders as a space where legal and moral realms are distorted, and even perverted.

In Mike Presdee’s (2000) book, *Cultural Criminology and the Carnival of Crime*, there are established links between Bakhtin’s carnival and modern day transgressions. Presdee focused

on sensations in light of the historical progression of actual carnivals to their contemporary manifestations in events like large-scale joyriding or riots. He explained that because people no longer receive temporary relief from life, previously garnered through the carnival, the 'fair' can simply erupt. We argue that this parallel can be applied to loosely regulated, illicit markets, which more neatly link to Bakhtin's 'carnival folk culture' of antiquated marketplaces.

The metaphor of the 'fair' conjures up ideas of 'dual cities' (e.g., Bauman, 1998), sometimes used by subcultural theorists (e.g., Anderson, 1984; 2000) and reflected in fictional works such as China Melville's book *The City & The City*, where two cities are superimposed. 'Dual cities' are often used to draw lines of inclusion/exclusion, to explore the process of 'othering,' or at worst to illustrate the exoticness of 'subterranean worlds'. But, these not our points and are some reasons that we are reluctant to use the concept of the 'fair.' For us, the appeal of 'unofficial/official' worlds is that everyone has the potential to be included in both worlds and to move freely between them. While doing fieldwork, we kept a foot in each.

Presdee rightly reminded us that "some 'pleasurable' performances in the 'fair' reflect on or articulate pain" (2000:32). Our use of the 'fair' to contextualize our research in sex markets is not used playfully. Rather, we use it to illustrate how what is "normal" in these markets, despite what we as outsiders feel, is ethically/morally acceptable in context, making our decisions in the research process more difficult. As researchers interacting with this young population who have particular vulnerabilities, we are governed by Institutional Review Board (IRB) regulations, constrained by own fears of over-involvement or inaction and we struggle to remain on the tightrope.

Fieldwork with a foot in each world

While studying young populations, the first ethical area to consider is how to interact with participants. Christensen (2002) described four ways that researchers perceive youth. The first is seeing them as objects with little to no agency. In this case, the study design reflects a desire to protect them as participants, at the expense, one may argue, of their voice being drowned out. The second is seeing youth as subjects acting, taking part in, and changing based on the social and cultural world in which they live (Christensen, 2002). The last two perspectives, where ethical issues are more likely to arise, are seeing youth as active participants. With these approaches, it is not as critical to devise a distinct set of ethical standards since it is undesirable to respond in a standardized manner. These work best with an a priori assumption of ‘ethical symmetry,’ where all participants are seen as fully involved, consulted, and heard. We abide by this approach, adding complexities and uncertainties to the research process.

There are much more radical approaches to fieldwork, especially in anthropology, where researchers call for unity of fieldwork and life (see Scheper-Hughes) and advocacy activism yielding life-long friendships. Marcus and Curtis (2015)³ abide by the Scheper-Hughes approach because it is humanist and desirable and we advocate for this approach with other populations. However, this is not strictly our position, especially with sex work involved youth. In the study of Atlantic City sex workers, Marcus and Curtis even pointed out that the risks were too great, so life-long friendships were limited to of-age, male participants who were not sex workers. We agree with them that long term reciprocity with youth would be an appropriate gesture. However, even long term reciprocity with youth could be a balancing act. A more extreme gesture, such as plucking young sex workers out of the marketplace to provide them with an official world life

³ *No love for children: Science and engagement in the study of child sex trafficking* is another chapter in this book. Marcus and Curtis were also the principal investigators in the “Atlantic City Study.”

plan or “Plan C,” while a different brand of a rescue operation, is even riskier because there are no organizational protections.

Involvement and emotional entanglement is integral to good ethnographic fieldwork and other in-situ research. But, we argue that it may be important to keep a foot in the ‘official’ world, not only when researching the young, but also in shorter ethnographies. The trend is quicker ethnographies, often lasting a few months or a year, where a total immersion in the group is nearly impossible and thus worlds are straddled. We are not advocating for this approach, but it is becoming the norm, so adjustments should be made with mini ethnographies or studies using in-situ interviews. While Bakhtin’s ‘world turned upside down’ may not always apply, the concept of official/unofficial worlds is useful, with the idea of a ‘world turned upside down’ used as a device to remain open, even with one foot out.

Official rules and dilemmas

There are common ethical dilemmas found in interviewing, which can often be foreseen and averted, but there are ethical problems that develop where fieldworkers have little control over what happens. Blind-spots inherent in this type of research make it difficult for ethnographers to prepare for diverse problems such the handling the researcher-participant relationship, maintaining anonymity, confidentiality and privacy, and guarding participants against exploitation (Dunlap et al., 2009; Goodwin et al., 2003; Sandberg & Copes, 2013; Scheyvens & Leslie, 2000).

Often unanticipated, ethical dilemmas are tied to the specific context of the situation at hand and therefore must be resolved on a case-by-case basis. How dilemmas are perceived and dealt with depends on the larger research setting and also influences the reciprocal process where field workers and participants shape the data together (Ferdinand et al., 2007; Goodwin et al.,

2003; Lee-Treweek, 2000). While out in the field, ethnographers typically are left on their own to make “standing decisions” about how to properly address these issues (Sandberg & Copes, 2013).

As researchers who are at least initially outsiders, we are asked to abide by the rules of studying human subjects. The IRB sets forth protocols to protect participants, especially the young, with a focus on their voluntary consent, symbolic understanding of consent, and understanding the risks and benefits of their involvement in studies. Researchers are obligated to report imminent danger and respond to other “red flags” in participants’ accounts, but some areas are not clearly red, especially in the sometimes topsy-turvy atmosphere of the sex marketplace. We are careful to keep our balance despite the confusion of colliding worlds and honor our responsibility to adhere to IRB regulations to protect; however, we grapple with how we construct our moral obligation to assist.

Constraints All Around

The distinction between childhood and adulthood is arbitrary, especially in the teenage years. Some scholars have argued there is a prolonged childhood in Western societies (Baumeister & Tice, 1986; Côté & Allahaar, 1996; Shanahan & Porfeli, 2005). Further, age related legal requirements, with many that constrain social activities, limit the young. These prohibitions influence their everyday social activities that in turn shape how they operate and are able to survive in licit and illicit spheres. Their initial constrained agency often is derived in licit worlds and can debilitate them in early adulthood (e.g., lack of job experience and savings).

The commercial sexual exploitation of children (CSEC) is a research topic that overlaps with sex trafficking. Policy implications are often derived from the standpoint that all individuals meeting the “sex trafficked victim” criteria are forced into sex work. Much like in statutory rape

cases, underage sex workers are legally unable to consent, so they are considered to have been forced, even if they acted of their own volition. The CSEC in the United States is an issue related to both the international and domestic sex trade. When investigating estimates of sex trafficked youth, one is bound to come across cases of youth who have not been trafficked from abroad, but rather started in the very neighborhoods in which they live and were raised. The Trafficking Victims Protection Act (TVPA) in 2000 widened the legal definition of sex trafficker to include pimps who profit from sex workers under the age of 18. In the United States, a teenage sex worker who works locally for anyone is automatically deemed trafficked and therefore exploited, lacking in agency and unable to give consent. The most noticeable issue is a lack of distinction between children and teenagers (Howard, 2014) with five year olds and seventeen year olds viewed as having the same agency.

Generally, the public discourse about sex workers relies on tales of victimization and rescue narratives that are touted as typical (Marcus et al., 2014). In many Western countries, there is also a bright line cultural rule that young sex workers lack agency (Horning, 2013). For instance, Dank (2011) and Lloyd (2011) argued that the majority of underage sex workers are commercially sexually exploited, despite voluntarily engaging in sex work, and thus they should never be labelled as independent entrepreneurs. Dank's reasoning was that their personal agency is constrained by socio-economic status and traumatic family backgrounds, which mysteriously becomes less relevant when they turn eighteen. Dank admitted that some participants in her study countered this discourse by portraying "themselves as in charge of their own destinies (2011:55)." She argued that their assertions of agency are the result of being so damaged that they are "eager advocates of their own exploitation (2011:55)." This normative cultural position is derived from the well-meaning idea that young people should be afforded special protections

because of their unique vulnerability. However, erasing agency may also have deleterious effects. For example, they may feel stigmatized as victims (Bjonness, 2012) or they may avoid helping organizations because they do not see themselves as victims (Howard, 2014; Weitzer, 2007).

The media may sensationalize coverage of exceptional cases of the commercial sexual exploitation of children (CSEC) and sex trafficking. Time and again there is a regretful acceptance of child victim stereotypes; however, not all youth who are trafficked have the same experiences. Much like with adults, not all youth may consider themselves victims, fight off their captors, or try to escape (Zimmerman & Watts, 2003).

Sex Work/ Trafficking Fieldwork Dilemmas

Generally, when doing fieldwork with those in sex marketplaces, the most obvious area to pay attention to is exploitation, which seems like it would be evident. This is not so with the murky definition of coercion, especially in light of the social constructions of constrained agency.

Remnants of ethical issues in sex trafficking research have inevitably spilled over in CSEC research due to issues of age and consent. Few definitions enable researchers to clearly distinguish between sex trafficking (Tyldum, 2010) and other (consensual) sex work. As a result, researchers often fail to clarify what is necessary for sex workers to be classified (and counted) as trafficked as there is confusion around coercion such as withholding of incomes and what qualifies as formal organization. A relatively clear definition of the target population is a prerequisite for most studies. Other ethical dilemmas are: 1) complications obtaining informed consent 2) assessing if someone is a victim of trafficking or CSEC, especially if they are reluctant to reveal experiences 3) accepting their refusal to identify with the standard exploited

“victim” label (Tyldum, 2010) 4) assessing if incentives are coercive 5) determining safe interview locations (Buchanan et al., 2002) 6) deciding how to react to illegal activity (Bailey, 2002; Cwikel & Hoban 2005; Sandberg & Copes, 2013) and 7) learning about physical abuse or violence (Cwikel & Hoban, 2005). Sometimes, our decisions are made quickly, multiple ethical dilemmas occur and our decisions are not “correct” in both worlds.

From an ethical standpoint, it is difficult to defend using a research design that entails identifying and interviewing individuals who view themselves as current victims of exploitation. This is especially the case when once participation is complete, the identified victim is left behind continuing to be exploited (Tyldum, 2010; Zimmerman & Watts, 2003). It is problematic if there is no form of assistance, remedy or exit provided with participation in the study (Tyldum, 2010; Zimmerman & Watts, 2003). On the flip side, Brunovskis and Surtees (2010) discussed issues in providing assistance to those who identify as victims. Though the researcher may see this type of intervention as beneficial, they may inadvertently be overstepping boundaries; contacting authorities can "create distrust between persons in prostitution, facilitators (e.g. pimps, brothel owners, etc.) and those who work on a day-to-day basis to assist them, thus potentially compromising on-going access and intervention opportunities (Brunovskis & Surtees, 2010:12).”

Methods

We explored how we traversed/crossed paths with the ‘carnavalesque’ atmosphere of underground sex markets. We used Bakhtin’s idea of a ‘world turned upside down’ in two ways:

- 1) What we are told is a young victim with constrained agency may not be a victim and may demonstrate agency. We explore the overt and hidden dimensions of this constraint, which manifested during the countless hours of observing and interviewing these young people.

- 2) What we are told what we should do in a situation where we see coercion, but this may not be the right thing to do. We explore walking the ethical/moral line of doing research with underage participants, the dangers involved in near 'missteps,' and the social and cultural processes involved in these scenarios. What do you do as an interviewer?

Samples

We were both ethnographic field researchers in the first study that is referred to as the "Atlantic City Study." This research was an investigation of the Commercial Sexual Exploitation of Children (CSEC) in Atlantic City, New Jersey⁴. This laid the foundation for our continued research of commercial sex markets.

The Atlantic City study involved observing and interviewing more than 150 sex workers between 16 and 24 years old in Atlantic City from 2010 to 2012. Atlantic City is known for its casinos, boardwalks and beaches. Through this fieldwork, we became familiar with accounts of agency as it pertained to youth and our own ethical/moral decision making.

The second study was carried out by the first author of this chapter. The study was an in-situ exploration of pimp labor and constructions of risk, informally called the "Pimp Study." 85 pimps/traffickers were interviewed in housing projects in Harlem, New York and in nonprofits⁵ from 2011 to 2012⁶. The average start age was 17 years old, so many began as teenagers. Many of the young pimps worked with similarly aged sex workers, often legally classifying them as sex traffickers.

⁴ Atlantic City was chosen as the pilot for an Office of Juvenile Justice and Delinquency Prevention (OJJDP) study across six cities that sought to replicate the New York City CSEC Study. This is because it is the second-largest gambling market in the country and reputed to be a hub for CSEC. The ethnographic study that we are reporting was a self-funded side study done by researchers in the OJJDP study.

⁵ Two non-profit organizations in Harlem agreed to allow me to use interview rooms in order to continue the project. The first was CitiCare, a health center and the second was FACES, formerly the Minority Task Force for the Prevention of HIV/AIDS. Both organizations hoped that participants would be interested in their free and low cost services.

⁶ Funded by the CUNY Graduate Center Doctoral Students Research Grant.

The third study conducted by the second author, informally called the “NYC Sex Work Study,”⁷ explored violent victimization as well as the resilience that is fostered over time by female and male-to-female (MTF) transgender street-based sex workers. A total of 34 in-depth interviews were completed with 15 male-to-female transgender and 19 female street sex workers between the ages 18-30 (many participants were young). Interviews were conducted in private places and the vehicle of the field researcher in New York City from 2012 to 2013.

Procedure

We used the sensitizing concepts, or central organizing ideas (see Blumer, 1954) of *constraint*, including *constrained agency* as a way of exploring our fieldwork decision making, including areas where our balance on the tightrope was shaky. Through our extensive discussions and reviews of our field notes from the initial Atlantic City Study, we decided that these were the most relevant topical areas. We honed these general themes.

We used an analytic framework derived from Ferninand et al. (2007), where they explored ethical dilemmas of doing fieldwork. They used cases, with an entire study making up each case, to illustrate specific fieldwork conundrums, and followed this with subsections titled: *the dilemma* and *response*. We did not use single cases or single studies, but rather we treated the themes, often comprised of several accounts and sometimes using examples across studies, as a type of case. The studies were similar in that they all entailed research interactions with young people in US sex markets in the same region (2011-2013). We felt that the studies were similar enough to warrant

⁷ Funded by PSCCUNY cycle 43 project grant in 2012.

integrating cases across studies into single themes, and we also realized the benefit of having different swathes of young people in US sex markets, including pimps, to explore often ignored dimensions. We discussed how issues came up in interviews from typical to extreme and our feelings of what could have/should have been done.

Analysis

Teenage constraint and questions of coercion

Constructed and real families who sell sex: Exploiters or saviors?

[“Atlantic City Study” based on field notes and an interview in Atlantic City, New Jersey (2010-2011)]

It was the height of the summer and word spread that we were doing interviews in a local fast food restaurant. Soon, we were swarmed with young people, girls and boys and young mothers, waiting to be interviewed about their activity in local sex markets. Each of us occupied a booth and interviewed the stream of participants for much of the day. I sat down and a young mother said “I’ll take her.” She explained that she lived with a much older woman called “Mama.” One perspective is that Mama provided her with food and shelter and helped her take care of her young child by helping with childcare and buying diapers. In the world right side up, Mama was a master manipulator who targeted vulnerable young mothers and withheld resources and threatened eviction if they did not sell sex and give her a large portion of the money. There were several other young mothers in the same situation, also living with Mama. Legally, the young woman qualified as sex trafficked before she turned 18, but now at just barely 18, the question of coercion arose.

As a researcher, I was concerned about Mama coercing young people because they had limited resources and places to turn. This participant was very forthright about her feelings and experiences and we spoke for a long time. Eventually, I asked if she

needed help leaving or if she would like to connect with social services. She looked down and laughed lightly, and she looked up and said that there were free bus tickets for people that wanted to go home. She explained that she went home a few times, but that things were so bad there and she received no help raising her child. She talked about how Mama was very good helping them care for the children and she was “a witch, but reliable.” “I always come back,” she explained. During the course of the interview, I asked her in other ways if she needed assistance, but she said that unless I had a job for her, that this was her best option for now. She reassured me, but in the end I still wrote down a few numbers on a piece of paper, which she reluctantly took, crumpled up, and put in her pocket while shrugging about the futility of the gesture.

Dilemma and response: Who decides the best options? A case could be made that Mama coerced her into sex work, and that she was currently being exploited, but as field researchers we are limited as to what we can offer. With her explanation of sex work as her best alternative and no one being in imminent danger, I had few options. Negotiating options with this participant was a balancing act for several reasons. 1) she most likely did not view herself as coerced or as a victim 2) she felt she chose the best option for her and her family 3) she tried to get help from the systems of family and state and they both failed her 4) she was technically an adult at 18 and able to legally make her own decisions, which she had already been doing since 15 5) her child was not in harm’s way and likely was receiving better care as compared other alternatives.

Her choice to sell sex was influenced by her inability to secure housing and adequate employment in the licit system, which is typical of the constraint imposed on the young by the state. This may have been compounded by the structural constraints of

being a poor, African American woman in the United States. While the possibility of Mama's coercive strategies were troubling, the ineffectiveness of family and state systems took center stage, all occurring in the world that is supposedly 'right side up.'

["Pimp Study:" Based on field notes, memos and interviews in Harlem, NY (2011-2012)]

Mista Warbux talked about his biological and step fathers both pimping. He was well past underage, but he described hanging around sex workers since eight years old and being more "ardent" about pimping around 13. The theme of families selling sex and encouraging and sometimes requiring the young male family members to pimp was typical. Teenagers who live in families where this business exists are often employed by their legal guardians and are expected to carry on the family legacy. The older males are fathers, uncles, or cousins and they initiate the teenage pimps into the business. Sometimes, they describe this initiation as "a test" or "a challenge." Dantes started when he was 15 years old:

My father's a pimp. It started with me when I was real young. You know what I'm saying so I first started, I had my first two. When I first had my first bitch though, I was like 15. I was 15 when I started. My father actually gave me or introduced me to her. You know what I'm saying. Ha. My father wanted to see if I could do it, so I showed him I could.

Other times, they did not enjoy the work, but were required to contribute. The family business sometimes operated out of the house, making non-participation difficult. Daryl lived with his uncle and his uncle's sex workers, and the family business operated in the home. He discussed his first turn-out, the training process and his feelings about pimping. Daryl said that he did not want to keep pimping because he did not like it.

I mean someone was basically training me on what to do ...not physically training me, but telling me oh you can do this. You can make some money off of it and you can make a whole lot of money so. So when I was introduced to it that's when I started doing it. I had one girl and then she knew a couple other girls and I have to live with my uncle. My uncle who has two bedrooms that are empty so they sleep there. I mean he's pretty much with everything that's going on. But it's not mainly me it's him. I don't really like it, but it so much money. I do it, but ...

Dilemma and response: What boy doesn't enjoy pimping? Technically, when Daryl and Dantes were teens, they both could have qualified as labor trafficked based on the UN definition.

In the scenarios where young males are given something akin to a masculinity test (in the case of Dantes) could be construed as a form of coercion, especially within families. However, I indirectly probed Dantes about “the test” to see if he felt coerced into the work. He portrayed his initiation as an apprenticeship where he learned the family trade and was happy that he found a way to be financially solvent. I was more concerned about Daryl (now in his late teens and barely adulthood) and the other similar cases where coercion was still possible. Early in the interview, it was unclear if he was forced to work for family. To understand the scenario fully, I probed in different ways about his willingness to work and as reflected in the above passage he eventually admitted that he was not forced and also that he felt that he could not quit because of money.

For most people, these scenarios do not qualify as ethical dilemmas because of how we construct male sexuality and agency, even with teenagers. If you replace the young family member with a young female who is forced or coerced into selling sex or even pimping, as part of a family business, this is more palatable as a human trafficking case. What is necessary to constitute having an ‘ethical problem’? Official cultural rules were not violated. This distinction brings up who is more readily categorized as a trafficking victim, despite legal definitions. This is a murky area because of how agency is constructed based on gender and lived realities of males/females. However, while a call to social services, a non-profit for victims or law enforcement may have been received as a prank, I was left with the moral dilemma of having no options (if needed) and questions about the construction of ‘ethics’ around teenage males.

In this theme, young people are constrained by the formal sector and therefore denied tools for basic survival. The sad, paradoxical reality may be that families who provide transferable skills to their children and the Mamas who support them are often the only people

around to play the part of heroes and heroines in the ‘world turned upside down.’ Further, these participants demonstrated agency, in their practical decisions to survive within and for their families.

Lovers, con artists or egalitarian business partners?

[“Pimp Study:” Based on field notes and interviews, Harlem, NY (2011-2012)]

Early on in the study, I spoke with Samuel who described walking around his neighborhood at 12 years old and being asked by a woman to stand near her and make sure that she returned when she went off with various men. He would eat dinner with his family and leave to help her late into the evening. He says he didn’t realize that he was pimping for a long time, but when he did he could not give up the income. This theme of sex workers luring young males into pimping arose in a few other cases. Jean, who is 19 years old, met his sex worker (who was in her late 20’s) while she was working and she took him in, gave him a ‘freebie,’ and taught him how to be a ‘daddy.’

She what she explained to me was that she says being a daddy like that’s what they call it, being a daddy is it’s a responsibility like. It’s like having a daughter even a that’s a sick twisted way but it’s like having a daughter cause’ she says all I have to do is provide hair, nails, clothes, food, and like um protection. When she said the protection see that’s what had me at first like I’m not too sure, but when she said the whole protection part I was I was like “I was a bad kid” so like when she said protection I was like “alright I’m for it.”

Dilemma and response: Mrs. Robinson as a sex worker? Older women manipulating teenage male sexuality, by banking on them feeling pressured to pass masculinity tests and using these as coercive strategies to employ them as pimps or traffickers are not palatable as coercion narratives. Most people would say there is no victim here, despite wide age differences and sometimes initiation through sex. Interpretations of coercion are always intertwined with gender and lead to questions about ethics in general and leave researchers with moral dilemmas where a foot in both worlds does not help.

[“Pimp Study:” Based on field notes and interviews, Harlem, NY (2011-2012)]

Jason, who started pimping at 16 years old, described how he and his first turn-out (or his first sex worker) grew up in the system.

I ain't gonna lie; it was my high school sweetheart. I met her through goin' to classes, you know I was feelin' her, but um she was lost. She wasn't even like girlfriend material. She was raised in the system so she didn't have a mind of her own. She was in and out of the foster care system. She needed someone to take care of her, so... Me, I've been on my own since I was 12, used to just be me and my uncle, from there it was jail, streets, jail, drugs, I was already fucked up so I just brought her in with me. I molded her and she became something extravagant and she just brought mad girls. You know she was more the boss, you know what I'm sayin'.

The scenario of similarly disenfranchised youth banding together to sell sex was a recurrent theme. This is also illustrated in the case of Mike J who met his first "turn-out" at a local shelter for runaway teens called Safe Horizons, where they were both getting a free meal. They hatched a plan to sell sex.

Dilemma and response: Boys don't go hungry? While vulnerable youth such as the homeless are sometimes targets to be sex workers, their pimps can be in similar dire situations. The collaborative efforts of at-risk teens to sell sex may begin with coercion and segue into a mutual agreement and sometimes what is construed as coercion is just the start of an entrepreneurial dyad. More typically both teens are at-risk. While "constrained agency" is easy to ascribe to females, it is not the same for young males. Jason was at a more stable place in terms of basic survival, i.e., food and shelter, whereas Mike J was living in an abandoned building and still getting free meals in local youth shelters. I asked Mike J if he needed help connecting to any other services and he shrugged this off by telling me that he was fine. If Mike J was a female, or even a female pimp, I probably would have been more persistent. My own gender biases got in the way.

[“Atlantic City Study:” Based on field notes and interviews, Atlantic City, NJ (2010-2011)]

The participant was an 18 year old high school dropout who had been in “the life” since she was 17 years old. She had no permanent residency and lived alone in a hotel room she rented out. Her reason for leaving home was not uncommon. “My family left *me*. I took care of my

brother and myself since I was 11.” She stated nonchalantly, “some guy started pushing on me and he wouldn’t leave it [sex] alone. He started offering me stuff and he offered me \$300 so I took it cuz I was gonna’ need it. I been poor for a long time.” Soon it became her only form of employment.

She initially stated she had no pimp but later revealed that she had a special someone with whom she shared all the money she earned. “I give all [of my money] and he manages it for me.” When asked if this was a pimp she indicated that he was more than just that; it was a complicated relationship. She talked about her pimp as one would talk about a significant other/boyfriend. Her "pimp" was being interviewed outside the car by the study's principal investigator and the age difference was clear; the participant was clearly younger and he had been in the business a long time. They met after she had run away from home at 17 and he got her involved in sex work. She stated:

I actually have feelings for him...you also have sex with your pimp, too...you know, to make sure your game is up there. If your game is not up there, he’s not gonna put you out there. Because you’re not gonna’ catch as many dates. And then he’s gonna’ have to worry about...like...cuz you break him [e.g. give money)]...if you’re not putting money in his pocket he never gonna’ put you out there. All the pimps that I know fuck their girls.

When I asked how she felt about that she said, “In the hustle, in the game, it’s not wrong but technically, you know it’s wrong. You know it’s wrong but once you get in the game...” she trailed off.

Dilemma and response: Ambiguous relationships? In cases like this, researchers expect to deal with the consent dilemma in terms of respondent's age and constrained agency. However, that was not the case here. The respondent seemed very willing to participate in the sex market. During a discussion about youth in sex work she stated, “...When you’re younger you’re vulnerable. But I still have rules.” Despite having rules, the vulnerability still exists and she seemed well aware of that. When asked if she carried protection she stated “I should, but I really

don't want to get stopped by the cops..." She explained that once she got beaten and raped after sex; the client took all her money and she went after him. "It made me feel fucked up." However, instead of feeling scared she stated, "I was *mad*. I was really mad."

The part that made me question her agency was not so much the age difference with her clients and pimp, but rather the description she gave of her relationship with her pimp, which seemed rather complicated ... or perhaps not. She did not seem to view him as her pimp and seemed conflicted at the thought of telling people he was anything but a boyfriend.

Other than listening there was very little I felt that I could do. Since there was no clear-cut case of sexual exploitation or imminent physical force, I did not have the power to intervene. Nevertheless, even if one might argue that there was sexual exploitation at play – given her age and the dynamics of the relationship with her pimp (or boyfriend) – I was in no position to tell her to leave him or the sex market; in fact, it most likely would have offended and undermined her. However, looking in, we may judge this as being a case of exploitation. I decided the best course of action was to just listen.

Toward the end of the interview, a patrol car began to circle our vehicle, which was parked outside a convenience store. I remained in the car with the respondent. I delayed the interview while the principal investigator, standing outside with the respondent's pimp and a couple of girls that were waiting to be interviewed, was approached by two police officers. After showing his credentials and documentation pertaining to the study, he was told that the interviews had to be moved to another location. The manager had complained about loiterers. It was then that a girl wearing nothing but her bra and panties under a transparent yellow parka and no shoes, jumped into the car stating that she didn't want to be seen by the cops. The respondent revealed that this girl was her friend and associate.

The principal investigator returned to the car and, after explaining the encounter he had with the police, drove us to a secluded parking lot a few blocks away. The respondent, with a shaky laugh, said “At first I thought this was a set up. Ya’ll motherfuckers gonna’ get me arrested.”

Almost naked girl and the official world

The almost naked girl from the previous story, asked to be interviewed. The two participants stayed in the car and we drove to another parking lot. “I don’t want to get stopped by the po po again!” she yelled and we realized she was also drunk. The beginning of the interview was spent primarily trying to explain how the principal investigator and I had no affiliation with law enforcement or any organization or agency that would get them in trouble with the law. We went to another parking lot where the possibility of the police showing up was lower.

The participant said she was 19 years old and had been in the life since she was 14. “I did it before, but it was nothing serious [only did it when desperate].” But now this was her only source of income. She still lived at home with her mother who received SSI and her father was deceased. She started selling sex because she stated:

I’m not a follower or nothing but you know I was thinking cuz they was making nice good money, having nice phones, nice clothes, nice uggs, nice shoes, whatever. So I was interested and I was like ‘hey, I wanna’ have that stuff’ so I did it too cuz I wasn’t getting that shit at my house. Yeah, I dunno, I’m no follower or nothing like that at all but hey if you doing good...they just trying to help me out and I was like ‘alright.’

She worked alone, or rather side by side with other sex workers, both on and off the street. She stated “I don’t really get [clients] from pimps. They don’t really help out that much.” After being asked to specify whether she had someone who helped her, she stated: “Not really. Myself kinda...I was supposed to be in one of them madam things and there’s a whole bunch of chicks and no pimps.”

Despite her independence from pimps and being the sole price negotiator with clients, she made less money than her friend. She set her own rules and own time, however her rules depended on the situation; for instance, she stated that if she was desperate for money she would have sex for \$20. No substance abuse was apparent, however she did say that the month prior to the interview she started smoking crack. She stressed, "I'm not addicted."

She was enthusiastic about sex work. In addition to the easy money she said she also enjoys the work itself. The only pitfall was that it took too long for her clients "to finish." When asked if she would like to leave sex work she stated, "...not really."

Dilemmas and response: Aiding and abetting or something? This participant jumped into the car for obvious reasons: she was avoiding the police who would have stopped her because she was almost naked. Had I told the girls to get out of the car, most likely the girl in the parka would have gotten arrested for public indecency.

Once she provided informed consent I told her I couldn't ignore the elephant in the room and asked why she was half naked. She laughed with me. "I got into a little situation. In a little argument with somebody. I wasn't actually wearing my clothes...and I took them off and I asked if I could have some stuff. I still had this [parka] on." She said there was a person who had a bag with her clothes (and money) and that she had to get it back. She didn't provide any more information regarding why she couldn't get her clothes back or who had them.

I continued with the interview protocol. Life on the street is fast, and as a researcher interviewing in the street you have no control over what happens. One has to respond quickly; otherwise potential participants will lose interest or be unable to participate. Moreover, in this particular situation, assuming the respondent 1) had somewhere to go to get changed and 2) had clothes to change into, there was no other time the interview could be scheduled, as she had been

waiting (in that state), anxious to finish in time to get to work. Furthermore, given the state she was in, I felt uncomfortable telling her to get out of the car (i.e., it would endanger her). I said I didn't feel comfortable with her getting out of the car like that and offered to drive her to a secure location to get her clothes once the interview was complete.

Not halfway into the interview, the previous participant (18 year old with the pseudo pimp/boyfriend) walked up to the car and presented yet another dilemma. She had an alcoholic beverage in her hand. Kindly rejecting her offer to have some, I asked if she could wait to drink because having an open container in the car was illegal. It is possible we could also have gotten in trouble for simply being around underage girls who were drinking. Had I asked her to leave with the beverage 1) she could get stopped by the police and arrested, and 2) the current respondent, still half-naked, would have left with her resulting in an incomplete interview. I suggested she wait outside the car and put the beverage away so as to avoid being stopped. Despite my request, she continued to drink with the current respondent.

If I responded to these ethical dilemmas without the 'fair' in mind, participants would have been in harm's way. 'Official' rule enforcers were nearby and this young girl was in a general vulnerable position, so it seemed safest to let them stay in a car. Each of my decisions brought up 'official/unofficial' world issues where responding would have been very different. In a 'world turned upside down,' you do not: kick participants out of your car (especially when they can be arrested), bring up underage drinking, or lecture them about wardrobe choices. However, keeping my one foot in the 'official' world allowed me to have the wherewithal to decline drinking with teenage sex workers. These interviews were a balancing act.

Role as an interviewer: Counselor, savior, or pest?

["NYC Sex Work Study:" Based on field notes and interviews, (2012-2013)]

The participant was a 19 year old female who had been selling sex on the street for a few years. She talked about sex work as an outlet from everything she had experienced in life; it was a good topic for her, as she was able to show strength by describing her independent business side. The only violence in her life that she had experienced was by her former boyfriend.

Similar to other participants, she had experienced emotional, physical and sexual abuse at various points in her life. Not all respondents who described relationships where they had been assaulted, beaten up, manipulated, controlled and sexually taken advantage of by those they loved were as free to leave their abusive boyfriends. The intimate partner violence that this respondent experienced was, by far, the most horrific of all cases. The last month of abuse, leading up to her escape, was the most violent; in fact, she revealed that during this month she was pregnant. He had controlled her every move and beat her on a daily basis, also threatening to kill her family if she left.

Following her accounts of abuse that led to her escape, I inquired whether she had been in touch with the police. She stated, "Yeah, but they can't find him." She also mentioned that "they" (referring to his associates: other drug dealers and pimps) could be hiding him.

I don't know how I'm dealing with it. I feel like...as a person I don't know who I am anymore now. I feel I changed a whole lot...I don't feel the same. My attitude changed. It's just weird, I dunno how to deal with it. And sometimes I catch myself...thinking about it and I start tearing up and getting very emotional about it and then it's like...sometimes I feel like committing suicide. I'm not gonna' lie.

Mentions of suicide and self-mutilation unfortunately were not uncommon in this study. However, most of the other respondents had received therapy, had support systems, or had stopped destructive behaviors. I asked when she started having them. It was then that she started crying and stated that the doctors had told her that, due to the abuse, her twins were likely to be birthed crippled or stillborn; therefore, the best option was to terminate the pregnancy.

Since these were recurring and recent thoughts of suicide, I was unsure of how to respond. I felt that her life was in my hands. I asked how frequently she thought about killing herself. She said "when I really get depressed. Like...the other day I felt like it." She talked about not having tried to kill herself yet. So far, it was just a thought, but that at the pace she was going it was very possible she would do it.

There was very little I could do besides offer counseling and follow up with her. I told her that she must talk to someone else, as I'm not a counselor or equipped to help her. This was the first interview where a respondent openly asked for a counselor and had never received any therapy.

Dilemma and response: Determining where help ends and harassment begin: The following day, I reached out to some counselors, one who was assigned to the project and another from a community based organization that deals specifically with intimate partner violence. Although I did "my part" as a researcher, and followed IRB regulations, I still felt terrible leaving the respondent behind. Up until that point, it seemed like a no brainer to just get her counseling. For the next two weeks, we stayed in touch and I checked in on her.

Giving professional help is easier said than done. How do you ensure the safety of your respondent without crossing over into the "danger zone" of harassment? The counselor was ready for her within one day after the interview, but due to the respondent's schedule, there was never a meeting. She never told me to stop contacting her and I did because I was afraid that she was feeling harassed. This fear was especially overwhelming when she quit responding to my calls. After two weeks of calling her she finally responded saying that she was "too busy" to meet with a counselor.

This is an ongoing dilemma, as I still have her number and want to check in on her and make sure she gets the counseling she appeared to need and want.

Discussion

Our approach to fieldwork with sex market involved youth was to have a foot in both worlds allowing for inter-subjectivity. This approach diverges from the populist manifesto of total immersion where fieldwork and life are intertwined, but where everything is “right side up.” We do not advocate for our ‘two-world’ approach with all types of populations or even when doing research with other participants in the sex marketplace. However, doing research with a population who is vulnerable because of ‘official’ world constraints and a strongly voiced and heard ‘official’ discourse that socially constructs their lives, having one foot in both worlds was an important device that we used to stay on the tightrope in both.

‘Two-world’ does not equal only two interpretations. For instance, in the story about Mama being an exploiter and savior, it seems that we are advocating for an either/or story line and also merely boasting about being able to see the two stories or relaying that participants experience both. We are also skeptical of dichotomies. The two poles are presented to allow the reader to imagine the variations and in-betweens of these stories, with most readers probably not agreeing fully with either story. The two poles allows for a range, and the possibility of multiple accounts, even in single stories.

As researchers, we experienced constraints in how we interpret coercion and danger in a ‘fair’ that we only temporarily joined. We quickly learned that coercion is not always what it seems and that what we are told we should do in scenarios where we see coercion may not be the right thing to do. For instance, in the story where the participant appeared to also be a victim of

domestic violence, persistent offers of help may have pushed her away. Also, in-situ or short term ethnographies do not always allow for multiple and extensive contacts with the same participants, so this kind of over-involvement can be the wrong thing to do.

We as fieldworkers entered the sex marketplace as informed scholars with particular questions in mind and an awareness of moral values, especially in terms of exploitation, which influences and often challenges our moral responsibilities (Ferdinand et al., 2007). The contours of exploitation were not clear-cut. For instance, some young sex workers voiced agency in the face of seemingly contrary circumstances. Some pimps despite talking about voluntarily pimping portrayed vulnerabilities and in some cases described what could be construed as coerced labor imposed by family members. Often, participants voiced contrary positions and many shades of grey.

Where do moral responsibilities begin and where do they end? Should we take participants home with us, provide them with food and try to find them jobs? Is this the best case, non-secular ‘rescue operation’ scenario? Should ‘rescue’ or any type of ‘Plan C’ be part of the research protocol, or do we only rescue the safe bets, the willing, and the of-age? The boundaries are unclear, and the rules are ambiguous, especially with inter-discursive accounts and in light of assessing whether we would lose our balance in one world or both. However, losing that balance might not always be perilous – despite usually trying our best to walk it, in some situations, one can only act ethically and transcend ‘official’ and ‘unofficial’ constraints by deliberately jumping off the tightrope.

References

- Anderson, E. (1984; 2000). *Code of the streets*. W. W. Norton & Company
Bailey, J. (2002). *Conversations in a brothel: Men tell why they do it*. Sydney: Hodder.

- Bakhtin, M. (1984). *Rabelais and his world*. Bloomington, IN: Indiana University Press.
- Bauman, Z. (1998) *Work, consumerism and the new poor*. Buckingham: Open University Press.
- Baumeister, R., and Tice, D. (1986). How adolescence became the struggle for self: A historical transformation of psychological development. In J. Suls and A. Greenwald (Eds.) *Psychological perspectives on the self* (Vol. 3) (pp.183-201), Hillsdale, NJ: Psychological perspectives on the self (Vol. 3) (pp.183-201), Hillsdale, NJ:
- Bjonness, J. (2012). Between emotional politics and biased practices: Prostitution, policies, social work and women selling sexual services in Denmark. *Sexual Research and Social Policy*, 9, 192-202
- Blumer, H. (1954). What is wrong with social theory? *Journal of American Sociological Society*, 19 (1), 3-10.
- Brunovskis, A., & Surtees, R. (2010). Untold stories: biases and selection effects in research with victims of trafficking for sexual exploitation. *International Migration*, 48(4), 1-37.
- Christensen, P., & Prout, A. (2002). Working with ethical symmetry in social research with children. *Childhood*, 9(4), 477-497.
- Côté, J.E. & Allahar, L. (1996). *Generation on hold: Coming of age in the late twentieth century*. New York, NY: New York University Press.
- Cwikel, J., & Hoban, E. (2005). Contentious issues in research on trafficked women working in the sex industry: Study design, ethics, and methodology. *Journal of Sex Research*, 42(4), 306-316.
- Dank, M. (2011). *The commercial sexual exploitation of children*. El Paso, TX: LFB Scholarly Publishing LLC.
- Dunlap, E., Johnson, B. D. & Randolph, D. (2009). Ethical and legal dilemmas in ethnographic field research: Three case studies of distressed inner-city families. In D. Buchanan, C. B. Fisher, & L. Gable (Eds.), *Research with high-risk populations: Balancing science, ethics, and law* (pp. 207-229). Washington, DC: American Psychological Association.
- Ferdinand, J., Pearson, G., Rowe, M., & Worthington, F. (2007). A different kind of ethics. *Ethnography*, 8(4), 519-543.
- Goodwin, D., Pope, C., Mort, M., & Smith, A. (2003). Ethics and ethnography: An experiential account. *Qualitative Health Research*, 13(4), 567-577.
- Holstein, J.A., & Gubrium, J.F. (1995). *The active interview*. Qualitative research methods series, 37. Thousand Oaks, CA: Sage Publications.
- Horning, A. (2013). Peeling the onion: Domestically trafficked minors and other sex work involved youth. *Dialectical Anthropology*, 37 (3), 299-307.
- Howard, N. (2014). Teenage labor migration and anti-trafficking policies in West Africa. *American Academy of Political and Social Sciences*, 653, 124-140.
- Lloyd, R. (2011). *Girls like us: Fighting for a world where girls are not for sale, an activist finds her calling and heals herself*. New York, NY: Harper-Collins.
- Marcus, A. and Curtis, R. (under review). *No love for children: Science and engagement in the study of child sex trafficking*. In de Wildt and D. Siegal (Eds.), *Ethical issues of researching human trafficking*. Springer.
- Marcus, A., Horning, A, Curtis, R, Sanson, J, & Thompson, E. (2014). Pimping dynamics: Conflict and agency in pimps' relation with underage trafficking victims. *Annals of American Academy of Political and Social Science*, 653, 225-246.
- Presdee, M. (2000). *Cultural criminology and the carnival of crime*. Routledge.

- Melville, C. (2010). *The city and the city*. Random House.
- Sandberg, S., & Copes, H. (2013). Speaking with ethnographers: Challenges of researching drug dealers and offenders. *Journal of Drug Issues*, 43, 176-197.
- Scheper-Hughes (2004). Parts unknown: Undercover ethnography of the organs-trafficking underworld. *Ethnography*, 5, 29-73.
- Scheyvens, R., & Leslie, H. (2000, February). Gender, ethics and empowerment: Dilemmas of development fieldwork. *Women's Studies International Forum*, 23, 1, 119-130. Pergamon.
- Schlegel, A. (1996). *Adolescence: An anthropological inquiry*. Free Press.
- Shanahan, M. J., Porfeli, E. J., Mortimer J. T., & Erickson, L. (2005). Subjective age identity and the transition to adulthood: When do adolescents become adults? In F. R. Settersten, Jr., F. Furstenberg, Jr., & R. Rumbaut (Eds.) *On the frontier of adulthood: Theory, research, and public policy* (pp. 225-255). Chicago: University of Chicago Press.
- Lee-Treweek, G. (2000). The insight of emotional danger. In G. Lee-Treweek & S. Linkogle (Eds.), *Danger in the field: Risk and ethics in social research* (pp. 114-131). London: Routledge.
- Tyldum, G. (2010). Limitations in research on human trafficking. *International Migration*, 48(5), 1-13.
- Weitzer, R. (2007). The social construction of sex trafficking: Ideology and institutionalization of a moral crusade. *Politics & Society*, 35(3), 447-475.
- Zimmerman, C., & Watts, C. (2003). WHO ethical and safety recommendations for interviewing trafficked women. *Gender, women and health*, 30. World Health Organization. Retrieved from http://www.who.int/gender/documents/women_and_girls/9789242595499/en/

Exhibit "D"

Judith Newlin

From: Claudia Cojocaru <ccojocaru@jjay.cuny.edu>
Sent: Tuesday, January 22, 2019 8:43 PM
To: Katherine Chabalko
Cc: Siegel-Rozenblit, D. (Dina); R.deWildt@uu.nl; Judith Newlin
Subject: Re: Concerns regarding a chapter in "Ethical Concerns in Research on Human Trafficking"

Dear Miss Chabalko,

Thank you for the email. As I relayed to Dr. Siegel in our correspondence, I only contacted Dr. Siegel as a courtesy, before I pass the matter to my attorneys to file official complaints. Because I was recently informed that Horning and Paladino were warned about this situation, I prefer to have my attorneys address this matter through formal channels.

All the very best,

Claudia Cojocaru

On Jan 14, 2019, at 11:51 AM, Katherine Chabalko <Katherine.Chabalko@springer.com> wrote:

Dear Ms. Cojocaru,

My name is Katie Chabalko, and I am the Senior Editor for Social and Behavioral Sciences here at Springer. I am also copying in Judith Newlin, who is currently managing our program in Criminology. Through Dina Siegel, we have received your claim of plagiarism, regarding the chapter "Walking the Tightrope: Ethical Dilemmas of Doing Fieldwork with Youth in US Sex Markets" by Amber Horning and Amalia Paladino in the book *Ethical Concerns in Research on Human Trafficking*, edited by Dina Siegel and Roos DeWildt. As mentioned in the note below, our Research Integrity team is looking into this claim.

They were not able to find any evidence of plagiarism in published works, and asked whether there was any evidence in an unpublished work (such as a draft article or chapter, for example). Your note below seems to indicate that you have such materials. If so, if you can send that to me, that would be very helpful for them to continue their examination of this matter.

Springer is a member of COPE (Committee on Publication Ethics). Per the COPE guidelines, our next step is to go to the authors with this claim and any examples you provide, and ask the authors for an explanation. While we would not disclose your identity directly, it's possible they may be able to figure it out themselves from the information provided. This is the only step we can take to move the case forward on our side, but it may be inevitable that this will expose you as the source of the complaint. So, before doing so, I want to ask if this is okay with you.

I will await a further response from you.

Katie

Katie Chabalko

Springer Science+Business Media

Social and Behavioral Sciences
Senior Editor

From: Claudia Cojocaru [<mailto:ccojocaru@jjay.cuny.edu>]
Sent: Friday, January 04, 2019 6:00 PM
To: Katherine Chabalko
Subject: Fwd: Concerns regarding a chapter in "Ethical Concerns in Research on Human Trafficking"

Begin forwarded message:

From: Claudia Cojocaru <ccojocaru@jjay.cuny.edu>
Subject: Re: Concerns regarding a chapter in "Ethical Concerns in Research on Human Trafficking"
Date: January 4, 2019 at 5:58:11 PM EST
To: "Siegel-Rozenblit, D. (Dina)" <Dina.S@uu.nl>
Cc: "Kaherine.Chabalko@springer.com" <Kaherine.Chabalko@springer.com>, "Wildt, R. de (Roos)" <R.deWildt@uu.nl>

Dear Dr. Siegel,

Thank you for your email. I'm sorry to hear that the evidence is not enough- according to the US Office of Research Integrity, the evidence I provided is consistent with "the appropriation of another person's ideas, processes, results, or words without giving appropriate credit." . Note that it is not necessary to have the work published, as plagiarism comes in many forms. Of course, there is other evidence, but I will take this matter to my attorneys, and they will decide what to do regarding this, and other instances of plagiarism. Dr. Siegel, thank you for your consideration in this matter. I wanted to try addressing this issue informally, and as discreetly as possible, mainly because I once considered the people involved friends; however, since this is not an option, I will take it through formal channels.

Again, I appreciate your time and help.

All the very best,
Claudia Cojocaru

On Jan 4, 2019, at 4:19 PM, Siegel-Rozenblit, D. (Dina) <Dina.S@uu.nl> wrote:

Dear Claudia,

I checked in with the publisher, and they were not able to find any published evidence to support the claim of plagiarism. Do you have any evidence (for example a draft article or chapter you authored) of which segments ended up in the published book chapter?

Best regards,
Dina Siegel

From: Siegel-Rozenblit, D. (Dina)
Sent: Wednesday, December 19, 2018 4:01 PM
To: Claudia Cojocaru
Cc: Wildt, R. de (Roos)
Subject: RE: Concerns regarding a chapter in "Ethical Concerns in Research on Human Trafficking"

Dear Claudia,

Thank you for reaching out to us to make us aware of your concerns. We take a allegation of plagiarism very seriously. I am reaching out to the publisher, which is a member of the Committee on Publishing

Ethics. They will review the matter. This will take some time, but I will be in touch when I have more information.

Best regards,
Dina Siegel

From: Claudia Cojocarú [ccojocarú@jjay.cuny.edu]
Sent: Thursday, December 06, 2018 2:53 AM
To: D.Siegel@uu.nl
Cc: Wildt, R. de (Roos)
Subject: Concerns regarding a chapter in "Ethical Concerns in Research on Human Trafficking"

Dr. Siegel,

My name is Claudia Cojocarú, and, until April this year, I worked with Anthony Marcus and Ric Curtis.

I am writing to you to give you the opportunity to discreetly address Amalia Paladino and Amber Horning's plagiarism in the chapter "Walking the Tightrope: Ethical Dilemmas in Doing Fieldwork with Youth in US Sex Markets", you and Roos DeWildt published in a 2015/2016 edited volume titled "Ethical Concerns in Research on Human Trafficking". I am reaching out to find a solution in an attempt to avoid Paladino's and Horning's public shaming, as they may be willing to see this as an opportunity to change their ways. I am certain that you did not know that the individuals mentioned are the subjects of several investigations, as outlined in this report "John Jay Professors face Allegations of Drug Sales and Sexual Misconduct" <https://www.nytimes.com/2018/09/22/nyregion/john-jay-professors-allegations.html> .

Please see below an excerpt from a report I am currently in the process of filing with US authorities, which is part of a larger investigation in the conduct of Richard Curtis and Anthony Marcus, and of their known associates. This excerpt details how Anthony Marcus, Richard Curtis, Amalia Paladino, and Amber Horning, under the pretenses of "peer reviewing" and "supervising" my writing, had shamelessly and recklessly plagiarized my work in an effort to legitimize The "Atlantic City Study", a deeply problematic study ridden with ethical violations and falsified data. Note that my work was already developed on the Bakhtin's framework of "carnavalesque" in 2014. My notes show I started working on that sometime in May 2014, if not earlier. Paladino and Horning began working on their paper heavily much later, once Ric Curtis and Amalia got access to my Google docs.

Needless to say, the actions Amber Horning and Amalia Paladino engaged in are reprehensible and deserve to be held accountable for what they did. However, given the gravity of these actions, I am unwilling to have anything I worked on associated with them, or my experiences and research used to legitimize their conduct.

Please do not hesitate to contact me if you need additional details.

Excerpt outlining plagiarism:

"... Not only I provided my editing and analytical skills, but my ideas and intellectual property were routinely plagiarized and taken from me without permission.

Here's an example:

 Claudia.docx
48K

Bufnitza <ms.bufnitza@gmail.com>
To: Anthony Marcus <amarcus@jjay.cuny.edu>

Fri, Oct 24, 2014 at 11:03 PM

Hi Anthony,

I finally managed to see the comments and changes. Thank you for taking time to do that. I appreciate it. I don't normally like to talk about how I feel, but I think I misunderstood how much of my own feelings I was supposed to put in there, or how much focus on the personal experience I was to depict. Since I never wrote a report from the field, I kind of did what I saw in Ric's report. I feel bad I put all that in there, it probably looks like a very angry and codependent venting fuck show- excuse my language. I wasn't certain about the circus, but I do see the point you make. I also have the analysis Bakhtin wrote about the carnivalesque and laughter on Rabelais's Gargantua and Pantagruel, there are some things there that would connect with the idea of circus. I am getting pretty insecure about it (writing) though, if you think I am wasting your time, please do tell me, I prefer to know where I stand- I am quite oblivious to anything and I tend to get confused if I don't have a certain level of certainty. I am trying really hard to come close to normal behavior, but sometimes I miss.

Thank you,

Claudia

<https://mail.google.com/mail/u/0?ik=d1d408c0cc&view=pt&search=...msg-f%3A1482936179076173431&siml=msg-f%3A1482960568153103608> Page 2 of 5

As evident from the above pictured email, I was already writing about these issues in 2014; I spoke at length about these analyses with Anthony Marcus and Ric Curtis. Unbeknownst to me, Amalia Paladino, Anthony Marcus and Ric Curtis were more interested in appropriating my work than treating me like a colleague, or affording me the basic respect any human being deserves. I came across the book chapter presented here by accident, and I realized that Amalia Paladino and Amber Horning were equally involved in plagiarism, as evident from the following example. This book chapter was published in 2016, and both authors, Amalia Paladino, and Amber Horning have been on Ric Curtis' and Anthony Marcus' team for much longer than I was, as they both worked on the now infamous "Atlantic City study". Amalia was my best friend when she and Anthony Marcus appropriated work I did. Amber Horning almost became my dissertation adviser had I accepted to enroll in the PhD program at UMASS Lowell. Incidentally, the chapter featured here is about the "Atlantic City study", and it is but one way that my experiences and my work have been used to validate and justify the problematic aspects of that study, while concurrently advancing the careers of the researchers involved.

Chapter 13

Walking the Tightrope: Ethical Dilemmas of Doing Fieldwork with Youth in US Sex Markets

Amber Horning and Amalia Paladino



The Sex Market as “Carnavalesque” and Colliding Worlds

Doing fieldwork in “unofficial” contexts such as sex marketplaces creates a feeling that everything is questionable, yet acceptable. This uncertainty results in cognitive dissonance, where researchers question their actions or inactions. This is how we operationalize our “missteps.” We engaged in ethnography and what Holstein

A. Horning (✉)
William Paterson University, Department of Sociology, 300 Pompton Rd. Wayne,
NJ 07470, USA
e-mail: ahorning@jjay.cuny.edu

A. Paladino
Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice,
Social Networks Research Group, 619 W. 54th St/, 7th Floor, New York, NY 10019, USA
e-mail: apaladino@jjay.cuny.edu

© Springer International Publishing Switzerland 2016

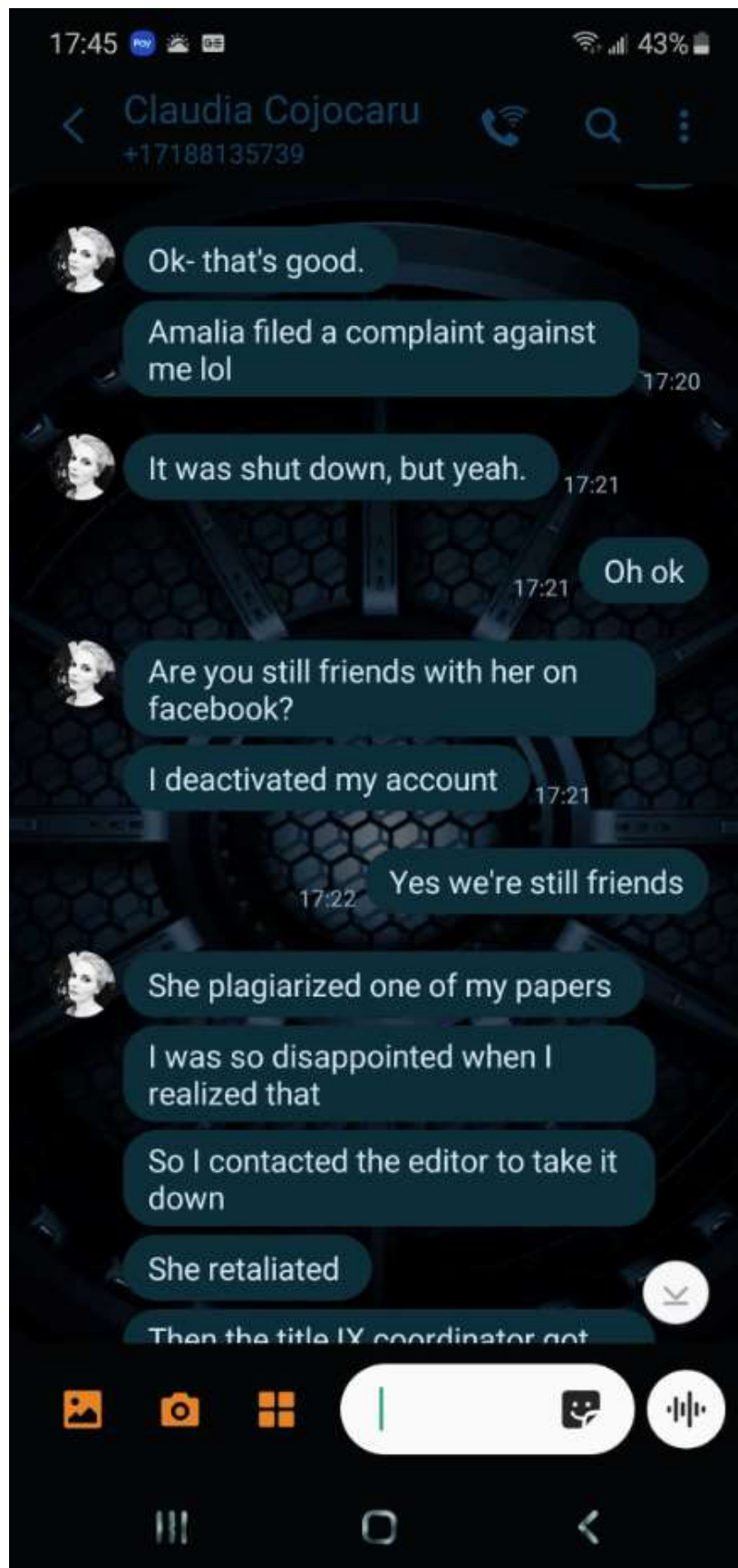
205

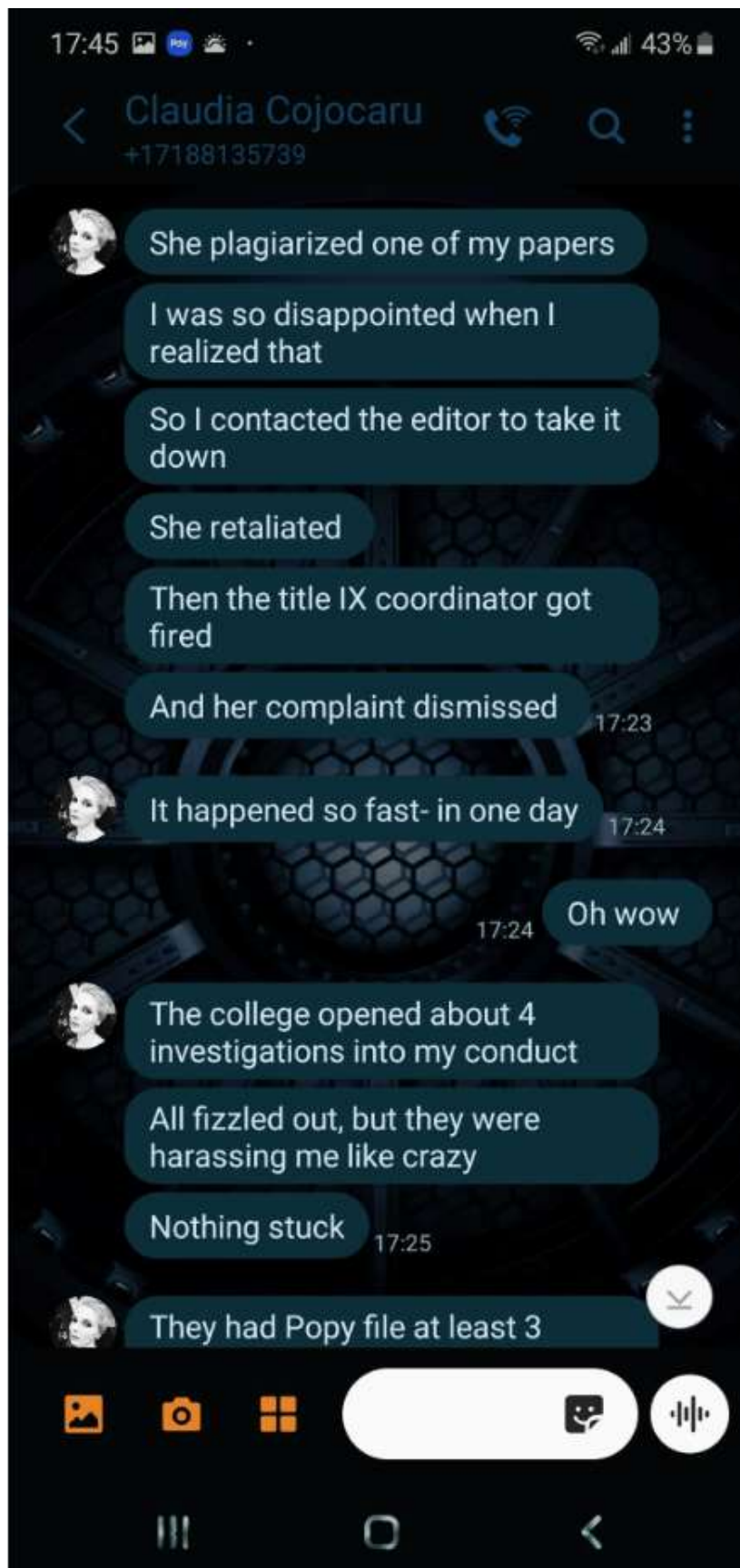
D. Siegel, R. de Wildt (eds.), *Ethical Concerns in Research on Human Trafficking*,
Studies of Organized Crime 13, DOI 10.1007/978-3-319-21521-1_13

In this chapter, we explored how we traversed the ‘carnavalesque’ atmosphere of underground sex markets. This term was claimed by Mikhail Bakhtin (1984) and depicts ‘unofficial’ worlds where if you are not looking from the vantage point of a ‘world turned upside down,’ you may see nebulous rules, loose social boundaries and changeable hierarchies. We used this concept to examine how we approached ethical dilemmas in doing fieldwork with young sex workers and pimps. While we kept a foot in both ‘unofficial’ and ‘official’ worlds, we approached the dilemmas with the view of a ‘world turned upside down.’ We critically explored the more relevant concept of exploitation, especially coercion, in light of the idea that sex market involved youth are inherently exploited due to age related constrained agency e.g., immaturity, naiveté or traumatic upbringings (Dank, 2011; Lloyd, 2011). The themes of constrained agency manifested in unexpected ways that is in ways that were alternative to how some scholars and the public culturally and socially construct their lives. Further, we examined themes of constraint in the contexts of the sex market, the licit market and the research sphere, which are worlds that can collide, but also hold important intersections. As researchers, we walked the moral/ethical line of doing fieldwork with young participants and we also illustrated the balancing act involved in near missteps.

Best,
Claudia Cojocar

Exhibit "E"





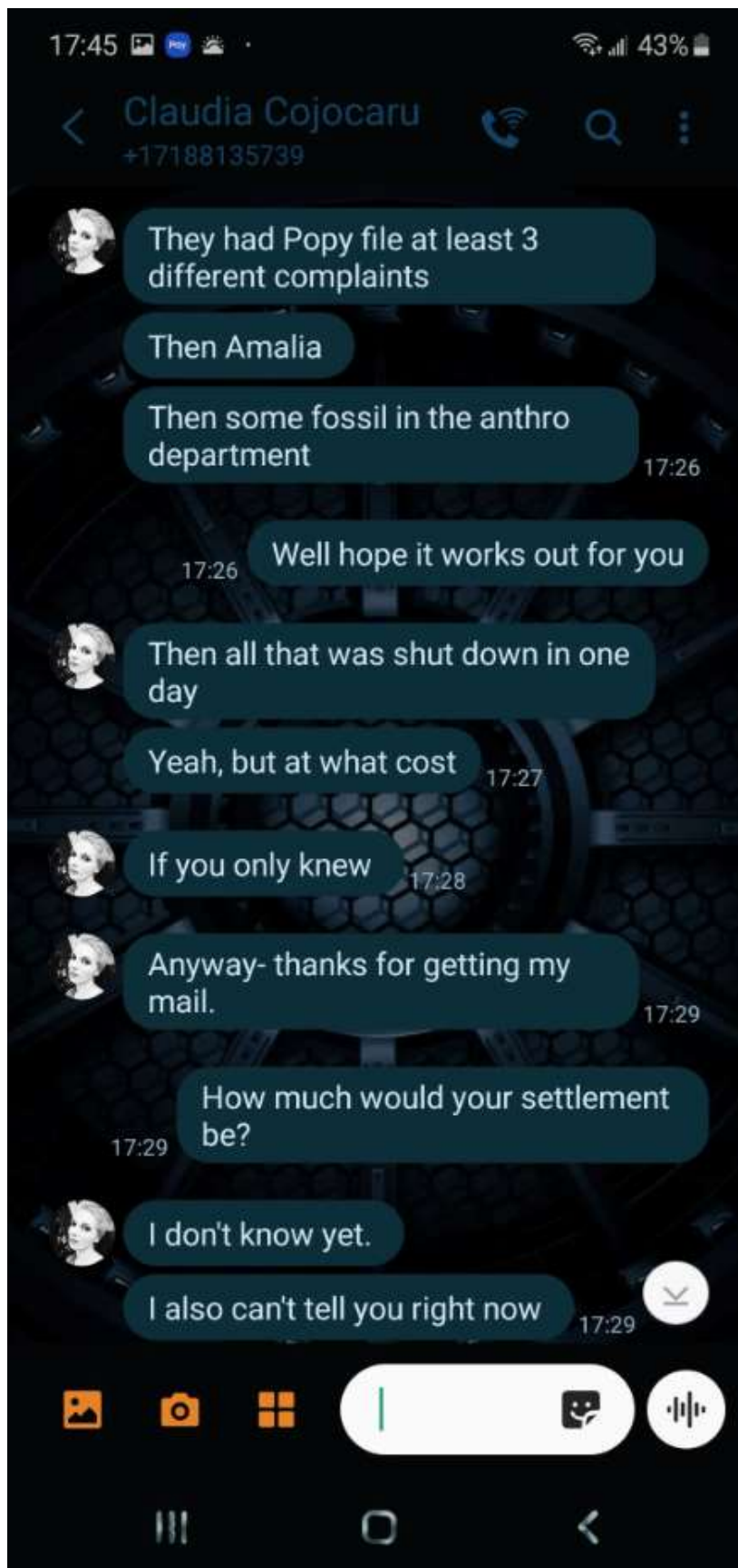




Exhibit "F"

Dear Friends and Colleagues of Professor Ric Curtis:

My name is Bob Herbst. I have been Ric Curtis's lawyer throughout these Star Chamber proceedings. Like some leaders down through the ages, Karol Mason, the President of John Jay College, decided to execute the accused first and inquire into the charges thereafter. She suspended Ric last summer without any previous notice or opportunity to defend himself, and without any preliminary investigation or fact-finding. She has permitted him to be pilloried in the New York Post on false, fabricated charges of rape, sexual assault, sexual harassment and drug dealing, by two women, Claudia Cojocar and Naomi Haber, who have used the #MeToo movement to their advantage to conspire, along with others, to "nail him [Ric] on unprofessional predatory conduct," in the words of one conspirator.

I am a civil rights lawyer who has represented victims of rape, sexual assault, sexual harassment and gender discrimination for decades. But in this case, I have watched the College and its President abuse the Title IX process, withholding from us the actual complaints of Cojocar and Haber, and providing only a bare summary thereof in December 2018, more than four months after the suspension. When the complainants hired a prominent employment litigator to threaten to sue the College, also naming Prof. Curtis as a defendant in a draft lawsuit complaint sent to the Administration, President Mason's Administration declined to share it with us, again depriving us of a detailed statement of the accusers' allegations. The Administration also apparently referred the matter to the District Attorney for criminal investigation, again without hearing Ric's version of events, and apparently without disclosing any of the ample evidence available from the accused and from John Jay faculty, students and staff attesting to the lack of credibility of Cojocar and Haber.

After we fully cooperated with the District Attorney, presenting the same detailed defense and evidence of fabrication, conspiracy and motive that we later presented to President Mason's Title IX investigator, the District Attorney declined to credit any of the allegations against Ric Curtis, and closed his investigation without bringing any charges. Now, after delaying completion of his investigation for almost the entire academic year, the Title IX investigator has delivered his report to President Mason, apparently not to be shared with us. Not sharing this report with Prof. Curtis is, in our view, another abuse of the Title IX process, which contemplates that, before any disciplinary action is taken, the Title IX investigator's report and the evidence on which it is based be turned over to the accused employee.

Throughout this sorry process, President Mason and her administrators have been more concerned about the media and social media pressure arising from these false allegations, and their desire to "change the culture" at the College and not be perceived to be tolerant of sexual misconduct, than they have been about truth and fairness. They have ignored, failed to investigate, and delayed resolution of complaints by members of the College community against Cojocar and Haber, have permitted Cojocar to continue teaching in the face of these complaints, and ignored evidence, readily available from the accused and other faculty, students and staff, that both women lacked credibility and were prone to making false attacks against others when they thought it was in their interest to do so – attacks to which Ric was

particularly vulnerable because his teaching and research in the course of his 30 years of loyal and devoted service to the College has focused on crime, sex, race and drugs in New York City.

According to the Administration's very brief "Notice of Outcome" correspondence, **the Administration's investigator could not substantiate any of the complainants' allegations of rape, attempted rape, sexual assault, and sexual violence.** None of those lurid allegations were found to be credible. Moreover, according to the correspondence we received, the College has been unable to substantiate any instance of illegal drug use or dealing by Prof. Curtis. Nor was there any support for the charge, laid against him by Cojocar and Haber in the New York Post, that Prof. Curtis was the leader of a "cult" on the John Jay College campus.

But you would not know that from Karol Mason's statements to the College community (and therefore to the press). By announcing on May 15, 2019 that she intends to fire Prof. Curtis and thanking the fabricators for their complaints – instead of disciplining them for making false and malicious accusations – President Mason left the misleading and damning impression that those lurid accusations have been substantiated by her investigator.

Accordingly, I think it is high time to inform you of what we told the District Attorney and the President's investigator last year:

Ric Curtis never had sex with Cojocar or Haber.

Ric Curtis never raped or assaulted, sexually or otherwise, Cojocar or Haber, or attempted to do so.

Ric Curtis never had a relationship of a sexual nature of any kind with Cojocar or Haber.

Ric Curtis engaged in no inappropriate or exploitative physical contact with Cojocar or Haber, never sexually harassed Cojocar or Haber, and did not create an unwelcome sexually, gender-based or otherwise hostile work or academic environment for Cojocar or Haber.

Although drug use was not part of the allegations which resulted in Prof. Curtis's premature and unjustified suspension, nor of the allegations which were summarized for us by the President's Title IX investigator to which we were asked to respond, we told that investigator the truth: Prof. Curtis never sold to or used narcotic drugs with Cojocar or Haber, never saw them use narcotic drugs, and never encouraged them to stop taking their prescription medications.

Prior to July 2018, when Prof. Curtis was suspended and first learned of these allegations, neither Cojocar nor Haber had ever complained to him or told him that they had been the victim of rape, sexual assault, other assault, or sexual harassment by him (or any of the other accused professors), despite the fact that, for several years, they both maintained friendly, academically appropriate relations with Ric and shared with him many complaints

about alleged misconduct they perceived directed against them by others, both inside and outside the John Jay community.

Ric was utterly floored by the allegations which led to his suspension, and that the College would suspend him without any fact finding, and without coming to him to ask for his version of events, especially considering his decades at the College, during which he mentored successive generations of students and junior faculty and was called upon by previous administrations to chair three different departments. Prof. Curtis is not, and has never been, a danger to either woman, which should be the only reason to suspend a tenured faculty member of 30 years standing without any preliminary investigation or fact-finding.

We also want to inform you of some of the evidence of fabrication, and motive to fabricate, which we presented to the District Attorney and the Administration's investigator:

Evidence of Fabrication

With the help and support of many of you, our investigation revealed that Cojocararu and Haber began at some point to conspire together to fabricate these false allegations against Ric. The evidence of fabrication includes the following:

- a. Cojocararu sent a text message to Amalia Paladino on June 18, 2018, attempting to persuade her to join in suing John Jay, writing that she has been planning to do so for two years. *See Exhibit A.*
- b. On Jan. 26, 2017, Cojocararu sent an Instant Message to Amalia that Haber was going to fabricate that "Ric was running a sex trafficking ring," and that Haber "always fabricates." *See Exhibit B.* Less than two years later, both Cojocararu and Haber made exactly that fabricated allegation against Prof. Curtis. That was 2.5 years after he had supposedly started raping, and assaulting, and sexually harassing them.
- c. That Instant Message followed communications from Cojocararu in 2016 that discussed her trust toward Ric, and her anger toward everyone else. Cojocararu wrote that Ric is "good energy," that she "humiliated" another Professor at Rutgers, that she "pretends" she is crazy, that she pushes her Attention Deficit Disorder and Asperger's, that she "would like to fuck them [the Rutgers faculty about whom she complained when she was a Masters Degree student] up where it hurts." About Haber, Cojocararu wrote that she "caught [Haber] in quite a few lies," that Haber "is acting out some kind of person I don't know," that Haber is stealing Cojocararu's work and wallet, and that Haber "is constantly fucking herself up." Cojocararu then asked why she herself is "attracting characters" like Haber. *See Exhibit C.*

- d. We were informed that Cojocarú's and Haber's allegations of sexual assault and being pimped out supposedly occurred in the years 2014 to 2017. But we have never been presented with, and could not find, one electronic communication to Prof. Curtis during that time period in which either woman alluded to such activities by him.
- e. However, Cojocarú has never been shy about immediately complaining to others, and on social media, when she decides someone has abused or taken advantage of her, either sexually or otherwise. Sometime before 2013, Cojocarú filed a complaint alleging that she was pushed and her hair was pulled by a patron in a bar. She immediately called the police, and her complaint was mentioned in a court decision in 2013. *See Exhibit D*. While I understand entirely that some women are reluctant to report sexual misconduct when it occurs, Cojocarú's actions and communications demonstrate that she is not. That is clear from the documentary and electronic record in this case. You can see this in the complaints – sexual harassment and otherwise – she made against the Rutgers faculty after she was admitted to the Masters Degree program there. Cojocarú wrote three emails when she was a student there, on November 6, 2016, December 6, 2016, and June 2, 2017, which she shared with Ric. In those emails, she made a series of extraordinary, incredible complaints against numerous members of the Rutgers faculty, of, in her words, inhuman treatment, harassment, bullying, stalking, exploitation, plagiarism, obstruction of academic freedom, boundary violations, censorship, discrimination, gender discrimination, hostility, symbolic violence, gaslighting, insults, passive aggressive attacks, labeling, grade penalization, unexplained grading criteria, retaliation, and more. She accused her Rutgers Department Chair of exposing her to "relentless . . . sexual harassment" (by an interviewee), and of being "rather dull and overly compliant, rejecting creativity and intellectual inquiry in favor of safety and redundancy," and of showing favoritism to two other students who she characterized as suffering from "influenza or, worse, "compienza," and being "intellectually dim, but compliant and servile." *See Exhibit E*. Cojocarú made similar complaints to Prof. Curtis about others outside the college, such as Kevin Bales, a professor emeritus of Sociology in the United Kingdom, and Anne Milgram, the former Attorney General of New Jersey. *See Exhibit F*.
- f. This pattern – of immediately calling those to account that she believes have disadvantaged her in some way – will be familiar to victims of the myriad complaints Cojocarú has made against John Jay faculty, students and administrative staff. One such victim was Deputy Anthropology Chair Hanna Lessinger, who received several abusive emails from Cojocarú, out of the blue, asserting, among other things, that Prof. Lessinger was too "stupid" to understand the work of a true feminist like Cojocarú. Cojocarú circulated this email to others in the Department to humiliate and provoke Prof. Lessinger. *See Exhibit G; see also Exhibit O*. Many other College community members can speak to Cojocarú's (and in some cases, Haber's) penchant for false attacks and complaints, and utter lack of credibility, including but not limited to Amalia Paladino, Popy Begum, Anjelica Camacho, Avram Bornstein, Peter Mets, Marcia Esparza, Sarah Rivera, and Dan Stageman.

- g. Instant Messages among Cojocarú, Haber, Cojocarú's boyfriend Sebastian Hoyos-Torres, and Lambros Comitas and Ansley Hamid at Columbia Teachers College, reveal that they all conspired together to fabricate allegations of "predatory conduct," culminating in this shared Message: "we may not need to bother about exposing Ric's lack of academic credentials, or his fraudulent scheming to get them, if we nail him on unprofessional, predatory conduct, that'll do." *See Exhibit H.*
- h. That is precisely what they have succeeded in doing, hoodwinking President Mason into suspending Prof. Curtis and barring him from teaching, his research projects, his office, his students and the College campus. Now, in the face of all the evidence exculpating Ric Curtis, President Mason has announced that she is intent on justifying and compounding that suspension by instituting proceedings to terminate him – when she, her administration and many faculty and staff have known the truth about Cojocarú and Haber for some time now.
- i. Ansley "Andy" Hamid used to be a professor in the John Jay Anthropology Department until he was terminated in the late 1990s for using heroin after he received a \$2.5 million federal grant (with Ric Curtis) to study heroin. Hamid blames Ric for being terminated and appears to have been seeking vengeance since then. Comitas, a long-time and close colleague of Hamid's who was both Hamid's and Curtis's dissertation advisor at Columbia University, appears to have still been bitter about losing a lucrative Directorship position and a second \$2.5 million grant that Curtis and Hamid had written that would have come to Comitas's research institute but for the same case in which Hamid lost his position at John Jay. For those who want to learn more about that case, an article in the Chronicle of Higher Education by Scott Smallwood will provide you with the details and help you understand why Hamid and Comitas would conspire with Cojocarú and Haber. *See Exhibit I.*
- j. Cojocarú has tried to enlist others in their conspiracy against Ric, such as Amalia Paladino and Laura Murphy (a sex researcher who now lives in the UK). Cojocarú has made false charges that Prof. Curtis was sleeping with Amalia Paladino and Popy Begum, making life at the College hell for both women. Both Amalia Paladino and Popy Begum filed Title IX complaints of sexual misconduct against Cojocarú and Haber, which the College has delayed resolving now for almost the entire academic year. Cojocarú also falsely accused others in the College community of knowing about, and being complicit in, sexual assaults by Ric against her and Haber.
- k. In March 2017, Cojocarú wrote a revealing message to Leo Dominguez, in which Cojocarú says of Haber, "She really needs to fuck as many middle aged men in the college as she can. . . . It's my fault. She wouldn't be able to do so if she didn't imitate me." *See Exhibit J.* The evidentiary record we submitted to the District Attorney and President Mason's investigator makes clear that neither Cojocarú nor Haber are sexual assault or sexual harassment victims in this case, but rather, women

who have put the John Jay community through a chaotic year with their false and malicious accusations and their poisonous use of the New York Post to vilify and stigmatize Ric, destroy his reputation, and cause him to lose his professional affiliations built up over decades of loyal service to this College as a teacher and Chair of several of its departments.

Why They Did It

Substantial evidence demonstrates that both women had motives to fabricate these false charges against Ric and others, and that they have done so (1) for financial reasons, laying the predicate for a lawsuit against John Jay, (2) because they aspired to become leaders of the #MeToo movement, (3) because they came to believe that Prof. Curtis was not sufficiently supportive of their efforts (a) to get into a PhD program, and (b) to teach, and be properly compensated for teaching, at the College, and (4) to foreclose the College's decision not to reappoint Cojocararu as an adjunct. This evidence includes Cojocararu's communications indicating that she believes herself to be such a leader, and one referring to Haber as wanting to be a "survivor leader," see *Exhibit B* above, as well as the following:

- a. A February 25, 2015 text message to Ric where Cojocararu said that she felt she probably wouldn't get into any program, PhD or not. "I don't know what I can do. No job, no school prospects, no money . . . things are starting to look pretty bleak for me now." See *Exhibit K*.
- b. Prof. Curtis wrote Cojocararu positive recommendation letters for the University of Nevada at Las Vegas, the University of Massachusetts at Amherst and John Jay. At John Jay, Ric had recently resigned from the PhD program and was not on the admission committee, and that committee did not reach out to him, so he had no input and no role in the decision not to admit Cojocararu except to write her a letter of recommendation. Ric advocated with Jody Miller at Rutgers and helped get Cojocararu into the Rutgers Masters Program, but she burned her bridges there with her many complaints against faculty, see the examples in *Exhibit E* above, so that door to a PhD was closed.
- c. Both Cojocararu and Haber also blamed Ric for not being able to get teaching roles at the college. In December 2016, Cojocararu asked him for teaching roles in the Law and Police Science Department, but there were no classes in that department that she was qualified to teach. In August 2017, Haber asked to teach freshman classes with Ric, but because she did not have a Masters Degree, the Dean of Undergraduate Studies told Prof. Curtis that she would not be permitted to do so, days before the beginning of the fall semester. In September 2017, Cojocararu who had been teaching as an adjunct in Anthropology, found out that she was being paid less than what she had been told she was going to be paid. She got very upset, complained vociferously, and accused Anthropology Department Chair Anthony Marcus and Prof. Curtis of being

responsible for it. Ric was not responsible for it, having had no role in setting her adjunct salary.

- d. Cojocarú's emails to Prof. Curtis now began to change. On September 4, 2017, Cojocarú wrote she was thinking of re-assessing her position with respect to him, that he knew what all the "shitty people, bullies, white supremacists at Rutgers" and "that life sucking succubus, Haber," had done to her, but Ric just stood by and watched. "I think I got the message now," she wrote to him. *See Exhibit L.*
- e. Then, in January 2018, Cojocarú wrote to Leo Dominguez about both Ric and Jody Miller at Rutgers, saying that she was "on the receiving end of both of these bastards' dark side." *See Exhibit M.* Even while she is turning against Prof. Curtis and has started to consider him her enemy, Cojocarú made no sexual misconduct allegations against him.
- f. In early April 2018, Cojocarú wrote to Anthony Marcus that if Jody Miller and Barb Brents, a faculty member at UNLV, tell enough people how unethical she is, she will eventually get tired of trying to get a PhD. She asked if Anthony knows anything about this, and wrote that a mutual "friend" has implicated Anthony and Ric in this "conspiratorial clusterfuck," apparently meaning that Ric was telling people that she is unethical and that he was trying to prevent her from getting into a PhD program. *See Exhibit N.* Again, something Ric never did. But by now, he has clearly become an enemy in her mind.
- g. Then on May 1, 2018, Hanna Lessinger told a new faculty member being recruited to the Anthropology Department, who had already experienced Cojocarú's attacks – that Anthony has decided that Cojocarú will never teach in the Department again, *see Exhibit O*, and that message somehow got back to Cojocarú.
- h. On May 4, 2018, shortly after sending these emails where Anthony and Ric are identified as enemies, Cojocarú sent Amalia Paladino the conspiratorial Hamid-Haber-Comitas-Sebastian communication mentioned above, attempting to recruit Amalia to their conspiracy. It is quite possible that Cojocarú thought at that time that Teachers College was her last chance for admission to a PhD program, and she found willing partners with the two professors there who bore a 20-year-old grudge against Ric.
- i. In June 2018, Amalia Paladino emailed Prof. Curtis that Cojocarú was making really serious allegations against him, including that he tried to pimp Cojocarú and Haber out. *See Exhibit P.* This is exactly what Cojocarú had told Amalia back in January 2017 that Haber was attempting to fabricate.
- j. On August 9, 2018, Cojocarú confirmed in a tweet that she believed she was a target of a character assassination campaign by "people I once believed to be my support network and friends." *See Exhibit Q.* Prof. Curtis was indeed part of her support

network and a friend, but he had never assassinated her character. Cojocarú's false beliefs in that regard, along with Haber's, help explain their false and fabricated accusations against him and the other members of their support network.

- k. Two days later, on August 11, 2018, Cojocarú tweeted that "the simple act of reasserting my boundaries angered them into trying to fire me." See *Exhibit R*. So Anthony's decision not to have Cojocarú teach again in Anthropology was obviously an important factor in motivating her to lodge false accusations against Ric and the other members of her support network, although Ric had no role in Anthony's determination not to permit her to teach anymore. And by lodging false accusations of sexual misconduct, Cojocarú secured the ability to continue to teach at the College, the Administration fearing that not permitting her to teach after she lodged such allegations might be perceived as retaliation for lodging those allegations, exposing the College to a lawsuit.

The Administration's Title IX investigator could not totally ignore all this evidence of fabrication and motive, and our Outcome Letter informed us that the investigator rejected *all* of Cojocarú's specific allegations against Ric, to wit:

You committed sexual violence, including sexual activity without affirmative consent, such as sexual assault, and/or rape/attempted rape, and/or forcible touching/fondling towards Complainant Cojocarú in your office at various times in or about the Summer of 2015.	NOT GUILTY
In or around the fall of 2015, you encouraged Complainant to create accounts on websites like seekingarrangments.com to offer sex.	NOT GUILTY
In or around 2015 to 2016, you encouraged the Complainant to have sex with unnamed academics.	NOT GUILTY
In or around 2015 or 2016, you proposed a threesome with Complainant and another individual on two separate occasions.	NOT GUILTY
At Complainant's apartment, there were several times where you stood in between her and the said individual and rubbed their backs at the same time.	NOT GUILTY
In or around September 2015 at a social gathering in Park Slope, the Complainant states that you made unwelcomed sexual advances, in that you attempted to persuade	NOT GUILTY

Complainant to go upstairs to one of the bedrooms and have sex with you.	
In or around September 2015 at a social gathering in Park Slope, the Complainant states that you touched her without her consent and made unwelcomed sexual advances, in that you stood behind her and rubbed your groin against her buttocks.	NOT GUILTY
At various times from 2015 to 2016, you touched Complainant without her consent, including rubbing your hands against various parts of her body.	NOT GUILTY
On two separate occasions in or around the summer of 2015, the Complainant states that you incapacitated her by giving her a beverage then you had oral sex and sexual intercourse with her without her consent.	NOT GUILTY
In or around 2016 or 2017, you exposed your leg, and compelled Complainant to touch it.	NOT GUILTY
On January 29, 2016, you engaged the Complainant in a conversation at a bar, where you suggested that she and another student should have a threesome with another faculty member.	NOT GUILTY
engaged in retaliatory conduct against her through communications sent, on or about July 23, 2018 to on or about July 30, 2018 to Ms. Cojocar, from another John Jay employee, that she perceives as adverse treatment and/or intimidation and/or reprisals as a result of Ms. Cojocar filing a complaint against you with the College.	NOT GUILTY

Having found Prof. Curtis NOT GUILTY of all Cojocar's specific allegations of which we were notified and given an opportunity to defend, the Investigator purported to substantiate two specific allegations of which we were *not* informed in the Summary of Allegations:

You did not report two alleged instances of sexual misconduct by (1) an adjunct lecturer, and (2) by a former adjunct who was unaffiliated with the College at the time of the incident, of which you were informed by "Jane Doe."	DETERMINED BY A PREPONDERANCE OF THE EVIDENCE
--	---

In determining allegations of which Prof. Curtis was never given formal notice and an opportunity to defend, the College and its Title IX investigator have again denied Prof. Curtis the process he was due under Title IX and the United States Constitution. Moreover, in the first instance, in 2016, as reported to Ric by Jane Doe (and subsequently confirmed to us by Jane Doe), the former adjunct and Jane Doe were drinking at a bar, he came on to her, she said no, and they parted ways, without any sexual assault or activity. In the second incident, about which Jane Doe first informed Ric in 2016, *a year after it occurred*, Jane Doe and the adjunct had been drinking, it appeared that any sexual activity between the two did not constitute either sexual violence or sexual assault under the College’s Sexual Misconduct Policy, and Jane Doe requested Prof. Curtis not to report the incident. Under these circumstances, he reasonably believed that neither incident required a report under the College’s Policy.

Finally, the Outcome Letter informed us that the investigator partially substantiated a general allegation derived from Cojocarú’s allegations:

<p>The Original Allegation: During the period from approximately 2014 to 2017, you, along with others, fostered and created a hostile and discriminatory work environment, in that you encouraged nonacademic sexually-charged discussions, regular use of alcohol and other substances, discouraged the use of prescribed medications, and engaged in inappropriate and exploitative physical contact.</p>	<p>The Investigator’s Finding: The Investigator substantiated that, during the period from approximately 2014 to 2018, you encouraged non-academic sexually-charged discussions and the regular use of alcohol and other substances and engaged in inappropriate and unprofessional physical contact.</p>
---	---

In other words, Prof. Curtis is NOT GUILTY of fostering and creating a hostile and discriminatory work environment, discouraging the use of prescribed medications and engaging in “exploitative” physical contact. And while the charge of which we were notified extended only to some unspecified date in 2017, the investigator has taken into consideration unspecified alleged misconduct in 2018 of which we were never notified during the investigation or given a chance to defend, and about which we remain in the dark today. That is a due process violation under Title IX and the United States Constitution.

But the more substantive question is this: having found Ric not guilty of all such specific misconduct alleged by Cojocarú, what weight can possibly be given to the investigator’s substantiation of “encouraging sexually-charged discussions or use of alcohol or inappropriate physical contact, when no specific instances of same have been identified, alleged or substantiated?

Prof. Curtis is an urban ethnographer. He does community and “street” research on sex, race, drugs and harm reduction in communities of color in New York City. He “talks the way they talk,” and does it with a culturally sensitive, relatable, informal style, and with the liberal use of

humor to set people at ease in discussing these topics. All of that has made him one of John Jay's most successful teachers, researchers and mentors over 30 years. In his work, and in his discussions with faculty, students, researchers, harm reduction workers and other members of these communities, context is as important as the words themselves. The downside is that he is vulnerable to having his words twisted out of context. However, Cojocar and Haber talked to Ric for years without any indication, prior to their fabricated allegations of sexual assault and sexual harassment, that anything he said to them was unwelcomingly "sexually charged," or that any of their interactions constituted "inappropriate physical contact."

To bring disciplinary charges – let alone termination proceedings – on such flimsy general charges without any specific instances, or for not reporting interactions not confirmed as sexual misconduct by the purported victim who specifically requested that no report be made, is a hatchet job, unworthy of John Jay, its President and Administration, and of the City University of New York.

The same can be said with respect to the investigator's findings on Haber's allegations. All allegations of sexual touching or requests from Prof. Curtis to Haber or others for sexual contact with him were unsubstantiated:

In 2016, you requested, on various occasions, that the Complainant provide you with a back massage.	NOT GUILTY
You placed an "electrocution" type of machine on the Complainant, placing the suction onto the Complainant's thighs and lower back in a sexual manner.	NOT GUILTY
From around 2015-2017, at the College, you gave Popy Begum foot massages and had sexual conversations with Ms. Begum.	NOT GUILTY

Other allegations of Ric's pimping out Haber, or making comments about others' sexual partners or preferences were also unsubstantiated:

In or around the fall of 2015, you encouraged Complainant to create accounts on websites like seekingarrangments.com to offer sex.	NOT GUILTY
In 2015, and leading up to November 2015, you encouraged the Complainant to have sex with unnamed academics.	NOT GUILTY
You encouraged the Complainant to engage in sexual relations with John Jay faculty members as well as with potential faculty	NOT GUILTY

members including, in 2017, a professor from Harvard.	
At various times from 2015 through 2017, in your office, you discussed and/or made comments, in front of the Complainant, about another adjunct's sexual partners and sexual and erotic preferences.	NOT GUILTY

In two instances, the investigator substantiated Haber's false allegations that Ric "suggested" or "encouraged" her to have sex with men: a male faculty member in 2015 in a three-way with Cojocar, and a professor in Philadelphia that the College was hoping to recruit as a Department Chair in 2015 and 2016. The substantiated finding on the first allegation is inconsistent with the investigator's NOT GUILTY finding on that same allegation made by Cojocar (see the next-to-last allegation in the Cojocar box above), since they stem from the same visit to a Manhattan bar on January 29, 2015 with Cojocar and Haber and two other College faculty members. Neither of the two faculty members confirmed the alleged "suggestion" by Ric to Cojocar and Haber. It never happened. No explanation has been given for the investigator's substantiation of that same allegation coming from Haber while exonerating him of the same charge coming from Cojocar.

The second allegation is a joke, twisted out of context. During the recruitment process, the Philadelphia professor was open about the fact that his divorce proceedings were concluding. In January 2017, Haber, Amalia Paladino and Ric joked about a "mission" in which Ric and Haber would send Amalia – not Haber – to flirt with the professor to seduce him to come to John Jay, since Amalia was going to Philadelphia with her boyfriend for the Women's March later that month. Amalia told the investigator that no one was proposing this seriously, it was never intended to be carried out, and in fact was never pursued.

Two other substantiated allegations were also willfully twisted to constitute unwelcome sexual misconduct when they were not. In 2014, when Haber was inquiring about field work, Prof. Curtis showed her a video that he has used in class for years without complaint, in which an HIV-prevention outreach worker used a replica penis and vagina to describe her work demonstrating how to use female condoms to members of the community. The video – about which Haber complained for the first time four years after she was shown it – is not sexually provocative or inviting and did not constitute unwelcome sexual harassment of Haber.

Haber also complained that one of the other videos Ric showed her at the same time in 2014 had him working out "shirtless," and that in 2016, he sent her a message with a photo of him shirtless, saying "Me and Leo missed you this morning." In the 2014 video, which is not sexual, he is standing on an exercise ball in the John Jay Fitness Center, with his shirt on. The 2016 text message and photo – published by the New York Post – was from Ric at the Fitness Center, because Haber had told him that she would run with him (and Leo) on his birthday. Haber regularly attended morning workout sessions and runs in Central Park with Ric, Leo and other

students, faculty and staff on occasion. *See Exhibit S* for photos that Haber posted on social media referring to her attendance. When Haber did not show up, Ric sent a message to Haber saying that he and Leo had missed them for their run on his birthday. Prof. Curtis and others joining him often ran shirtless when the outside weather was warm enough. Haber herself often ran in a sports bra, which you can see in *Exhibit S, upper right photo* (no more inappropriate than men running without a shirt). Accordingly, this was not sexual, and when one understands the context, the notion that Haber considered it to constitute unwelcome sexual harassment is ludicrous.

As with Cojocar, the investigator purported to substantiate an allegation of which we were not notified in the Summary of Allegations, another Title IX due process violation: that on August 14, 2015, Ric sent Haber an email offering to buy her a black vibrator, and encouraged her not to report an incident of sexual harassment involving another faculty member. Suggesting Prof. Curtis should have reported the incident is inconsistent with the College's earlier fact-finding, as the College reportedly exonerated that faculty member of Haber's sexual harassment charge when Haber filed a complaint against him years later. Moreover, as Haber well knew, the offer of a vibrator was a joke rather than unwelcome sexual harassment. Haber had told Prof. Curtis that she had recently begun to work with that faculty member on a project but was feeling uncomfortable about it, as she was beginning to believe that he thought she liked "black men." Shortly after politely withdrawing from the project, Haber wrote Ric that she, accompanied by a black student, had run into the faculty member in the hallway, and she was worried that the faculty member would continue to believe that she liked black men, just not him. "Fuck me," she wrote. Ric responded by jokingly offering to "buy you a black vibrator for your birthday! LOL." Haber replied, "AHAHHHAHAHAHAHA. I'm peeing," *see Exhibit T*, making clear that she understood the offer was a joke, and welcomed it. Again, if one understands the context, the allegation that this constituted unwelcome sexual harassment of Haber is ridiculous.

Finally, as with Cojocar, the investigator exonerated Prof. Curtis of the charges that he created for Haber a hostile and discriminatory work environment, discouraged the use of prescribed medications, and engaged in inappropriate and exploitative physical contact, while inexplicably substantiating that portion of the general charge of encouraging sexually charged discussions and the regular use of alcohol and other substances from 2014 to 2017, without citing any specific instances of alcohol or other substance abuse, or any sexually charged discussions other than the fabricated "suggestion" and the few videos, photos and joking communications – all twisted out of context – discussed above.

So to sum up, after a year's suspension of a 30-year senior tenured faculty member, barring him from his office, his teaching, his research, his students, his colleagues and the any part of the campus, and destroying his reputation and much of his life, what does President Mason have from the belated allegations in Summer 2018 of lurid sexual misconduct by Prof. Curtis over four years – 2014 to 2017 – supposedly victimizing Cojocar and Haber? No sexual violence, no rape, no attempted rape, no drug incapacitation prior to sexual assault, no sexual assault, no forcible or unwelcome touching, fondling or exposure of the leg, no consensual sex, no groin rubbing against their private parts, no back massage or rubs, no "electrocution"

machine suction cups on thighs and lower back, no unwelcome sexual advances, no foot massages, no “pimping” them out to faculty members or on websites like seekingarrangements.com, and no retaliatory conduct.

All that is left, over the course of four years with these two women – who received the support, mentoring, advice, assistance and friendship of Ric Curtis all that time before they turned on him – and who by Cojocarú’s own admission did not need any “suggestion” or “encouragement” from anyone to sleep with men on campus – are a handful of harmless photos and videos, and communications that Haber understood as jokes. None of it constitutes sexual harassment or sexual misconduct under the College’s Sexual Misconduct Policy, because there was no unwelcome conduct of a sexual nature, let alone unwelcome sexual conduct which Ric presented as a condition of Haber’s “employment or academic standing,” or which he “used as the basis for employment decisions or for academic evaluation, grades, or advancement,” or which “substantially interfered with” Haber’s “educational or work experience.” In short, Ric Curtis is not guilty of the sexual misconduct for which President Mason suspended him and caused him, his family, his students and his colleagues, so much heartache and chaos.

There is some evidence that President Mason and her Administration became aware last fall that the sexual misconduct allegations – upon which this premature and unjustified suspension were solely predicated – were not credible, and that those allegations could not reasonably support either the suspension or the termination proceedings which they expected to prosecute in order to “change the culture” at the College. Accordingly, in an effort to nail Prof. Curtis on other uncharged misconduct, the College embarked on a review of every project and grant associated with Prof. Curtis, although Cojocarú and Haber had apparently alleged no financial improprieties. The College found no such improprieties. It then started an investigation of illegal drug dealing on campus. Again, they came up with nothing.

They are still at it. We have recently been informed that a lawyer at CUNY is reinterviewing some of the 60 witnesses purportedly interviewed by the Title IX investigator, purportedly to “tie up loose ends,” but where Ric’s guilt is presumed, and the witness is asked leading questions designed to elicit statements adverse to Prof. Curtis and at odds with statements earlier made to the investigator. Questions include “Why is it that no one wants to say anything negative about Ric Curtis?” “How can it be that no one saw him doing drugs on campus?” “Why is everyone so scared of Ric Curtis?”

This “replay” of the investigation hardly comports with the letter or spirit of Title IX and the Due Process Clause of the United States Constitution. It is not right, and it is deeply unfair to Prof. Curtis.

There is no basis in this case for firing or otherwise disciplining Ric Curtis, and President Mason should be encouraged to drop her announced intention to commence such proceedings against him. Prof. Curtis will fight these unjust termination proceedings, to clear his name and restore

him to his rightful place as a senior member of the College faculty. We shall fight with growing confidence and strength as the truth becomes more widely known.

Exhibit A

[Portion of a Facebook-Messenger conversation between Amalia Paladino (blue) and Claudia Cojocar (grey).]

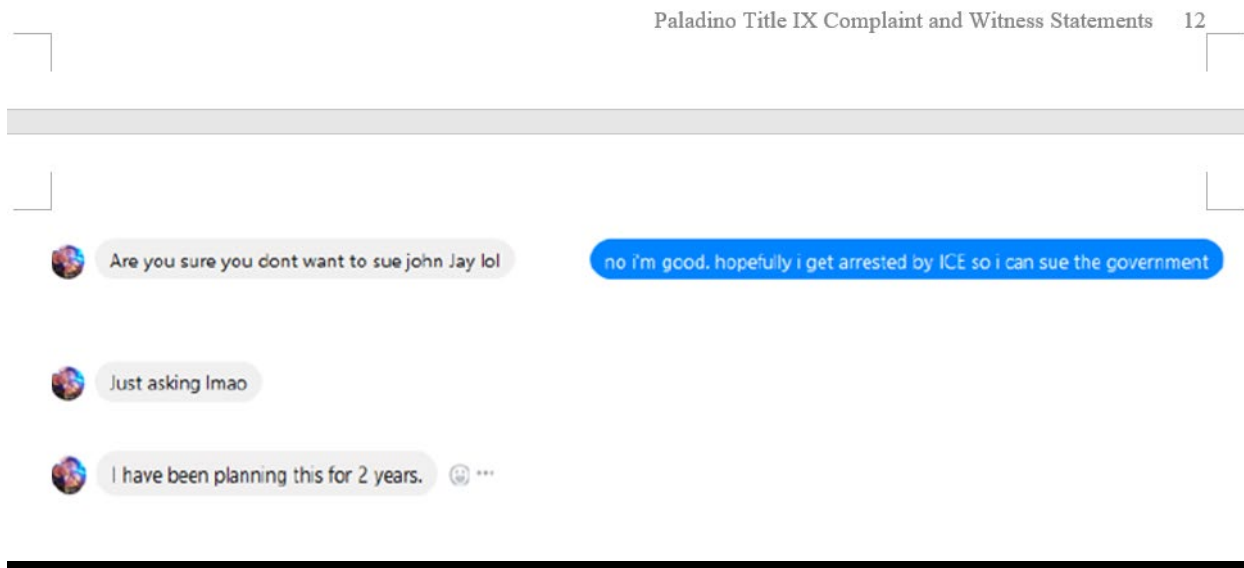


Exhibit B

Note: the messages on the left are Claudia Cojocar's.

... 😊 yeah

i know what you're saying

Shandra told me Naomi wanted to be a "survivor leader"

Imagine that

Whatever

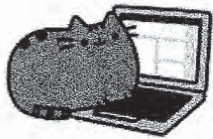


Fuck her and her delusions

sorry if i'm not more chatty right now...i'm like doing laundry and trying to edit a chapter while talking. i used up my break earlier to work out and spend time with roberto.



How much longer are you going to keep us all in suspense



naomi? a survivor leader?



Yeah

should the person leading be someone who survived?

survivor*

Well, it was going to be like this - i was going to traffic her

Or Ric

Or whomever

And while I was going to prison or whatever, she was going to tell her story of how she fell for my manipulative shit

I can't make this stuff up

Besides, most people in this movement have not been trafficked

I spent these 2 years wisely

you wanted to get incarcerated as a trafficker?

trafficker

Me?

i think i missed something. give me a second

She wanted to convince people I was the trafficker

right

that's what you said

She told people her and I were in a relationship 😊 ...

haha

In her imagination

believable actually since you guys were around each other a lot i guess

That's what she was scheming

Not really

She wasn't here much

so she wanted someone to pimp her out essentially

Then she said to people I was abusive and I was forcing her to do stuff

i'm pretty sure trafficking doesn't work that way

It does in abolitionists imagination

... 😞
i guess it would be cool if someone came out and said "i wasn't trafficked, fooled ya!"
and presented evidence of the whole conspiracy

There is
That's why "trauma coerced bonding"
In case someone decided to turn around
Like that porn actress

no i mean evidence of the set up beforehand

I don't know lol
I wish

like, your conversations of setting the whole thing up

i feel like that's perfect

For what?

it would exemplify how easy one can pretend to be a survivor

I was pretending to be her- like what she was planning

and show the process of becoming a sex worker on one's own volition

Aha

albeit for the purpose of proving abolitionists wrong

She was all bent on getting "evidence"

... 😊 evidence of what

Of me being one of the following- 1)not trafficked, 2) a trafficker or a pimp; 3 a victim turned exploiter

just getting evidence of being pimped out...is not enough....that's like 1/4 of the plan in my eyes to successfully prove the point. otherwise the point of obtaining that evidence is moot

Or that Ric was running a sex trafficking ring

prove the point that anyone can pretend to be trafficked

Well, she was going to fabricate that lol

... 😊 nah you need to show the whole conspiracy
she's an amateur at research methodology

Well, not to the abolitionists

it doesn't add up

She doesn't know anything about methodology

Ahahaha

why fabricate?

She always fabricates
To get attention

... 😊 like...unless she was planning on living the life as a survivalist and that's it...

in which case fuck that

She doesn't think that far
Come on
You know the type
I don't know why she does it
Or if she thought she was going to get anything out of it

well....her plan would work brilliantly for our cause....if she added additional steps

and if her purpose was different

Like what?

actually...omg....you can play along and then out her

YES



Hehehe

that's even better

if she actually wants the fame

Do we need IRB



You're so evil

and the treatment...you can prove she 1) wanted to trick them into thinking she was trafficked and 2) she (like many others who may fake it) was able to succeed

and 3) we rule

Haha 😏 ...

I can't

Stop laughing

The treatment
She's the ultimate experiment
Natural one
Of sorts

yeah, I wonder....how far you can go without actually pimping her out

but her thinking you are
this can work
without irb

She knows I am not pimping her out

because it's not research

She wants to make other people think I am

just get that shit on tape

I am not going near her

transcribe it. write up everything after she joins the cult

Ahaha

and then turn it in to the new york times

Someone else can do that. I had enough of her

damn

i was hoping to take some credit for coming up with the idea

I can't waste my time with this lunatic

maybe we can manipulate someone...

poppy

Popy is pissed that she didn't get into Berkeley

unbeknownst to her...we can use her.

Ahaha

oh well...it was fun while it lasted

I will ask my spies at the coalition to record the meetings

She will go and spill the beans there

well, to answer your question about when i'll be in

next tues

i gotta teach

9 am She still owes me money lol 😊 ***

Over 400 dollars

now that....i'd go after a bitch

And the same from 2015 ASC

I will have to

I am so done with this. I just hope she stays away from me after I get my money

yeah

8:23pm

8/8/2018

Gmail - Fwd: Grievance Letter



Exhibit E

Ric Curtis <ric.curtis@gmail.com>

Fwd: Grievance Letter

CLAUDIA COJOCARU <cc1432@scarletmail.rutgers.edu>
To: ric.curtis@gmail.com

Sun, Nov 6, 2016 at 4:58 PM

Hey Ric,

I am forwarding you this email I sent yesterday to those individuals at Rutgers. Please hold on to it in case they keep claiming I never sent anything.

C

Sent from my iPhone

Begin forwarded message:

From: <cc1432@scarletmail.rutgers.edu>
Date: November 5, 2016 at 5:17:01 PM EDT
To: Michael Ostermann <osterma2@andromeda.rutgers.edu>
Cc: Johnna Christian <johnnac@andromeda.rutgers.edu>, "rod.brunson@rutgers.edu" <rod.brunson@rutgers.edu>, kenyatyson <kenya.tyson@rutgers.edu>
Subject: Grievance Letter

Dr. Ostermann,

I am writing to inform you that after discussing with my therapist, we both agreed that it is better for me I did not attend the meeting you scheduled for November 9th in person, but I will be available to discuss on the phone. I am providing you with the reasons for this decision below, and I have added relevant members of faculty and administration to this email. I also want to stress that I am aware that the problems that you are facing are partly symptomatic of a larger institutional dysfunction and fueled by toxic interpersonal conflicts among faculty, administration and other staff. However, it is not an excuse for poor performance and lack of respect or consideration for students.

To provide you some context for this grievance letter, I will start with disclosing that I have severe PTSD, which is part of life for me, as a survivor of human trafficking and gender based violence. I owe my high level of functioning to finding meaning and life force in being an activist, and a scholar looking at victimization, violence and social constructions of crime. Because of my experience and my work, I am quite aware of how the aggressive and dehumanizing tactics I was subjected to at SCJ work. Nevertheless, I tried to be the better person, as I was willing to give you, and the institution,

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOVr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=1583ba68a6162afc&q=claudia&qs=true&search=query&siml=1583ba68... 1/7

8/8/2018

Gmail - Fwd: Grievance Letter

the benefit of the doubt, but not at my expense. However, my best efforts and intentions are misinterpreted as an invitation to intensify the abuse, perhaps in efforts to run me down and obtain compliance with something I would clearly not consent to under different circumstances. Here are the main problems related to the class that I have been asking you to help me solve, and you have repeatedly ignored, or provided inadequate solutions, if any.

1. **Instructor's failure to attend to, or take responsibility for his professional duties.**
2. **Group Capstone Paper.**
3. **Unequal workloads.**
4. **Harassment, bullying, passive aggressive attitudes.**
5. **Obstruction of academic freedom.**

Instructor's failure to attend to, or take responsibility for his professional duties.

I have been consistent in my approach to inform you of my grievances, and of my reasons for having them. There is a lengthy *paper trail* attesting to my efforts to warning you of the possible consequences of your **experimental approach** to a MA program concluding course.

- A capstone paper written by 4 or 5 individuals is an irresponsible and ill conceived initiative; it places undue burden on some people, while it allows others to get undue credit.
- Every time I asked you to help me address these issues, you directed me to involve other institutional actors, even though the problem was directly related to the class project and to your unwillingness to do anything besides misdirecting my attention, or providing "solutions" that would unfairly place your own responsibilities on me.
- I am not paid to train students to do ethnographic observation, to provide them with skills I earned during years of hard work, or to share my research ideas and intellectual property; nor am I under any obligation to carry anyone to get an A, especially when I am belittled and invalidated.
- Training students to be productive and compassionate service providers, providing a safe environment to express and develop ideas, and take these ideas to fruition with the support and mentorship of experienced faculty is an institutional **requirement**, and it **is primarily your responsibility as a professor**, not mine as a student. It is now clear to me that none of these students have taken classes in qualitative research methods, or have been scholarly active, thus I am not taking responsibility for their development. **That is your job, and so far, you're not doing it.**
- Nowhere in the MA program handbook is stated that the capstone is a group project. Furthermore, no self respecting MA program ventures in such uncertain approaches. Do you understand how this violates boundaries and creates a toxic climate of codependency and dysfunction? It is your responsibility as faculty to ensure that your students are successful and graduate with the best of skills to become productive members of society, not

8/8/2018

Gmail - Fwd: Grievance Letter

encourage unhealthy, even destructive competition, facilitate exploitation and plagiarism, or dump your responsibilities onto students, in order to blame them if something goes amiss. Nikolas Rose calls it *responsibilization*. I am certain you're aware of this work.

- I asked you to help me solve some of these problems, and your response was not only vague, as in not providing any feasible solution, but had an ultimatum quality to it. I emailed and asked you to specify how would those directives be of benefit to me. I have not received a response, which seems to be the case every time there is an issue requiring mental effort, empathy or compassion, and respect for the person asking the question. This seems to be true for most faculty at SCJ, as avoidance of doing one's job seems to be on the rise.

Group Capstone Paper

(an exercise better suited to grade schools and some freshman or junior years in college than to a MA program)

- When we discussed the capstone last semester, there was no indication of a group assignment. I made it clear to you, and to the previous and current MA program directors, that I was going to do this project with some of the data from my MA guided fellowship Problem Solving Courts study. I know that members of previous cohorts did not have to go on and do a group school project.

I spent over 200 hours doing observations, and discussing with stakeholders at community and special courts in all boroughs in NYC, and Rochester. I even enrolled in a class in New Brunswick to be able to do a through analysis in this project. However, I never heard of your experimental ideas until the beginning of the semester, and you could have had the decency to inform everyone, as you have informed some students of your intentions.

- Therefore, when I identified your reasons for assigning a group paper to your unwillingness to spend time on reading and grading over 25 students' papers, you did not disagree. Even though it seems reasonable to want to reduce your work load, this is, after all, your job, and these students pay for these courses. **The least you can do is respect that, and please do your job.**
- **You can't possibly expect me to blindly comply with your demands, when you cannot provide a logical and decent justification for your decision to *experiment* on students. I am not speaking for others, but I voiced my concerns over the possible consequences of this project, and for my future prospects. Not only you failed to give me an explanation for why you would discount the possible negative impact this experiment may have on my professional future, but you also ignored my concerns, making me feel like I was talking to a wall. This is unacceptable, and it is not fair to me as a student, or to anyone else who is yet to understand how these issues could affect their future productivity and job performance.**

Unequal workloads

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOVr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=1583ba68a6162afc&q=claudia&qs=true&search=query&siml=1583ba68... 3/7

8/8/2018

Gmail - Fwd: Grievance Letter

- As I explained to you many times, I have been generous enough to provide research question, methodology, literature suggestions, strategies and even write and edit most of the assignments. If one pays attention to the ASC meeting I have this year, and to the Guided Fellowship proposal (which was used without my permission several times as marketing tool to attract more students) in addition to my reports and writing style, content and flow, it won't be a problem identifying where my work is. It doesn't bother me to work with people, and I am a pretty flexible person, but not when I am exploited, taken advantage of, harassed and when various individuals attempt to force their own interpretation of who and what I should be and do.
- I have explained the group members on numerous occasions why I made the choice of informing you of the rightful intellectual hierarchy as far as the project is concerned. I did not expect the vitriolic reaction from a group members, who assumes that reading 5 peer reviewed articles on procedural justice, and cutting and pasting chunks of material written by me on Google documents constitutes equal work loads, equal contribution to research questions and methodology, as well as claiming full intellectual property on the work I have done so far. In reaction to my demand that she apologize for overstepping boundaries, and to my rightful claims of intellectual ownership, Shakeya Saffold has engaged in aggressive and bullying behavior, which prompted me to seek distance from her and mute my cell phone messages, and indicate to you that the situation was getting worse, as I warned you earlier in the semester.

Harassment, bullying, passive aggressive attitudes.

- In response to my warning, instead of seeking to solve the problem between you and I, as stated in faculty handbook, you emailed the whole group, dumping the problem and the responsibility to attempt to solve it on all of us. In addition, you are not responding to my emails, even though you know that the problem is getting serious and you are obviously aware that I have attempted many times to bring it to your attention. So far, the band-aid solutions you provided have not worked, as the above mentioned student has been harassing me and even called me names.
- I did not see the text messages she was sending out (which, by the way, were informing the other group members that she has made the decision to exclude me from the group), and I had no idea about what she has been doing. Unless you instructed her to take initiative and push me out, this is a clear action to ostracize a person, which is one trait of bullying.
- In addition, she had messaged me on social media, in an aggressive and demeaning manner, way after 10 PM last Sunday, to engage in a series of vicious put-downs, and demanding I defer to her authority, "as she has been the source of the research ideas, methodologies and writing of the group projects since before she met me" (paraphrasing).
- This behavior is an indication of a pathological element in her personality make-up, so I allowed her to vent, out of consideration for her well being, these individuals are unpredictable and largely impulsive and manipulative. I am familiar with such people, although rarely I choose to let them around me, in fact, I make sure that when I sense a person like this, I elect to keep my distance. In this case, your demand that I comply with your unrealistic experiment coerces me to accommodate her abuse, with no regard for the impact this, and the history of similar happenings at SCJ that I informed you about, may have on my own well being.

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOvr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=1583ba68a6162afc&q=claudia&qs=true&search=query&siml=1583ba68... 4/7

8/8/2018

Gmail - Fwd: Grievance Letter

- After this incident, I compromised for the good of everyone, and against my own well being, and I reluctantly resumed contact with this person. However, since she made some claims about a court study she allegedly had been thinking and working on “since before she even met me” I asked her to tell me about it and elaborate on methods, research questions and data collection. I specified I wouldn’t want to not give credit where due, and asked her to talk about it being that I am a highly ethical and serious scholar. Shakeya not only refused, but she avoided to answer my questions because, according to her, **1) I was stressing her out with my question; 2) She needed to get an A.** As one can see, these actions reflect several ethical and interpersonal problems: the inability to apologize and take responsibility for lies, lashing out and projecting when confronted with such questions and with my unwillingness to allow her to abuse me and crush my self esteem; and last but not least, her statement that she wanted an A and implying that I was there to provide that for her. When I finally had enough of the harassment and unrealistic and exploitative demands, I wrote an email to the group in an attempt to shed some light on the consequences of disregarding my experience, intellectual property and work, and reassuring that my major concerns were mainly directed at protecting my intellectual property and their work, and to the way the professor places the burdens of his responsibility to others. As expected, nobody either acknowledged, or responded to this email. In addition, Shakeya resumed her stalking of my social media profile, and reacted to a discussion on plagiarism (which I have often with friends in academia and NGOs) with texting me with a screenshot and calling me a **“fucking retard”**. At this point I asked her to stop harassing me and I have blocked her from social media and from contacting me.

- I have done everything I could to accommodate you and these students, to the point that my auto-immune and PTSD symptoms are creeping back, and it will take a while to get to a doctor, since I had to sever my relationship with one of my health-care providers, as a result of his discussing my medical conditions with a 3rd party without my consent, which constitutes a violation of privacy. Under such circumstances, **the blatant disregard of my concerns and for my person constitute a hostile learning environment, and it has been like this since I first came to this school.**

These are extremely disturbing facts, and make me question not only how people are graded in this school, on what criteria, but how many others have been subjected to such exploitation and blatant harassment to force them to perform work that would benefit others.

- There is talk of rampant plagiarism in SCJ, but unfortunately it is not the only place this happens. I am very protective of my work and my social and intellectual capital, as I have been plagiarized before, and I will not relent under any circumstance. What bothers me is that faculty may be either unaware of the epidemic proportion of this often violent appropriation of intellectual capital, indifferent or even tacitly encouraging it. I find it repulsive that a school with such pretenses as SCJ Newark would allow this problem to get to this level.

- I am expecting resistance from faculty and students regarding these concerns. I am aware that there will be attempts to misinterpret my words, miscontextualize and misconceptualize my statements, and perhaps even to accuse me of imagining these issues. I would warn against such attempts to invalidate my perception and my concerns, simply because it would save time and would be more productive if, for once, there would be respect and consideration in these exchanges on your part, and not narcissistic injury and reactivity to some kind perceived transgression I may commit to your assumed status or hierarchical standing.

- If none of these concerns had been grounded in reality, I would accept any explanation you would provide; however, in the absence of such explanation, and the seemingly deliberate effort to ignore or pretend that these problems do not exist does not

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOvr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=1583ba68a6162afc&q=claudia&qs=true&search=query&siml=1583ba68... 5/7

8/8/2018

Gmail - Fwd: Grievance Letter

make them go away. These are serious concerns, symptomatic of a larger and much more serious and even sinister problem, which seems to be alarmingly pervasive. Yet, despite similar complaints from other people I have spoken to at SCJ, and who have taken me in confidence and agreed with me, it seems that neither the faculty, nor the administration or the students are making any efforts to stabilize the situation they are responsible for creating and sustaining, whether willingly or unwillingly.

Obstruction of academic freedom.

- Another pervasive problem at SCJ is impeding/obstructing academic freedom and censorship. If you recall, Dr. Ostermann, you have expressed your position on my critical views of corporations like Center for Court Innovation, and on Broken Windows policing. You demanded I provided more evidence, and unfairly criticized my position, to the point that I had no choice but to point out to you that you were visibly biased.
- Because I have been censored and punished for my views before at SCJ, I anticipated you'd have a conservative and patriarchal response to my work; thus, I warned you that the others should not be penalized for my views, and if you needed to scold me, you could do so in private. I have the right to ask for such consideration not only because I am a stand alone scholar and I know what I am doing, as my publications and academic collaborations records show, but also because it was my study after all, and I was generous enough to provide a part of it (of the Problem Solving Court Study, not the neo-nazi/alt-right, or the anti-trafficking movement ones) to adapt it as group project. You dismissed my request, and took off points. Only after I emailed you with the result of my ASC practice presentation, which incorporated the same claims, which were subsequently supported and agreed with by the evaluating faculty, you responded to me and denied that you engaged in suppression of academic freedom, but rather minimize it as "comments meant to be helpful". I disagree.

As I told you, and have discussed with the others added on this email, in person and in our correspondence, despite my efforts and my openness to solving these problems with minimal possible harm, both regarding numerous past incidents of bullying, harassment, boundary violations, censorship, discrimination and impeding academic freedom directed at me, not only they were not solved, **but they have continued.** Thus, I have consulted with close friends, who are working in the same field as our faculty, are tenured professors at universities in the US and Europe, and thus have extensive experience with such matters, and they all agreed that my grievances are reasonable and that it is in my best interest to follow the course of action I am initiating now.

Although there are documented effects of the impact these actions had, and continue to have on my health and well being, and despite my efforts to engage faculty and administration to solve these problems, curiously, the only actions taken to address these problems are focused on me, and my

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOvr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=1583ba68a6162afc&q=claudia&q=true&search=query&siml=1583ba68... 6/7

8/8/2018

Gmail - Fwd: Grievance Letter

behavior. I am wondering if this is done, perhaps, in an attempt to silence me, or, even more sinister, something along the lines of “blaming the victim”?

Because there are no signs of movement in the right direction from any of the relevant institutional actors, and *I have no intention of continuing to be subjected to harassment, bullying, hostility, discrimination, academic obstruction, censorship, symbolic violence, gaslighting, insults, passive aggressive attacks, labeling, grade penalization and unexplained grading criteria, and retaliation, I am adding the dean on this email, and will continue to self advocate and seek redress, within and outside the school if necessary. Please be informed that I require immediate attention to help solving these problems and **will not accept anymore misdirection, intimidation and misrepresentation of my grievances from faculty, or from institutional agents**, in an effort to diminish and ultimately avoid responsibility for these grave violations of my civil rights, my personal integrity and my academic freedom and potential.*

At the best,

Claudia Cojocar

PS: Please excuse possible grammatical mistakes, or longer sentences, as I have been stressed lately and this letter has taken a lot of time and energy out of me.

Sent from [Mail](#) for Windows 10

8/8/2018

Gmail - Fwd: Corrections Grade Appeal URGENT



Ric Curtis <ric.curtis@gmail.com>

Fwd: Corrections Grade Appeal URGENT

Claudia Cojocar <claudia.cojocar@icloud.com>
To: Ric Curtis <ric.curtis@gmail.com>

Tue, Dec 6, 2016 at 10:14 PM

here's another email I am sending these fucks. look what these assholes did to me Ric.

tell everyone!

Bufnitza

Begin forwarded message:

From: Claudia Cojocar <claudia.cojocar@icloud.com>

Subject: Corrections Grade Appeal URGENT

Date: December 6, 2016 at 10:13:37 PM EST

To: Kenya Tyson <kt401@andromeda.rutgers.edu>, Kenya Tyson <kt401@andromeda.rutgers.edu>, kenya.tyson@rutgers.edu, Johnna Christian <johnnac@andromeda.rutgers.edu>, rod.brunson@rutgers.edu

Cc: Johnna Christian <johnnac@andromeda.rutgers.edu>

Good evening,

This is to inform relevant institutional actors of my intention of challenging the grade assigned to me on the Spring 2016 Corrections course, replacing the IN with a B, as noted on November 30th 2016 in the system.

As per the section on grade appeals in MA Handbook at page 16, I have taken the issue with the MA Program director, Dr. Johnna Cristian, who happens to be also the instructor who assigned the grade. Following a rather disjointed and unclear argument on Dr. Christian's part, in particular regarding the rationale behind the said grade, I am compelled to bring this issue to further examination, as the explanation has been considered unsatisfactory, by me, and by two independent evaluators of the material assigned a 75%, the final paper for the course, which is responsible for the final grade in the course.

Here are the arguments I make to support my case for the change of grade from a B to an A. In addition, I would like to know why these have happened, and I will not settle for anything else but the truth. Whatever it is, I have the right to challenge it, to know about it, and I am owed an explanation and a public apology.

I am confident that these arguments are going to be sound and valid, and will provide compelling for even the most thorough and critical evaluator.

Context to the complaint:

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOvr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=158d746b160fd442&q=claudia&qs=true&search=query&siml=158d746b... 1/4

8/8/2018

Gmail - Fwd: Corrections Grade Appeal URGENT

Dr. Christian's argument regarding the grade relies on her own preconceived ideas surrounding students' competency or worthiness to tackle certain aspects of the CJ field. Whereas Dr. Christian's teaching and overall leadership provide a solid foundation for all the students in the school, which is a key element to the survival of the whole department, her perspectives can be rather dull and overly compliant, rejecting creativity and intellectual inquiry in favor of safety and redundancy. My final paper was on the Puritan origins of stigma, tracing it through a framework of cultural and historical analysis, in an attempt to provide an alternative solution to help with re-entry programs. Given the state of stagnation in CJ theory and practice, with criticism amounting from different fields regarding the devastating consequences CJ research and the employment of actuary methods (read risk management methods) has on real world human beings, the paper was meant to tackle serious lacunae in the field and how those relate to one of the most salient concerns facing reentry- stigma. Dr. Christian did not think the connections were relevant (unlike one of the academics cited there, who found the paper *tremendous*; so did others in the field who read it).

The paper is currently under review at a journal in the UK, and hopefully will make its way to print soon.

In addition, Dr. Christian has not made a compelling case to justify the grade she assigned the paper, nor did she provide a detailed argument regarding why points were deducted, and how many points were taken off for each "offending" statement.

Arguments

The following excerpt is from the class syllabus, and based on this syllabus I have written my project outlines and given a presentation at the end of the semester which included my strategy of tracing and characterizing stigma in the re-entry research context. Please see the attached syllabus for more information.

"The class will seek to identify current gaps in our knowledge about incarceration, as well as some of the unique challenges related to conducting research in a prison setting and related to prisoner reentry."

As evident from the above excerpt, the course was designed to help students identify the gaps in our knowledge about incarceration and related research

1. **Dr. Christian** argued that I did not follow the course goals, and the project's instructions:

- "Final projects will differ based on student interests and prior experience. All students will complete a comparable level of work, and projects will be designed in consultation with the professor. Ten points of the final project grade will be based on a presentation given at the end of the semester.

My Argument

- My paper pointed out exactly those gaps, as in the first excerpt, but I believed I called them lacunae, which is essentially the same thing, except it's in Latin. Whether it was my tendency to embed terminology from my past educational background, or the critique of Criminal Justice field as "an arid, theoretically barren field", it makes no difference. If Dr. Christian penalized me for having a critical perspective, and using latin and innovative perspectives, that considerably constrains and silences me. This is coercive, intimidating and ultimately impedes my academic freedom and violates the first amendment rights.

2. **Dr. Christian** justified her grading of the paper by claiming that I did not use the interview data from her study. These interviews were part of a study Dr. Christian conducted with formerly incarcerated men, and a few members of the class were part of a group trained to do the interviews and subsequently transcribe these for use for the professor and for our projects. The following explains why I could not use the limited data these few interviews had, and provides much needed context to the problem.

8/8/2018

Gmail - Fwd: Corrections Grade Appeal URGENT

My Argument

- I did participate with Dr. Christian in two interviews. The second interview was rather frightening. The participant was relentless in his sexual harassment of me, and he was rude and disrespectful. He proceeded to describe in detail his attacks on his former girlfriend, and taunt us with sexually explicit details of his encounters with another women he was seeing. He seemed to enjoy ranting about things that were unrelated to the interview, and constantly attempted to make me feel uncomfortable. I did finish the interview, exposing myself to about two hours of verbal garbage, but I was confused as why Dr. Christian did not end the interview, even though she admitted the subject was "pretty much the worst they had so far". Given my history of past victimization, of which Dr. Christian knows extensively, it is unclear to me why she allowed the individual to continue with the harassment. Is it worth here to mention that Dr. Christian is perhaps one of the very few people who has extensive knowledge of my past, and I have trusted Dr. Christian with details that would place any person in a vulnerable position because I trusted her and I believed her to be a caring, compassionate person.
- Thus, when I asked for a different interview to transcribe, Dr. Christian said 1) she will find another interview, then 2) it wasn't necessary. I insisted, not wanting to appear to take advantage of my history of trauma to do less work than the others, but Dr. Christian refused, not before she accused me of using my trauma in the context of employing sykes and matza's "techniques of neutralization" to justify my trying to get out of it. This comment happened in class, and I later found out one other student heard it and she felt really bad for me. It's one thing to make a joke, and it's another to dismiss, invalidate and trivialize my traumatic past, and to do so in such cruel manner, especially that Dr. Christian knows how I have been brutalized by many, many people. Because of my past history the class was able to gain tremendously valuable insight in the psyche of victims of confinement, violence or mental illness. It is very hard for me to describe how the cruelty and vitriolic hatred in this comment have affected me and made me feel dehumanized and devalued. Needless to say, there was no other interview to transcribe.
- When I started writing the final paper, which I turned in within a month from the due date (despite of having 1 year in cases of INC grades. The INC is because of an unexpected and particularly severe fall in my health - **an autoimmune disorder flare-up to be exact- which is a result of a sustained pattern of abuse and harassment from faculty and students at SCJ, of which you are already aware**), yet Dr. Christian has not either acknowledged, nor graded the paper. To make matters worse, Dr. Christian did not offer any feedback, did not provide any corrections or suggestions, and did not contact me to inform me that she had a problem with the paper until I asked her what happened with the grade at the beginning of the fall 2016 semester. I made do with whatever I had, and what I had, even from Joanna's transcribed interview, was not sufficient to write a paper focused on narrative analysis. that's why in my presentation I made sure to explain why I chose to make a parallel with the puritan narratives, and I drew heavily on Shadd's book, *Making Good*.

3. Dr. Christian claims that the paper is deeply flawed in its discussion of the state of the CJ research and system.

My Argument

- I disagree with Dr. Christian, and so does everyone who has given me feedback the whole summer, while Dr. Christian did not. The paper is original, unique, and has an innovative approach that has never been taken before. It is possible that Dr. Christian did not understand the interdisciplinary parts (the anthropology, history, psychology and legal and literary theory I drew on to build my arguments). I don't think it's a bad thing to ask me to clarify, but maybe that meant Dr. Christian was forced to do her job, which was to give me feedback and help me write a better paper, and to admit to her own insecurities and lacunae in interdisciplinary approaches. I don't judge the latter; we all have areas of

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=dKKOvr-M4GM.en.&cbl=gmail_fe_180802.13_p1&view=pt&msg=158d746b160fd442&q=claudia&q=true&search=query&siml=158d746b... 3/4

8/8/2018

Gmail - Fwd: Corrections Grade Appeal URGENT

knowledge that aren't as strong as others; I, for one, couldn't care less about school shootings, but I will ask and try to inform myself if something comes my way and I will have to understand it. But that's just who I am.

If Dr. Christian did not reach out to me because she simply did not feel I was worth the effort to put in doing her job, especially after the cruelty and the labeling she had no problem placing on me, that is a serious issue, and needs closer examination.

4. Dr. Christian hinted at turning assignments in late.

My Argument

- 1) I have PTSD/ADHD. I don't have to explain to Dr. Christian (who should know at least some basics on how to interact with adults with these conditions) that sometimes people tend to turn in things late. Furthermore, Dr. Christian **has given plenty extensions to Carolina Vargas and Gianna Buttari**, as well as to others, **who do not suffer from anything, except perhaps "affluenza"** or, worse, "complienzza" to illustrate the type of student deserving of A in this class and school: intellectually dim, but compliant and servile.
- Given that I have 1 year to turn in assignment as far as incomplete grades are concerned, I don't see how that should figure in the calculations and final evaluations.

In conclusion, I have to disclose that I am deeply concerned and worried about what kind of professionals this school unleashes on the world. The fact that these students, upon graduation, will have the lives of marginalized and vulnerable people in their hands, presents a serious concern to me. It is not just my ethical standards and my sensitivity toward human rights and civil liberties, but I fear for the well being of the entire families of the people who will be as unfortunate as to fall victims to the products of SCJ. You are welcome to debate me, to argue with me or try to discredit me (hint: it did not work), but you know I am right. I am an activist, and a scholar activist for a reason. Because I know pain, and I hope nobody has to go through that.

Looking forward to seeing a response favorable to me as soon as possible, within a week, to be fair.

Best regards,

Claudia Cojocar

8/8/2018

Gmail - Fwd: CARE Team



Ric Curtis <ric.curtis@gmail.com>

Fwd: CARE Team

Claudia Cojocar <claudia.cojocar@icloud.com>
To: Ric Curtis <ric.curtis@gmail.com>

Tue, Dec 6, 2016 at 7:42 AM

Yeah, challenge this you scumbag fucks! I am so not letting them off the hook! Ha! They thought they could fuck me up! Well, here's the result! I will send this to the chancellor next week !

C

Sent from my iPhone
[Quoted text hidden]

8/7/2018

Gmail - Re: Urgent: Rutgers: Diploma Review Status Changed



Ric Curtis <ric.curtis@gmail.com>

Re: Urgent: Rutgers: Diploma Review Status Changed

Claudia Cojocarui <c.cojocarui@outlook.com>
To: "Rod K. Brunson" <rodbruns@scj.rutgers.edu>
Cc: "ric.curtis@gmail.com" <ric.curtis@gmail.com>

Fri, Jun 2, 2017 at 1:42 PM

Dear Dean Brunson,

Thank you for your response. Unfortunately, adding dean Tyson on the thread will not solve anything; it did not help last year, it will not help now. If this is a stalling tactic, or simply bureaucratic passive aggressive behavior, it's not my concern any longer. That should signal that I am not willing to negotiate, or compromise. I moved on from this, and I would like to keep moving on as far as I can from SCJ. My work and expertise benefit the reputation of your school; in addition to that, it added a trace of humanity to the void. However, it is not in my best interest to continue to do that for a collective of ungrateful and abusive individuals, regardless of whether they may, or may not have done the things they did on purpose. It will be foolish of me to consider to continue engaging with your school, dean Tyson or Dr. Miller solely based on my respect for, and emotional attachment to some of your people. That's why I am letting you know that if this issue will not be addressed in a timely manner, I will retain legal counsel and will appeal to your chancellor.

Sir, with all due respect, you did not provide an explanation to this situation, and I am owed one. In addition to that, I am owed explanations for the following:

- 1) why was I never reimbursed for the ASC conference costs (total 1000 dollars for 2015 and 2016);
- 2) why was I never given an explanation for why my email address was blocked on SCJ servers, preventing me from getting important emails and information while I was a student (there's evidence of that, and I have it);
- 3) why do you think this is ok to do to people, or to me to be exact?

Please, don't do this again. I am not your garden variety student, and I am not someone who can be forced into accepting and internalizing abuse and discriminatory treatment. I am not afraid to stand up for myself, and I am not bound by hierarchies. I don't owe anyone anything and, most importantly, I don't owe your school anything. SCJ doesn't not have anything I want or need, as a matter of fact, it owes me, so please think about the consequences of playing 'ivory tower white patriarchy games' with me. I didn't want to go this route, but remember that I have stood up for myself and risked my life for others when nobody did that for trafficked women; furthermore, in a time when everyone makes the most out of "their stories" going publicly in the anti-trafficking and modern day slavery circus with titillating narratives of degradation and sexual abuse, I continue maintaining my privacy and work to help the people who have suffered most. That should say something about my character and tenacity, and should make you reflect on why, out of all the students in that school, do you have to keep dealing with me when I am long done with all this?? I ask myself that a lot, as I have to move on and stand against aggressive fascism, and violent mysogyny and racism, as my heritage and ethics demand it. Maybe you have not embraced science as public service, and as a way to improve humanity, but I did. Epistemological anarchism allows me to continue building knowledge and help people find a way to rebuild their communities and make kin. I am sorry to say that your program at SCJ is only useful to break those human bonds. As an accomplished researcher, out of of all people, you know what that means, Dean Brunson.

I am looking forward to reading an email from you containing explanations for the above concerns and grievances. It is indeed shameful that I have to spend more time to address this, but if that's what I have to do, that's what I will do, but this time it will be on my terms. Your school failed to solve the issue when given the opportunity.

Best regards,

https://mail.google.com/mail/u/0/?ui=2&ik=5894686607&jsver=SpEck3ZemTg.en.&cbl=gmail_fe_180801.14_p1&view=pt&msg=15c69e65e5407deb&q=claudia&qs=true&search=query&siml=15c69e65... 1/4

8/7/2018

Gmail - Re: Urgent: Rutgers: Diploma Review Status Changed

Claudia

Get [Outlook for iOS](#)

From: Rod K. Brunson <rodbruns@scj.rutgers.edu>
Sent: Friday, June 2, 2017 8:31:54 AM
To: Claudia Cojocar
Cc: Kenya Tyson; Johnna Christian
Subject: Re: Urgent: Rutgers: Diploma Review Status Changed

Dear Claudia,

I have added Associate Dean Tyson to this message and have asked her to monitor the situation.

Best,

--Rod

Rod K. Brunson, Ph.D.
Dean and Professor
Rutgers University
School of Criminal Justice
123 Washington Street
Newark, NJ 07102-3094
(973) 353-3311 (Voice)
(973) 353-5896 (Fax)

From: Claudia Cojocar <c.cojocar@outlook.com>
Sent: Friday, June 2, 2017 3:25:52 AM
To: Rod K. Brunson; Johnna Christian
Cc: rcurtis@jjay.cuny.edu
Subject: Urgent: Rutgers: Diploma Review Status Changed

Dr. Christian, Dean Brunson,

I am writing to officially express my concern about the inhuman treatment your department continues attempt to subject me to. I want to bring to your attention the fact that despite my completing the required work for the 'Program Evaluation' class, and emailing the assignment to Dr. Joel Miller ahead of the deadline, the grade has not been changed. Furthermore, Dean Brunson - who has never acknowledged my concerns, nor had the common decency to respond to any of the emails I sent, or the questions I raised- decided to change my status to 'not graduating'. Surely none of you misses me, or my 'radical' autoethnography work with the anti-trafficking movement/courts, as much as to compel me to remain in this liminal state, between life and Newark SCJ...

Dean Brunson, I would like to remind you that gender discrimination is a problem taken seriously in academia, and a man in your position should remember to treat everyone with respect and consideration, and to address misogynistic conduct when it takes place. Ultimately, Dean Brunson, failing to provide an explanation for

8/7/2018

Gmail - Re: Urgent: Rutgers: Diploma Review Status Changed

this decision is not only disrespectful and rude, it's also offensive and uncalled for. I don't appreciate being treated like that, and I thought I made that clear in my previous complaints.

Dr. Christian, I am truly sad that I have to continue to bring this to your attention, but your position requires you are aware of this grievance. I am aware that bullying, gaslighting and backstabbing are common among staff and faculty, but I don't care what your people do to each other anymore. I just want to get my degree and move on. Miller and I had a number of less than pleasant exchanges before, but that did not prevent me from respecting his expertise, or wanting to learn from him; I told him on many occasions. Somehow, he seems to only have contempt for anything I do or say, and I honestly don't think that I can do anything more than I already did to ameliorate the situation. I am not interested in, nor do I care why some people may resort to playing these power games, but I am not going to let this slide like I did before.

Finally, I do not know what you're punishing me for, but this reflects poorly on you, and on your program, not on me. I don't owe your school anything, on the contrary.

I did my best to make things work; obviously you did not, as your actions have shown so far. I would think that under these circumstances you'll want to wrap this up as soon as possible. God forbid someone like me, an anarchist and formerly trafficked person, would be on your roster for too long. That doesn't fit well with the SCJ clusterfuck of conservative, far right wing and neoliberal ideologies. Because I do not expect anyone to do their job, and offer a viable outcome, please be aware I will consult with other academics close to me to find a solution.

Best regards,

Claudia Cojocar 

Get [Outlook for iOS](#)

From: nwk_reg@gradadm.rutgers.edu <nwk_reg@gradadm.rutgers.edu>

Sent: Thursday, June 1, 2017 3:04:37 PM

To: c.cojocar@outlook.com

Subject: Rutgers: Diploma Review Status Changed

Dear Claudia,

This is an auto generated message to inform you that the dean of your school has updated your diploma application review status to:

Not Graduating

It is strongly recommended that you review your diploma application for accurate information.

Your diploma application review status is available anytime by clicking on the link below:

<https://grad.admissions.rutgers.edu/Diploma/>

If you have any questions or concerns, please contact your dean's office.

If you wish to apply for a future graduation date you must complete a new application on the diploma application website.

Sincerely,

8/7/2018

Gmail - Re: Urgent: Rutgers: Diploma Review Status Changed

The Graduate Registrar's Office at Newark

Rutgers, the State University of New Jersey

Exhibit H

[Text message of Ansley Hamid in a group Facebook Messenger chat conversation Haber, Sebastian Hoyo-Torres and Lambros Comitas.]

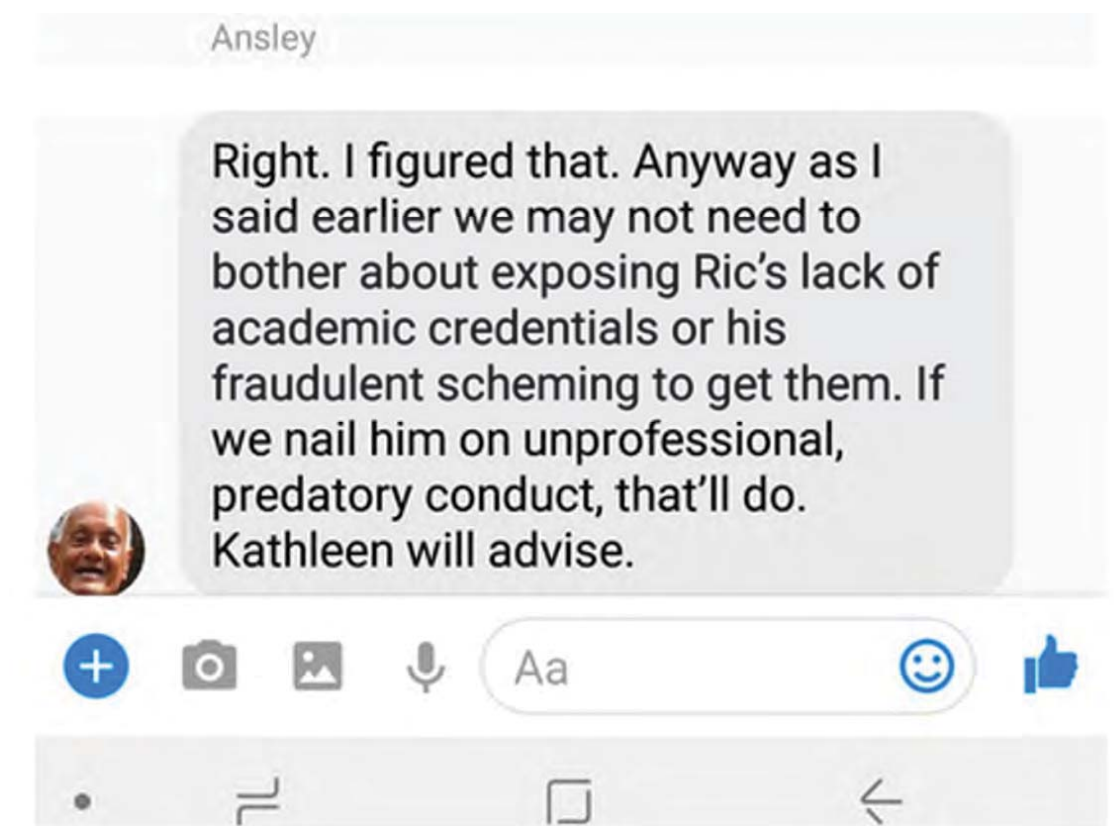


Exhibit P

From: **Amalia Paladino** <amalia.paladino@gmail.com>
Date: Mon, Jun 18, 2018 at 10:10 PM
Subject: Re: holy fucking shit
To: Ric Curtis <ric.curtis@gmail.com>

Her accusations are really serious. They're against you. She said she's defending my name (I don't even know about what) and that she isn't implicating me. It's like she wants me to hop on the conspiracy train with her. I'm all for conspiracies....but her endeavors are suspicious. She's saying you gave Poppy my work and tried to pimp her and Naomi out. And that you turned everyone against me, telling others I'm a criminal and trying to discredit me. I don't have time for this shit.

On Mon, Jun 18, 2018 at 10:03 PM, Amalia Paladino <amalia.paladino@gmail.com> wrote:

*oblivious

On Mon, Jun 18, 2018 at 10:02 PM, Amalia Paladino <amalia.paladino@gmail.com> wrote:

Claudia is sending me a shit load of IMs and said that she has mentioned my name related to stuff. What the fuck is going on? Am I really this obvious that my name is floating around and I don't know about it? I told her to stop talking about me in every context...but now I'm concerned about what she said. She and I never speak (the last time I mentioned her to you was actually the last time I had spoken to her).

I received a random fucking email from Salfati earlier today....and Claudia said she spoke to her about me. WTF.

--

Amalia Paladino, PhD
Sociology Department
CUNY Graduate Center/John Jay College
899 Tenth Avenue
New York, NY 10019
<http://snrg-nyc.org/>

--

Amalia Paladino, PhD
Sociology Department
CUNY Graduate Center/John Jay College
899 Tenth Avenue
New York, NY 10019

Exhibit "G"

← **Thread**



Schrödinger's Criminologist
@anarkriminology



Last year, [@naomi_haber](#) and I filed [#TitleIX](#) complaints with John Jay College, something that has been in the news then, and a couple of weeks ago.

During this time, we both received threats; I was attacked and stalked; my home was broken into; I was ostracized at work. [#MeToo](#) 🙋

10:35 PM · Jun 21, 2019 · [Twitter for iPhone](#)

1 Retweet 5 Likes



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019



Replying to [@anarkriminology](#)

1. I am lucky that [@naomi_haber](#) and my partner were accompanying me to class, to doctors' appointments, even to my therapist. I rarely left my apartment; Naomi barely left hers too. We didn't talk to too many people apart from close friends+some family members. [#MeToo](#) 🙋 [#TitleIX](#)

1

1

3



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019



2. While I was struggling to keep myself afloat and functioning, to honor my commitment to my students [@JohnJayCollege](#), people supporting the now disgraced professors were busy launching defamation campaign after defamation campaign, seeking to disparage [@naomi_haber](#) & I. [#MeToo](#) 🙋

1

1

3





Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

3. I recently was shown a number of letters sent to the whole John Jay community, in which supporters of these professors compiled a number of decontextualized statements, half-truths, and even lies, seeking to exonerate the respondents by discrediting @naomi_haber & I. #MeToo 🙄



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

4. @naomi_haber and I examined these letters carefully, looking at each component as objectively as we could. Needless to say, it was very hard to go through so much toxic material, but we did and we address a few of those disturbing claims below:



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

4. a) the letters are full of #antisemitic tropes. @naomi_haber and I are accused of "conspiring" together to get "prof.s" fired, which we apparently achieved through our "control of the media".

Note: "Jewish conspiracy" "Jewish media control"-well known Anti-Semitic canards



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

5. Interestingly enough, the "evidence" brought to the claim that @naomi_haber and I "hatched a conspiracy" is made up fragmented and decontextualized materials, frankensteined together for a semblance of authenticity.

These probably amount to a couple of felonies if pursued.



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

6. Of course, since @naomi_haber and I are prison abolitionists, we didn't want to get tangled with the CJ system, or be complicit with the state in violence. So we refused to collaborate with the state, seeking other avenues for relief and justice. #MeToo 🙄



1



1



3





Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

7. Incredibly, the respondents' team seized this and distorted the facts claiming the respondent was found "not guilty" by the college and Vance's office.

This claim intentionally misdirects anyone into believing that there was an actual legal proceeding.

This is INCORRECT



1



1



3



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

8. I am familiar with @ManhattanDA's sex crimes unit. I also do research on secondary victimization, which includes revictimization by state actors like prosecutors/cops. @naomi_haber and I didn't want to deal with Vance's office because it's notorious for treating victims badly.



1



1



4



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

9. When I went to the DA's office for a meeting, I noticed that I was followed by the same person who attacked me on the train a few days prior.

If that wasn't enough, I was accused of having an affair w/@naomi_haber by a detective. When I denied it in horror, he insisted.



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

10. He couldn't understand why @naomi_haber and I were so close. He needed me to provide him with evidence that I wasn't having a sexual relationship with my best friend.

I stopped crying. I took a deep breath before I told him "we're both of Eastern European Jewish descent".



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

11. Upon hearing that, the cop laughed, and then said "oh, I understand now... it all makes sense." I suppose I gave him a look, since he added "me too". I didn't care whether he was trying to say he was Jewish too; all I cared about was to get it over with. I wanted out.



1



1



2





Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

12. Complying with the state was yet another indignity that @naomi_haber and I had to go through to ensure that we helped the college in their #TitleIX process. While we were abiding by the rules, the respondents acted like they were above the law, and lashed out in every way



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

13. For example, I received a series of menacing messages, in which I'm called "a renegade", warned to withdraw my complaint "stop this now" and accused of "blood libel". I was weirded out, so I sent Naomi the messages. She immediately identified the #antisemitic canard.



1



1



2



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

14. Overall, this has been incredibly stressful for @naomi_haber and I. We lost friends, we were ostracized, we were blamed for what happened to us. I had to move. Naomi had to change jobs. We almost didn't apply to graduate programs. We lost so much, but we gained too. #MeToo 🙌



1



1



3



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019

15. Despite the violence and the defamation campaigns, we're still standing. We're still here. We're still fighting. @naomi_haber and I did this because nobody else at John Jay had the courage to. We did it so no other woman/student go through what we have been through. #MeToo 🙌



1



1



3





Schrödinger's Criminologist

@anarkriminology



16. The disgraced professors' supporters don't want to accept this reality, so they invented one of their own, in which the building blocks are all misogynistic, victim blaming tropes, anti-Semitic canards, and rape myths. To this day, these people refuse to let go of the swamp.

10:35 PM · Jun 21, 2019 · [Twitter for iPhone](#)

1 Retweet 2 Likes



Queen of Chonk @naomi_haber · Jun 21, 2019



Replying to @anarkriminology

Thank you Meowsk 🌟❤️

1



1



Schrödinger's Criminologist @anarkriminology · Jun 21, 2019



You're welcome Nomsk ❤️



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

Replying to @anarkriminology

17. This is evident in how the swamp cult leader and his faithful followers are so entrenched in preserving that toxic parallel universe, that they deny any responsibility for their actions, and, in turn, punish @naomi_haber and I for escaping the swamp cult. Here's how:



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17a. Denying that the swamp is a cult, and providing as "evidence" statements made by individuals @naomi_haber and I

identified as swamp members. Incidentally, these people are known as most loyal to the cult leader, as they've been handsomely rewarded for it for years.



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17b. Some of these loyal swamp cultists went as far as to file complaints against @naomi_haber and I, while setting up "secret" chat-rooms/"support groups" #JohnJayCollege, where they indoctrinated recruits into spreading #antisemitic #misogynistic tropes & endorsing #rapemyths



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17c. In fact, this happened in the open, on social media, and with John Jay "Wellness Center" staff going to classrooms to invite students to these "support groups" formed to soothe the wounded egos of powerful white men who played victim, while on paid leave. #TitleIX #MeToo 🍷



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17d. These professors we paid full salaries & told to stay away from campus given the #TitleIX investigation, but they broke these rules nonetheless by roaming on campus, teaching others' classes, showing explicit videos, inviting students to conferences, or to study "prostitution"



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17e. Clearly, these professors think they're above CUNY code of conduct/and the law. They broke those rules with impunity; and, they complained about having been put on paid leave following the #TitleIX complaints. This shows the extent of these men's entitlement and privilege.



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17f. Appalling reason given for their behavior:

Lawyer: As tenured professors doing research on drugs/sex, it's natural that they behave in the manner of the culture they study.

Me: are you justifying their behavior by claiming that WE WERE their research project?

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17f. Even if @naomi_haber & I were the subjects of a "research study", we didn't sign CONSENT forms.

We had no idea we were experimented on. We would NOT #consent to

*brainwashing

*coercive identity change

*stop taking medication

*unpaid labor

*relentless sexual abuse

#MeToo 🙋



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17g. If #JohnJayCollege actually facilitates such "research study", this is not only highly unethical, but would also have complex legal ramifications, which should be further investigated by relevant authorities.

So, yeah, here's a dilemma to be pondered upon.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17h. Is the swamp a "research study" where:

a) @naomi_haber & I (+many others) were targeted because of our history of trauma, then coerced/abused/degraded under the guise of "doing sex/drugs research"?

b) is the swamp an exploitative cult whose leaders went native?

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17j. Neither option favors these professors, so they resolve to send out letters in which they viciously attack @naomi_haber and I, endorsing all the possible rape myths in the process of substantiating our own claims about how toxic & dangerous the swamp was for us.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

17k. You'd think that those who are familiar with coping mechanisms in trauma/ptsd & the responses to toxic environments, like in confinement, in cults, or in gangs, would see through the BS of an angry charismatic leader lashing out to silence his victims. That's not the case.



1



1



1



-  **Schrödinger's Criminologist** @anarkriminology · Jun 22, 2019 ▼
18. These letters aren't crafted to appeal to reason, or to tell the other side's truthful story.
- These letters are crafted to appeal to the darkest facets of its recipients' psyche, the #shadow.
- They're designed to bypass super-egos, going for the primal structures.
- #MeToo 🙌
- 1 1 1 1
-  **Schrödinger's Criminologist** @anarkriminology · Jun 22, 2019 ▼
19. The letters want its recipients to see the swamp cult leader as a martyr, a victim of a "witch-hunt" orchestrated by @naomi_haber & I, depicted as "vengeful women" who, decided to "bite the hand that fed them". 😞
- These tropes appeal to misogynistic hearts most.
- #MeToo 🙌
- 1 1 1 1
-  **Schrödinger's Criminologist** @anarkriminology · Jun 22, 2019 ▼
- 19a. What's particularly striking in these letters is the grandiosity in the descriptions of the cult leader. Even his supporters' testimonials reflect that- a life-savior, a man of "immaculate character", whose status alone should except him from accountability.
- #MeToo 🙌
- 1 1 1 1
-  **Schrödinger's Criminologist** @anarkriminology · Jun 22, 2019 ▼
- 19b. In short, he can do nothing wrong. To establish that, these letters proceed to profile @naomi_haber & I as these angry, money hungry, media controlling, manipulative con-artists by... revealing (decontextualized) conversations in which I say terrible things about Naomi.
- 1 1 1 1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19c. I'm interested how relevant is to the actual case we brought the fact that @naomi_haber and I fought over things that, conveniently, aren't mentioned in these letters at all.

Is it because if they were, it would paint a darker, more devastating picture? It is.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19d. Earlier in this thread I mention an argument advanced by these letters in which the disgraced professors' behavior at the swamp is justified as them having internalized their research methods, suggestions that @naomi_haber & I were research subjects, or they went native.



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19e. Such was the cult environment at the swamp, that to survive there we had to

- 1) speak the swamp language
- 2) emulate the swamp leader's behavior
- 3) report to the swamp leader everything that happened
- 4) be loyal to the swamp leader
- 5) become clones of the swamp leader

#MeToo 🙋



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19f. @naomi_haber and I never denied we talked trash about each other to appease the swamp leader, or his entourage. We never denied that we had an incredibly hard time coping with the sustained assaults we were subjected to. In fact, that's 1 reason we filed the complaints.



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19g. I am not certain @naomi_haber or I would've escaped that swamp if we didn't act like we were "down with the program". What those letters show is how life at the swamp was, not how we are.
The more hatred/paranoia/misogyny, the better. It made the swamp leader happy.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19h. Like all abusers, they use screenshots of our moments of struggle& anguish, of fear& submission, against us-to further degrade/demean us. They punish @naomi_haber &I for resisting being broken down; for refusing to extinguish our friendship.
That's what the swamp is.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19i. Incredibly, these letters are holding against @naomi_haber &I the fact that we wanted to escape that toxic, exploitative, abusive environment accusing us of "conspiring" against the swamp leader by secretly planning to escape.

They claim we "conspired" to sue to get 💰



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19j. To make this #antisemitic canard stick, a conversation is quickly doctored to make believe that @naomi_haber & I were after \$ rather than justice, and quickly included in a malicious complaint, one of the many ridiculous complaints filed against us (per the letters)

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

19k. Complaint goes nowhere, so doctored discussion is then spread around touted as "proof" of our "cunning greed". If I was to look closer and ask for context, I would see that this wasn't about @naomi_haber & I but about another victim suing.

We only wanted to escape.

#MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

20. Some may look at this thread 📰 - judge @naomi_haber & I for addressing the letters; others may criticize us thinking that we're putting this out in public & we shouldn't.

This kind of thinking is unacceptable, because it's silencing both of us, just like those letters #MeToo 🙋



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

21. Those letters project the raging anger of a controlling, angry, and violent cult leader, not a wrongfully accused person, portrayed a victim & a martyr.

Those letters also show what happens to people who come out against this person.

They show what the swamp is.

#MeToo 🙋



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

22. In the end, these letters were not shown to me to warn @naomi_haber and I that we were the targets of a defamation campaign. This was orchestrated and put in place the moment we filed the #TitleIX complaints, exactly the way I told the former #TitleIX investigator. #MeToo 🙄



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

23. This whole process of punishment and silencing was developed and enacted precisely because we told the truth.

Those participating in silencing/punishing @naomi_haber & I knew exactly what they were doing-they did it because they wanted us to hurt, or preserve their privilege



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

24. Arguments in these letters were used to convince the press to write favorably about these professors; no reporter took this seriously. It didn't deter swamp cult members from continuing the defamation campaign. They concluded @naomi_haber & I must've "controlled the media".



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

25. Now that the investigation conclusion led to the termination of these disgraced professors, the point of this last angry lash out is perhaps to show that it is still the cult leader who has the power over us; that he is the one who made us; he is the one to break us.

#MeToo 🙄



1



1



1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

26. The cult leader claim to power rests in him saying he offered @naomi_haber and I job opportunities, mentored us, wrote us rec. letters.

It's no secret that we weren't paid for our labor; he made other people write those rec. letters; his mentorship got us in trouble. 🙄



1



1



1





Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

26a. When @naomi_haber and I actually went and applied to programs WE wanted to apply to, as opposed to those the cult leader was directing us to, we were admitted without any of these professors' "help". This is how we got the power back, by making it on our own!

2 1 2



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

26b. Taking the power back is a long, exhausting process, yet a rewarding one. I'm reclaiming all the work that was taken from me, given to these professors' favorite mentees to ensure they make it in grad school. I will return to writing and publishing, moving on with life.

1



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

26c. Taking the power back is holding these professors accountable, and exposing the corruption that allowed for the abuses @naomi_haber and I were subjected to, which includes properly addressing the defamatory claims made in these letters.

That process already started.

#MeToo

1 1



Schrödinger's Criminologist
@anarkriminology



27. To conclude this long ass thread, I want to thank [@naomi_haber](#) for being my best friend and trusting me when things were going so bad. For hiding with me in the bathroom so the swamp spies couldn't see us breaking the leader's rules. (We weren't supposed to talk). #BFF ❤️

3:40 PM · Jun 22, 2019 · [Twitter for iPhone](#)

1 Retweet 2 Likes



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019
Replying to [@anarkriminology](#)



27a. I want to thank my partner [@seathebass92](#) for pointing out to me the reality outside the swamp.
For being a steady supporter of our shared values and beliefs.
For encouraging me to do my PhD.
For all those times he held me and told me things will get better.
For everything

1



3



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019



27b. I want to thank this really amazing supporting group of academics [#TheCatBand](#). I wouldn't be here today without you all. ❤️❤️❤️

1



2



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019



27c. I want to thank my supporters and extraordinary mentors [@RutgersSCJ](#). You know who you are.

1



3





Schrödinger's Criminologist
@anarkriminology



27d. I want to thank @JanineEwen for being on this journey with me, supporting me whenever she could. You're the queen 👑 Janine! ❤️

3:40 PM · Jun 22, 2019 · Twitter for iPhone

2 Likes



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019
Replying to @anarkriminology



27e. I want to thank all the people who attacked my& @naomi_haber's credibility, who said terrible things to us &about us, all those who believe/support these disgraced professors! You consistently show us that we did the right thing escaping the swamp/reporting these professors.



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019



27d. As it is the case with defensive projection, these letters reflect the swamp and its inhabitants, not @naomi_haber and I.

Whatever those letters said is an insight into a place we both are happy to have escaped from. They don't describe us, but they describe their authors.





Janine Ewen @JanineEwen · Jun 22, 2019

Replying to @anarkriminology

I am me because of you. ALWAYS here for you. Let's battle through life together with your amazing peers! I love you! xxx

1



2



Schrödinger's Criminologist @anarkriminology · Jun 22, 2019

I love you too Janine!! You're fantastic!! 🙌🙌🙌❤️❤️❤️

1



2



Janine Ewen @JanineEwen · Jun 22, 2019

I hope we can all be together someday! You know you are ALL welcome my way if you want to come to Scotland!!! XX @naomi_haber @seathebass

1



4



Queen of Chonk @naomi_haber · Jun 22, 2019

❤️❤️❤️



2



Exhibit "H"

← Tweet



Red Canary Song 红莺歌 @RedCanarySong · Jul 22, 2019

Sharing thoughts tomorrow, 7/22 at the sex workers & allies circle - 7pm in front of 209 Madison Ave:

@thejessicaraven
@TS_Candii
@gildamerlot
@asiannomad
@anarkriminology
Ryan Cantor

We are survivors, immigrants & QTPOC sex workers organizing against violence & exploitation. [twitter.com/RedCanarySong/...](https://twitter.com/RedCanarySong/)

This Tweet is unavailable.

3 22 36



Bryan Knight 26K Fllwrs! @BryanKnight66 · Jul 22, 2019

This graphic is confusing.

1 3



Kai Zen Cole 张楷 🌈 (they / she) @heartofcode_KZ · Jul 22, 2019

Thanks for that feedback! Will work on making message more clear.

1 3

This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist

@anarkriminology



Replying to [@gildamerlot](#) and [@SFFNY](#)

[@sffny](#) is a large organization. Most of its clients are domestic violence victims+their children. The org. provides shelter, services & legal representation to numerous women with children, some who have been trafficked. There's a sex trafficking departments there too.

11:29 PM · Jul 24, 2019 · [Twitter for iPhone](#)

2 Likes





Schrödinger's Criminologist
@anarkriminology



Replying to @gildamerlot and @SFFNY

I'm familiar with the issue. I'm a criminologist and I am a formerly trafficked person. My research focuses on these specific concerns, including social movements, systems of social control, legitimacy, policing, etc. That's how I know most of the literature you cite.

12:20 AM · Jul 25, 2019 · [Twitter for iPhone](#)



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 25, 2019



Replying to @anarkriminology and @gildamerlot

You're either taking the research/academic articles out of context , or misinterpret the information. It's ok, it happens to a lot of people, even in academia. The people who circulate these articles should also make sure that they summarize them for everyone to understand.



This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 25, 2019



I'm not silencing you.
I'm pointing out that you are talking about things you have a limited understanding of. That's a legitimate reason to bring these issues to your attention.





Schrödinger's Criminologist @anarkriminology · Jul 24, 2019



This is not ok. twitter.com/gildamerlot/st...

This Tweet is unavailable.



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 25, 2019



You can call yourself whatever you want, but that doesn't mean you get to call me whatever you want. I'm pointing out some misleading information in your statements, especially because I've been researching these issues for years now. You don't like that? Write a rebuttal.



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 25, 2019



I pointed out more than enough. You need to calm down and re-assess your statements; this isn't helping anyone, particularly your cause. Talk to people who know better.



This Tweet is from a suspended account. [Learn more](#)



glen jake
@glenjakenyc



Replying to [@gildamerlot](#) and [@anarkriminology](#)



12:58 AM · Jul 25, 2019 · [Twitter for iPhone](#)

1 Like



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 25, 2019



I'm not a US citizen.





MrsRobinson @Coyoteri · Jul 30, 2019



12 WAYS TO DO NOTHING ABOUT TRAFFICKING
 ★.....: WHILE PRETENDING TO★

1 Use grossly exaggerated numbers of trafficked people to justify new laws.	2 Ignore other forms of exploitative labour and focus only on female trafficked victims.	3 Frame trafficking as a "human rights issue" but attack it through criminal law.	4 Include human rights language in conventions, but make these provisions optional.
5 Set the bar for accessing victim services so	6 Allow trans-border trafficking to fuel	7 Lump traffickers with all other	8 Think of traffickers and their individual motivations ("evil"

1

10

12



leila (lay-luh) raven @theleilaraven · Jul 30, 2019



lol #12!! 😂😭😭

1



4





Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

.@Coyoteri-is there a way to explain how one reconciles these contradictions-on 1 side you have these vitriolic [victim-blaming] attacks on my friend and I, then, on the other side, you claim you include trafficked people's interests into your sex workers rights activism?



Anti Prostitution Lobby Attacks John Jay College Professors to Discredit their Research.

coyotewebadmin · October 7, 2018 · Comments Off



Did she concoct her complaints because she was rejected from the Ph.D. program? What does any of these allegations have to do with prior the research?

Here is the smoking gun

1



3





Schrödinger's Criminologist
@anarkriminology



Replying to @anarkriminology @Coyoteri and 6 others

Can you explain to me, @Coyoteri, why you put out that defense of serial sexual abusers/rapists Curtis & Marcus? Was it because it's worth denying what happened to @naomi_haber & I? To protect that shit research because it appears to validate #libertarian claims on sex work?

1:40 PM · Jul 30, 2019 · Twitter for iPhone

1 Retweet 2 Likes



MrsRobinson @Coyoteri · Jul 30, 2019
Replying to @anarkriminology @BryanKnight66 and 6 others
Silencing youth who engage in survival sex isn't the solution.



1





MrsRobinson
@Coyoteri



Replying to [@anarkriminology](#) [@BryanKnight66](#) and 6 others

Actually discounting the voices of 1000 youths that were interviewed is unacceptable. Poverty and criminalization are essential to the conversation. The research has nothing to do with the alleged assault. We advocate for youth drop-in centers & LGBT half houses.

3:48 PM · Jul 30, 2019 · [Twitter Web App](#)

2 Likes



Schrödinger's Criminologist [@anarkriminology](#) · Jul 30, 2019
Replying to [@Coyoteri](#) [@katezenlove](#) and 7 others
[@Coyoteri](#), you are misinformed. Smh.



1



Schrödinger's Criminologist [@anarkriminology](#) · Jul 30, 2019
Replying to [@Coyoteri](#) [@BryanKnight66](#) and 6 others
.[@Coyoteri](#) why are you misdirecting the focus from the statements you make in your blog post? Also, why are you implying that I am "discounting the voices of 1000 youth"? These are all unfounded assumptions.



1



1



MrsRobinson [@Coyoteri](#) · Jul 30, 2019
Because you seem to suggest that we should just discount all their research, when the research has NOTHING to do with the allegations made against them.





Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

Replying to @anarkriminology @Coyoteri and 7 others

Is this how you choose to represent the interests of "youths involved in the sex trade"? By defending "academics" who engaged in abusing vulnerable youth? There was even an investigation into that shit study, yet no mention of it in your blogpost. Why not?

Anti Prostitution Lobby Attacks John Jay College Prof...
 "Thirty academics and advocates from as far away as Australia are calling on John Jay College to examine ...
coyoteri.org

1

1

3



Schrödinger's Criminologist

@anarkriminology

Replying to @anarkriminology @Coyoteri and 8 others

.@Coyoteri I'm taking this opportunity to address some of the insinuations you raised in your blog post, while I illustrate the discrepancies between claims of concern for trafficking in the sex sector by some actors in the movement for decriminalization of consensual sex work.

2:07 PM · Jul 30, 2019 · [Twitter for iPhone](#)

1 Retweet 3 Likes





Schrödinger's Criminologist @anarkriminology · Jul 30, 2019



Replying to @anarkriminology @Coyoteri and 8 others

.@Coyoteri: 1) I am in a PhD program I love; stay tuned for the lawsuit filed against John Jay to find out more about PhD programs 😞
2) since I was actually trafficked, my voice and positionality was the ideal formula to justify that "research" you're trying to rescue.

The NY Post weighs in

Did she concoct her complaints because she was rejected from the Ph.D. program? What does any of these allegations have to do with prior the research?

Here is the smoking gun





Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

Here's why I'm of interest to academics, practitioners & activists alike: the fact that there is actual evidence of lived experiences, out of which I only present these artifacts- my passport and visa used when I was trafficked. #SexTrafficking is real. #LaborTrafficking is real.



1 2 4



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

It's mind boggling that I have to provide these pictures to point out how fucked up this life was to me, and to show you that, in fact, I know what I am doing because I have been navigating these different worlds for decades. Those who read my work know. 😞

1 1 2



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

I don't care what's said about me; I hear the silence. I've been hearing the silence since I decided to stand up against Curtis& co. I want to thank [@Coyoteri](#) for giving voice to these atrocious men, while channeling the whispers from the SW rights mvmt [#libertarian](#) faction.



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

I never compromised my integrity; I asked for forgiveness when I wronged someone, and I tried to do the right thing. Maybe what's been said here will help everyone understand that it's not about one side or the other. It's about all in between as well.
Thanks for reading.





Red Canary 红莺歌 @RedCanarySong · Jul 30

As a movement, we need to do better in centering the voices of survivors of trafficking.

Trafficking is an issue of sex worker justice.

We support the advocacy work that @coyoteri does, and also are listening to critiques of this blogpost by traffick survivor @anakriminology.

2 7



Gilda Merlot @gildamerlot · Jul 30

Not saying this to be mean.... but she's a cis white woman who was able to come in legally. The idea that we need to center her...is hilarious.

Anyone can call themselves a sex trafficking victim. The fact that she policies people more marginalized than her is an issue

2 3



Gilda Merlot @gildamerlot · Jul 30

A few days ago, this "sex trafficking survivor" gave me a lot of shit for criticizing Marian Hatcher who makes policy for police for over 10 years. She told everyone I was "attacking" her for refusing to take down my tweets. People were in my dms telling me to shut up.

Marian Hatcher
Policy Analyst & Victim Advocate, Cook County Sheriff's Office

Effective Partnership with Law Enforcement

- Breakout Session
- La Grange Campus Track C

The National Johns Suppression Initiative (NJSI) is a nationwide multi law enforcement agency effort to reduce the demand for sexually exploited individuals, while holding buyers accountable. As of February 2019, more than 130 law enforcement agencies have

Q & A with Marian Hatcher
A national pioneer in the fight against the demand driving sexual exploitation is survivor leader Marian Hatcher, senior project manager and human trafficking coordinator at the Cook County Sheriff's office. Marian has Sanctuary for Families and advocate for immigrant and LGBTQ+ rights

Followed by a response panel of state and city legislators.

Free. For more information and to register, [click here.](#)

1 5



kate zen 张小姐 @katezenlove · Jul 30

She didn't tell you to shut up. I DM'ed because I don't want to see you two attack each other. She works closely with DecrimNY. You were wrong to assume she's a citizen. She has actually experienced sex trafficking in Romania, and also does careful academic work in this area.

2 ↻ 1 ↗



Gilda Merlot @gildamerlot · Jul 30

She's a legal immigrant. I read her story and the details are fuzzy. I see something very wrong with privileging person centering herself and refusing to take any criticism at all. And mostly attacking sex workers and groups.

1 ↻ 1 ↗



Schrödinger's Criminologist (((Claudia Cojocaru))) @anarkri... · Jul 30

.@gildamerlot, what's your problem with my immigration status? In fact, what is your problem with me? You keep targeting me with these ad-feminam attacks, why? You make presumptions about my orientation, my identity, my beliefs, yet you never met me, nor do you understand my work.

1 ↻ 1 ↗



Gilda Merlot @gildamerlot · Jul 30

You came for me first. You made me cry a few days ago and forced me to censor myself fit criticizing a head of police. Organizations told me to give in to your demands.

All I see is you targeting sex workers and sex worker organizations.

1 ↻ 1 ↗



Decrim NY @DecrimNY · Jul 30, 2019

Replying to [@katezenlove](#) [@gildamerlot](#) and 8 others

These conversations need to be had offline. We are all on the same team & attacking one another is inappropriate. We never discredit one another's experiences of surviving violence & exploitation. End demand folks decide who is a "good survivor" and who isn't. We don't.



1



5



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

[@gildamerlot](#) you brought this out in the open, so I can't help you there.



1



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

[@gildamerlot](#) I don't represent anyone. I don't presume to do that. I, however, will speak my mind, and am willing to engage in dialogue, even the strained kind. I didn't police you, nor did I silence you. I did call you out on your claims. You're also projecting, so think abt it



1





Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

@gildamerlot I'm sorry that the #CJSystem victimized you. It's what the CJ machine does, and, as criminologists, we're striving to change this culture. Yet, I can't help but ask where are these distorted ideas regarding victimhood coming from?



1



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

@gildamerlot, you don't know what I believe; but tell me more, I want to know.

what are you suggesting to do with this system?

Imagine you're drafting policy. What would be your strategy? What would your goals be? Would you think harm can come to people during change?



1



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

Ok. Interesting. Tell me more @gildamerlot.

What else?

Tell me about consent and coercion? How would you define these?

How would you address harm surrounding violations of consent?

What do you think about restitution?

What about the state?



1



1



This Tweet is from a suspended account. [Learn more](#)



MrsRobinson

@Coyoteri



Replying to [@gildamerlot](#) [@RedCanarySong](#) and 7 others

Research shows that criminalization & immigration laws fuel violence & exploitation. This idea that victims are more important than sex workers is problematic because sex workers are the ones that are easily exploited because they can't report violence without risking arrest

3:44 PM · Jul 30, 2019 · [Twitter Web App](#)

2 Likes



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist

@anarkriminology



Replying to @gildamerlot @Coyoteri and 7 others

@gildamerlot Do you think #HumanTrafficking exists? What about #victims? Can people get victimized, or they just get what's coming to them? What about #coercion? Do you think individuals can frighten others and force them into doing things they don't want?

#Libertarians 🙄

7:13 PM · Jul 30, 2019 · [Twitter for iPhone](#)

1 Retweet 1 Like



This Tweet is unavailable. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

.@Coyoteri perhaps the fact that 30 academics questioned their research methods and practices should concern you. You put down those other academics to validate that so called study. Why can't you find other research to validate your claims?



MrsRobinson @Coyoteri · Jul 30, 2019

Replying to @anarkriminology @BryanKnight66 and 6 others

Because you seem to suggest that we should just discount all their research, when the research has NOTHING to do with the allegations made against them.



1



1



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

.@Coyoteri is at least consistent- this argument is yet another product of the #libertarian ideological clusterfuck of this faction of the SW rights mvmt. Sounds like Alan Dershowitz concocted it, just like that academic rapist apologist blog-post. 🙄



MrsRobinson @Coyoteri · Jul 30, 2019

Replying to @anarkriminology @gildamerlot and 6 others

Excuse me, nobody ever said that there weren't victims. Exploitation is caused by criminalization, in fact, globally sex workers report that the majority of the violence comes from the police. Please review policeprostitutionandpolitics.com



1



1



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

You can't overthrow capitalism by internalizing libertarian ideology. What you are telling me here is libertarian doublespeak. Libertarian ideology is the quintessential free market capitalism, which is capitalism on steroids. You don't know me. At all 😏



1



1



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

So you don't identify as libertarian, but almost everything you say is libertarian ideology. How come?

I don't like to label people, but do you want to be labeled a criminal? Is that what you identify as? Or is it what you were told you were?



1



This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

I don't know about you being a "criminal" but I can see you are a libertarian. I'm going to end this discussion here. I hope one day you'll look back and reflect on your words and choices. I hope you will find happiness and peace. Good luck!



MrsRobinson @Coyoteri · Jul 31, 2019

Replying to [@anarkriminology](#) [@gildamerlot](#) and 7 others

Decriminalization is the only model known to reduce violence and exploitation in the sex industry. Under decrim anyone can come forward to report being exploited without fear of arrest. Criminalization & immigration laws fuel trafficking & give all the power to the abusers.



2





MrsRobinson @Coyoteri · Jul 30, 2019

Replying to @anarkriminology @gildamerlot and 6 others

Excuse me, nobody ever said that there weren't victims. Exploitation is caused by criminalization, in fact, globally sex workers report that the majority of the violence comes from the police. Please review policeprostitutionandpolitics.com

1



3



This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)

This Tweet is from a suspended account. [Learn more](#)



Schrödinger's Criminologist @anarkriminology · Jul 30, 2019

@gildamerlot "persecute"? Are you referring to "prosecution"? This is confusing.

Whereas I agree that often "prosecution" and "persecution" are indistinguishable, I'm not sure I follow your logic here. Are you saying that traffickers shouldn't be held accountable?

1



1



This Tweet is from a suspended account. [Learn more](#)



MrsRobinson
@Coyoteri



Replying to @gildamerlot @anarkriminology and 7 others

They have even locked sex workers out of harm reduction funding, as if sex workers don't count.



Beyond Strange Bedfellows
How the "War on Trafficking" Was Made to Unite the Left and Right
feature.politicalresearch.org

12:26 PM · Jul 31, 2019 · [Twitter Web App](#)

2 Likes

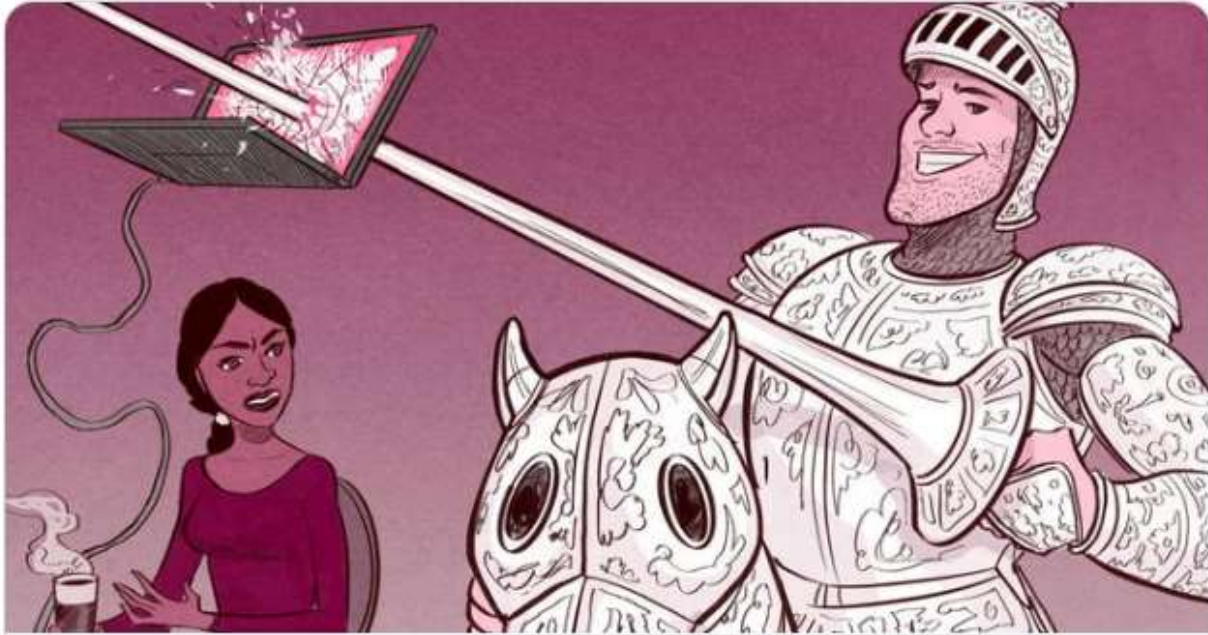




MrsRobinson
@Coyoteri



Replying to @gildamerlot @anarkriminology and 6 others



Sex, lies, and surveillance: Something's wrong with the war on sex trafficking
Silicon Valley's biggest companies have partnered with a single organization to
fight sex trafficking -- one that maintains a data collection pipeline, is partn...
engadget.com

12:26 PM · Jul 31, 2019 · [Twitter Web App](#)

1 Like





MrsRobinson
@Coyoteri



Replying to @gildamerlot @RedCanarySong and 6 others

Block the haters & don't give them the power to suck up all your energy. They are irrational people who can't be educated & they don't care about the health & safety of sex workers.

8:45 PM · Aug 29, 2019 · [Twitter Web App](#)

2 Likes



Bryan Knight (almost) 25K Filwrs! @BryanKnight66 · Aug 29



Replying to @Coyoteri @gildamerlot and 6 others

Yeah but if you don't talk, then they become unopposed and the Echo Chamber Effect goes unrestricted





Bryan Knight 26K Flwrs!

@BryanKnight66

Replying to @gildamerlot @RedCanarySong and 6 others

You are #badass. Keep up the pressure.

9:31 PM · Aug 29, 2019 · Twitter Web App

1 Like



MrsRobinson @Coyoteri · Aug 30, 2019

Replying to @BryanKnight66 @gildamerlot and 7 others

Good Morning

Please share with your networks. Thank You



Soliciting for Change organized by Matthew Marciello

Who We Are:COYOTE (Call Off Your Old Tired Ethics) RI is a grassroots organization focusing on... Matthew Marciello needs your support for ...

gofundme.com



Exhibit "I"

1/26/17, 1:55 AM

Hey

When are you coming to school



I have to provide you with those medicines

hey

aww, no rush

my back actually feels a little better

I finally got my Otezla

Yay!



I told Ric about Naomi

i have been doing situps...and i think in the beginning i was just sore from that.



And the abolitionists

really?



Yeah

what did he say?

I think he was really angry

does she still go to his office?

You know how he gets

did you tell him she records conversations?

His eyes turned like steel

he got that way when i told him about josh

Yeah, I told him that the day after she did it

Yeah

i think that was the first time i saw him that upset

I was a bit scared

makes sense he'd be pissed about naomi

I didn't know Memphis had some girl putting ads up

And Naomi saw that

he has a lot of those lol

I don't think I saw one

I don't think he believes me

I don't know why

It's weird

he who?

Ric

about naomi?

Yeah

I mean, it does sound crazy

But I did what I had to do

yeah

I don't care whether anyone believes me

I know what I know

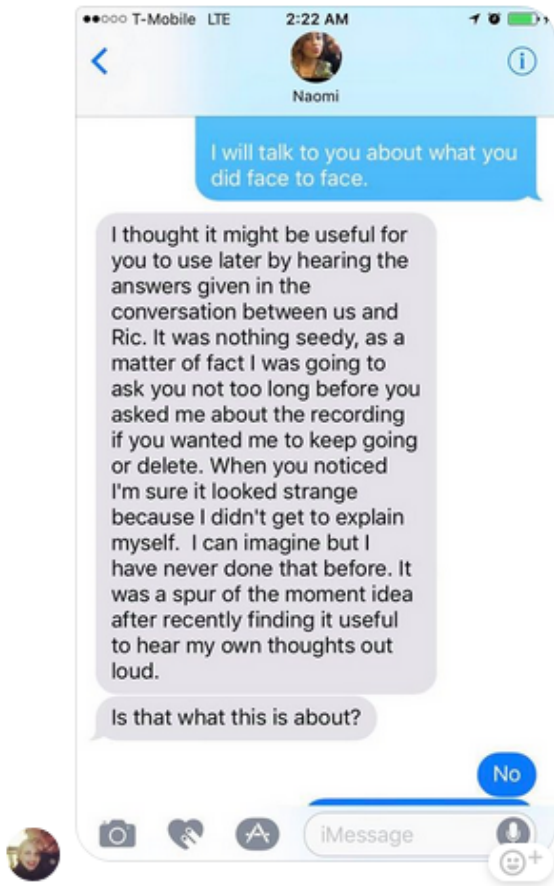
And I never lied to anyone



So yeah

well hopefully he sees for himself





now that he knows he'll be conscious of it

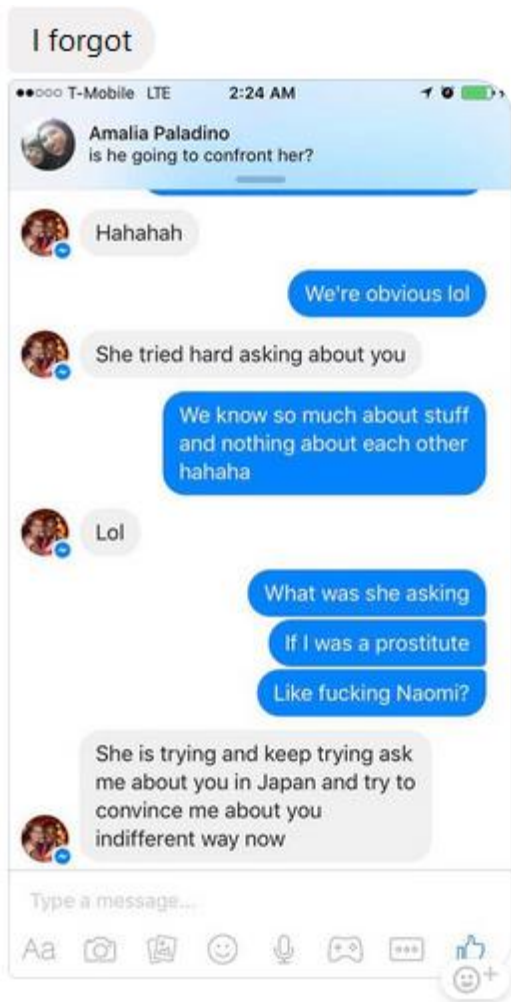
This bullshit

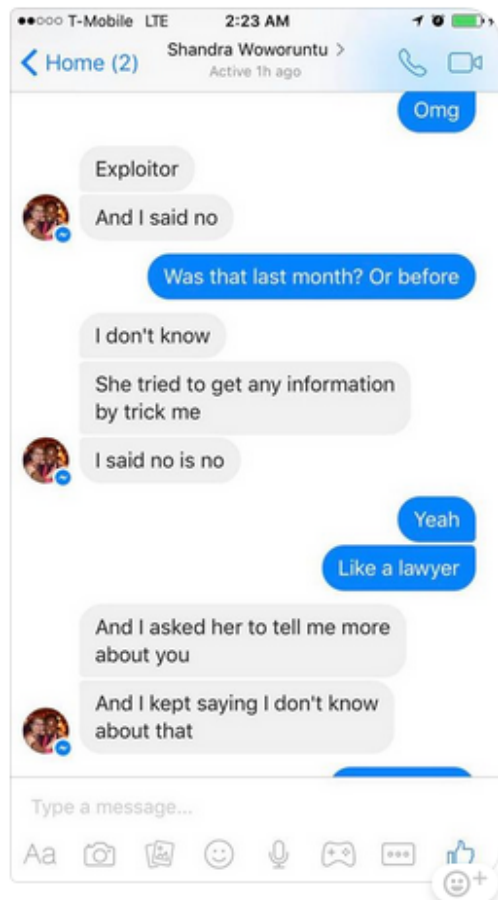
yeah

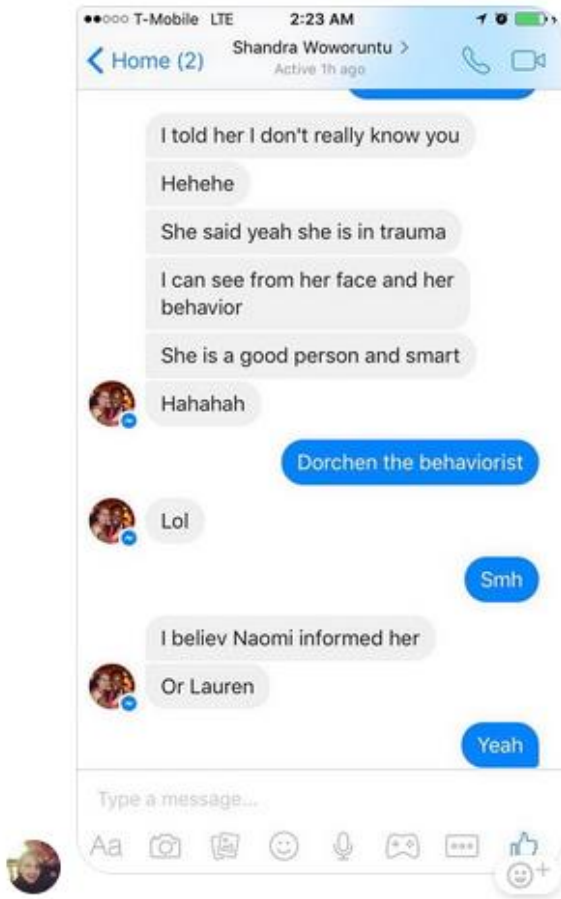
you showed him?

is he going to confront her?

No I didn't show him







she who?

Dorchen
 Dorchen Leidholdt
 Some CATW people
 Lauren and in Lauren Hersch

oh

you should

i mean, that way he believes you

I shouldn't have to do it

If he wants to believe that abolitionist cunt

He can go ahead

i mean it's always good so he knows what she confessed to

otherwise it's like hearsay you know?

if he wants to tell anyone he can say "i saw it with my own eyes"

In my experience, he saw her with his own eyes

He should know

I don't have to

i mean, it's not that he wouldn't believe you. but otherwise, if he wants to share this with anyone else who might be recorded, he can say it's not gossip. people will be more inclined to believe it

if he says "i read that she admitted it"

I texted him that

It makes me so sick



To think about something like that

yeah

Ron warned me

I mean, nobody believes her because she's fucked up

But why do something like this



I can't wrap my head around it

because she's fucked up i guess

to each their own lol

What she did with her fucking handlers at the coalition

I think these people are just like that



They are just full of hate

yeah

don't let it upset you so much...their days are numbered

I am not upset

But when I think about all those years in federal lock up

I am pissed

She was memorizing how to appear a victim

What to say



How to "perform"

yeah

i know what you're saying

Shandra told me Naomi wanted to be a "survivor leader"

Imagine that

Whatever



Fuck her and her delusions

sorry if i'm not more chatty right now...i'm like doing laundry and trying to edit a chapter while talking. i used up my break earlier to work out and spend time with roberto.

How much longer are you going to keep us all in suspense



naomi? a survivor leader?



Yeah

should the person leading be someone who survived?

survivor*

Well, it was going to be like this - i was going to traffic her

Or Ric

Or whomever

And while I was going to prison or whatever, she was going to tell her story of how she fell for my manipulative shit

I can't make this stuff up

Besides, most people in this movement have not been trafficked



I spent these 2 years wisely

you wanted to get incarcerated as a trafficker?

trafficker



Me?

hold on

i think i missed something. give me a second



She wanted to convince people I was the trafficker

right

that's what you said



She told people her and I were in a relationship

haha



In her imagination

believable actually since you guys were around each other a lot i guess

That's what she was scheming

Not really



She wasn't here much

so she wanted someone to pimp her out essentially



Then she said to people I was abusive and I was forcing her to do stuff

i'm pretty sure trafficking doesn't work that way



It does in abolitionists imagination

i guess it would be cool if someone came out and said "i wasn't trafficked. fooled ya!"

and presented evidence of the whole conspiracy

There is

That's why "trauma coerced bonding"

In case someone decided to turn around



Like that porn actress

no i mean evidence of the set up beforehand

I don't know lol



I wish

like, your conversations of setting the whole thing up

i feel like that's perfect



For what?

it would exemplify how easy one can pretend to be a survivor



I was pretending to be her- like what she was planning

and show the process of becoming a sex worker on one's own volition



Aha

albeit for the purpose of proving abolitionists wrong



She was all bent on getting "evidence"

evidence of what



Of me being one of the following- 1)not trafficked, 2) a trafficker or a pimp; 3 a victim turned exploiter

just getting evidence of being pimped out....is not enough....that's like 1/4 of the plan in my eyes to successfully prove the point. otherwise the point of obtaining that evidence is moot



Or that Ric was running a sex trafficking ring

prove the point that anyone can pretend to be trafficked



Well, she was going to fabricate that lol

nah you need to show the whole conspiracy

she's an amateur at research methodology



Well, not to the abolitionists

it doesn't add up ✓

She doesn't know anything about methodology



Ahahaha

why fabricate? ✓

She always fabricates



To get attention

like...unless she was planning on living the life as a survivalist and that's it... ✓

in which case fuck that ✓

She doesn't think that far

Come on

You know the type

I don't know why she does it



Or if she thought she was going to get anything out of it

well...her plan would work brilliantly for our cause...if she added additional steps ✓

and if her purpose was different ✓



Like what?

actually....omg....you can play along and then out her
YES



Hehehe

that's even better
if she actually wants the fame

Do we need IRB



You're so evil

and the treatment...you can prove she 1) wanted to trick them into thinking she was trafficked and 2) she (like many others who may fake it) was able to succeed
and 3) we rule

Haha

I can't

Stop laughing

The treatment

She's the ultimate experiment

Natural one



Of sorts

yeah, i wonder....how far you can go without actually pimping her out

but her thinking you are

this can work

without irb



She knows I am not pimping her out

because it's not research



She wants to make other people think I am

just get that shit on tape



I am not going near her

transcribe it. write up everything after she joins the cult



Ahaha

and then turn it in to the new york times



Someone else can do that. I had enough of her

damn

i was hoping to take some credit for coming up with the idea

I can't waste my time with this lunatic

maybe we can manipulate someone...

poppy

Popy is pissed that she didn't get into Berkeley

unbeknownst to her...we can use her.

Ahaha

oh well...it was fun while it lasted

I will ask my spies at the coalition to record the meetings

She will go and spill the beans there

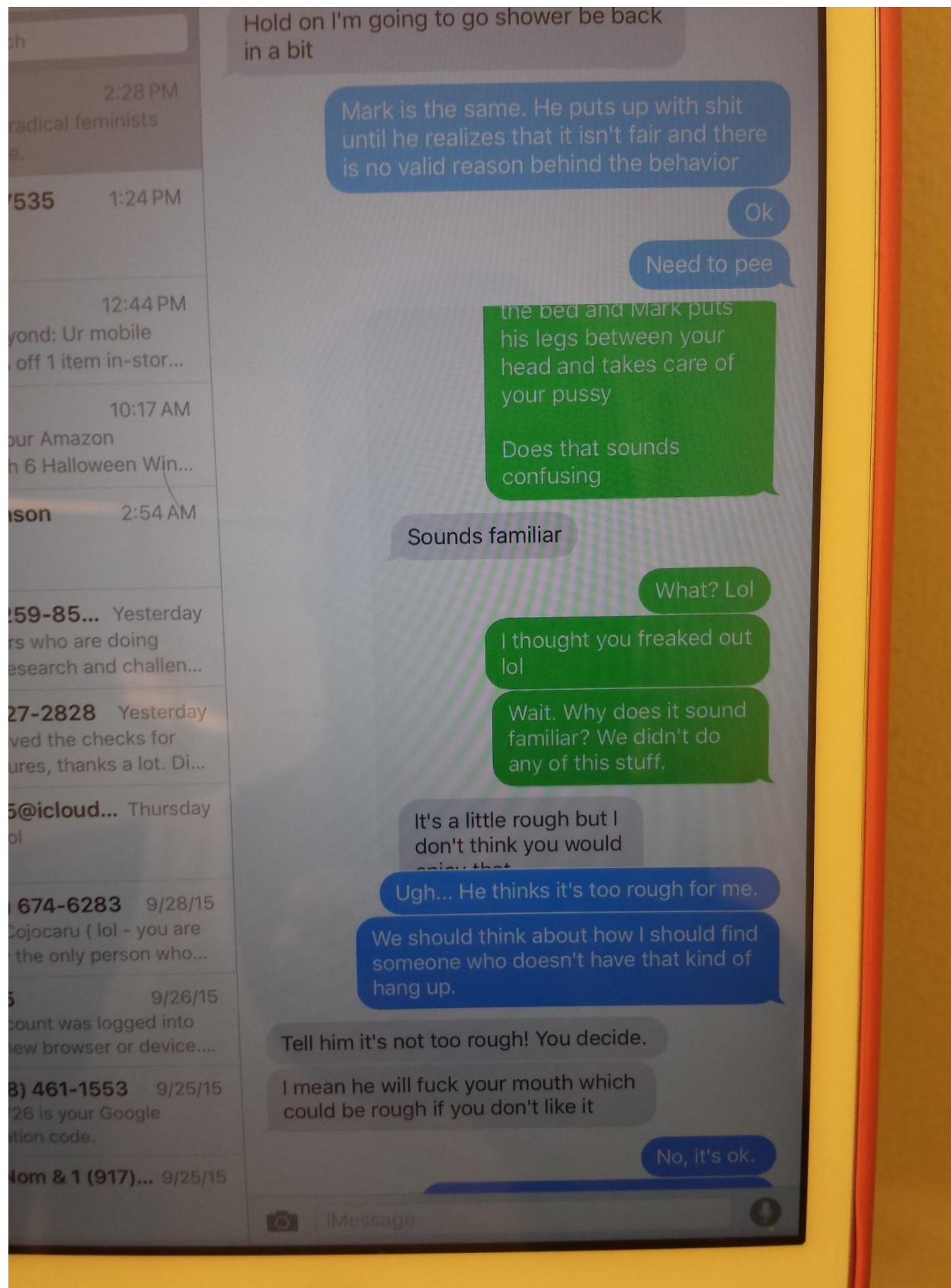
well, to answer your question about when i'll be in

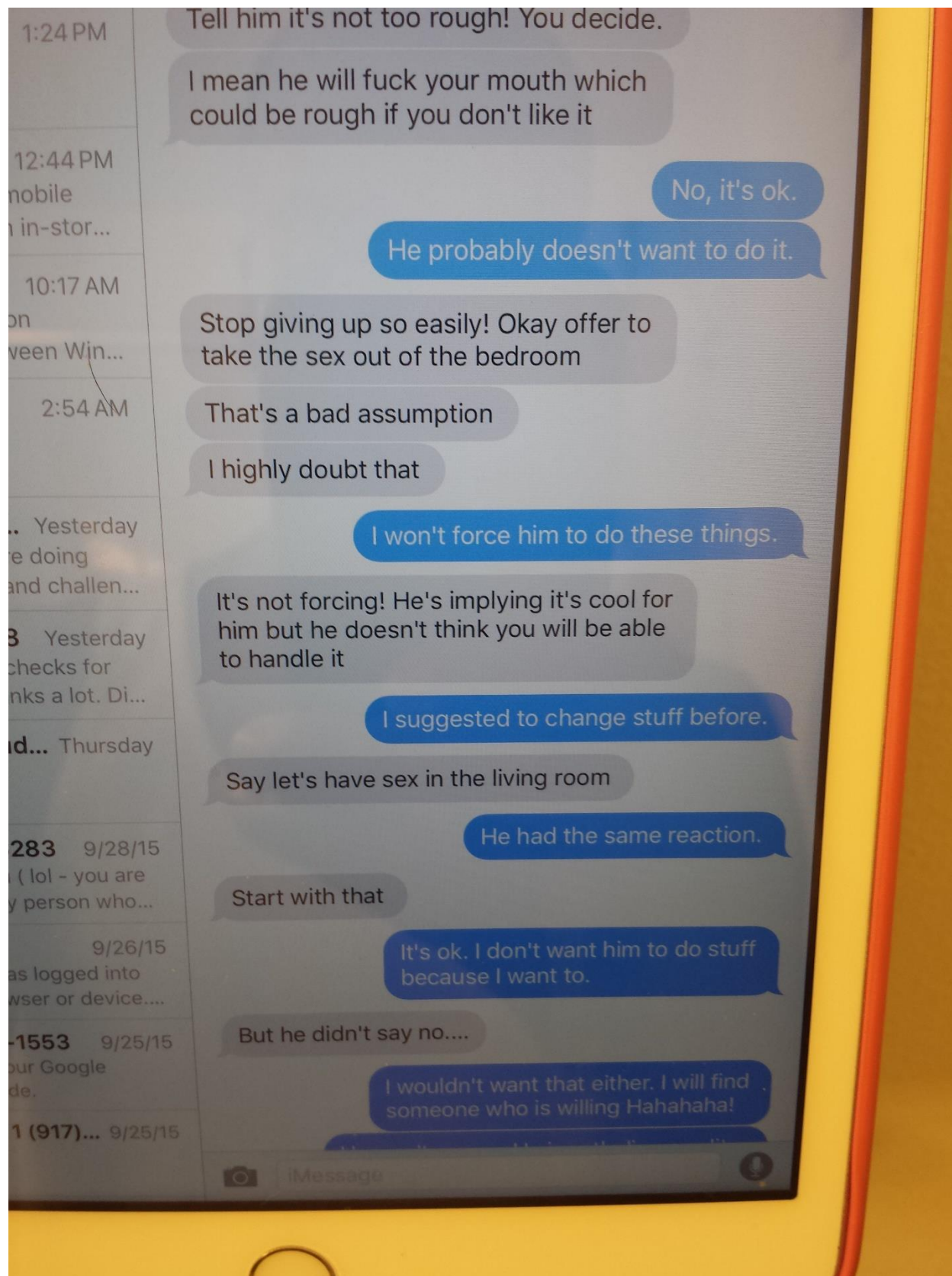
next tues

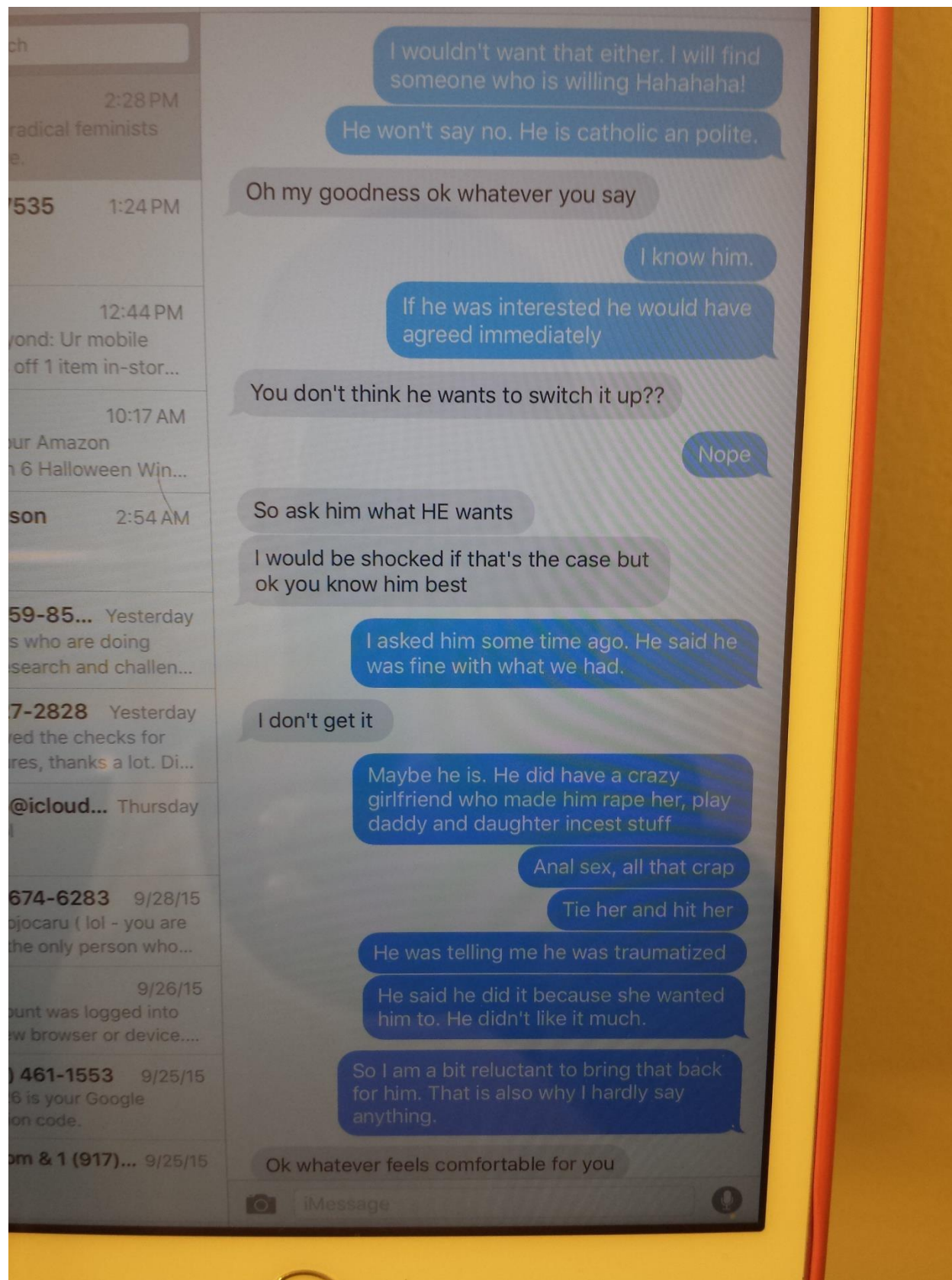
i gotta teach

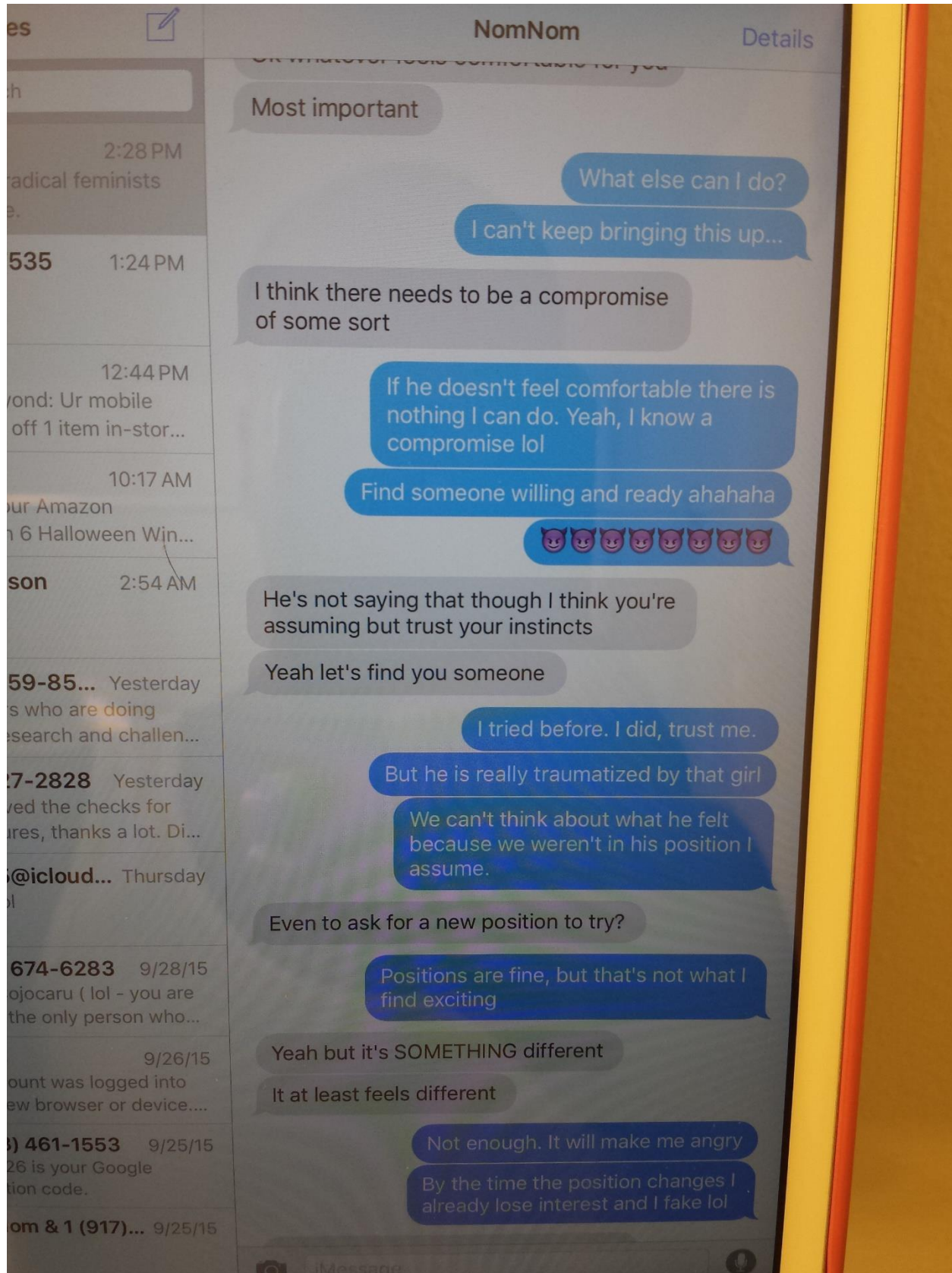
She still owes me money lol

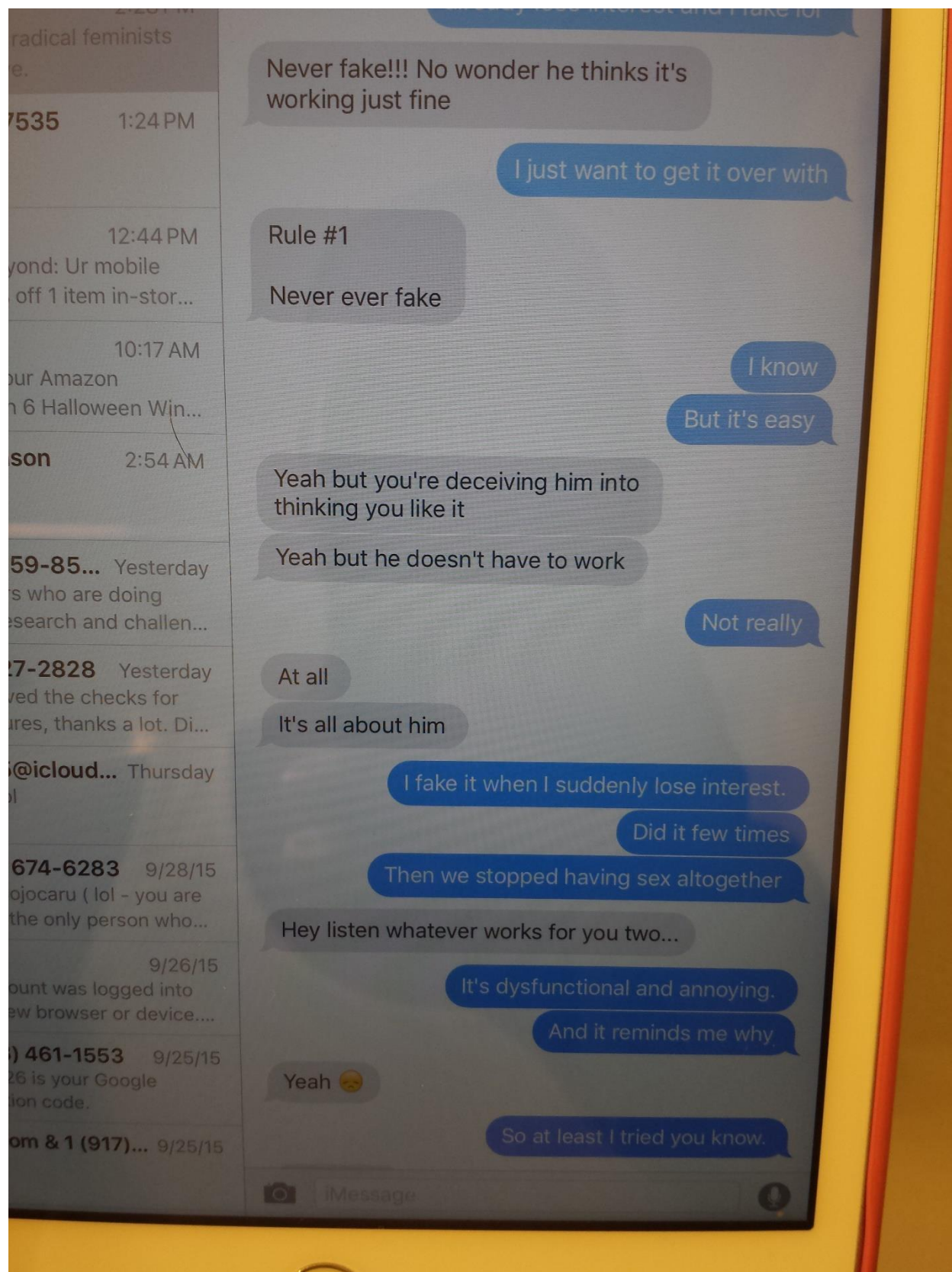
Exhibit "J"

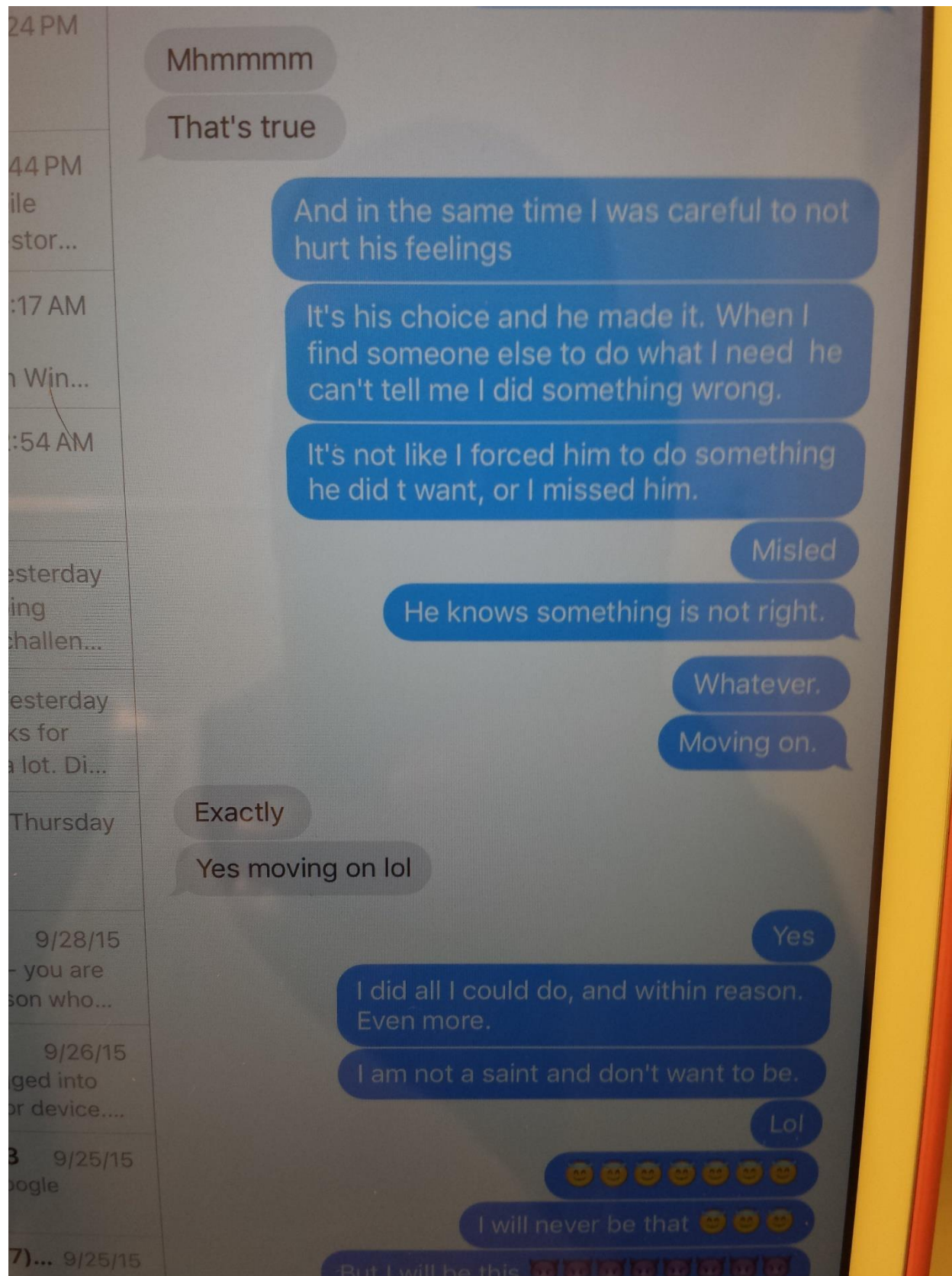


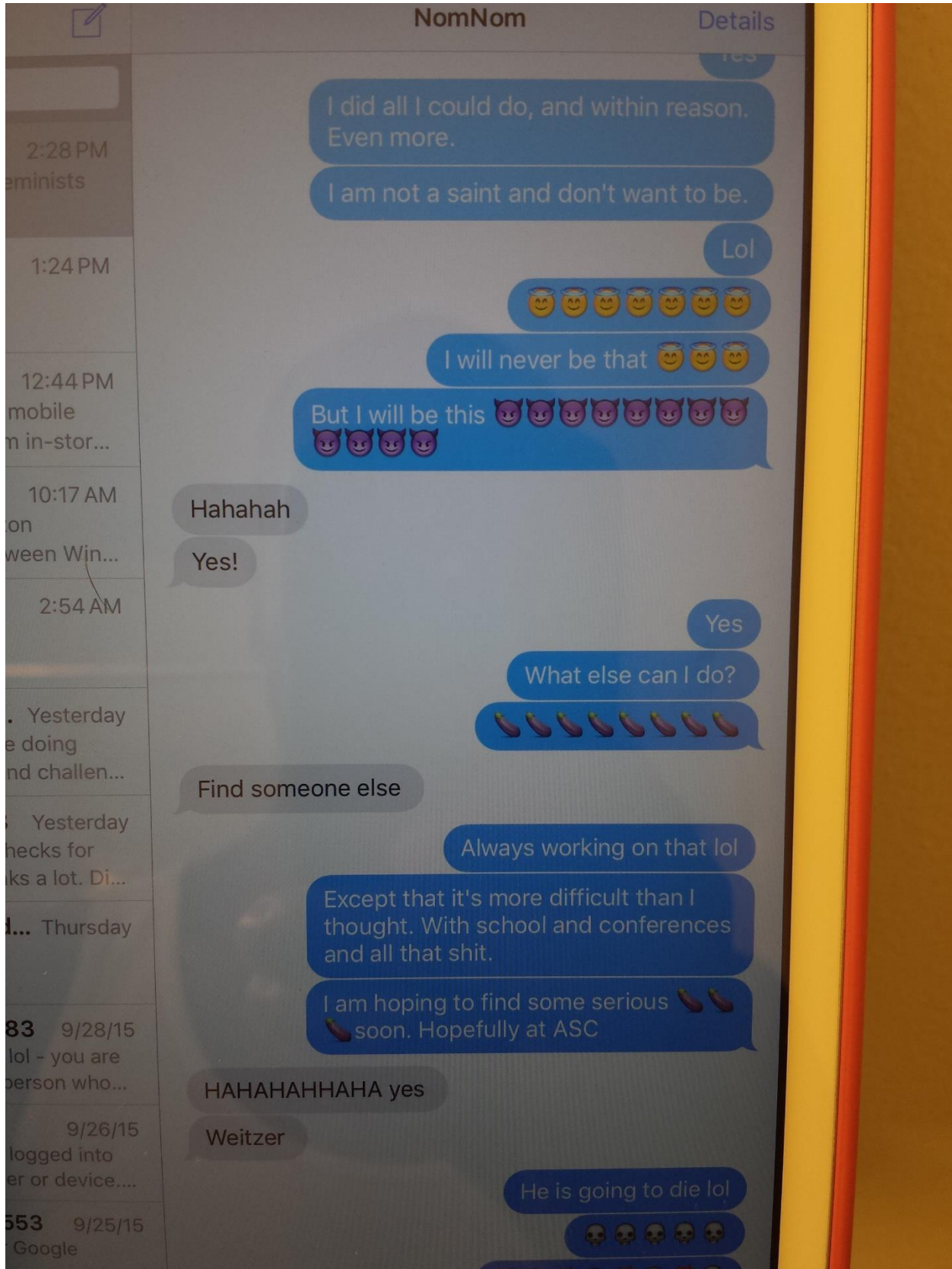


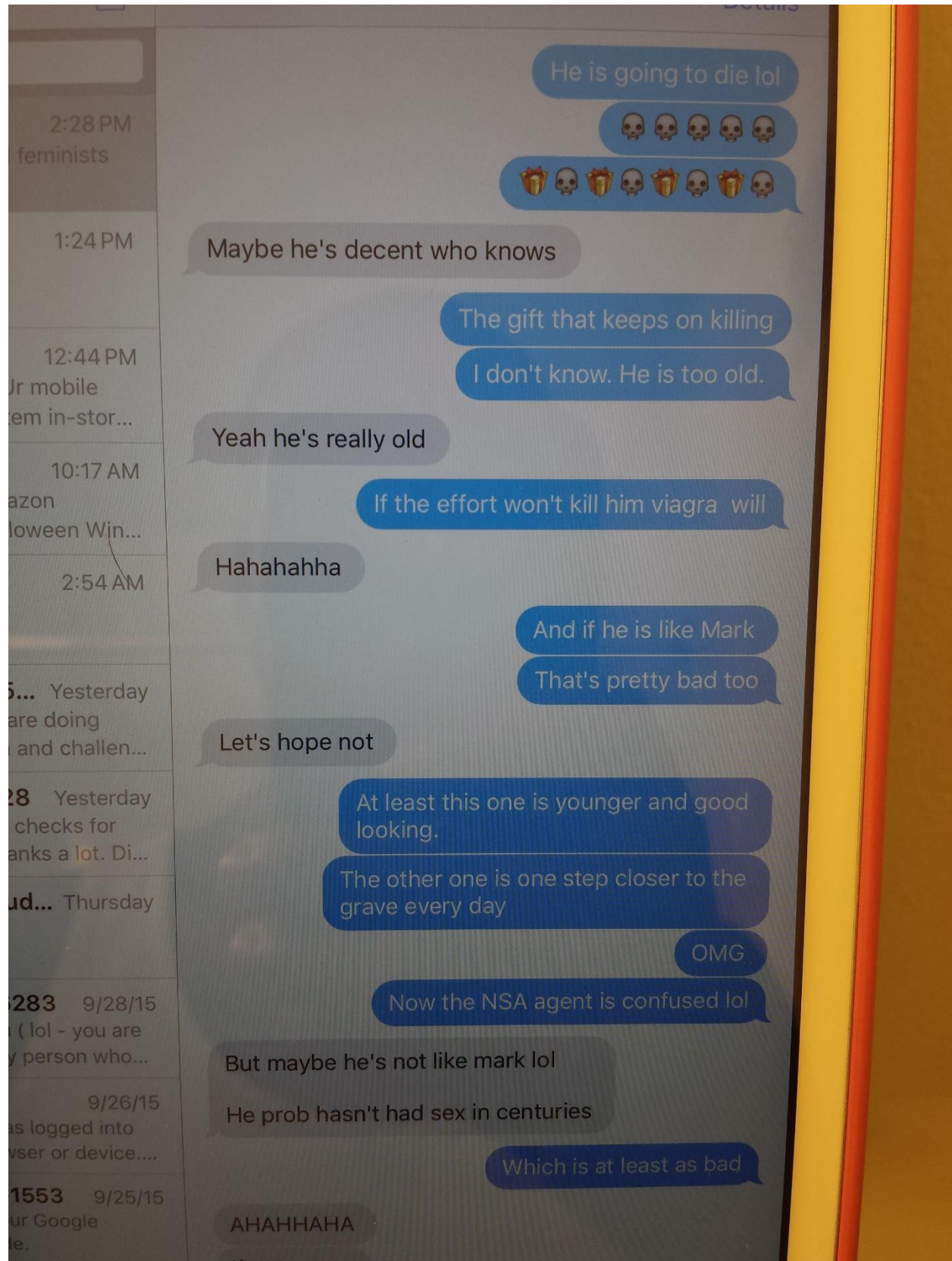


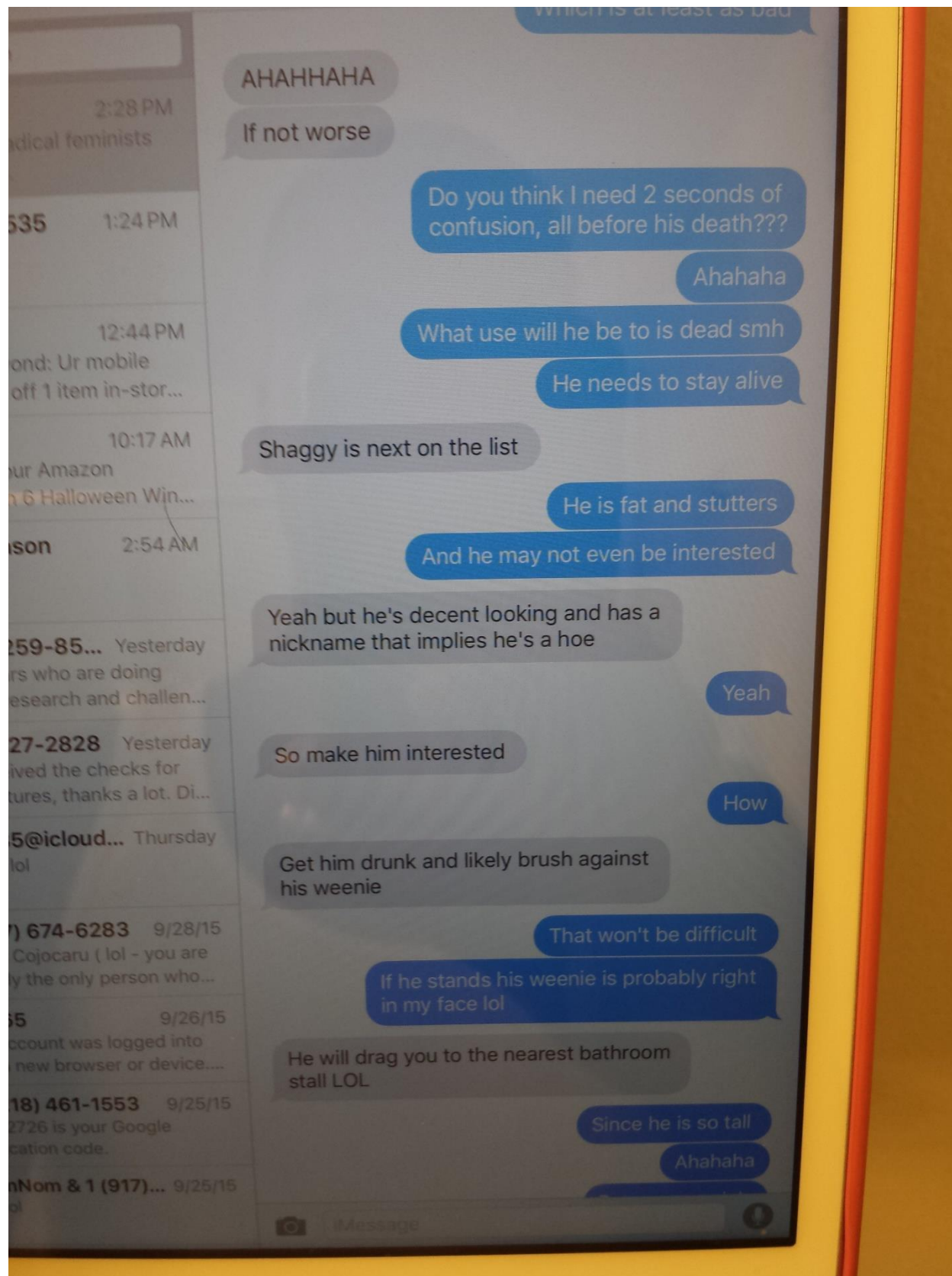


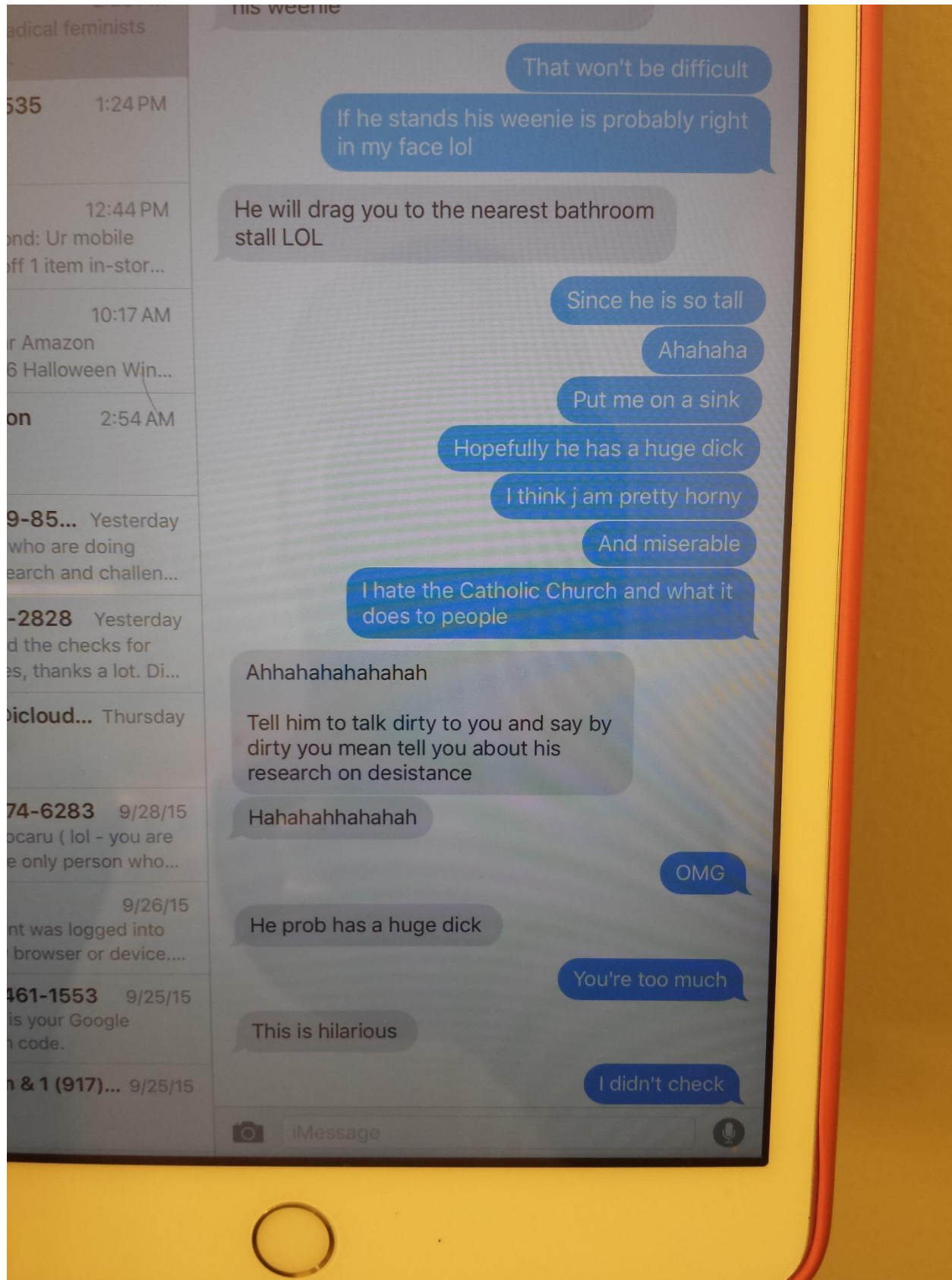












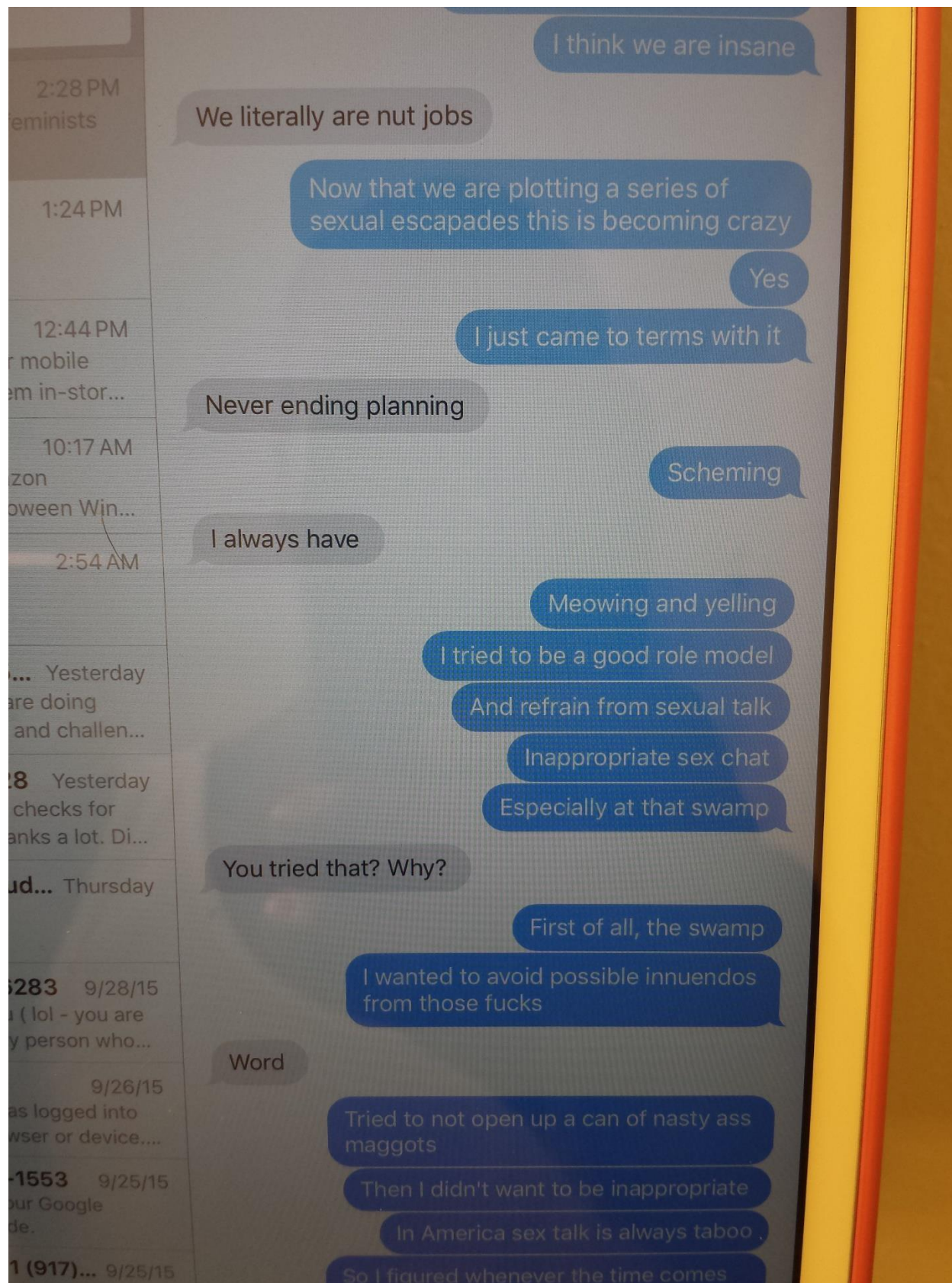


Exhibit "K"

6/18/18, 9:16 PM



A contact is waving at you!



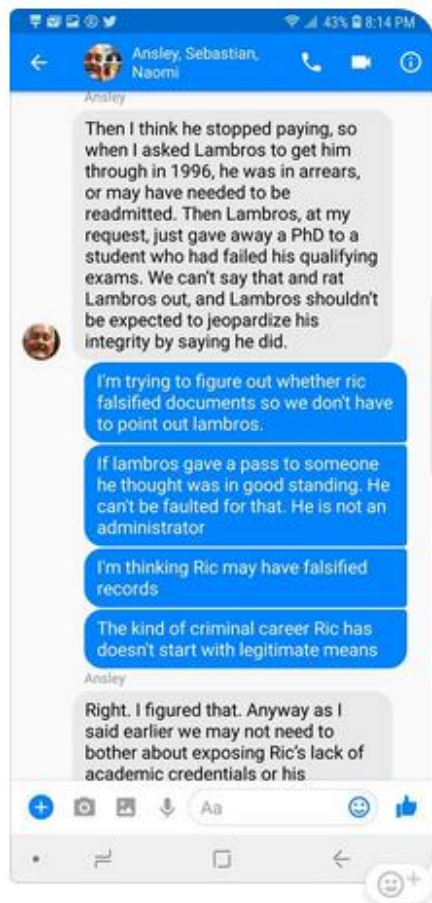
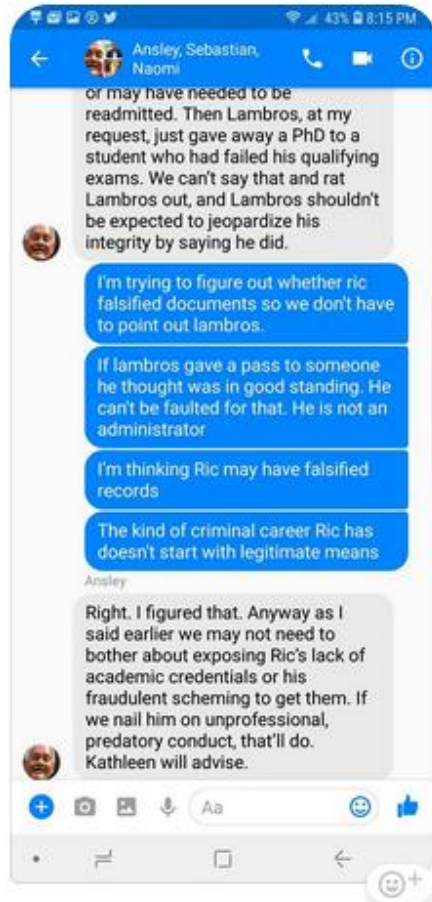
Wave

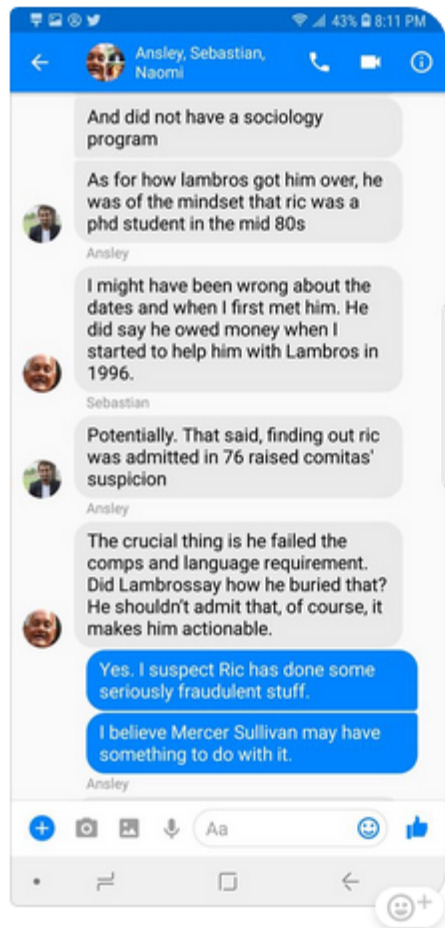


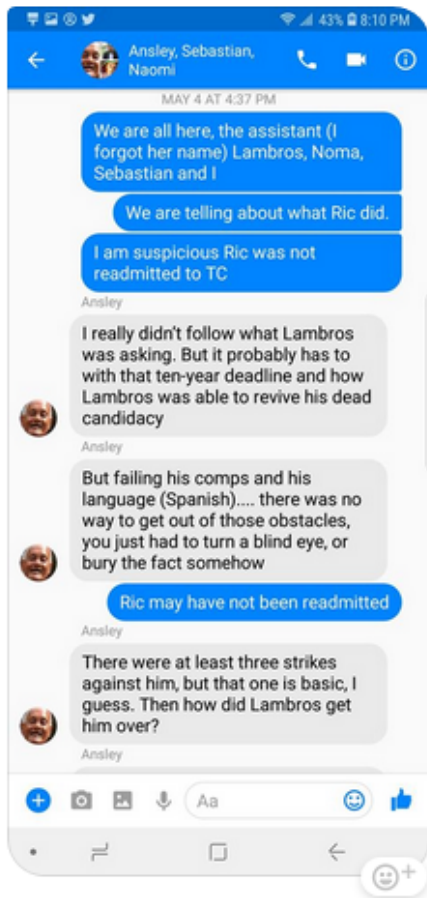
I wanted to tell you that I saw Gabrielle Salfati last week and, as you can imagine, I talked to her about you a little. I know you probably hate me, and want to kill me, but I want you to know that whatever I said, and will say in the future, is because I have no other choice. I did the best I could under the circumstances.



One of the things I wanted to atone for was the fact that I didn't speak up when people spoke ill of you. I feel bad that I didn't even question those people; I only accepted what they said, which was something along the lines "she is unethical" "she puts people in danger" etc. I should have said something, but I didn't. For that, I am sorry.
However, I spent about 2 years digging for information, and I found out something that I believe should give you an answer to why some things are the way they are.









There is a report about the AC study in which you are viciously eviscerated and blamed for a lot of things, and everyone I talked to never questioned why you were made a sort of scapegoat for that. As a RA, why were you suddenly responsible for all the ethical stuff? And if you were the bad guy, where did you learn that from?

Hey i would really appreciate it if you not use my name in any context when it comes to people i have worked with.

i do not want you talking about me in any way. ✓

 I can't. I'm sorry, but that's not a promise I can make.

ok then. please stop talking to me then. ✓


 I knew you were going to say that.

i am asking for a simple favor. to omit my name ✓

this is very disrespectful. ✓


I am not going to use your name in public amalia

I think you should hear me out

 Then you can do whatever you want.

there is no reason to speak to anybody at cuny about me in a way that would implicate any other person. ✓

Maybe I know something and I have evidence of something

 Maybe this is helping you.

i received a random email from salfati today. and if the reason she is emailing me because you spoke to her, then i am disappointed to say the least.

I understand that.



Did you know that many people didn't want to talk to you because they thought you were a horrible person?

i am taken by this, claudia. it's really random and i feel like you crossed the line with our friendship.

It took me a while to understand what was happening.

Please Amalia.

This has nothing to do with our friendship. It's beyond that.



Please, hear me out.

whatever it is you heard, i don't care about it. and i would rather you not try to make things right as you see it, involving me.



There's something horrible I found out

i have a LOT on my plate, claudia. and it's not all work related.

Amalia don't shut me out



I don't care what happens to me, but you had so much shot done to you.

i'm not taking on any quest to find out corruption in the phd program. once out, i'm out. also...salfati seems to think she is still on my committee..

I know. But she can get your dissertation accepted



Ric will never let you leave

and she has no idea i defended. also bizarre. her email was really random.



Yes she knows.

well not according to the email

it's my business claudia

i really don't want anyone involved

please respect that

i feel violated by you



I don't know what she wrote. I was surprised she thought she was on your committe

it doesn't settle well with me knowing that you're talking about me in any context related to the corruption you are accusing ric of



I want you to know that I respect you and I care about you. I knew you were going to be upset, but I took that risk.

i really do not like that my name is being used. ✓

well i want you to prove that ✓

by not talking about me ✓



He is the one who used your name and did the things he did.

otherwise, your words to me mean nothing ✓

i am disappointed ✓



I'm sorry you are disappointed, but as far as Ric is concerned, he has plenty to account for, and I am not going to stop.

and given that you are talking to people affiliated with me, i am even more disturbed ✓

He has done horrible things. You are only one of the people he talked badly about.



I am another one. It's a whole different thing.

well in your quest, you are walking all over me.

you can pursue whatever it is you want to pursue without including my name

I'm sorry you see it like that, but he has walked all over both of us.

Your name won't be used.



I hope you get your PhD and get a good job soon. I really hope so.

you violated the trust i had in you. do you understand that?

i don't need an advocate



I know. I hope this could have done differently, but it is what it is. I hope you can forgive me one day.

and if you want to be my advocate, i would have hoped you first asked me if i wanted that. and then asked to include me or use my name.

you went behind my back.

I know you don't need an advocate. I didn't go behind your back, I didn't want him to know, and you would have told him.



Because you care about him. I don't. He makes my skin crawl and I saw what he is.

well i heard from someone, i can't remember, that you told administration that ric was pimping me out. that's the most absurd thing i've ever heard.

i told you that never happened.



I never said that

well rumors manifest

that's what i'm trying to tell you.



I said ric called you names and discredited you.

and that's why i don't want my name circulating

I said Ric lied about you to everyone, just the way he said about me. Ric tried to pump me and Naomi out



People think you're callous and a criminal Amalia



I only said that it wasn't true, that you are not callous and you are not a criminal. I had only good things to say about you. I don't think you will understand why I did what I did, but maybe one day you will. I thought ill of you at one point, and it was because he poisoned me against you. For that, I am sorry. I don't have his mentality, and I dont have his manipulative skills, but I have a good heart.



You keep saying you feel violated by me, but my question is why you don't feel violated by Ric? Why not by him saying terrible things about you to Popy? Stealing your work to give to popy? Why are these not making you feel violated? Ric doesn't have the right to do this to you, or anyone else. I always had love for you, and will always have. You were my best friend. Obviously, this is not what you think, and it's ok. I did not expect anything else. Take care Amalia.

i wasspeaking to my landlord

i haven't read what you wrote yet

you're gonna have to give me a minute to respond

hold on

i'm juggling a lot at once right now



What is going on

Take your time. I'm here.

nothing

hey i'm not trying to cut ties with you. you came at me with all of this suddenly and while i don't agree with you, i dd' want bad blood between us.

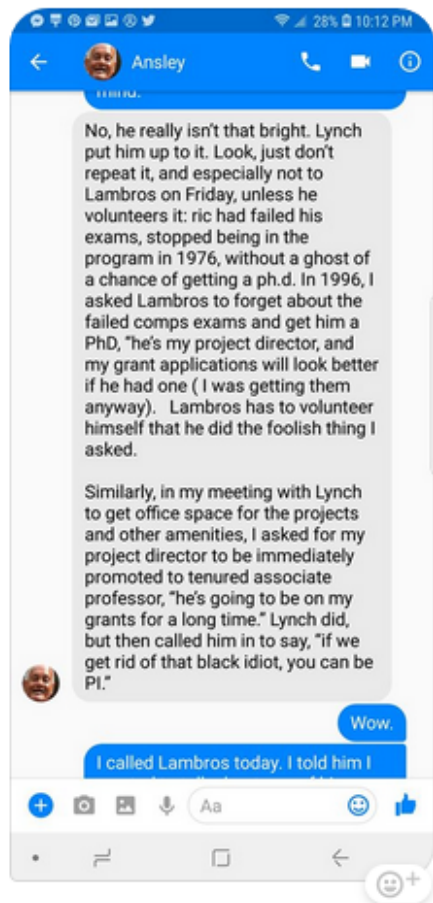
don't*

why i do or do not trust ric should not be of any concern. to anyone. i have not seen any proof of the things you say



Thank you. I'm not trying to end the friendship either

and he has actually vouched for me many times.



Do you know who this guy is?



Ansley Hamid

no

i really don't care about how ric got his phd

or didn't get his phd

i'm sorry



It's all good

it really doesn't bother me



It bothers me though. Among other things.

i'm not trying to make it seem like i'm brushing you off...but i get way more concerned about my shoes getting wet in the rain than that



How can you have a PhD dissertation supervisor someone who doesn't have one

there's dirt on everyone



Amalia

all i care is that i get mine



In trying to help you get your PhD

and i know i earned it

Yes



You more than earned it

Yes



You more than earned it

you don't understand that i'm voluntarily making changes

like...it was incomplete



Your dissertation has 5 dissertations inside

because i made so many changes at the last minute

i know lol



You have so much stuff, you can sustain 12 years of research.

it's my fault



Salfati said it's too long

i can write papers and publish them...but if you don't give me a page limit...i'm never finish



She wants to help you get your PhD asap

she hasn't even read it

she's quant

She said it was long.



Yeah. But she knows you're good.

she wats it to be 200 pages

no.

she's also not on my committee

And she said she was sick a few years ago



Can you get her back on?

i love her. but she doesn't do this kind of research

Amalia, I think ric is jealous of you

Just talk to her please

She cares about you



Please

no, maybe i'll talk to her to potentially publish with her...



Amalia, salfati is good to have on your side

claudia....i don't think you know our relationship that well to say whether she does or doesn't

this is overbearing. please respect the boundary.

I'm only telling you what she told me. I have a relationship with this person independently



She was my professor too, and we kept in touch constantly.

Alright. I guess I did my best to but I see it's not welcome. You do want you feel it's best for you. I can't do more than I already did.



You seem to be unaware of what I actually do or who I am. You still think I am that I am a lost person, traumatized and lonely, in need of help, like Ric likes to cast me. I have never been that person, quite the opposite. In addition to that, I have my own work and my own research is said to have shifted paradigm. I'm not one to shove that in anyone's face, but I am not a certain that I was clear enough on this aspect.

i have to get off facebook right now and do work. won't ignore your messages but i'll have to get back to you tomorrow. i really don't want any drama in my life right now. i'm not saying that you are drama...but dealing with something like ric's phd and anything that arises from my name being used would equate to drama. you may not use my name negatively, but rumors spread and get distorted.

i never said those things about you



The rumors were spread before I defended you. It's ok. I won't bother you again.

i don't think you're all that



I'm sure you don't I, but that doesn't matter. It matters that others do.

you can't control what others think

just let it go

the anxiety isn't worth it

I'm not anxious. I have no psychological issues. I am simply righting a wrong. I just happened to have stumbled into a whole different world while doing it.



So I solved a problem. Unfortunately, the problem happened to have multiple layers and it made more ripples than I expected. For that, I am sorry.

i'm way more enraged about kids getting separated from their parents at the border than i am about anything else. so long as i treat everyone with respect, they will at least eventually (if not right away) see that i'm not a threat. and those who would want to exploit me will eventually realize that they will lose.

people like that always trip on themselves



It was never my intention to bring attention to you. Your relationship with Ric is your own, but he said and did things beyond my capacity of forgiveness.



Not just about you, but mainly about me, and a few others. I will never allow Ric, or anyone else to use me to justify that shit Atlantic City study. I will never allow my work to be plagiarized and used to advance a mediocre con artist's career. I will not be silent about Ric's attempts to sexually harass me, or make me get into a threesome with him. I won't allow that.

the atlantic city study itself was not shit. we did good work.



If you are comfortable with being part of that, it's ok. I am not.

That's not what I heard.

whether or not the publications did it justice is another story



I don't know I wasn't there.

i mean there was an entire effort by the gov't to shut it down



The publications were bad.

when we weren't finding what they wanted

that was known 7 years ago

8



I saw the documents

holy shit

8 years ago

Yes



8 years ago

that was before naty



Yep

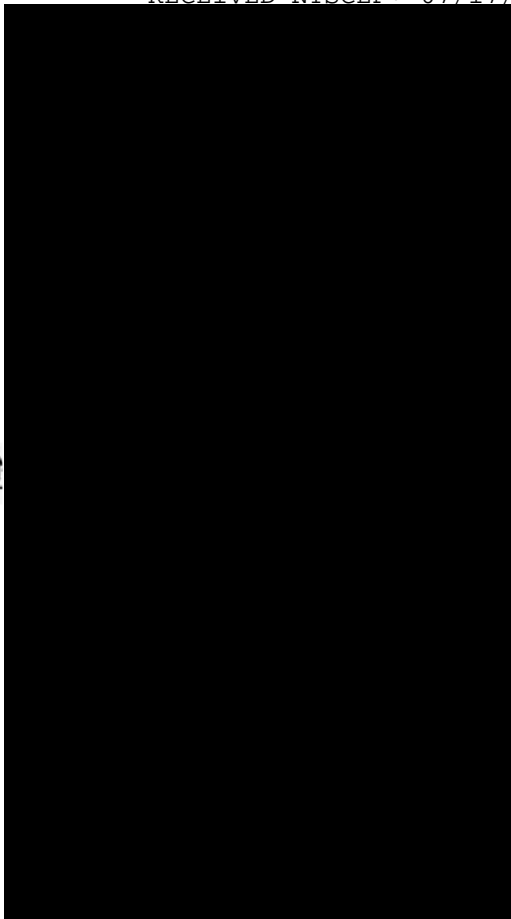
and [redacted] issue

oh man...if i knew then what was to come

You were smart



You didn't publish much on that stuff



Wow

her gymnastics recital was 80s themed

she's 5



GIPHY



i feel like my job on earth is done lol

She's so beautiful

she's a huge 80s fan

Its just starting

and loves rock

and is weird as fuck

Well, just like you

Lol



Why is she weird?

like goofy weird

really interesting personality

so fucking smart it's scary

yesterday she said, "people are disrespecting me"

i'm like what??????

she was talking about my sister and joey not playing with her

they were talking

lol



She is so smart



anyway.....my only concern in life right now is her



You did a good job.

so...understand i can't take on more right now



You and your mom raised her right.

my mom did a lot

and [REDACTED] (her other grandmother)

and [REDACTED] too

I know. I am not asking you to.

How's [REDACTED]?



You had a lot

she's great. a couple years clean.

from heroin that is...she smokes pot occasionally and moderately goes out with friends



You probably still have. I am not trying to fuck your stuff up, but I had to take that position on Ric.

she made a 180



You all helped. This is important.

like...she still has issues....but it's not nearly as bad as before

methadone was a life savor

I'm trying to help naomi

and honestly....ric helped a lot with that situation. he helped me get through it.

She had a couple of horrible years. She was unrecognizable

which is why i give him the benefit of the doubt and won't saying anything about him without evidence.

I don't know... he got something out of it.

I don't want you to say anything about him. I don't care what happens to him. I have enough evidence

I know what he said to me about you. I know what he did. I saw him/heard him saying stuff to [REDACTED]

So much nasty shit.

well this is why i don't sleep with advisors/professors...i can avoid drama. integrity is a great feeling.

I never slept with anyone like that.

But Pitt said you did

Popy

so did every other hater.

Ric said that too.

in his dreams

ad he'd be implicating himself if he spread that rumor around

I don't know what he gets out of this. It is sickening he says these things

so

He told me

I dont spread rumors.

Popy did





Yep

alright i gotta get going



Ok.

drink some tea. watch a movie.



I'm sorry it happened like this

hey have you seen Dark?



I'm fine.

i think you'd like it

on netflix

it's fuked




I have been planning this for 2 years.

fucked




Stop then watching scary movies lol


i love it ✓
anyway ✓

 Its the one with the atomic stuff

i finished the season with roberto. if you haven't een it....do it ✓


 I saw some

yeah ✓

 Are you and Roberto good

it is slow in the beginning ✓
gets better ✓
yeah we're fine ✓

I saw up to the part where this kid gets home in a different time

 I'm happy to hear that.

lol that happens throughout the whole series ✓

like several times



Are you sure you dont want to sue john Jay lol

different people



Just asking lmao

no i'm good. hopefully i get arrested by ICE so i can sue the government



That would be me

i will not let them question me



Popy reported me to ICE

shit. will. go. down.

but you're legal so don't worry

"legal"

you're a "legal human"

ugh

i hate the terminology we've come to use

colloquially

anyway sleep well

Yeah

She doesn't think



AMD she is hateful

you will always come across people like that

don't bother with them



You know she deleted the email for rec letter from a PhD program I applied to

unless they're the gov't

She is a terrible person.



The gov't is a mess

hey i really gotta go. take care ok



You too

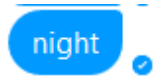
and remember.....avoid my name. i will not like that. i'm trusting you again...please respect that boundary.



I don't have any reason to use your name

ok good

thanks



Night

6/19/18, 3:16 PM

<https://www.thedailybeast.com/defense-contractors-cashing-in-on-immigrant-kids-detention>



Defense Contractors Cashing In On Immigrant Kids' Detention

A scandal-plagued company that used to work for the CIA is poised to profit off the influx of

thedailybeast.com

It's been a while since I sobbed uncontrollably. I listened to those recordings of the children begging for their parents.



Hurting kids makes money for some people.

Exhibit "L"

Question  Inbox x**Amalia Paladino** <amalia.paladino@gmail.com>

Sun, Jul 13, 2014, 9:16 AM

to A.M. 

btw!!!! after the game I will send you what I write for the analysis. Can we clarify the themes first in writing just so I make sure I don't deviate in any way? These are the themes I have in my notes that are relevant to my interviews:

- dilemma in interviewing "current" or "recent" victims of violence--safety concerns and suicidal behavior.
 - the violence wasn't pertinent to sex work, but rather intimate partner violence. what do you do if they don't accept your help? since it's a domestic matter, it's harder to justify intervention (compared to CSEC and exploitation by pimps). this actually brings us to another interesting discussion. how public and private spheres merge...when the pimp is the boyfriend/facilitator. there are more "emotions" tied to the "perpetrator" so the "victim" is less likely to accept assistance--typical domestic violence scenario. this kinda goes hand in hand with your first analysis on mama i think...is she the savior or the exploiter? maybe this theme can follow.
- is naivety the same as victimhood/constrained agency??
 - interviewing youth who are perfectly happy being in sex work and are overly enthused....but seem naive. here i would bring in those two young girls from AC. one of them was wearing the clear parka and was in her underwear, barefoot. the other talked about how much her "bf" loved her, all the while he was really her pimp and had other girls. she was clearly being played. the two girls talked about their tracks and where they were going to work that night. after one finished the interview she went and bought alcohol and brought it back to the car. she and her friend drank it and mentioned how they were going to use the money they earned to buy clothes for the stroll. what do you do as a researcher? i did nothing since it was all post-hoc and technically out of my hands.

Tonight/tmw i'm gonna work on writing these up. please let me know about the themes. i would hate to spend this precious time writing stuff that can't be used!!!!

cross your fingers for Argentina!!!!



A.M. Horning <a.m.horning@gmail.com>

Sun, Jul 13, 2014, 1:21 PM



to me ▾

Hi Amalia,

This looks good! I am cobbling some of the analysis together. We'll edit lit review again after we write analysis. I edited the Bakhtin section (based on original). I'll send you my new version, with accepted changes, Bakhin updated and some new analysis before the game.

I am doing a little dance for Argentina right now!

~A



↩ Reply

➡ Forward

Re: chapter (This one)  Inbox x



A.M. Horning <a.m.horning@gmail.com>
to me ▾

 Thu, Jun 19, 2014, 3:45 PM   

Hi Amalia,


I just made a few minor changes.

~A

Amber Horning, M.A., PhD student
John Jay College of Criminal Justice, CUNY
899 Tenth Ave.
NY, NY 10019
USA



Chapter_Walking the tightrope.docx



Walking the tightrope: Ethical and moral issues doing fieldwork with underage **and young actors in US commercial sex markets**

By: Amber Horning¹ and Amalia Paladino²

¹ [Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice, Social Networks Research Group, 619 W. 54th St., 7th Floor, New York, NY 10019, USA](#)

² [Department of Criminal Justice, CUNY Graduate Center/John Jay College of Criminal Justice, Social Networks Research Group, 619 W. 54th St., 7th Floor, New York, NY 10019, USA](#)

1

Page 1 / 8

Chapter_Walking the tightrope.docx

Open with

Abstract

In this chapter, we explore how we traversed the carnivalesque atmosphere (Bakhtin, XXXX) of underground sex markets, including its horrors. There is an academic debate about whether youth involved in sex for pay are inherently commercially sexually exploited due to age-related constrained agency (Dank, 2011; more). We discuss the overt and hidden dimensions of this constraint, which manifested during the countless hours of observing and interviewing these young people. We explore walking the moral/ethical line of doing research with young participants and the dangers involved in near missteps, and the social and cultural processes involved in these scenarios.

The scenarios in this chapter were derived from three separate studies, one in Atlantic City and two in New York City. The first study involved participant-observation and interviews with underage sex workers in Atlantic City, New Jersey from 2010 to 2012. We interviewed more than 150 sex workers between 16 and 24 years old. The second study involved 85 in-situ interviews with pimps/traffickers in Harlem, New York from 2011 to 2012. The young pimps worked with similarly aged sex workers, often legally classifying them as traffickers. In a third study, female and male-to-female transgender street sex workers, many of whom were young, were interviewed in New York City from 2012 to 2013.

[We can fix this last- adding themes etc.]

Introduction—Colliding Contexts

Often, outsiders construct the social worlds of sex workers, pimps, traffickers and the trafficked as spaces where sexual activities are transgressions, relationships are destructive and the usual behaviors of these social actors are deemed morally questionable, and wrongly.

2

Page 2 / 8

Chapter_Walking the tightrope.docx

Open with

celebrated. Mikhail Bakhtin discusses the notion of Canivalesque, which signifies one's world being upside down. As characterized in Ben Jonson's Bartholomew Fair, the "fair" is a space that epitomizes the concept of Bakhtin's world "turned upside down," as it is a place where "extreme behaviors" and "social disorder" are permitted and encouraged. The fair is an escape from the social constraints of law and order with nebulous rules and regulations. In this social sphere/environment, individuals are essentially liberated and given a license to violate societal norms and behave contrary to their "normal" selves, "violating social boundaries and revolting established law"; the unusual is not only usual, but is also celebrated. To an outsider, it's "a confusing and chaotic place." The world of social classes becomes disrupted, as there is the "blurring and crossing of social boundaries"; regardless of class, individuals can speak and interact freely with one another and social positions are inverted: "The elite become the low and the low become the elite." In the sex trade, schoolyard peers can be pimps, boyfriends can be daddies, strangers can be mommies, wealthy clients can be friends, and social networks can equal dollar signs. Most of us unknowingly live in other variations of "worlds upside down," but the exchange or benefit of money or goods for sex is often illegal, and so this fair is viewed by outsiders as a space where legal and moral realms are distorted, and even perverted, and the legal realm is distorted. Criminal behavior is either condoned or tolerated and there is an absence of punishment. "The fair, then, is a place where rules and regulations become increasingly nebulous. [This is good, but we should emphasize the normalcy of it all].

The public discourse about sex workers rely on tales of exploitation and rescue narratives and these are touted as prototypical (CITE). When underage or young people are engaged in the sex trade, for many, the fair takes on a grotesque or horrific quality, with fun house mirrors being scary, bogeymen becoming real and all signs pointing to imminent danger. In the United States,

Page 3 / 8

Chapter_Walking the tightrope.docx

there is a bright line cultural rule that sex workers under the age of 18 lack agency (Horning, 2013). In Dank's book, the *Commercial Sexual Exploitation of Children*As researchers and outsiders, our positions can be neutral (XXXX preferred by some) achieved through constant reflexivity, she argues that the majority of underage sex workers are commercially sexually exploited, despite voluntarily engaging in sex work, and so they should never be labelled as independent entrepreneurs. Her reasoning is that their personal agency is constrained by socio-economic status and traumatic family backgrounds. Dank admits that some participants countered this discourse by portraying "themselves as in charge of their own destinies (2011:55)." She argues that their assertions of agency are the result being so damaged that they are "eager advocates of their own exploitation (2011:55)." This is a normative cultural position held by the public and many scholars and is derived from the well-meaning idea that young people should be afforded special protections because of their disenfranchised status of being young; however erasing agency may have unknown deleterious effects.

The delineation between adulthood and childhood is arbitrary, with the difference between a 15, 16 or 17 year old and an 18 year old being difficult to discern, and some arguing that in Western societies the young experience a prolonged childhood (Arnett, 2000, Baumeister & Tice, 1986; Cote, 1996; Cote, 1997; Demos & Demos, 1969; Kemiston, 1972; Lapsley et al., 1985; Muus, 1996; Neugarten, 1996; Schlegel, 1996; Shanahan & Porfeli, 2005; Weisfeld, 1979). Legally, young people in New York and New Jersey are disenfranchised because like most adolescents in advanced industrialized nations, they are required to participate in school (until age 16²), have an adult guardian (until age 18²), are barred from institutions such as full-

²School attendance law varies by state. In New York, minors are required to be in school until 16 unless state requirements for early withdrawal are met. See, for example, "Age range for compulsory school attendance and special education services, and policies on year-round schools and kindergarten programs," National Center for Education Statistics (retrieved October 2013): http://nces.ed.gov/programs/digest/d08/tables/d08_165.asp

4

Page 4 / 8

Chapter_Walking the tightrope.docx

time labor (until age 16²), marriage (generally until age 18³), and many adult venues such as bars and nightclubs where alcohol is served (until age 21⁴). These prohibitions influence their everyday social activities that in turn shape how they operate and survive in licit and illicit spheres, with their initial constrained agency often being derived in licit worlds.

We, as researchers, engage in studies with human subjects. The IRB sets forth protocols to protect participants, especially the young, with a focus on their voluntary consent, symbolic understanding of consent, and understanding the risks and benefits of their involvement in studies(CITE). With most studies, researchers are obligated to report imminent danger and respond to other “red flags” in participants’ accounts. With this vulnerable population, the IRB generally requires special ethical/moral protocols to provide assistance in cases where the young are thought to need assistance or at least connect them to appropriate organizations. In ethnographic or in-situ studies, with those engaged in sex work or those who are trafficked, the most obvious areas to pay attention to are forms of exploitation, such as force or coercion. [a little more here]. However, generally identifying coercion is a murky task, and even murkier in light of constrained agency. This is compounded by the local contexts of a “world upside down,” and by regional contexts that confine the young to a disenfranchised status (Cote & Allaha, 1996). As researchers investigating this population, who do experience particular vulnerabilities in illicit and licit spheres, we walk the tightrope. In order to avoid missteps, we are careful to keep

² Federal and state laws regulate parental obligations and rights, but most states generally require adult legal guardians until age 18, with some exceptions. For an overview of these laws and regulations, see Jean Pardeck’s *Children’s Rights: Policy and Practice, Second Edition*. New York: Routledge, 2006.

³ Federal law regulates labor. See, for example, “Minimum Age for Employment,” New York State Department of Labor (retrieved October 2013): <http://labor.ny.gov/workersprotection/laborstandards/workprot/schlattid.shtml>.

⁴ State law regulates the marriageable age, which varies between 16 and 18 in all states, with some exceptions for minors below 16. In New York, minors between 14 and 16 can get married with written consent from a parent and judge, minors between 16 and 18 can get married with written parental consent, and individuals 18 and over can get married without parental consent. See “Information on Getting Married in New York State,” New York State Department of Health (retrieved October 2013): <http://www.health.ny.gov/publications/4210/>.

⁵ While minors can access nightclubs and similar venues that are organized specifically to include all ages, they cannot drink alcohol or access bars until age 21, since federal law regulates the U.S. drinking age. See National Minimum Drinking Age Act of 1984 (21 U.S.C. § 158).

5

Page 5 / 8

Chapter_Walking the tightrope.docx

our balance despite the confusion of colliding worlds with our responsibility to adhere to IRB regulations set forth to protect and our moral obligation to assist.

a. Literature on ethics in ethnographic work—Speaking with Ethnographers (Sandberg and Copes, 2013). How do IRB protocols mesh with the realities of in situ and ethnographic fieldwork? How do we maintain ethics/morals and stay on the tightrope?

[Amalia can you feel in some of the details about IRB standards for this para?]

Methodology

a. We explore how we traversed/crossed paths with the carnivalesque atmosphere, or “world upside-down,” of underground sex markets, including its horrors. We use idea of “World Upside-Down” in two ways:

i. What we are told is a young victim with constrained agency may not be a victim and may demonstrate agency. We discuss the overt and hidden dimensions of this constraint, which manifested during the countless hours of observing and interviewing these young people.

ii. What we are told we should do in a situation where we see coercion may not be the right thing to do. We explore walking the moral/ethical line of doing research with underage participants and the dangers involved in near missteps, and the social and cultural processes involved in these scenarios. What do you do as an interviewer?

b. When you enter a world that’s upside-down, everything becomes questionable, yet acceptable. These moments of uncertainty result in cognitive dissonance, in which the researcher questions their action or lack thereof.

c. Three studies – Scenarios are derived from three separate studies, one in Atlantic City and two in New York City. Sample= 21 and under.

i. Discuss Evolution of styles. We will start with the AC study (but those shouldn’t be the main stories). Those experiences essentially prepped us for our own studies. But, truth is there really is no way to prepare. Every situation is different—we learned that from experience.

ii. Illustrate how the idea of constrained agency is a social construction and is viewed differently. We wind up falling into it. What to do becomes unclear.

iii. We will draw out 4 interviews from each study and identify themes around complacency v. coerced/constrained agency.

6

Page 6 / 8

Chapter_Walking the tightrope.docx

iv. We'll draw out stories, exploring feelings of what could have/should have been done. How those issues came up in interviews and how we dealt with them. The obvious and the ambiguous.

d. The first study involved participant-observation and interviews with underage sex workers in Atlantic City, New Jersey from 2010 to 2012. We interviewed more than 150 sex workers between 16 and 24 years old.

e. The second study was carried out by the first author of this chapter. The study involved 85 in-situ interviews with pimps/traffickers in Harlem, New York from 2011 to 2012. There were forty young pimps who often worked with similarly aged sex workers, often legally classifying them as traffickers.

f. In a third study, female and male-to-female transgender street sex workers, many of whom were young, were interviewed in New York City from 2012 to 2013. The majority interviews from this study were carried out in public places or the vehicle of the field researcher.

II. Themes of constrained agency

a. Official ideas versus unofficial stories of CA

b. Typical stories about constrained agency with focus on individual and structural force/coercion

c. Constrained agency across different populations

III. When to respond?

a. Interference versus social responsibility

IV. Missteps and regaining balance

a. Unavoidable v. avoidable

b. Broken v. Fixes

V. Conclusions

Page 7 / 8

Re: the new tightrope Inbox x



A.M. Horning <a.m.horning@gmail.com>

Fri, Jul 18, 2014, 8:05 PM



to me ▾

Hi Amalia,

So, I edited to the last section of the lit review. And moved around some stuff in the analysis.

I won't work on this till Monday. Have a look and see if this makes sense.

hope the point was fruitful.

~A

—

Amber Horning, M.A., PhD student
John Jay College of Criminal Justice, CUNY
899 Tenth Ave.
NY, NY 10019
USA





Amalia Paladino <amalia.paladino@gmail.com>

Sat, Jul 19, 2014, 5:09 PM



to A.M. ▾

Hey Amber,

I think you did an excellent job cutting it down and solidifying our Bahktin connection!!!! You did a wonderful job. Pat yourself on the back and have a drink!

I noticed you didn't include the part of the half naked girl.....should i cut that down so that we can use it? I can get it to one page double spaced. That would be the only added thing (and I'd tweak the DV case).

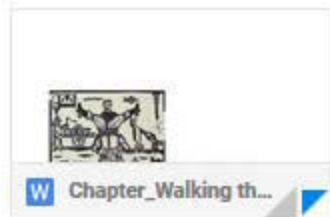
I will try to shorten some of my stories so that the half naked girl/beer incident fits....i think it'd go well under a theme like: *When there is no "right" response*

I think I can condense this story to include the "getting stopped by the police incident" and the "half naked girl" and the "underage drinking during the interview." Basically all of that happened within an hour and half. I can do it, I know I can. I really want these stories in. The main dilemma being that letting them out of the car could've endangered them or gotten them arrested (there were a couple girls who jumped in the car at first...including the half naked girl and a girl who was high on crack. all under 20 years old.

What do you think? I can try to fit it in right after the damon girl....since she was part of this next dilemma and it happened immediately after.

—

Amalia Paladino
Doctoral Program in Criminal Justice
John Jay College, CUNY
899 Tenth Avenue
New York, NY 10019





Amalia Paladino <amalia.paladino@gmail.com>
to A.M. ▾

Jul 21, 2014, 8:30 AM ☆ ↶ ⋮

Will send you the DV part within the hour.

⋮



A.M. Horning <a.m.horning@gmail.com>
to me ▾

Jul 21, 2014, 8:34 AM ☆ ↶ ⋮

yeah, it is really good, but we have to draw bakhtin out... here see what i did. the two interviews are in different themes, but back to back. just have a look. It is called 7.21. i will edit whole doc later.

i am moving on the conclusion.

~A

⋮



A.M. Horning <a.m.horning@gmail.com>
to me ▾

Jul 21, 2014, 8:35 AM ☆ ↶ ⋮

also, i think specific risk stuff should go in our journal article - so

⋮



A.M. Horning <a.m.horning@gmail.com>
to me ▾

Jul 21, 2014, 8:35 AM ☆ ↶ ⋮

i condensed it

⋮



A.M. Horning <a.m.horning@gmail.com>

Jul 21, 2014, 9:05 AM



to me ▾

oh, also don't forget citations about sex trafficking research turned rescue operation



Amalia Paladino <amalia.paladino@gmail.com>

Jul 21, 2014, 9:17 AM



to A.M. ▾

Shit, can I send you those after you send this to anthony? [REDACTED] is awake and i'm the only one with her. She has a fever. I revised the DV interview.

I will send you the citations today.



Amalia Paladino <amalia.paladino@gmail.com>

Jul 21, 2014, 9:23 AM



to A.M. ▾

Let me know what you think...i wanted to say a little more about the complex relationship that develops between ethnographers and respondents when trying to get them help....but i'm feeding [REDACTED] i know you need this now.



Amalia Paladino <amalia.paladino@gmail.com>

Jul 21, 2014, 9:25 AM



to A.M. ▾

when she naps i will send you all the references.



← Reply

➡ Forward

tightrope with updated references >



Amalia Paladino <amalia.paladino@gmail.com>

Mon, Jul 21, 2014, 2:28 PM



to A.M. ▾

I didn't track the updated references. There are a couple that you cited that I don't have the full references for...I highlighted them in red. There are a couple references that aren't cited in the paper (I commented on those). I noticed a couple typos for my citations and corrected them in the text. Those changes are tracked!

During [REDACTED] next nap I will continue working on this. I'll start trimming and send it to you later today.

Amalia Paladino
Doctoral Program in Criminal Justice
John Jay College, CUNY
899 Tenth Avenue
New York, NY 10019



Reply Forward

Re: walking the tightrope (this one) and bakhtin



Inbox x



A.M. Horning <a.m.horning@gmail.com>

Mon, Jun 23, 2014, 7:36 AM



to me

Hi Amalia,

Here is the latest version. Still working on methodology and findings. Coming along.

I was able to find Bakhtin (attached is intro to piece on carni- it is a bit dense, but i like it). I will put all articles in dropbox later this week.

~A

p.s. hooray argentina win! (very frustrating game to watch though)
us is still in the mix and fun game to watch.
god i love the world cup.

Amber Horning, M.A., PhD student
John Jay College of Criminal Justice, CUNY
899 Tenth Ave.
NY, NY 10019
USA

2 Attachments



Re: the latest on the tightrope



A.M. Horning <a.m.horning@gmail.com>
to me

Tue, Jun 24, 2014, 6:56 AM ☆ ↶ ⋮

Hi Amalia,

Here is an updated version of the draft.

In terms of lit review, I think it may be good to refresh on IRB protocols for underage and young (vulnerable pops). Did you have to write up bit on vulnerable pops for IRB for your study? Some of this language should be in the last para of lit review. Also, see if there are other studies about ethics/morals of studies on trafficking (all kinds, but focus on sex). We should connect concerns about coercion to these works, you could also look for studies about other pops who are coerced. We need to connect to larger lit in discussion and some should be referenced in lit review.

Also, after you look through this and fleshing out your stories to connect to themes, we should have a skype about the themes and see if we can improve them etc.

I can see that a discussion about constrained agency and gender may be in order (not sure where, but this will come up with female, male and trans sex workers and male pimps as composition for all three studies. Just a thought.)

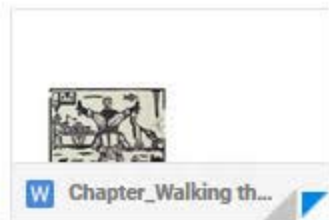
Also, do you think the Bakhtin analogy is working? I like it, but it has to work for findings ~~ which can be weird.




~Amber


























hahaha Brazil killed Cameroon - that was painful to watch

—

Amber Horning, M.A., PhD student
John Jay College of Criminal Justice, CUNY
899 Tenth Ave.
NY, NY 10019
USA



RE: Book chapter on ethical concerns in research on human trafficking   



Amber Horning <ahorning@jjay.cuny.edu>

 Jul 23, 2014, 7:17 PM



to de, me ▾

Dear Roos,

I hope that this email finds you well and maybe on another exotic trip!

We are ready to submit our chapter (see attachment). Hopefully, you will enjoy reading it as much as we enjoyed writing it. Please let us know about the next steps.

Best Regards,

~Amber



Amalia Paladino <amalia.paladino@gmail.com>

Wed, Jul 23, 2014, 8:21 PM



to A.M. ▾

I just read it again. I love how you tied in Bakhtin to everything. I feel like you were in my head, actually.

I noticed like 3 typos....nothing serious....like a "the" missing and a misspelled word or misplaced comma. Actually surprised it was just a few! You're a machine! lol I'm sure we will be editing after their feedback so if you want me to take over the the proof reading before final submission let me know. It sounds weird....but I kinda like doing it (it's like an escape lol).

I'm really happy with it. You're awesome. A pleasure to be your co-author!

Have a wonderful birthday and don't think about work....just drink and be merry :)

...

--

Amalia Paladino
Doctoral Program in Criminal Justice
John Jay College, CUNY
899 Tenth Avenue
New York, NY 10019



Wildt, R. de (Roos) <R.deWildt@uu.nl>

Tue, Jul 29, 2014, 10:52 AM



to Amber, me ▾

Dear Amber,

Thanks for sending the chapter. Well-received in Utrecht (nothing exotic but the temperatures are friendly).

Dina and I will read the chapter and get back to you by the end of August.

Furthermore you will receive a Publishing Agreement from us or Springer (the publisher) in the upcoming weeks.

If you have any questions or things you would like to discuss in the meantime – please don't hesitate to contact me!

Best wishes,

Roos

VERIFICATION

STATE OF NEW YORK }
COUNTY OF NASSAU } ss.:

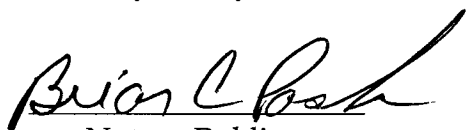
AMALIA S. PALADINO, being duly sworn, says:

I am a Plaintiff in the action herein. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters we believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

Dated: Mineola, New York
July 17, 2020


AMALIA S. PALADINO

Sworn to before me this
17th day of July, 2020


Notary Public

BRIAN C. PASCALE
Notary Public, State of New York
No. 02PA6145267
Qualified in Nassau County
Commission Expires May 1, 2022

ATTORNEY'S AFFIRMATION OF SERVICE

BRIAN C. PASCALE, an attorney at law admitted to practice before this Court, affirms as follows:

On July 17, 2020, I served the within **VERIFIED COMPLAINT** upon:

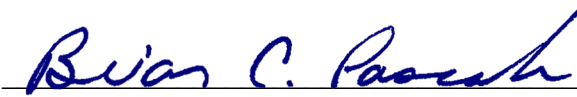
**Wigdor LLP
85th Fifth Avenue
New York, NY 10003**

the address designated by said party(s) or attorney(s) for that purpose:

- by depositing a true copy of the same, enclosed in a post-paid properly addressed wrapper, **VIA FIRST CLASS MAIL**, in a post office depository under the exclusive care of the United States Postal Service within the State of New York.
- by depositing a true copy of the same, enclosed in a post-paid properly addressed **CERTIFIED MAIL** wrapper, in a post office depository under the exclusive care of the United States Postal Service within the State of New York.
- by dispatching a copy by overnight delivery via **FEDERAL EXPRESS OVERNIGHT MAIL** to the parties above named at the address so indicated.
- by **PERSONALLY** delivering a true copy of same to each person above named at the address so indicated. I knew each person mentioned and described in said papers a party therein;
- by transmitting a true copy of same to the parties above named by **FAX** transmission at the facsimile number so designated by said parties.
- by transmitting a true copy of same to the parties above named **ELECTRONICALLY FILING** the within papers on the New York State Courts Electronic Filing system ("NYSCEF").

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Mineola, New York
July 17, 2020


BRIAN C. PASCALE

Index No.: 151711/20

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

AMALIA S. PALADINO,

Plaintiff,

-against-

CLAUDIA COJOCARU,

Defendant.

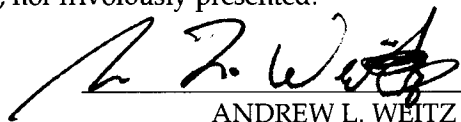
VERIFIED COMPLAINT

WEITZPASCALE
Attorneys for Plaintiff
AMALIA S. PALADINO
221 Mineola Boulevard
Mineola, New York 11501
Tel: (516) 280-4716

CERTIFICATION PURSUANT TO 22 N.Y.C.R.R. § 130-1.1a

ANDREW L. WEITZ hereby certifies that, pursuant to 22 N.Y.C.R.R. § 130-1.1a, the foregoing **VERIFIED COMPLAINT** is not frivolous, nor frivolously presented.

Dated: Mineola, New York
July 17, 2020


ANDREW L. WEITZ

WEITZPASCALE
ATTORNEYS FOR PLAINTIFF



NYSCEF - New York County Supreme Court

Confirmation Notice



The NYSCEF website has received an electronic filing on 07/17/2020 06:36 PM. Please keep this notice as a confirmation of this filing.

151711/2020

Amalia S. Paladino v. Claudia Cojocar

Assigned Judge: None Recorded

Documents Received on 07/17/2020 06:36 PM

Doc #	Document Type
6	COMPLAINT Verified Complaint
7	EXHIBIT(S) A Exhibit A - April 6, 2018 Email
8	EXHIBIT(S) B Exhibit B - November 29, 2018 Text Messages
9	EXHIBIT(S) C Exhibit C - Ethical Concerns in Human Trafficking
10	EXHIBIT(S) D Exhibit D - December 6, 2018 to January 22, 2019 Springer Emails Alleging Plagiarism
11	EXHIBIT(S) E Exhibit E - March 11, 2019 Texts to Mark Johnson
12	EXHIBIT(S) F Exhibit F - Herbst Letter to CUNY Community (with Relevant Exhibits Only)
13	EXHIBIT(S) G Exhibit G - June 21, 2019 & June 22, 2019 Tweets
14	EXHIBIT(S) H (Redacted per 202.5(e) or 206.5(e)) Exhibit H - July 30, 2019 Tweet_Redacted
15	EXHIBIT(S) I Exhibit I - January 26, 2017 Facebook Messenger Conversation
16	EXHIBIT(S) J Exhibit J - October 7, 2015 Facebook Messenger Conversation
17	EXHIBIT(S) K (Redacted per 202.5(e) or 206.5(e)) Exhibit K - June 18, 2018 Facebook Messenger Conversation_Redacted
18	EXHIBIT(S) L Exhibit L - Bakhtin Emails_Redacted

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF - New York County Supreme Court Confirmation Notice



151711/2020

Amalia S. Paladino v. Claudia Cojocaru
Assigned Judge: None Recorded

Filing User

Brian C Pascale | bcpascale@weitzpascale.com | 516-280-4716
221 Mineola Blvd., Mineola, NY 11501

E-mail Notifications

An email regarding this filing has been sent to the following on 07/17/2020 06:36 PM:

DAVID E. GOTTLIEB - dgottlieb@wigdorlaw.com

BRIAN C. PASCALE - bcpascale@weitzpascale.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.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF - New York County Supreme Court Confirmation Notice



The NYSCEF website has received an electronic filing on 07/17/2020 06:38 PM. Please keep this notice as a confirmation of this filing.

151711/2020

Amalia S. Paladino v. Claudia Cojocar

Assigned Judge: None Recorded

Documents Received on 07/17/2020 06:38 PM

Doc #	Document Type
--------------	----------------------

19	AFFIRMATION/AFFIDAVIT OF SERVICE Attorney's Affirmation of Service for Verified Complaint
----	--

Filing User

Brian C Pascale | bcpascale@weitzpascale.com | 516-280-4716
221 Mineola Blvd., Mineola, NY 11501

E-mail Notifications

An email regarding this filing has been sent to the following on 07/17/2020 06:38 PM:

DAVID E. GOTTLIEB - dgottlieb@wigdorlaw.com

BRIAN C. PASCALE - bcpascale@weitzpascale.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.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile