

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF

-----X

Plaintiff/Petitioner,

- against -

Index No.

Defendant/Respondent.

-----X

**NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system (“NYSCEF”), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see “Information for Attorneys” pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk’s Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: nyscef@nycourts.gov).

Dated: _____

Name	
Firm Name	Address
	Phone
	E-Mail

To: _____

2/24/20

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

-----X

AMALIA S. PALADINO,

Plaintiff,

S U M M O N S

-against-

Index No.: 156016/2020

CLAUDIA COJOCARU,

Date Purchased: 08/03/2020

Defendant.

-----X

PLAINTIFF DESIGNATES NEW YORK COUNTY AS PLACE OF TRIAL
BASIS OF VENUE IS THE SITUS OF THE OCCURRENCES

YOU ARE HEREBY SUMMONED to answer the Complaint in this action by serving your Answer on Plaintiff's attorneys within 20 days after service of this Summons, exclusive of the day of service, or within 30 days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to Answer or Appear, Judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: Mineola, New York
August 3, 2020

PLAINTIFF'S ADDRESS:

AMALIA S. PALADINO
714 Palisade Avenue
Union City, NJ 07087

DEFENDANT'S ADDRESS:

CLAUDIA COJOCARU
904 Dickinson Street, Floor 2
Philadelphia, PA 19147

Yours, etc.

WEITZPASCALE



By: ANDREW L. WEITZ
Attorneys for Plaintiff
221 Mineola Boulevard
Mineola, New York 11501
Tel: (516) 280-4716

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

-----X
AMALIA S. PALADINO,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

Index No.: 156016/2020

CLAUDIA COJOCARU,

Date Purchased: 08/03/2020

Defendant.
-----X

Plaintiff, AMALIA S. PALADINO, by her 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. At all times hereinafter mentioned, Defendant, CLAUDIA COJOCARU, was a resident of the State of New York as set forth in her June 10, 2019 Complaint¹ and February 6, 2020 Amended Complaint² in the action *Claudia Cojocarua and Naomi Haber v.*

¹ See, *Cojocarua, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 1, ¶ 15.

² See, *Cojocarua, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 62, ¶ 16.

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 filed in the United States District Court for the Southern District of New York (“SDNY”) and assigned SDNY Civil Case No. 19-cv-5428 (AKH).

5. 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.

6. The within action is timely pursuant to Governor Andrew Cuomo’s Executive Orders tolling “any specific time limit for the commencement, filing, or service of any legal action, notice, motion, or other process or proceeding, as prescribed by the procedural laws of the state”, specifically Executive Order Nos. 202.8 (issued March 20, 2020), 202.14 (issued April 7, 2020), 202.28 (issued on May 7, 2020), 202.38 (issued June 6, 2020), and 202.48 (issued July 6, 2020).

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 PhD in Criminal Justice from The Graduate Center at CUNY.

13. At all times hereinafter mentioned, Plaintiff was an adjunct professor 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 May 30, 2019 Plaintiff, AMALIA S. PALADINO, by good conduct, industry, and ability, had attained an excellent reputation in her profession and trade as an academic, teacher, researcher, 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, was owned by Naomi Haber.

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

34. At all times hereinafter mentioned, the username, “@naomi_haber”, on the social media network known as Twitter, was registered to Naomi Haber.

35. At all times hereinafter mentioned, the person referred to as “Naomi” is Naomi Haber (“Haber”).

36. At all times hereinafter mentioned, the person referred to as “Ric” is Dr. Ric Curtis (“Curtis”).

37. At all times hereinafter mentioned, the person referred to as “Anthony” is Dr. Anthony Marcus.

38. At all times hereinafter mentioned, the person referred to as “Leo” is Leonardo Dominguez (“Dominguez”).

39. At all times hereinafter mentioned, the person referred to as “Barry” is Dr. Barry Spunt (“Spunt”).

40. At all times hereinafter mentioned, the person referred to as “Amber” is Dr. Amber Horning-Ruf.

BASIS FOR THE WITHIN ACTION

41. The subject action is brought for libelous, disparaging, negligent, and/or injurious statements published by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter, under her pseudonymous username “@anarkriminology” on May 30, 2019, June 21, 2019, June 22, 2019, July 19, 2019, July 30, 2019, and September 21, 2019.

(A)

DEFENDANT’S MAY 30, 2019 TWEETS

42. On or about May 30, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Swamp, and those who worked there, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.³ A true and correct copy of the relevant Twitter statements (“Tweets”) are annexed hereto as **Exhibit “A”** and incorporated herein by reference.⁴

43. On or about May 30, 2019 Defendant, CLAUDIA COJOCARU, published the following statements under her pseudonymous username “@anarkriminology” on

³ The Tweet also consisted of ten (10) Reply Tweets by Defendant to her original Tweet.

⁴ This Exhibit has been Bates numbered for reference.

the social media network known as Twitter when Retweeting an opinion piece titled “Academia is built on exploitation. We must break this vicious circle” published by The Guardian on May 18, 2018 available at <https://www.theguardian.com/higher-education-network/2018/may/18/academia-exploitation-university-mental-health-professors-plagiarism>: “I can relate to this article- [sic] see thread below!” See, Exhibit “A”, Page 1. (emphasis added).

Schrödinger’s Criminologist @anarkriminology • May 30, 2019
3. “Unfortunately, these untethered conditions are also very favourable for those with an unhinged sense of entitlement.”

The swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a [sic] cult of vicious, angry, abusive sexual predators. 🚫 #MeToo 🙋

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

44. As set forth in greater detail below, the “self-serving/unhinged/entitled men” Defendant, CLAUDIA COJOCARU, refers to, who she alleges are members of a “a cult of vicious, angry, abusive sexual predators”, are Drs. Curtis, Marcus, Spunt, and Mr. Dominguez, four (4) CUNY John Jay professors she and Ms. Haber accused of purportedly committing multiple crimes, including, but not limited to, those of a heinous sexual nature.

45. As set forth in greater detail below, the “enablers” Defendant, CLAUDIA COJOCARU, refers to, who she alleges are members of a “a cult of vicious, angry, abusive sexual predators”, includes Plaintiff, AMALIA S. PALADINO.

(Intentionally Left Blank)

(B)

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

46. 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 "B"** is a true and correct copy of Mr. Herbst's letter, with its relevant exhibits, and is incorporated herein by reference.⁵

47. 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 "B", Page 1.

48. 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 "B", Page 2. (emphasis supplied).

49. 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

⁵ This exhibit, and its relevant exhibits thereto, have been collectively Bates numbered for reference.

the District Attorney and the Administration's investigator[.]” *See*, Exhibit “B”, Page 3.
(emphasis added).

50. 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.*⁶
- 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.*⁷ 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 “B”, Page 3. (emphasis added).

...

- 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.*⁸

See, Exhibit “B”, Page 5.

⁶ *See*, Exhibit “B”, Page 16.

⁷ *See*, Exhibit “B”, Pages 17-27.

⁸ *See*, Exhibit “B”, Page 44.

51. 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 "B", 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.*⁹ This is exactly what Cojocarú had told Amalia back in January 2017 that Haber was attempting to fabricate.

See, Exhibit "B", Page 7. (emphasis added).

⁹ *See, Exhibit "B", Page 44.*

52. On or about 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.¹⁰ A true and correct copy of the relevant Tweets are annexed hereto as **Exhibit "C"** and incorporated herein by reference.¹¹

53. On or about 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 "C", 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

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**

¹⁰ The Tweet also consisted of twenty-seven (27) Reply Tweets by Defendant to her original Tweet.

¹¹ This Exhibit has been Bates numbered for reference.

[sic] fragmented and decontextualized materials, frankensteined together for a semblance of authenticity. These probably amount to a couple of felonies if pursued.

See, Exhibit "C", 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 [sic] (decontextualized) conversations in which I say terrible things about Naomi.

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

(C)

DEFENDANT'S JULY 19, 2019 TWEET

54. On or about July 19, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Swamp, and those who worked there, under her pseudonymous

username “@anarkriminology” on the social media network known as Twitter.¹² A true and correct copy of the relevant Tweets are annexed hereto as **Exhibit “D”** and incorporated herein by reference.¹³

55. On or about July 19, 2019 Defendant, CLAUDIA COJOCARU, published the following statements under her pseudonymous username “@anarkriminology” on the social media network known as Twitter when Retweeting an article titled “George Nader, prominent Mueller report witness, charged with child sex trafficking” published by CBC World News on July 19, 2019 available at <https://www.cbc.ca/news/world/nader-charges-sex-trafficking-1.5218438>:

“... George Nader, 60, was transporting a 14-year-old boy from Europe to Washington, D.C., in February 2000 and engaging in sex acts with him.”

If the boy was Eastern European I’m going to be sick...



See, Exhibit “D”, Page 1. (emphasis added).

...

Schrödinger’s Criminologist @anarkriminology • Jul 19, 2019
 2. While I was working @JohnJayCollege at **Ric Curtis’s swamp**, I often heard **#SexWorkersRights** advocates deny **#SexTrafficking even existed**. As a survivor, that made me incredibly uncomfortable. **Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.**

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

...

¹² The Tweet also consisted of eleven (11) Reply Tweets by Defendant to her original Tweet.

¹³ This Exhibit has been Bates numbered for reference.

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
5. These distortions were the norm at the swamp. In fact, **the swamp was where I learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't "win".** Curtis said **"#SexTrafficking victims were just prostitutes who played victims" [.]**

See, Exhibit "D", Page 3. (emphasis added).

(D)

DEFENDANT'S JULY 30, 2019 TWEET

56. 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 annexed hereto as **Exhibit "E"** and incorporated herein by reference.¹⁴

57. 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 "E", Page 12. (emphasis added).

¹⁴ This Exhibit has been Bates numbered for reference.

58. The Atlantic City Study was a federally funded study to estimate the number of commercially sexually exploited children throughout the United States which began with a pilot study in Atlantic City (“Atlantic City Study”).

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

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

(E)

DEFENDANT’S SEPTEMBER 21, 2019 TWEETS

61. On or about September 21, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Swamp, analogizing it, and those who worked there, to Jeffrey Epstein, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.¹⁵ A true and correct copy of the relevant Tweets are annexed hereto as **Exhibit “F”** and incorporated herein by reference.¹⁶

62. On or about September 21, 2019 Defendant, CLAUDIA COJOCARU, published statements about the Swamp, analogizing it, and those who worked there, to Jeffrey Epstein, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter when Retweeting an article titled “‘When you are in, you can’t get out.’ Women describe how Jeffrey Epstein controlled them” published by the Miami Herald on September 20, 2019 available at

¹⁵ The Tweet also consisted of seven (7) Reply Tweets by Defendant to her original Tweet.

¹⁶ This Exhibit has been Bates numbered for reference.

<https://www.miamiherald.com/news/state/florida/article235247637.html>:

Exercise for @JohnJayCollege bureaucrats: **take this article, replace Epstein's name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🙌 #MyJohnJay**

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

...

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019
Replying to @anarkriminology

1. **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **"Everyone around us had to know, because we looked so broken. But no one did anything."**

I can relate to this. #MeToo 🙌

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019

2. Because nobody helped me when I was trafficked, I knew I had to go back and help others. **Whether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo 🙌**

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

CLAUDIA COJOCARU'S TWEETS WERE 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

63. Defendant, CLAUDIA COJOCARU, published the Tweets on May 30, 2019, June 21, 2019 to June 22, 2019, July 19, 2019, July 30, 2019, and September 21, 2019 to undermine and malign Plaintiff's credibility.

64. 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.

65. 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.

66. 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 implicate Dr. Curtis for over two (2) years and Plaintiff knew she lacked the research credentials to be an ethnographer and an expert in sex trafficking research.

67. 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.

68. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide admissible 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.

69. Defendant, CLAUDIA COJOCARU, was motivated to undermine and

malign Plaintiff's credibility because Plaintiff could provide admissible 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.

70. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide admissible 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.

71. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide admissible 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.

72. Defendant, CLAUDIA COJOCARU, was motivated to undermine and malign Plaintiff's credibility because Plaintiff could provide admissible 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 fabricated.

73. 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.

74. 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.

75. 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.

76. 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

77. 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.

78. 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.

79. 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.

80. 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 to her resume and claimed that she “rescued” girls while she was in Japan.

81. 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.

82. 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.

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

84. 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.

85. 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.

86. In or about February 2015, Defendant, CLAUDIA COJOCARU, admitted to Plaintiff that she did not conduct her own research study in Japan, or any study on the sex trade.

87. Plaintiff warned Defendant, CLAUDIA COJOCARU, of the academic repercussions of fabricating claims that she conducted a research study in Japan.

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

89. 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 of minority status.

90. 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, censorship, discrimination, gender discrimination, hostility, symbolic violence, gaslighting, insults, passive aggressive attacks, labeling, grade penalization, unexplained grading criteria, retaliation, and more. *See*, Exhibit "B", Pages 28-43.

91. 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 "B", Pages 28-43.

92. These allegations against the Rutgers faculty came after faculty members asserted that Defendant's auto-ethnography was "illegitimate and unethical" and needed to be "verified".

(B)

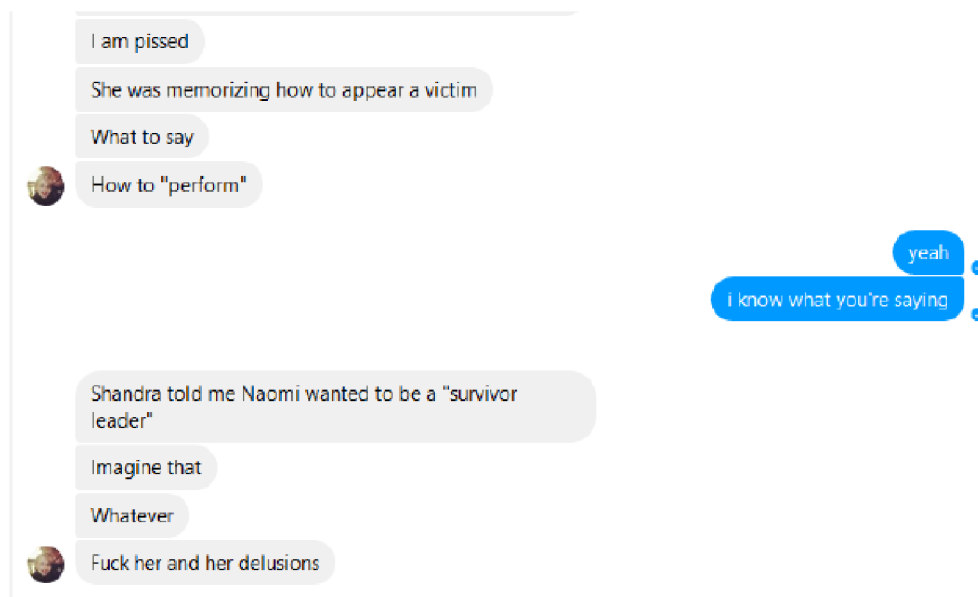
**COJOCARU'S ADMISSION THAT
NAOMI HABER ALWAYS FABRICATES ALLEGATIONS**

93. On January 26, 2017 Plaintiff and Defendant engaged in an instant message conversation on Facebook Messenger. Annexed hereto as **Exhibit "G"** is a true and correct copy of the instant message conversation on Facebook Messenger between Plaintiff and Defendant on January 26, 2017.¹⁷

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

(Intentionally Left Blank)

¹⁷ In the embedded 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.



See, Exhibit "G", Page 11.

95. As is also reproduced below, Defendant then stated that Ms. Haber planned to allege that COJOCARU, or Dr. Curtis, or someone else, was going to sex traffic her and 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:

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

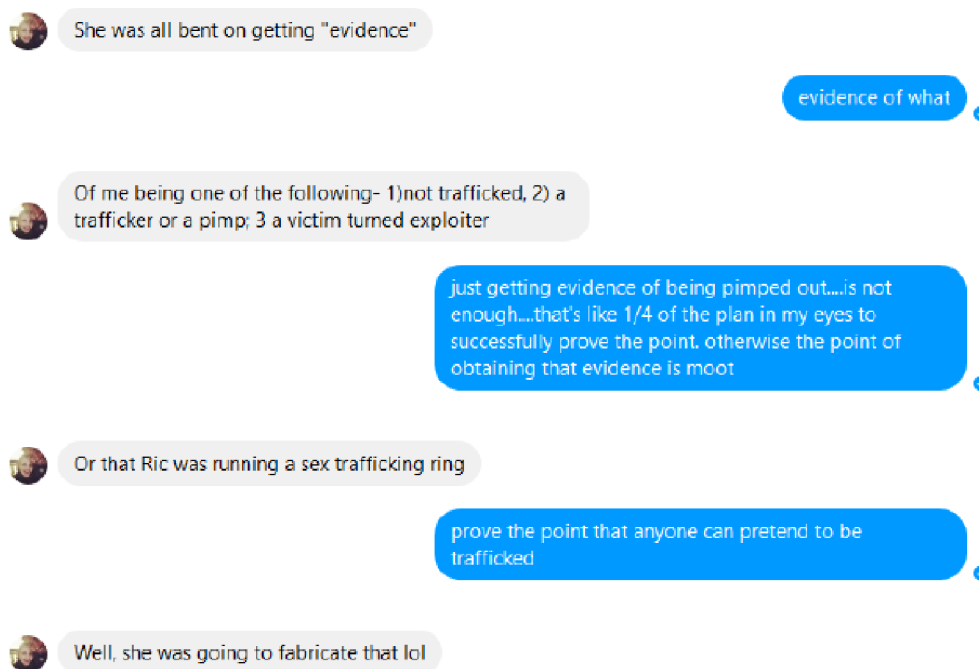
See, Exhibit "G", Page 12.

96. 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 “G”, Page 13.

97. Defendant further claimed that Ms. Haber was “bent on getting ‘evidence’” proving 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 “G”, Page 15.

98. 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 “G”, Page 15. (emphasis added).

99. 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[.]”

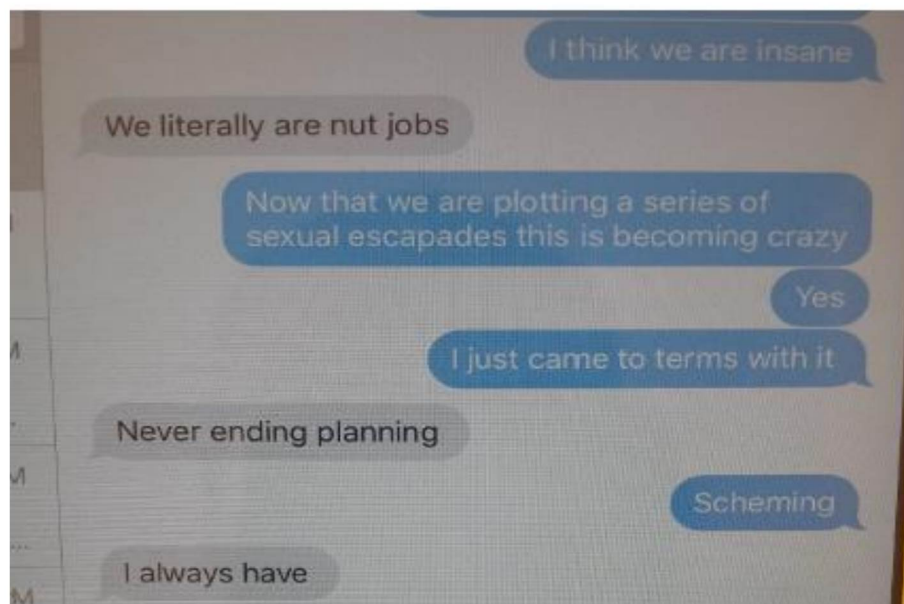
why fabricate?

She always fabricates
To get attention

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

100. 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 "H".¹⁸

101. 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[.]"



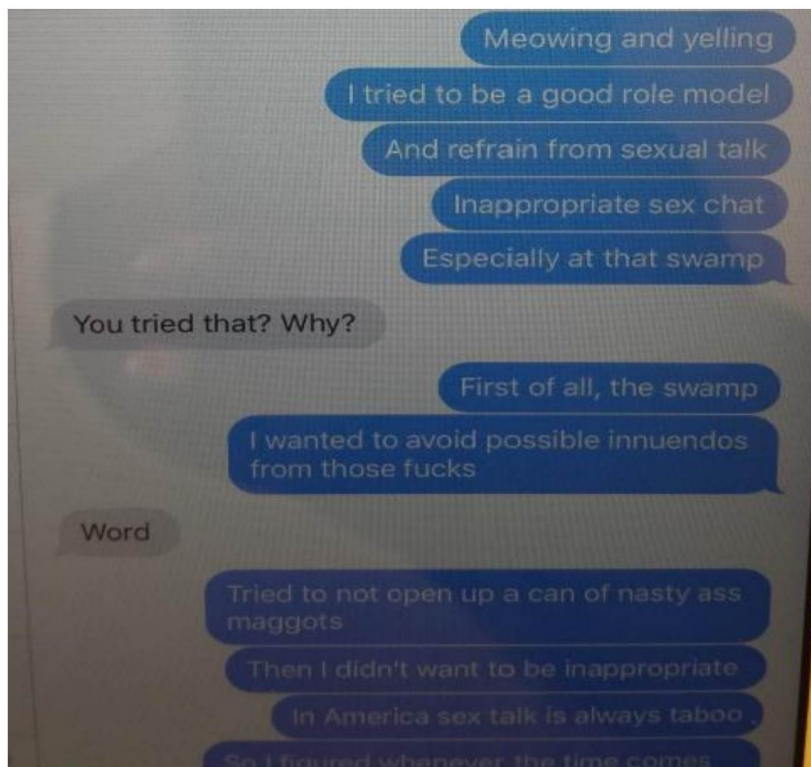
¹⁸ In the embedded screen shots Defendant's statements are on the right in blue with white text and Ms. Haber's are on the left in gray with black text.

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

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

103. 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 "H", Page 11. (emphasis added).

104. 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 "H", Page 11. (emphasis added).

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

(C)

**COJOCARU'S 2014 SCHEME TO
FRAME A CUNY ADJUNCT PROFESSOR**

106. 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,¹⁹ a then-adjunct at CUNY John Jay.

107. 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.

108. 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.

109. Defendant, CLAUDIA COJOCARU, stated “[l]et’s frame [John Doe].”

110. Having only recently met Defendant, CLAUDIA COJOCARU, and because Defendant made the statement in such an exaggerated way, Plaintiff believed Ms. COJOCARU was joking and did not believe she actually wanted to frame or set up John Doe for a false rape claim.

¹⁹ The real name of John Doe is withheld to protect his privacy and the privacy of others.

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

112. 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.

113. 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.

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

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

116. 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.

117. 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.

118. Approximately four (4) years later, Defendant, CLAUDIA COJOCARU, tried to influence Plaintiff to provide false testimony related to John Doe to support a claim that Dr. Curtis was facilitating sexual harassment in the workplace.

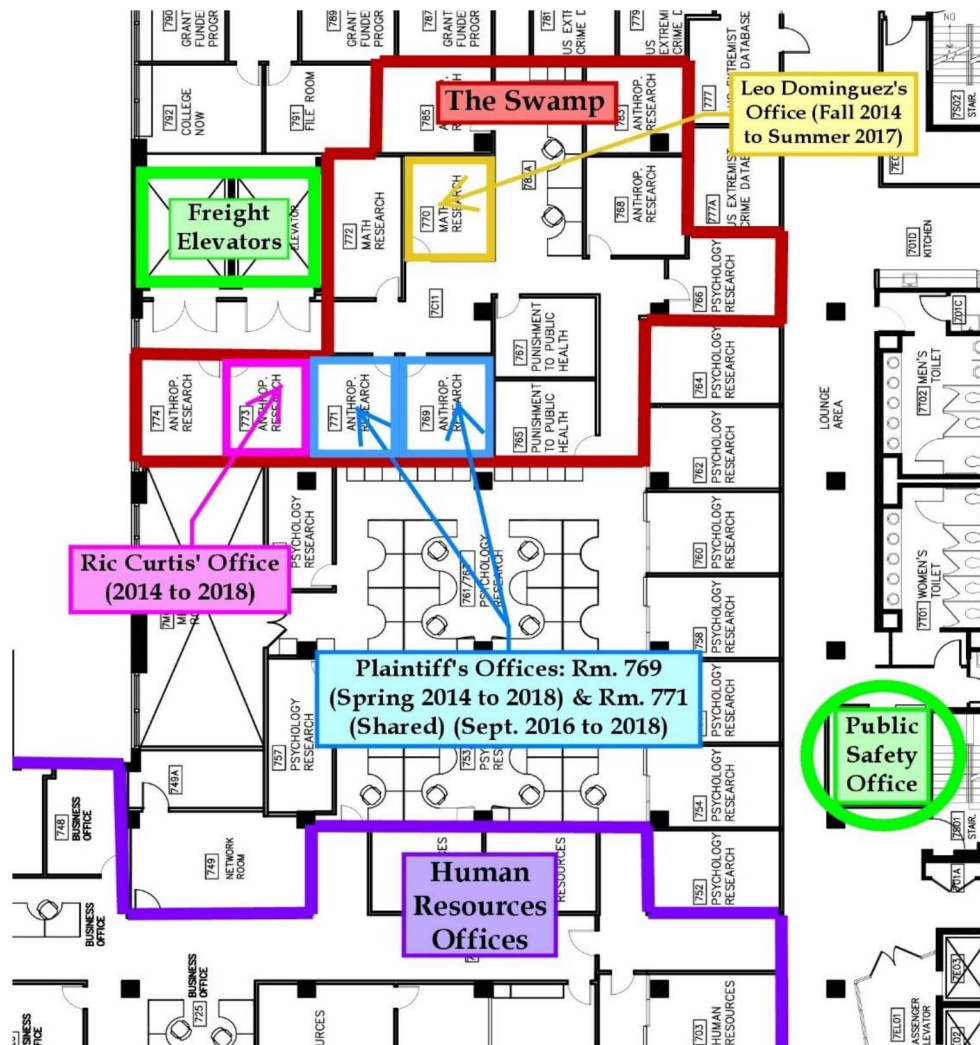
(Intentionally Left Blank)

(D)

COJOCARU'S FABRICATED MEANING OF THE "SWAMP"

119. Prior to 2014 CUNY John Jay had rented and/or leased the entire seventh floor of the building located at 619 West 54th Street in Manhattan (also referred to as the "54th Street Annex"). Annexed hereto as **Exhibit "I"** is a copy of the Floor Plan for the 54th Street Annex's Seventh Floor.

120. Reproduced below is part of the floor plan depicting the Swamp and its proximity to the Human Resources department and the Public Safety office:



See, Exhibit "I".

(i)

Layout of the 54th Street Annex, Seventh Floor

121. The Anthropology department research offices, commonly referred to as the "Swamp," in homage to the television series M.A.S.H., were located on the north side of the seventh floor and is identified in the above floor plan with a red outline.

122. The CUNY John Jay Human Resources department was located on the south side of the seventh floor facing West 54th Street and is identified in the above floor plan with a purple outline.

123. In between the Human Resources department and the Anthropology department research offices, located in room 701, was the CUNY John Jay Department of Public Safety which is identified in the above floor plan with a green circle.

(ii)

The Swamp's Layout

124. Between 2013 and 2017, the area commonly known as the "Swamp" consisted of twelve (12) Anthropology and Math Research Offices and cubicles, and one (1) Psychology Office (hereinafter referred to as "the interdisciplinary research area").

125. Between 2013 and 2017, the twelve (12) Anthropology and Math Research Offices and cubicles in the interdisciplinary research area were room numbers 765, 767, 768, 769, 770, 771, 772, 773, 774, 783, 785, 783A.

126. Between 2013 and 2017, the Psychology Office in the interdisciplinary research area was located in room number 766.

127. Most of the interdisciplinary research area was occupied by those pertaining to the Social Network Research Group ("SNRG").

128. From the fall of 2013 to the spring of 2014, Dr. Curtis' office was located in room 770 in the interdisciplinary research area, more commonly referred to as the Swamp, which is identified in the above floor plan with a yellow box.

129. Room 770 later became Mr. Dominguez's office from the fall of 2014 through 2017.

130. From 2014 to 2018 Dr. Curtis' office was located in room 773 in the interdisciplinary research area, more commonly referred to as the Swamp, which is identified in the above floor plan with a pink box.

131. In the spring of 2014, Dr. Curtis assigned Plaintiff, AMALIA S. PALADINO, room 769 in the interdisciplinary research area, more commonly referred to as the Swamp, to use as an office. Annexed hereto as **Exhibit "J"** is an email between Dr. Curtis to Kinya Chandler, the Senior Director of Operation in the Office of Academic Affairs for CUNY John Jay confirming Dr. PALADINO'S office assignment.

132. From the spring of 2014 through 2018, CUNY John Jay publically listed Plaintiff's office as being located in the 54th Street Annex, Seventh Floor.

133. From the spring of 2014 through 2018, CUNY John Jay publically listed Plaintiff's office as being located in room 769 in the 54th Street Annex.

134. From the spring of 2014 through 2018, Plaintiff, AMALIA S. PALADINO, was publically linked to the SNRG and the interdisciplinary research area, more commonly referred to as the Swamp.

135. From the spring of 2014 through 2018, Plaintiff, AMALIA S. PALADINO, was publically linked to the CUNY John Jay Anthropology department research offices, more commonly referred to as the Swamp.

136. Plaintiff, AMALIA S. PALADINO, continues to be publically linked to the CUNY John Jay 54th Street Annex.

137. Plaintiff, AMALIA S. PALADINO, continues to be publically linked to the CUNY John Jay Anthropology department research offices, within the interdisciplinary research area, more commonly referred to as the Swamp.

138. From the spring of 2014 through 2018, Plaintiff, AMALIA S. PALADINO, was the only female professor with her own private office in the interdisciplinary research area, more commonly referred to as the Swamp.

139. From the spring of 2014 through 2018, Plaintiff, AMALIA S. PALADINO, was the only female professor with her own team of research assistants in the interdisciplinary research area, more commonly referred to as the Swamp.

140. From the spring of 2014 through 2018, Plaintiff, AMALIA S. PALADINO, was the only female professor who consistently frequented the interdisciplinary research area, more commonly referred to as the Swamp.

141. In September 2016 Plaintiff moved her office computer to room 771 in the interdisciplinary research area, more commonly referred to as the Swamp, due to a lack of computers.

142. From September 2016 to 2018 Plaintiff shared the room 771 office in the Swamp with research assistants and other CUNY John Jay faculty, including Mr. Dominguez.

143. Rooms 769 and 771 in the 54th Street Annex are identified in the above floor plan with blue boxes.

144. Between 2014 and September 2016 Plaintiff had multiple research assistants who frequently used the offices and/or areas designated for use by research assistants in the 54th Street Annex, more commonly referred to as the Swamp.

145. At no point did Drs. Marcus or Spunt have an office in the Swamp.

(iii)

**Service Elevators Located in the Swamp
Required Security Hourly Monitor the Area**

146. Two (2) freight elevators were located on the 54th Street Annex's Seventh Floor within the area where the Anthropology department research offices were located, commonly referred to as the Swamp (hereinafter referred to as the "freight elevators").

147. The freight elevators are identified in the above floor plan with a green box.

148. The freight elevators were located directly across from Dr. Curtis' office in room 773. *See*, Exhibit "I".

149. All deliveries, garbage removal, and maintenance services, to the 54th Street Annex's Seventh Floor, were done through these freight elevators.

150. The area near the freight elevators was equipped with approximately three (3) surveillance video cameras which would record anyone who approached the freight elevators in the Swamp.

151. The freight elevators were a designated checkpoint for CUNY John Jay public safety officers.

152. The freight elevators were equipped with alarms that were armed at the end of each day.

153. CUNY John Jay Public Safety officers were required to disarm the alarms in the freight elevators each morning to allow service to the floor.

154. CUNY John Jay Public Safety officers were required to check and/or monitor the freight elevators and surrounding area every hour throughout the day to ensure that the location was secure.

155. CUNY John Jay Public Safety officers were required to maintain a log with the date and time they checked the freight elevators and surrounding area.

(iv)

Lack of Privacy in the Swamp

156. Room 773 in the Swamp, where Dr. Curtis' office was located, is approximately seventy-five (75) feet from the Public Safety Office, and approximately fifty (50) feet from the nearest Human Resources office in room 750.

157. While the 54th Street Annex's Seventh Floor had an approximately fifteen (15) foot ceiling, most offices on the floor, including those for the Human Resources department, the Anthropology department research offices, and the Public Safety office had walls that were approximately seven (7) feet tall.

158. Because the walls in most offices of the 54th Street Annex's Seventh Floor did not extend to the ceiling, it was possible to hear conversations taking place in other cubicles and offices.

159. Because the walls in most offices of the 54th Street Annex's Seventh Floor did not extend to the ceiling, it was possible to hear conversations taking place in other cubicles and offices, even when office doors were closed.

160. The distance between the top of the walls in the 54th Street Annex's Seventh Floor and the ceiling was large enough to allow a person to climb over from one office or hallway to another. Annexed hereto as **Exhibit "K"**, and reproduced below, is a photograph of Defendant, CLAUDIA COJOCARU, climbing over the wall to enter Dr. Curtis' locked office in or around the summer of 2016:

(Intentionally Left Blank)



161. The photograph was posted on the social media network known as Facebook where a Facebook user commented that “[c]learly Claudia Cjcr is up to no good 🍆[.]” See, Exhibit “K”, (emphasis added).

162. In or around the summer of 2016 Defendant, CLAUDIA COJOCARU, was neither a student, nor an employee, of CUNY.

(Intentionally Left Blank)

(E)**COJOCARU'S FRAUDULENT TITLE IX COMPLAINT TO
FABRICATE A HISTORY THAT DR. CURTIS HAD NOT
PREVIOUSLY ESCALATED SEXUAL HARASSMENT CLAIMS**

163. 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.²⁰

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

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

166. After speaking with Jane Doe, Dr. Marcus personally escorted John Doe out of the CUNY John Jay 54th Street Annex.

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

168. Contrary to Defendant's allegations in her Title IX Complaint, and subsequent federal lawsuit, Drs. Curtis and Marcus effectively handled Jane Doe's complaints.

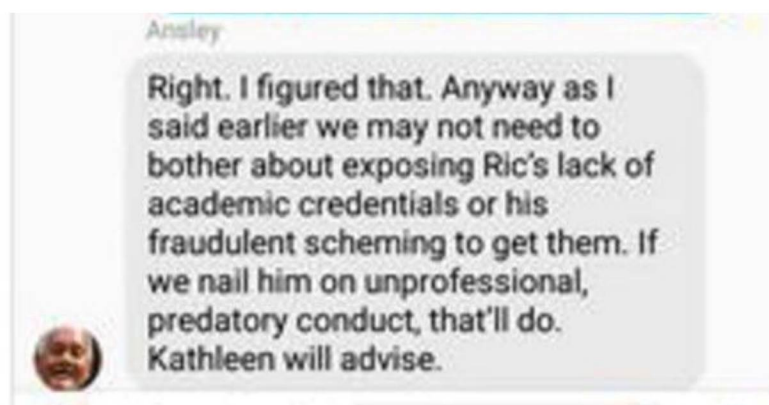
(F)**COJOCARU'S SCHEME TO FRAME FOUR
CUNY PROFESSORS FOR PERSONAL PROFIT**

169. On or about June 18, 2018 Defendant, CLAUDIA COJOCARU, shared screenshots of a group Facebook Messenger conversation between COJOCARU, Naomi

²⁰ Jane Doe's real name is withheld to protect her privacy and the privacy of others.

Haber, Sebastian Hoyos (Defendant's boyfriend and a current PhD 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 "L"** are true and accurate copies of the June 18, 2018 conversation between Plaintiff and Defendant.²¹

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



See, Exhibit "L", Page 2.

171. As demonstrated above, Ansley Hamid suggests that Dr. Curtis could be accused of having false credentials, but he adds, "as I said earlier, 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 "L", Page 2. (emphasis added).

²¹ In the embedded screen shots Defendant's statements are on the left (grey with black text) and Plaintiff's are on the right (blue with white text). However, in the shared Facebook Messenger screenshots inside that conversation, Defendant's statements are on the right (blue with white text) and Ansley Hamid, Lambros Comitas, and an unidentified "assistant" are on the left (grey with black text). The messages discussing unrelated individuals and a minor have been redacted pursuant to 22 NYCRR § 202.5(e).

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

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

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

(G)

**NEW YORK COUNTY DISTRICT ATTORNEY DECLINES TO PROSECUTE CURTIS,
MARCUS, SPUNT, AND DOMINGUEZ FOR THE ALLEGATIONS COJOCARU
AND MS. HABER MADE IN HER FALSE CRIMINAL COMPLAINT**

175. 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 that they were asserting against Ric Curtis, Anthony Marcus, Barry Spunt, Leonardo Dominguez.

176. 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.

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

(H)

**COJOCARU AND MS. HABER'S FEDERAL
LAWSUIT BASED ON FABRICATED CLAIMS**

178. 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 under the caption *Claudia Cojocararu 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).²²

179. Claudia Cojocararu and Ms. Haber later filed an Amended Complaint in the federal action on February 6, 2020.²³

180. The federal lawsuit alleged that Drs. Curtis, Marcus, Spunt, and Mr. Dominguez had subjected Claudia Cojocararu and Ms. Haber to, among other things, rape, sexual abuse, sex trafficking, and sexual harassment.

181. Claudia Cojocararu and Ms. Haber alleged that many of the events which are

²² See, *Cojocararu, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 1.

²³ See, *Cojocararu, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 62.

the basis for their federal lawsuit occurred in the interdisciplinary research area, more commonly referred to as the Swamp.

182. 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 which was titled "College professors allegedly sold drugs, 'pimped' out students."

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

184. The counterclaims in the federal lawsuit assert that Claudia Cojocararu and Ms. Haber (a) initiated sexual conversations with professors, and (b) had ulterior motives to fabricate allegations.

185. The counterclaims in the federal lawsuit further assert that Claudia Cojocararu has a long history of making complaints about others in academia.

186. 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 Cojocararu and Haber's motion to dismiss.²⁴

²⁴ See, *Cojocararu, et ano. v. City University of New York, et al.*, Civ. Case No. 19-cv-5428 (AKH), Docket No. 99.

187. 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
LIBEL PER SE
May 30, 2019 Tweet (Reply Tweet "3")

188. On or about May 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an opinion piece titled "Academia is built on exploitation. We must break this vicious circle" published by The Guardian on May 18, 2018, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

"I can relate to this article- [sic] see thread below!"

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

...

Schrödinger's Criminologist @anarkriminology • May 30, 2019
3. "Unfortunately, these untethered conditions are also very favourable for those with an unhinged sense of entitlement."

The swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🤬 #MeToo 🙏

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

189. 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 May 30, 2019, makes false and disparaging

statements falsely attacking Plaintiff's ethics, honesty, truthfulness, and stating that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex.

190. 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 May 30, 2019, makes false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, and stating that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex.

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

192. 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 enabler of vicious and abusive sexual predators negatively reflects upon and disparages Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

193. 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.

194. 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.

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

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

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

198. 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.

199. 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.

200. 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.

201. 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.

202. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

203. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

204. 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
LIBEL
May 30, 2019 Tweet (Reply Tweet "3")

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

206. On or about May 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an opinion piece titled "Academia is built on exploitation. We must break this vicious circle" published by The Guardian on May 18, 2018, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

"I can relate to this article- [sic] see thread below!"

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

...

Schrödinger's Criminologist @anarkriminology • May 30, 2019
3. "Unfortunately, these untethered conditions are also very favourable for those with an unhinged sense of entitlement."

The swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🚫 #MeToo 🙏

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

207. 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 May 30, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, and stating that

Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex.

208. 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 May 30, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, and stating that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex.

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

210. 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.

211. 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.

212. 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.

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

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

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

216. 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.

217. 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.

218. 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.

219. 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.

220. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

221. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

222. 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 THIRD CAUSE OF ACTION
INJURIOUS FALSEHOOD
May 30, 2019 Tweet (Reply Tweet "3")

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

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

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

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

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

228. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex when Defendant falsely stated "[t]he swamp @JohnJayCollege was crawling

with self-serving/ unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🗣️ #MeToo 🗣️". See, Exhibit "A", Page 2, Reply Tweet "3". (emphasis added).

229. 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.

230. 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.

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

232. 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.

233. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

234. 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 than 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 FOURTH CAUSE OF ACTION
DISPARAGEMENT
May 30, 2019 Tweet (Reply Tweet "3")

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

236. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex when Defendant falsely stated "[t]he swamp @JohnJayCollege was crawling with self-serving/ unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🇺🇸 #MeToo 🇺🇸". See, Exhibit "A", Page 2, Reply Tweet "3". (emphasis added).

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

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

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

240. 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 May 30, 2019.

241. 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.

242. 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 FIFTH CAUSE OF ACTION
NEGLIGENCE
May 30, 2019 Tweet (Reply Tweet "3")

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

244. On or about May 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an opinion piece titled "Academia is built on exploitation. We must break this vicious circle" published by The Guardian on May

18, 2018, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

"I can relate to this article- [sic] see thread below!"

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

...

Schrödinger's Criminologist @anarkriminology • May 30, 2019

3. "Unfortunately, these untethered conditions are also very favourable for those with an unhinged sense of entitlement."

The swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🚫 #MeToo 🙏

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

245. On May 30, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

246. On May 30, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's skill, research, findings, professionalism, temperament, ability, honesty, and ethics, and stating that Plaintiff enables and helps sexual predators who work with her and whose offices are located

adjacent to hers on the seventh floor of the 54th Street Annex.

247. On May 30, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

248. On May 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.

249. On May 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.

250. On May 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

251. On May 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

252. On May 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly

linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

253. On May 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

254. On May 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

255. 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

256. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

257. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

258. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

259. On May 30, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as

Twitter.

260. On May 30, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

261. On May 30, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

262. As a direct result and proximate cause of the false statements published on May 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.

263. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on May 30, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

264. 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 SIXTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
May 30, 2019 Tweet (Reply Tweet "3")

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

266. On or about May 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an opinion piece titled "Academia is built on exploitation. We must break this vicious circle" published by The Guardian on May 18, 2018, false and defamatory statements about Plaintiff, and the Swamp, alleging that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex when Defendant falsely stated "[t]he swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🚫 #MeToo 🙋". See, Exhibit "A", Page 2, Reply Tweet "3". (emphasis added).

267. On or about May 30, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" that Plaintiff enables and helps sexual predators who work with her and whose offices are located adjacent to hers on the seventh floor of the 54th Street Annex. See, Exhibit "A", Page 2,

Reply Tweet "3".

268. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "3" on May 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.

269. 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.

270. 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
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
May 30, 2019 Tweet (Reply Tweet "3")

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

272. 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 May 30, 2019.

273. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet “3” on May 30, 2019 constitutes negligent conduct on the part of said Defendant.

274. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet “3” on May 30, 2019 constitutes a negligent violation of a statutory standard of conduct.

275. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet “3” on May 30, 2019 constitutes a Negligent Infliction of Emotional Distress.

276. 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.

277. 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
PRIMA FACIE TORT
May 30, 2019 Tweet (Reply Tweet “3”)

278. Plaintiff repeats, reiterates, and realleges each and every allegation

contained in the preceding paragraphs as though fully set forth below.

279. The conduct by Defendant, CLAUDIA COJOCARU, on May 30, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

280. The conduct by Defendant, CLAUDIA COJOCARU, on May 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.

281. On May 30, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

282. The conduct by Defendant, CLAUDIA COJOCARU, on May 30, 2019 towards Plaintiff was without excuse or justification.

283. The conduct by Defendant, CLAUDIA COJOCARU, on May 30, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

284. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on May 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.

285. 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 NINTH CAUSE OF ACTION
LIBEL
June 21, 2019 Tweet (Reply Tweet "3")

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

287. 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 "C", Page 2, Reply Tweet "3". (emphasis added).

288. 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.

289. 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 Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she falsified communications and records and calling her a liar.

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

291. 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.

292. 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.

293. 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.

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

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

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

297. 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.

298. 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.

299. 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.

300. 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.

301. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

302. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

303. 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
INJURIOUS FALSEHOOD
June 21, 2019 Tweet (Reply Tweet "3")

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

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

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

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

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

309. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 "C", Page 2, Reply Tweet "3". (emphasis added).

310. 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.

311. 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.

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

313. 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.

314. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

315. 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 than 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.

(Intentionally Left Blank)

AS AND FOR AN ELEVENTH CAUSE OF ACTION
DISPARAGEMENT
June 21, 2019 Tweet (Reply Tweet "3")

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

317. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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 "C", Page 2, Reply Tweet "3". (emphasis added).

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

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

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

321. 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.

322. 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.

323. 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 TWELFTH CAUSE OF ACTION
NEGLIGENCE
June 21, 2019 Tweet (Reply Tweet "3")

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

325. 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 "C", Page 2, Reply Tweet "3". (emphasis added).

326. 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.

327. 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.

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

329. 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.

330. 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.

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

332. 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.

333. 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.

334. 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.

335. 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.

336. 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.

337. 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.

338. 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.

339. 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.

340. 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.

341. 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.

342. 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.

343. 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.

344. 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, researcher, and author including her skill, research, findings, 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.

345. 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
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "3")

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

347. 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 "C", Page 2, Reply Tweet "3". (emphasis added).

348. 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.

349. 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.

350. 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
June 21, 2019 Tweet (Reply Tweet "3")

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

352. 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.

353. 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.

354. 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.

355. 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.

356. 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.

357. 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 FIFTEENTH CAUSE OF ACTION
PRIMA FACIE TORT
June 21, 2019 Tweet (Reply Tweet "3")

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

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

360. 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.

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

362. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 2019 towards Plaintiff was without excuse or justification.

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

364. 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.

365. 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
June 21, 2019 Tweet (Reply Tweet "5")

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

367. 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 “C”, Page 2, Reply Tweet “5”. (emphasis added).

368. 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.

369. 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 Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she falsified communications and records and committed multiple felonies.

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

371. 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, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging she she falsified communications and records.

372. 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.

373. 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.

374. 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.

375. 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.

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

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

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

379. 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.

380. 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.

381. 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.

382. 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.

383. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

384. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

385. 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 SEVENTEENTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 21, 2019 Tweet (Reply Tweet "5")

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

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

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

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

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

391. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 "C", Page 2, Reply Tweet "5". (emphasis added).

392. 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 employers, publishers, colleagues, and students, as well as potential

employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 "C", Page 2, Reply Tweet "5". (emphasis added).

393. 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.

394. 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.

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

396. 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.

397. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

398. 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 than 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 AN EIGHTEENTH CAUSE OF ACTION
DISPARAGEMENT
June 21, 2019 Tweet (Reply Tweet "5")

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

400. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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 “C”, Page 2, Reply Tweet “5”. (emphasis added).

401. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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 “C”, Page 2, Reply Tweet “5”. (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 June 21, 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 A NINETEENTH CAUSE OF ACTION
NEGLIGENCE
June 21, 2019 Tweet (Reply Tweet "5")

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

409. 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 “C”, Page 2, Reply Tweet “5”. (emphasis added).

410. 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.

411. 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.

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

413. 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.

414. 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.

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

416. 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.

417. 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.

418. 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.

419. 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.

420. 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.

421. 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.

422. 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.

423. 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.

424. 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.

425. 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.

426. 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.

427. 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.

428. 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, researcher, and author including her skill, research, findings, 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 TWENTIETH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "5")

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 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 "C", Page 2, Reply Tweet "5". (emphasis added).

432. 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.

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, 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-FIRST CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 21, 2019 Tweet (Reply Tweet "5")

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 Reply Tweet "5" on June 21, 2019.

437. 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.

438. 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.

439. 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.

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, 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
PRIMA FACIE TORT
June 21, 2019 Tweet (Reply Tweet "5")

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 June 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

444. 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.

445. On June 21, 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 June 21, 2019 towards Plaintiff was without excuse or justification.

447. The conduct by Defendant, CLAUDIA COJOCARU, on June 21, 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 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.

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-THIRD CAUSE OF ACTION

LIBEL

June 22, 2019 Tweet (Reply Tweet "19b")

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 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 "C", Page 9, Reply Tweet "19b". (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 22, 2019, makes 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 22, 2019, makes false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, 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, researcher, 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, researcher, 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 limits of all courts having jurisdiction save the Supreme Court of the State of New York.

AS AND FOR A TWENTY-FOURTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19b")

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, researcher, 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 employers, publishers, colleagues, and students, as well as potential

employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 "C", Page 9, Reply Tweet "19b". (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 submits 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 than 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-FIFTH CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19b")

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, researcher, and author including her skill, research, findings, 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 "C", Page 9, Reply Tweet "19b". (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 22, 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 A TWENTY-SIXTH CAUSE OF ACTION
NEGLIGENCE

June 22, 2019 Tweet (Reply Tweet "19b")

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 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 "C", Page 9, Reply Tweet "19b". (emphasis added).

490. 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.

491. 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.

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

493. 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.

494. 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.

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

496. 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.

497. 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.

498. 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.

499. 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.

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 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.

505. 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.

506. 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.

507. 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.

508. 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, researcher, and author including her skill, research, findings, 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.

AS AND FOR A TWENTY-SEVENTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19b")

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 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 “C”, Page 9, Reply Tweet “19b”. (emphasis added).

512. 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.

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, 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-EIGHTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet “19b”)

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 "19b" on June 22, 2019.

517. 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.

518. 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.

519. 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.

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, 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
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19b")

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 22, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

524. 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.

525. On June 22, 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 22, 2019 towards Plaintiff was without excuse or justification.

527. The conduct by Defendant, CLAUDIA COJOCARU, on June 22, 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 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.

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 THIRTIETH CAUSE OF ACTION
LIBEL PER SE
June 22, 2019 Tweet (Reply Tweet "19j")

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 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 "C", Page 12, Reply Tweet "19j". (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 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.

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 22, 2019, makes false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she falsified evidence because she is an anti-semite, and calling her a liar.

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 being falsely identified as an anti-semite negatively reflects upon and disparages Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

536. 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.

537. 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.

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

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

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

541. 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.

542. 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.

543. 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.

544. 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.

545. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics 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 in her profession and trade as an academic, teacher, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

547. 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-FIRST CAUSE OF ACTION

LIBEL

June 22, 2019 Tweet (Reply Tweet "19j")

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

549. 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 “C”, Page 12, Reply Tweet “19j”. (emphasis added).

550. 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.

551. 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 Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she falsified evidence because she is an anti-Semite, and calling her a liar.

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

553. 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.

554. 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.

555. 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.

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

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

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

559. 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.

560. 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.

561. 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.

562. 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.

563. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

564. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

565. 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-SECOND CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19j")

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

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

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

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

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

571. The publication of the above-mentioned defamatory Tweet by Defendant,

CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 "C", Page 12, Reply Tweet "19j". (emphasis added).

572. 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.

573. 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.

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

575. 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.

576. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

577. 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 than 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-THIRD CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19j")

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

579. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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 “C”, Page 12, Reply Tweet “19j”. (emphasis added).

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

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

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

583. 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.

584. 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.

585. 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-FOURTH CAUSE OF ACTION
NEGLIGENCE
June 22, 2019 Tweet (Reply Tweet "19j")

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

587. 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 "C", Page 12, Reply Tweet "19j". (emphasis added).

588. 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.

589. 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.

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

591. 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.

592. 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.

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

594. 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.

595. 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.

596. 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.

597. 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.

598. 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.

599. 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.

600. 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.

601. 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.

602. 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.

603. 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.

604. 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.

605. 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.

606. 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, researcher, and author including her skill, research, findings, 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.

607. 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-FIFTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet “19j”)

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

609. 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 “C”, Page 12, Reply Tweet “19j”. (emphasis added).

610. 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 “C”, Page 12, Reply Tweet “19j”.

611. 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.

612. 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.

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
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19j")

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

615. 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.

616. 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.

617. 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.

618. 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.

619. 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.

620. 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-SEVENTH CAUSE OF ACTION
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19j")

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

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

623. 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.

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

Plaintiff.

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

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

627. 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.

628. 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-EIGHTH CAUSE OF ACTION

LIBEL

June 22, 2019 Tweet (Reply Tweet "19k")

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

630. 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 "C", Page 12, Reply Tweet "19k". (emphasis added).

631. 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.

632. 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 Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she falsified evidence and calling her a liar.

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

634. 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.

635. 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.

636. 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.

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

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

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

640. 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.

641. 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.

642. 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.

643. 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.

644. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

645. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

646. 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-NINTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
June 22, 2019 Tweet (Reply Tweet "19k")

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

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

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

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

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

652. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential

employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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).

653. 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.

654. 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.

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

656. 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.

657. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

658. 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 than 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 FORTIETH CAUSE OF ACTION
DISPARAGEMENT
June 22, 2019 Tweet (Reply Tweet "19k")

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

660. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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 “C”, Page 12, Reply Tweet “19k”. (emphasis added).

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

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

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

664. 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.

665. 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.

666. 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-FIRST CAUSE OF ACTION
NEGLIGENCE
June 22, 2019 Tweet (Reply Tweet "19k")

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

668. 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 "C", Page 12, Reply Tweet "19k". (emphasis added).

669. 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.

670. 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.

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

672. 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.

673. 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.

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

675. 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.

676. 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.

677. 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.

678. 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.

679. 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.

680. 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.

681. 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.

682. 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.

683. 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.

684. 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.

685. 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.

686. 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.

687. 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, researcher, and author including her skill, research, findings, 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.

688. 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-SECOND CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet "19k")

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

690. 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 “C”, Page 12, Reply Tweet “19k”. (emphasis added).

691. 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.

692. 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.

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.

AS AND FOR A FORTY-THIRD CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
June 22, 2019 Tweet (Reply Tweet “19k”)

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

695. 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.

696. 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.

697. 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.

698. 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.

699. 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.

700. 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-FOURTH CAUSE OF ACTION
PRIMA FACIE TORT
June 22, 2019 Tweet (Reply Tweet "19k")

701. Plaintiff repeats, reiterates, and realleges each and every allegation

contained in the preceding paragraphs as though fully set forth below.

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

703. 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.

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

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

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

707. 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.

708. 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-FIFTH OF ACTION
LIBEL PER SE
July 19, 2019 Tweet (Reply Tweet "2")

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

710. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
2. While I was working @JohnJayCollege at Ric Curtis's swamp, I often heard #SexWorkersRights advocates deny #SexTrafficking even existed. As a survivor, that made me incredibly uncomfortable. Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.

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

711. 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 19, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications.

712. 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 19, 2019, makes false and disparaging statements about Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she is a denier of the existence of sex trafficking which is contrary to Plaintiff’s beliefs, research and publications.

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

714. 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 a denier of the existence of sex trafficking which is contrary to Plaintiff’s beliefs, research and publications negatively reflects upon and disparages Plaintiff personally and Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

715. 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.

716. 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.

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

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

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

720. 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.

721. 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.

722. 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.

723. 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.

724. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

725. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

726. 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-SIXTH CAUSE OF ACTION
LIBEL
July 19, 2019 Tweet (Reply Tweet "2")

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

728. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
2. While I was working @JohnJayCollege at Ric Curtis's swamp, I often heard #SexWorkersRights advocates deny #SexTrafficking even existed. As a survivor, that made me incredibly uncomfortable. Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.

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

729. 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 19, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications.

730. 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 19, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, and Plaintiff personally, alleging she is a denier of the existence of sex trafficking which is contrary to Plaintiff’s beliefs, research and publications.

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

732. 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.

733. 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.

734. 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.

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

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

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

738. 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.

739. 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.

740. 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.

741. 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.

742. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

743. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

744. 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-SEVENTH OF ACTION
INJURIOUS FALSEHOOD
July 19, 2019 Tweet (Reply Tweet "2")

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

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

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

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

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

750. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications, when Defendant falsely stated **"[w]hile [she] was working @JohnJayCollege at Ric Curtis's swamp, [she] often heard #SexWorkersRights advocates deny #SexTrafficking even existed ... [and] ... Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well." See, Exhibit "D", Page 2, Reply Tweet "2".** (emphasis added).

751. 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.

752. 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.

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

754. 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.

755. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

756. 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 than 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-EIGHTH CAUSE OF ACTION
DISPARAGEMENT
July 19, 2019 Tweet (Reply Tweet "2")

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

758. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff is a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications, when Defendant falsely stated "[w]hile [she] was working @JohnJayCollege at Ric Curtis's swamp, [she] often heard #SexWorkersRights advocates deny #SexTrafficking even existed ... [and] ... Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well." See, Exhibit "D", Page 2, Reply Tweet "2". (emphasis added).

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

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

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

762. 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 19, 2019.

763. 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.

764. 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-NINTH CAUSE OF ACTION
NEGLIGENCE
July 19, 2019 Tweet (Reply Tweet "2")

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

766. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
2. While I was working @JohnJayCollege at Ric Curtis's swamp, I often heard #SexWorkersRights advocates deny #SexTrafficking even existed. As a survivor, that made me

incredibly uncomfortable. **Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.**

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

767. On July 19, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

768. On July 19, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter, falsely attacking Plaintiff’s ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking which is contrary to Plaintiff’s beliefs, research and publications.

769. On July 19, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

770. On July 19, 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.

771. On July 19, 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.

772. On July 19, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

773. On July 19, 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

774. On July 19, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

775. On July 19, 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

776. On July 19, 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

777. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

778. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

779. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

780. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

781. On July 19, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

782. On July 19, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

783. On July 19, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp,

where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

784. As a direct result and proximate cause of the false statements published on July 19, 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.

785. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on July 19, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

786. 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 FIFTIETH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
July 19, 2019 Tweet (Reply Tweet "2")

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

788. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, false and defamatory statements about Plaintiff, and the Swamp, alleging that Plaintiff is a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications, when Defendant falsely stated "**[w]hile [she] was working @JohnJayCollege at Ric Curtis's swamp, [she] often heard #SexWorkersRights advocates deny #SexTrafficking even existed ... [and that] ... Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.**" See, Exhibit "D", Page 2, Reply Tweet "2". (emphasis added).

789. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" that Plaintiff is a denier of the existence of sex trafficking which is contrary to Plaintiff's beliefs, research and publications. See, Exhibit "D", Page 2, Reply Tweet "2".

790. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "2" on July 19, 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.

791. 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.

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
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
July 19, 2019 Tweet (Reply Tweet "2")

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

794. 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 "2" on July 19, 2019.

795. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "2" on July 19, 2019 constitutes negligent conduct on the part of said Defendant.

796. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "2" on July 19, 2019 constitutes a negligent violation of a statutory standard of conduct.

797. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "2" on July 19, 2019 constitutes a Negligent Infliction of Emotional Distress.

798. 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.

799. 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-SECOND CAUSE OF ACTION
PRIMA FACIE TORT
July 19, 2019 Tweet (Reply Tweet "2")

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

801. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

802. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 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.

803. On July 19, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

804. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff was without excuse or justification.

805. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

806. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on July 19, 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.

807. 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 FIFTY-THIRD OF ACTION
LIBEL PER SE
July 19, 2019 Tweet (Reply Tweet "5")

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

809. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
5. These distortions were the norm at the swamp. In fact, the swamp was where I learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't "win". Curtis said "#SexTrafficking victims were just prostitutes who played victims" [.]

See, Exhibit "D", Page 3. (emphasis added).

810. 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 19, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are

losers who lost a competition, and (b) “just prostitutes who played victims”, all of which is contrary to Plaintiff’s beliefs, research and publications.

811. 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 19, 2019, makes false and disparaging statements about Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) “just weaker people” who are losers who lost a competition, and (b) “just prostitutes who played victims”, all of which is contrary to Plaintiff’s beliefs, research and publications.

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

813. 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 a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) “just weaker people” who are losers who lost a competition, and (b) “just prostitutes who played victims”, all of which is contrary to Plaintiff’s beliefs, research and publications, negatively reflects upon and disparages Plaintiff personally and Plaintiff’s professional

abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

814. 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.

815. 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.

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

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

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

819. 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.

820. 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.

821. 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.

822. 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.

823. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

824. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

825. 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-FOURTH CAUSE OF ACTION
LIBEL
July 19, 2019 Tweet (Reply Tweet "5")

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

827. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
5. These distortions were the norm at the swamp. In fact, the swamp was where I learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't "win". Curtis said "#SexTrafficking victims were just prostitutes who played victims" [.]

See, Exhibit "D", Page 3. (emphasis added).

828. 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 19, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition, and (b) "just prostitutes who played victims", all of which is contrary to Plaintiff's beliefs, research and publications.

829. 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 19, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition, and (b) "just prostitutes who played victims", all of which is contrary to Plaintiff's beliefs, research and publications.

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

831. 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.

832. 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.

833. 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.

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

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

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

837. 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.

838. 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.

839. 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.

840. 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.

841. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

842. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

843. 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
INJURIOUS FALSEHOOD
July 19, 2019 Tweet (Reply Tweet "5")

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

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

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

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

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

849. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill,

research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) “just weaker people” who are losers who lost a competition, and (b) “just prostitutes who played victims”, all of which is contrary to Plaintiff’s beliefs, research and publications, when Defendant falsely stated “[t]hese distortions were the norm at the swamp. In fact, the swamp was where [she] learned that #victims didn’t exist; they were just weaker people who didn’t last in the competition. They didn’t ‘win’. Curtis said ‘#SexTrafficking victims were just prostitutes who played victims’”. See, Exhibit “D”, Page 3, Reply Tweet “5”. (emphasis added).

850. 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.

851. 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.

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

853. 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.

854. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

855. 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 than 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-SIXTH CAUSE OF ACTION
DISPARAGEMENT
July 19, 2019 Tweet (Reply Tweet "5")

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

857. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition,

and (b) “just prostitutes who played victims”, all of which is contrary to Plaintiff’s beliefs, research and publications, when Defendant falsely stated “[t]hese distortions were the norm at the swamp. In fact, the swamp was where [she] learned that #victims didn’t exist; they were just weaker people who didn’t last in the competition. They didn’t ‘win’. Curtis said ‘#SexTrafficking victims were just prostitutes who played victims’”. See, Exhibit “D”, Page 3, Reply Tweet “5”. (emphasis added).

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

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

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

861. 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 19, 2019.

862. 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.

863. 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-SEVENTH CAUSE OF ACTION
NEGLIGENCE
July 19, 2019 Tweet (Reply Tweet "5")

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

865. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

Schrödinger's Criminologist @anarkriminology • Jul 19, 2019
5. These distortions were the norm at the swamp. In fact, the swamp was where I learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't "win". Curtis said "#SexTrafficking victims were just prostitutes who played victims" [.]

See, Exhibit "D", Page 3. (emphasis added).

866. On July 19, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

867. On July 19, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition, and (b) "just prostitutes who played victims", all of which is contrary to Plaintiff's beliefs, research and publications.

868. On July 19, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

869. On July 19, 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.

870. On July 19, 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.

871. On July 19, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

872. On July 19, 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

873. On July 19, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

874. On July 19, 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

875. On July 19, 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as

Twitter.

876. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

877. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

878. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

879. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

880. On July 19, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

881. On July 19, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

882. On July 19, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

883. As a direct result and proximate cause of the false statements published on July 19, 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.

884. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on July 19, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

885. 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
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
July 19, 2019 Tweet (Reply Tweet "5")

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

887. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "George Nader, prominent Mueller report witness, charged with child sex trafficking" published by CBC World News on July 19, 2019, false and defamatory statements about Plaintiff and the Swamp,

where Plaintiff's office was located, and to which she is publicly linked, that Plaintiff is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition, and (b) "just prostitutes who played victims", all of which is contrary to Plaintiff's beliefs, research and publications, when Defendant falsely stated "**[t]hese distortions were the norm at the swamp. In fact, the swamp was where [she] learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't 'win'. Curtis said '#SexTrafficking victims were just prostitutes who played victims'".** See, Exhibit "D", Page 3, Reply Tweet "5". (emphasis added).

888. On or about July 19, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" that Plaintiff is a denier of the existence of sex trafficking, a denier of the existence of sex trafficking victims, that sex trafficking victims are not victims, and that they are (a) "just weaker people" who are losers who lost a competition, and (b) "just prostitutes who played victims", all of which is contrary to Plaintiff's beliefs, research and publications. See, Exhibit "D", Page 3, Reply Tweet "5".

889. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "5" on July 19, 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.

890. 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.

891. 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-NINTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
July 19, 2019 Tweet (Reply Tweet "5")

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

893. 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 July 19, 2019.

894. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "5" on July 19, 2019 constitutes negligent conduct on the part of said Defendant.

895. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "5" on July 19, 2019

constitutes a negligent violation of a statutory standard of conduct.

896. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "5" on July 19, 2019 constitutes a Negligent Infliction of Emotional Distress.

897. 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.

898. 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 SIXTIETH CAUSE OF ACTION
PRIMA FACIE TORT
July 19, 2019 Tweet (Reply Tweet "5")

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

900. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

901. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 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.

902. On July 19, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

903. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff was without excuse or justification.

904. The conduct by Defendant, CLAUDIA COJOCARU, on July 19, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

905. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on July 19, 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.

906. 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-FIRST CAUSE OF ACTION

LIBEL PER SE

July 30, 2019 Tweet

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

908. 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 "E", Page 12. (emphasis added).

909. 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 "E", Page 12. (emphasis added).

910. 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

that the study was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought.

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

912. 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, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

913. 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.

914. 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.

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

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

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

918. 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.

919. 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.

920. 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.

921. 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.

922. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

923. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

924. 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
INJURIOUS FALSEHOOD
July 30, 2019 Tweet

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

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

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

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

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

930. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, 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 “E”, Page 12. (emphasis added).

931. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor,

and/or are substandard, 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 that the study was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit “E”, Page 12. (emphasis added).

932. 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.

933. 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.

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

935. 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.

936. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

937. 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 than 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 SIXTY-THIRD CAUSE OF ACTION
DISPARAGEMENT
July 30, 2019 Tweet

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

939. 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 "E", Page 12. (emphasis added).

940. 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 that the study was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit "E", Page 12. (emphasis added).

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

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

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

944. 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.

945. 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.

946. 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-FOURTH CAUSE OF ACTION
NEGLIGENCE
July 30, 2019 Tweet

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

948. 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 “E”, Page 12. (emphasis added).

949. 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.

950. 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.

951. 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 that the study was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought.

952. On July 30, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

953. 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.

954. 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.

955. On July 30, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

956. 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.

957. 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.

958. 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.

959. 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.

960. 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.

961. 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.

962. 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.

963. 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.

964. 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.

965. 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.

966. 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.

967. 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.

968. 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, researcher, and author including her skill, research, findings, 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.

969. 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-FIFTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
July 30, 2019 Tweet

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

971. 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 "E", Page 12.

972. 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 that the study was thereafter reinstated, giving the appearance that there was criminal wrongdoing found and charges brought. *See*, Exhibit “E”, Page 12. (emphasis added).

973. 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.

974. 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.

975. 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 SIXTY-SIXTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
July 30, 2019 Tweet

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

977. 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.

978. 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.

979. 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.

980. 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.

981. 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.

982. 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-SEVENTH CAUSE OF ACTION
PRIMA FACIE TORT
July 30, 2019 Tweet

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

984. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

985. 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.

986. On July 30, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

987. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff was without excuse or justification.

988. The conduct by Defendant, CLAUDIA COJOCARU, on July 30, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

989. 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.

990. 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-EIGHTH OF ACTION
LIBEL PER SE
September 21, 2019 Tweet

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

992. Following Mr. Herbst's June 5, 2019 letter to the CUNY John Jay community²⁵ which included copies of communications provided by Plaintiff containing statements and admissions by Defendant against her interests, Defendant, CLAUDIA COJOCARU, identified Plaintiff, AMALIA S. PALADINO, as a supporter of Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, and labeled Dr. PALADINO as being complicit in the horrible crimes Defendant and Ms. Haber alleged against them in her June 21, 2019 and June 22, 2019 Tweets.²⁶

993. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them"

²⁵ See, Exhibit "B".

²⁶ See, Exhibit "C".

published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Exercise for @JohnJayCollege bureaucrats: **take this article, replace Epstein's name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🍷 #MyJohnJay**

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

994. 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 September 21, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women.

995. 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 September 21, 2019, makes false and disparaging statements about Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women.

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

997. 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 a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of

commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women negatively reflects upon and disparages Plaintiff personally and Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

998. 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 having committed serious crimes and is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women negatively reflects upon and disparages Plaintiff personally and Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

999. 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.

1000. 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.

1001. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1002. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1003. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1004. 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.

1005. 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.

1006. 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.

1007. 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.

1008. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1009. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1010. 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-NINTH CAUSE OF ACTION
LIBEL
September 21, 2019 Tweet

1011. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1012. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter when Retweeting an article titled “‘When you are in, you can’t get out.’ Women describe how Jeffrey Epstein controlled them” published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Exercise for @JohnJayCollege bureaucrats: take this article, replace Epstein’s name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🍷 #MyJohnJay

See, Exhibit “F”, Page 1. (emphasis added).

1013. 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 September 21, 2019, makes false and disparaging statements falsely attacking Plaintiff’s ethics, honesty, truthfulness, calling

her a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women.

1014. 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 September 21, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging she is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women.

1015. The above-mentioned statements are false and defamatory.

1016. 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.

1017. 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.

1018. 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.

1019. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1020. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1021. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1022. 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.

1023. 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.

1024. 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.

1025. 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.

1026. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1027. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1028. 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 SEVENTIETH CAUSE OF ACTION
INJURIOUS FALSEHOOD
September 21, 2019 Tweet

1029. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1030. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, researcher, and author resulting in the damage of business and professional relations.

1031. Defendant's interference with Plaintiff's business and professional relations was made with malice.

1032. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

1033. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA

COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women when Defendant falsely stated that **"@JohnJayCollege bureaucrats [should] take this article, replace Epstein's name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🍷 #MyJohnJay"**. See, Exhibit "F", Page 1 (emphasis added).

1034. 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.

1035. 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.

1036. The average revenue earned per class taught is \$5,702.40.

1037. 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.

1038. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

1039. 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 than 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 SEVENTY-FIRST CAUSE OF ACTION
DISPARAGEMENT
September 21, 2019 Tweet

1040. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1041. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women when Defendant falsely stated **"@JohnJayCollege bureaucrats [should] take this article, replace Epstein's name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🍷 #MyJohnJay"**. See, Exhibit "F", Page 1 (emphasis added).

1042. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

1043. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

1044. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

1045. 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 September 21, 2019.

1046. 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.

1047. 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 SEVENTY-SECOND CAUSE OF ACTION
NEGLIGENCE
September 21, 2019 Tweet

1048. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1049. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about the Swamp, and those who worked there, including Plaintiff:

**Exercise for @JohnJayCollege bureaucrats: take this article,
replace Epstein's name with those of the disgraced profs,**

and those who were complicit, and voila, you have your swamp! #MeToo 🍌 #MyJohnJay

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

1050. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1051. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness, calling her a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring

that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women.

1052. On September 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

1053. On September 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.

1054. On September 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.

1055. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

1056. On September 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her

June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1057. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1058. On September 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 and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1059. On September 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1060. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1061. 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 and the Swamp, where

Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1062. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1063. 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 and the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019

Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1064. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1065. On September 21, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1066. On September 21, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff and the

Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1067. As a direct result and proximate cause of the false statements published on September 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.

1068. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on September 21, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

1069. 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 SEVENTY-THIRD CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet

1070. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1071. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” on the social media network known as Twitter when Retweeting an article titled “‘When you are in, you can’t get out.’ Women describe how Jeffrey Epstein controlled them” published by the Miami Herald on September 20, 2019, false and defamatory statements about Plaintiff and the Swamp, where Plaintiff’s office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets²⁷ that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, when Defendant falsely stated “@JohnJayCollege bureaucrats [should] take this article, replace Epstein’s name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp! #MeToo 🍷 #MyJohnJay”. See, Exhibit “F”, Page 1. (emphasis added).

1072. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username “@anarkriminology” that Plaintiff is a rapist, child molester, child abuser, sex trafficker, sex trafficker of children,

²⁷ See, Exhibit “C”.

sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, sex traffickers of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women. *See*, Exhibit "F", Page 1. (emphasis added).

1073. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in the Tweet on September 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.

1074. 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.

1075. 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 SEVENTY-FOURTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet

1076. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1077. Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff in publishing and/or electronically transmitting the Tweet on September 21, 2019.

1078. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the Tweet on September 21, 2019 constitutes negligent conduct on the part of said Defendant.

1079. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting the Tweet on September 21, 2019 constitutes a negligent violation of a statutory standard of conduct.

1080. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting the Tweet on September 21, 2019 constitutes a Negligent Infliction of Emotional Distress.

1081. 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.

1082. 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 SEVENTY-FIFTH CAUSE OF ACTION
PRIMA FACIE TORT
September 21, 2019 Tweet

1083. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1084. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

1085. The conduct by Defendant, CLAUDIA COJOCARU, on September 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.

1086. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

1087. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was without excuse or justification.

1088. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

1089. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on September 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.

1090. 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 SEVENTY-SIXTH OF ACTION
LIBEL PER SE
September 21, 2019 Tweet (Reply Tweet "1")

1091. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1092. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

(Intentionally Left Blank)

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019

Replying to [@anarkriminology](#)

1. **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **"Everyone around us had to know, because we looked so broken. But no one did anything."**

I can relate to this. #MeToo 🙏

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

1093. 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 September 21, 2019, make false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, alleging that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1094. 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 September 21, 2019, makes false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging Plaintiff knew Defendant and Ms.

Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1095. The above-mentioned statements are false and defamatory.

1096. 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 they falsely assert Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, negatively reflects upon and disparages Plaintiff personally and Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

1097. 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 having knowledge that four (4) men she worked with were committing serious crimes against Defendant and Ms. Haber, including, among other things, rape,

sexual assault, sexual abuse, sexual harassment, sex trafficking, forced prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, negatively reflects upon and disparages Plaintiff personally and Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

1098. 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.

1099. 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.

1100. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1101. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1102. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1103. 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.

1104. 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.

1105. 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.

1106. 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.

1107. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1108. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1109. 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 SEVENTY-SEVENTH CAUSE OF ACTION

LIBEL

September 21, 2019 Tweet (Reply Tweet "1")

1110. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1111. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22,

2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019

Replying to [@anarkriminology](#)

1. **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [*sic*] of trafficking her when she was 22. **"Everyone around us had to know, because we looked so broken. But no one did anything."**

I can relate to this. #MeToo 🙏

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

1112. 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 September 21, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, alleging that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1113. 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 September 21, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an

academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1114. The above-mentioned statements are false and defamatory.

1115. 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.

1116. 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.

1117. 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.

1118. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1119. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1120. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1121. 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.

1122. 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.

1123. 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.

1124. 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.

1125. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1126. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1127. 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 SEVENTY-EIGHTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
September 21, 2019 Tweet (Reply Tweet "1")

1128. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1129. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, researcher, and author resulting in the damage of business and professional relations.

1130. Defendant's interference with Plaintiff's business and professional relations was made with malice.

1131. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

1132. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

1133. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, when Defendant falsely stated "**Not one person helped us,**" said Sarah Ransome, a native of South Africa who

successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **'Everyone around us had to know, because we looked so broken. But no one did anything.'** I can relate to this. **#MeToo** 🍷". See, Exhibit "F", Page 2, Reply Tweet "1". (emphasis added).

1134. 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.

1135. 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.

1136. The average revenue earned per class taught is \$5,702.40.

1137. 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.

1138. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

1139. 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 than 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 SEVENTY-NINTH CAUSE OF ACTION
DISPARAGEMENT
September 21, 2019 Tweet (Reply Tweet "1")

1140. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1141. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, when Defendant falsely stated **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **'Everyone around us had to know, because we looked so broken. But no one did**

anything.' I can relate to this. #MeToo 🍷". See, Exhibit "F", Page 2, Reply Tweet "1".
(emphasis added).

1142. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

1143. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

1144. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

1145. 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 September 21, 2019.

1146. 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.

1147. 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.

(Intentionally Left Blank)

AS AND FOR AN EIGHTIETH CAUSE OF ACTION
NEGLIGENCE
September 21, 2019 Tweet (Reply Tweet "1")

1148. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1149. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019
Replying to [@anarkriminology](#)

1. **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **"Everyone around us had to know, because we looked so broken. But no one did anything."**

I can relate to this. #MeToo 🙏

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

1150. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff,

AMALIA S. PALADINO, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1151. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness, alleging that Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1152. On September 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to

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

1153. On September 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.

1154. On September 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.

1155. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

1156. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1157. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr.

Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1158. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1159. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1160. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1161. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1162. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and

Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1163. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1164. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1165. On September 21, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them,

under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1166. On September 21, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and as such, publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1167. As a direct result and proximate cause of the false statements published on September 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.

1168. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on September 21, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

1169. 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 EIGHTY-FIRST CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet (Reply Tweet "1")

1170. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1171. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, false and defamatory statements Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, when Defendant falsely stated **"Not one person helped us,"** said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell [sic] of trafficking her when she was 22. **'Everyone around us had to know, because we looked so broken. But no one did anything.'** I can relate to this. **#MeToo** 🍷". See, Exhibit "F", Page 2, Reply Tweet "1". (emphasis added).

1172. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" that

Plaintiff knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes. *See*, Exhibit "A", Page 2, Reply Tweet "3".

1173. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "1" on September 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.

1174. 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.

1175. 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 AN EIGHTY-SECOND CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet (Reply Tweet "1")

1176. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1177. 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 "1" on September 21, 2019.

1178. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "1" on September 21, 2019 constitutes negligent conduct on the part of said Defendant.

1179. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "1" on September 21, 2019 constitutes a negligent violation of a statutory standard of conduct.

1180. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "1" on September 21, 2019 constitutes a Negligent Infliction of Emotional Distress.

1181. 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.

1182. 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 EIGHTY-THIRD CAUSE OF ACTION
PRIMA FACIE TORT
September 21, 2019 Tweet (Reply Tweet "1")

1183. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1184. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

1185. The conduct by Defendant, CLAUDIA COJOCARU, on September 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.

1186. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress to Plaintiff.

1187. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was without excuse or justification.

1188. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

1189. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on September 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.

1190. 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 EIGHTY-FOURTH OF ACTION
LIBEL PER SE
September 21, 2019 Tweet (Reply Tweet "2")

1191. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1192. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

(Intentionally Left Blank)

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019
2. Because nobody helped me when I was trafficked, I knew I had to go back and help others. **Whether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes.**
#MeToo 🙏

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

1193. 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 September 21, 2019, analogize the Swamp, and those who work there, to Jeffrey Epstein, and those who enabled him to commit the heinous sexual crimes against children and young women.

1194. 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 September 21, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew

Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1195. 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 September 21, 2019, makes false and disparaging statements about Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with

deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1196. The above-mentioned statements are false and defamatory.

1197. 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 a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women negatively reflects upon and disparages Plaintiff personally and Plaintiff’s professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

1198. 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 having committed serious crimes and is a rapist, child molester, child

abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women negatively reflects upon and disparages Plaintiff personally and Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics.

1199. 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.

1200. 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.

1201. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1202. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1203. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1204. 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.

1205. 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.

1206. 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.

1207. 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.

1208. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1209. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1210. 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 EIGHTY-FIFTH CAUSE OF ACTION

LIBEL

September 21, 2019 Tweet (Reply Tweet "2")

1211. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1212. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you

are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019
2. Because nobody helped me when I was trafficked, I knew I had to go back and help others. **Whether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes.**
#MeToo 🙏

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

1213. 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 September 21, 2019, makes false and disparaging statements falsely attacking Plaintiff's ethics, honesty, truthfulness, alleging Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators,

involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1214. 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 September 21, 2019, makes false and disparaging statements about Plaintiff personally, and her professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics, alleging Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and

Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1215. The above-mentioned statements are false and defamatory.

1216. 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.

1217. 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.

1218. 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.

1219. Defendant, CLAUDIA COJOCARU, made the defamatory statements described above with reckless disregard for their truth and/or falsity.

1220. Defendant, CLAUDIA COJOCARU, knew that she had no reliable and/or unbiased evidence or information supporting the above-mentioned statements.

1221. Defendant, CLAUDIA COJOCARU, failed to properly determine the truth and/or falsity of her libelous statements prior to publishing the above-mentioned defamatory statements.

1222. 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.

1223. 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.

1224. 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.

1225. 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.

1226. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been injured.

1227. 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, researcher, and author for high quality, professionalism, skill, ability, honesty, and ethics has been damaged.

1228. 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 EIGHTY-SIXTH CAUSE OF ACTION
INJURIOUS FALSEHOOD
September 21, 2019 Tweet (Reply Tweet "2")

1229. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1230. The defamatory Tweet published by Defendant, CLAUDIA COJOCARU, irreparably harmed Plaintiff's good name, reputation, and credit as an academic, teacher, researcher, and author resulting in the damage of business and professional relations.

1231. Defendant's interference with Plaintiff's business and professional relations was made with malice.

1232. Defendant's interference with Plaintiff's business and professional relations was made with actual malice.

1233. Damages resulted because of the injury to Plaintiff's business and professional relationships caused by Defendant, CLAUDIA COJOCARU.

1234. The publication of the above-mentioned defamatory Tweet by Defendant, CLAUDIA COJOCARU, on the social media network known as Twitter falsely put Plaintiff's employers, publishers, colleagues, and students, as well as potential employers, publishers, and colleagues, and future students on notice that Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics are poor, and/or are substandard, that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a

forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, when Defendant falsely stated “[w]hether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo 🍷”. See, Exhibit “F”, Page 2, Reply Tweet “2”. (emphasis added).

1235. 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.

1236. 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.

1237. The average revenue earned per class taught is \$5,702.40.

1238. 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.

1239. Plaintiff, AMALIA S. PALADINO, respectfully submits 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.

1240. 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 than 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 AN EIGHTY-SEVENTH CAUSE OF ACTION
DISPARAGEMENT
September 21, 2019 Tweet (Reply Tweet "2")

1241. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1242. Defendant, CLAUDIA COJOCARU, published false and disparaging statements about Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, professionalism, temperament, ability, honesty, and ethics alleging that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and

sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes, when Defendant falsely stated “[w]hether in Japan, or at the [@JohnJayCollege](#) swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo 🍷”. See, Exhibit “F”, Page 2, Reply Tweet “2”. (emphasis added).

1243. Defendant, CLAUDIA COJOCARU, knew that her statements were false, or recklessly disregarded the possibility that they were false.

1244. Defendant, CLAUDIA COJOCARU, did not retract her false and/or recklessly made statements.

1245. Defendant, CLAUDIA COJOCARU, had no absolute or qualified privileges protecting her false statements.

1246. 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 September 21, 2019.

1247. 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.

1248. 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 EIGHTY-EIGHTH CAUSE OF ACTION
NEGLIGENCE
September 21, 2019 Tweet (Reply Tweet "2")

1249. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1250. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, the following false and defamatory statements about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them:

Schrödinger's Criminologist @anarkriminology • Sep 21, 2019
2. Because nobody helped me when I was trafficked, I knew I had to go back and help others. **Whether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo** 🙏

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

1251. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter.

1252. On September 21, 2019 Defendant, CLAUDIA COJOCARU, published the above-mentioned false and disparaging statements about and referring to Plaintiff, AMALIA S. PALADINO, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username "@anarkriminology" on the social media network known as Twitter, falsely attacking Plaintiff's ethics, honesty, truthfulness, alleging Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant,

and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes.

1253. On September 21, 2019 Defendant, CLAUDIA COJOCARU, had a duty to act with reasonable care toward the persons, assets, and reputations of others.

1254. On September 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.

1255. On September 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.

1256. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to act with reasonable care toward the persons, assets, and reputations of others.

1257. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1258. On September 21, 2019 Defendant, CLAUDIA COJOCARU, breached her duty to disseminate accurate information in statements she published about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1259. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her

pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1260. On September 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1261. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1262. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1263. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1264. 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, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1265. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently

published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1266. On September 21, 2019 Defendant, CLAUDIA COJOCARU, recklessly published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1267. On September 21, 2019 Defendant, CLAUDIA COJOCARU, carelessly published the above-mentioned false statements about and referring to Plaintiff, the Swamp, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated that Plaintiff supported, and publicly asserted Plaintiff was complicit in the horrible crimes Defendant and Ms. Haber alleged against them, under her pseudonymous username “@anarkriminology” on the social media network known as Twitter.

1268. As a direct result and proximate cause of the false statements published on September 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.

1269. As a direct result and proximate cause of the false statements which were negligently, recklessly, and carelessly published on September 21, 2019 Defendant, CLAUDIA COJOCARU, will, and has, cast a strong stigma on Plaintiff's professional abilities as an academic, teacher, researcher, and author including her skill, research, findings, 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.

1270. 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 EIGHTY-NINTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet (Reply Tweet "2")

1271. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1272. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" on the social media network known as Twitter when Retweeting an article titled "'When you are in, you can't get out.' Women describe how Jeffrey Epstein controlled them" published by the Miami Herald on September 20, 2019, false and defamatory statements

about Plaintiff, the Swamp, where Plaintiff's office was located, and to which she is publicly linked, and referring to Dr. Curtis, Dr. Marcus, Dr. Spunt, and Mr. Dominguez, who Defendant publicly stated in her June 21, 2019 and June 22, 2019 Tweets that Plaintiff supported, alleging that Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes when Defendant falsely stated "**[w]hether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo 🍷**". See, Exhibit "F", Page 2, Reply Tweet "2". (emphasis added).

1273. On or about September 21, 2019, Defendant, CLAUDIA COJOCARU, publicly published under her pseudonymous username "@anarkriminology" that

Plaintiff is a rapist, child molester, child abuser, sex trafficker, child sex trafficker, facilitator of commercial sexual exploitation of children, sexual deviant, and sexual predator, who was involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or who enables and/or assists rapists, child molesters, child abusers, sex traffickers, child sex trafficker, facilitators of commercial sexual exploitation of children, sexual deviants, and sexual predators, involved in a sex trafficking ring that facilitated the sexual abuse and exploitation of children and young women, and/or alleging that those who worked in the Swamp, Plaintiff included, knew Defendant and Ms. Haber were being, among other things, raped, sexually assaulted, sexually abused, sexually harassed, sex trafficked, a forced into prostitution, and that Plaintiff ignored it, acted with deliberate indifference, and allowed the alleged rapes, sexual assaults, sexual harassment, sex trafficking, and forced prostitution to happen and/or continue, which would have rendered Plaintiff complicit in the serious and heinous crimes. *See*, Exhibit "F", Page 2, Reply Tweet "2".

1274. The actions and conduct of Defendant, CLAUDIA COJOCARU, in publicly publishing the defamatory statement in Reply Tweet "2" on September 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.

1275. 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.

1276. 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 NINETIETH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
September 21, 2019 Tweet (Reply Tweet "2")

1277. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1278. 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 "2" on September 21, 2019.

1279. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "2" on September 21, 2019 constitutes negligent conduct on the part of said Defendant.

1280. The conduct by Defendant, CLAUDIA COJOCARU, towards Plaintiff in publishing and/or electronically transmitting Reply Tweet "2" on September 21, 2019 constitutes a negligent violation of a statutory standard of conduct.

1281. The acts and conduct of Defendant, CLAUDIA COJOCARU, in publishing and/or electronically transmitting Reply Tweet "2" on September 21, 2019 constitutes a

Negligent Infliction of Emotional Distress.

1282. 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.

1283. 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 NINETY-FIRST CAUSE OF ACTION
PRIMA FACIE TORT
September 21, 2019 Tweet (Reply Tweet "2")

1284. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as though fully set forth below.

1285. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was malicious and done with the intent to harm Plaintiff.

1286. The conduct by Defendant, CLAUDIA COJOCARU, on September 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.

1287. On September 21, 2019 Defendant, CLAUDIA COJOCARU, negligently caused, or disregarded the substantial probability of causing, severe emotional distress

to Plaintiff.

1288. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff was without excuse or justification.

1289. The conduct by Defendant, CLAUDIA COJOCARU, on September 21, 2019 towards Plaintiff constitutes a negligent violation of a statutory standard of conduct.

1290. As a result of these willful and wanton violations and actions by Defendant, CLAUDIA COJOCARU, on September 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.

1291. 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, 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;

(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, 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;

(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, 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;

(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;

(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, 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;

(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;

(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, 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;

(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;

(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, 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;

(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;

(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, 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;

(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;

(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, 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;

(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;

(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, 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;

(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) in the SIXTY-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;

(nnn) in the SIXTY-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;

(ooo) in the SIXTY-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;

(ppp) in the SIXTY-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;

(qqq) in the SIXTY-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;

(rrr) in the SEVENTIETH 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;

(sss) in the SEVENTY-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;

(ttt) in the SEVENTY-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;

(uuu) in the SEVENTY-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;

(vvv) in the SEVENTY-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;

(www) in the SEVENTY-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;

(xxx) in the SEVENTY-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;

(yyy) in the SEVENTY-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;

(zzz) in the SEVENTY-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, 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;

(aaaa) in the SEVENTY-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;

(bbbb) in the EIGHTIETH 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;

(cccc) in the EIGHTY-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;

(dddd) in the EIGHTY-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;

(eeee) in the EIGHTY-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;

(ffff) in the EIGHTY-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;

(gggg) in the EIGHTY-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;

(hhhh) in the EIGHTY-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, 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;

(iii) in the EIGHTY-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;

(jjj) in the EIGHTY-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;

(kkk) in the EIGHTY-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;

(lll) in the NINTIETH 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) in the NINETY-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;

(nnn) 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.

(Intentionally Left Blank)

Dated: Mineola, New York
August 3, 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

VERIFICATION

STATE OF NEW YORK }
COUNTY OF NASSAU } ss.:

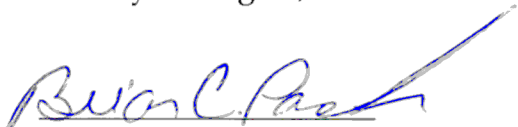
AMALIA S. PALADINO, being duly sworn, says:

I am the 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
August 3, 2020


AMALIA S. PALADINO

Sworn to before me this
3rd day of August, 2020


Notary Public

BRIAN C. PASCALE
Notary Public, State of New York
No. 02PA6145267
Qualified in Nassau County
Commission Expires May 1, 20**23**

Exhibit "A"

← Thread



Schrödinger's Criminologist

@anarkriminology



I can relate to this article- see thread below!

Academia is built on exploitation. We must break this vicious circle | Universities | The Guardian



Academia is built on exploitation. We must break this vicious circle | Anonymous ...
What did I find when I joined a university? Poor mental health, huge workloads, ego-driven professors and rampant plagiarism
theguardian.com

10:31 AM · May 30, 2019 · Twitter for iPhone

1 Retweet 7 Likes





Schrödinger's Criminologist @anarkriminology · May 30

Replying to @anarkriminology

1. "I initially assumed this was isolated to my university. However with a little online research, I found these toxic conditions were commonplace in universities the world over."

It took me a while to identify these toxic patterns. Once I did, I knew I had to take action!



1



2



Schrödinger's Criminologist @anarkriminology · May 30

2. "... the organisation provides infrastructure and services. With these resources...academics are then free... to further their own positions as quasi-entrepreneurs."

I come from a place where knowledge production is nurtured to help society, not individual academics. 🚫🚫🚫



1



3



Schrödinger's Criminologist @anarkriminology · May 30

3. "Unfortunately, these untethered conditions are also very favourable for those with an unhinged sense of entitlement."

The swamp @JohnJayCollege was crawling with self-serving/unhinged/entitled men & their enablers-a cult of vicious, angry, abusive sexual predators. 🚫 #MeToo 🙋



1



1



3



Schrödinger's Criminologist @anarkriminology · May 30

4a. "It strikes me that a rogue professor can often operate on campus with virtual impunity."

#TitleIX cases reveal that for years rogue academics preyed on students/junior faculty/staff.Plagiarism, Exploitation, sexual assault , retaliation- they did it all, w/no consequences.



1



2



6





Schrödinger's Criminologist @anarkriminology · May 30

4b. Each academic scandal brought to the public's attention shows a pervasive pattern of multi-layered exploitation, but only the drugs, alcohol & sexual assault catch our attention. No1 wants to talk about the extreme labor exploitation+rampant plagiarism. These are important too



1



1



3



Schrödinger's Criminologist @anarkriminology · May 30

4c. If plagiarism& exploitation were ok, there wouldn't be rules against these.

Abuse/sexual violence can be used to coerce the victim into giving up their work/silence them if work was plagiarized.

A good study makes the plagiarizer's career->breaking the victim's spirit 🚫



1



3



Schrödinger's Criminologist @anarkriminology · May 30

4d. It's irresponsible to let exploitative, unethical academics get away with theft of labor and ideas; entitled academics are not owed labor, ideas, or sexual favors (gross). This culture has to be erased, because it has long term consequences affecting future generations!



1



3



Schrödinger's Criminologist @anarkriminology · May 30

5. The Swamp: "There are also many academics who can only muddle through by riding on the coattails of students. Always quick to take advantage of any vulnerability, the usual suspects usually appear on a long list of co-authors of random and unrelated publications." 🤡🤡🤡



1



1



3



Schrödinger's Criminologist @anarkriminology · May 30

5a. "Sadly, students are also vulnerable to the theft of data, ideas and materials; not only by their colleagues, but sometimes by their own supervisor. In a university environment, this type of bad behaviour is unfortunately so frequent, it is too often normalised and ignored."



1

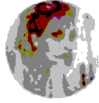


1



6





Schrödinger's Criminologist @anarkriminology · May 30



5b. Again, it's irresponsible to normalize and reward such bad behavior. The institution is often complicit in these cases. Institutions ought to be called out as well for engendering such toxic and exploitative climate. I, for one, won't let this happen to me.



Exhibit "B"

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, "complienzza," 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 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:

- a. A February 25, 2015 text message to Ric where Cojocarú 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 Cojocarú 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 Cojocarú except to write her a letter of recommendation. Ric advocated with Jody Miller at Rutgers and helped get Cojocarú 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 Cojocarú and Haber also blamed Ric for not being able to get teaching roles at the college. In December 2016, Cojocarú 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, Cojocarú 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 Cojocaru (grey).]

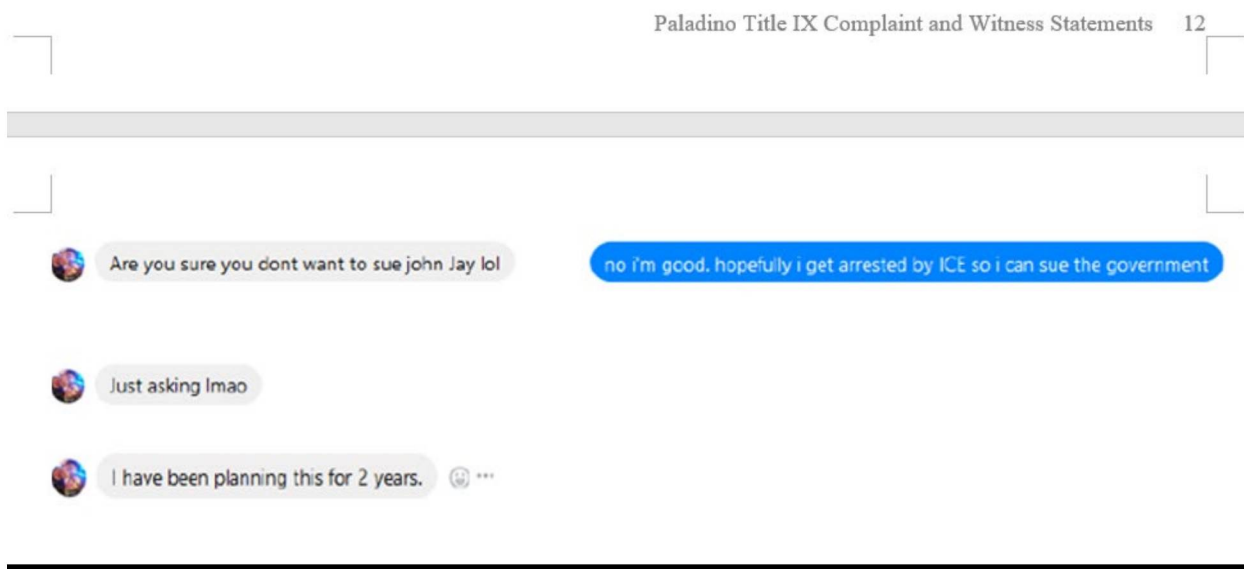


Exhibit B

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

8:23 am

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 Cojocarú <claudia.cojocarú@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 Cojocarú <claudia.cojocarú@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.&cb1=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 woman 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 to 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 a 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 into 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&qs=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 Cojocarú <c.cojocarú@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.]

Ansley

Right. I figured that. Anyway as I said earlier 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. Kathleen will advise.



Aa



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 "C"

← 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

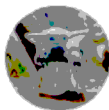


1



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 the 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



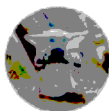
1



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.



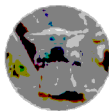
1



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 🙌



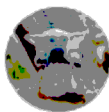
1



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



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



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



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





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 #antiseimtic 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 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 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 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 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



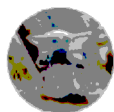
Schrödinger's Criminologist @anarkriminology · Jun 22, 2019
27c. I want to thank my supporters and extraordinary mentors [@RutgersSCJ](#). You know who you are.

1



3





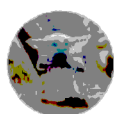
Schrödinger's Criminologist
@anarkriminology



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

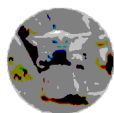
2 Likes



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 "D"

← Thread



Schrödinger's Criminologist
@anarkriminology

"... George Nader, 60, was transporting a 14-year-old boy from Europe to Washington, D.C., in February 2000 and engaging in sex acts with him."

If the boy was Eastern European I'm going to be sick...
🤢🤢🤢

 **CBC World News** @CBCWorldNews · Jul 19
George Nader, prominent Mueller report witness, charged with child sex trafficking
cbc.ca/news/world/nad...



7:39 PM · Jul 19, 2019 · [Twitter for iPhone](#)

1 Retweet 3 Likes

🗨️ ↻️ ❤️ ↗️



Schrödinger's Criminologist @anarkriminology · Jul 19

Replying to @anarkriminology

1. "Last month, prosecutors told a court that FBI agents found dozens of child-porn videos on one of Nader's phones, with some depicting children as young as 3 years old. "

I just can't keep it together anymore, this is sickening.



George Nader Hit With New Charges of Sex Trafficking

The key cooperator is accused of preying on a 14-year-old boy from Europe he allegedly flew to the U.S.

thedailybeast.com



1



1



Schrödinger's Criminologist @anarkriminology · Jul 19

2. While I was working @JohnJayCollege at Ric Curtis's swamp, I often heard #SexWorkersRights advocates deny #SexTrafficking even existed. As a survivor, that made me incredibly uncomfortable. Curtis, Anthony Marcus & their associates denied that sex trafficking existed as well.



1



Schrödinger's Criminologist @anarkriminology · Jul 19

3. Although they didn't explicitly say that to my face, I heard them talk about it. It took a 15 h long interrogation by a former prosecutor working on a #HumanTrafficking case for A. Marcus to convince himself I was trafficked, as he admitted after that. I was horrified.



1



2



Schrödinger's Criminologist @anarkriminology · Jul 19

4. After said abusive interrogation, The now disgraced @JohnJayCollege professors reluctantly admitted that #SexTrafficking is real, but only happened rarely. They never agreed that teenagers could be trafficked. They had... "agency". Only "dumb" ones got trafficked. 🤡🤡🤡



1



1



 Thread

Schrödinger's Criminologist @anarkriminology · Jul 19

5. These distortions were the norm at the swamp. In fact, the swamp was where I learned that #victims didn't exist; they were just weaker people who didn't last in the competition. They didn't "win". Curtis said "#SexTrafficking victims were just prostitutes who played victims"



1



1



Schrödinger's Criminologist @anarkriminology · Jul 19

6. I didn't think he was serious then. I wondered "who would actually say something like that?"

I know better now- this is #libertarian ideology at work, denying coercion and victimhood - denying #SexTrafficking because it contradicts their fucked up belief system.



1



1



1



Schrödinger's Criminologist @anarkriminology · Jul 19

7. There is no progress if we internalize #LibertarianDoublespeak as #CJreform discourse. There is NO change if #libertarian #fascists take over our movements and we end up doing their dirty work, reproducing the very cycles of violence we aim to disrupt.



1



1



Schrödinger's Criminologist @anarkriminology · Jul 19

8. #CJReform is about changing the current punitive culture, and healing communities devastated by mass incarceration. However, this can't happen if this is following the #FreeMarket ideology of #libertarians like the #KochBrothers and #ArnoldVentures.



1



2



Schrödinger's Criminologist @anarkriminology · Jul 19

9. So yeah, #SexTrafficking's real. #JeffreyEpstien and #GeorgeNader are just two privileged men, and two monsters. These do exist, and they become like that because they are enabled by a network of accomplices, friends, cops, their lawyers & prosecutors (@ManhattanDA 🤔 anyone?)



1



3



Schrödinger's Criminologist @anarkriminology · Jul 19

10. These defendants, like #JeffreyEpstien, #HarveyWeistein, or #GeorgeNader are probably the most reviled of human beings, especially within the CJ system.

Yet, I acknowledge I have to make the effort to recognize and respect their humanity, to better do the work I do. 😊



1





Schrödinger's Criminologist @anarkriminology · Jul 19



11. Feeling the hurt and the sorrow of past suffering (damn flashbacks) while struggling with deeply contradicting emotions about people who do the kind of things Epstein and Nader did, is exhausting. I welcome discussions, other opinions, comments. It balances things out.



Exhibit "E"

← 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.

1 Retweet Like Share

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.

1 Retweet Like Share

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.

1 Retweet Like Share

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



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

Call Off Your Dog

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?



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.

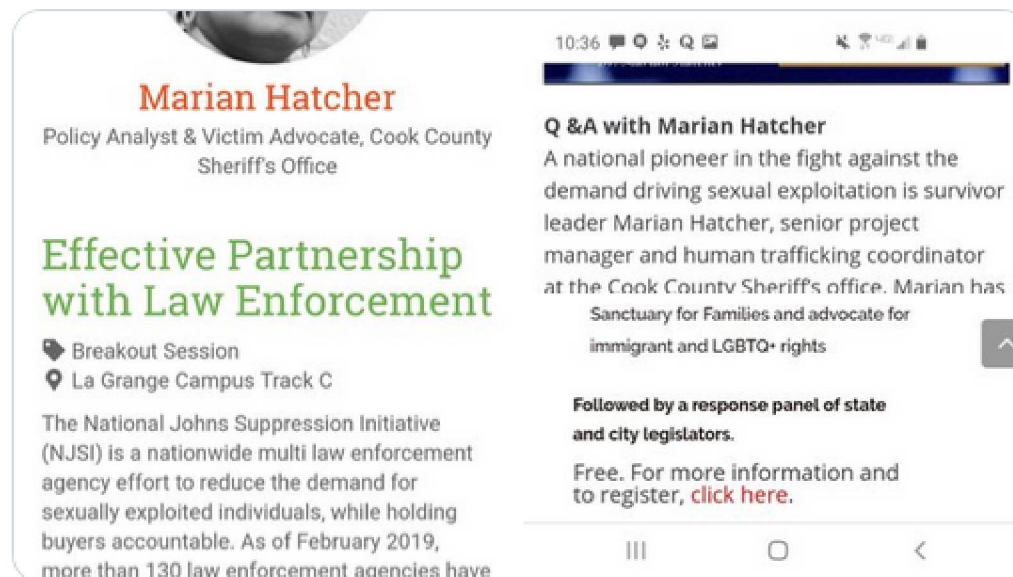
Anyone can call themselves a sex trafficking victim. The fact that she policies people more marginalized than her is an issue

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.



The screenshot shows a tweet from Gilda Merlot about Marian Hatcher. The tweet content includes:

- 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 privilege 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.



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.



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





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 Fllwrs! @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](https://www.gofundme.com)



Exhibit "F"

← Thread



Schrödinger's Criminologist
@anarkriminology



Exercise for @JohnJayCollege bureaucrats: take this article, replace Epstein's name with those of the disgraced profs, and those who were complicit, and voila, you have your swamp!

#MeToo  #MyJohnJay



'When you are in, you can't get out.' Women describe how Jeffrey Epstein contro...
For two decades, Jeffrey Epstein built a sex trafficking enterprise that reached across state borders and spanned the globe. Using an almost bottomless quarry ...
[miamiherald.com](https://www.miamiherald.com)

8:50 AM · Sep 21, 2019 · Twitter for iPhone

2 Retweets 2 Likes





Schrödinger's Criminologist @anarkriminology · Sep 21, 2019



Replying to @anarkriminology

1. "Not one person helped us," said Sarah Ransome, a native of South Africa who successfully sued Epstein and ...Maxwell of trafficking her when she was 22. "Everyone around us had to know, because we looked so broken. But no one did anything."

I can relate to this. #MeToo 🙏



Schrödinger's Criminologist @anarkriminology · Sep 21, 2019



2. Because nobody helped me when I was trafficked, I knew I had to go back and help others. Whether in Japan, or at the @JohnJayCollege swamp, the similarities are striking. Those who deny these are complicit in perpetuating these crimes. #MeToo 🙏



Schrödinger's Criminologist @anarkriminology · Sep 21, 2019



3. Academia, like other isolated pockets of privilege, maintains its façade by silencing survivors, and rewarding the abusers+their accomplices. This ensures the cycle of violence continues. It must be disrupted, through activism & calls for accountability. #MeToo 🙏 #JohnJayCollege





Schrödinger's Criminologist @anarkriminology · Sep 21, 2019

4. #JeffreyEpstein's crimes were facilitated by enablers who also profited from his crimes; these patterns are present in other instances, with Epstein wanna-be men at all levels of society. #Academia has more than it's own share 📌 @JohnJayCollege #MeToo 📌



College professors allegedly sold drugs, 'pimped' out students
Veteran professors at the Manhattan school renowned for training future crime-fighters ran a lawless den of depravity called "the swamp," where ...
[nypost.com](https://www.nypost.com)

🗨️ 1

↻ 1

❤️ 1

📌



Schrödinger's Criminologist @anarkriminology · Sep 21, 2019

5. Let us not single out @JohnJayCollege for sexual abuse and exploitation of students... here's how professors at Ivy League #DartmouthUniversity treated women students. #MeTooAcademia



Dartmouth Professors Are Accused of Sexual Abuse by 7 Women in Law... For over a decade, three tenured professors "leered at, groped, sexted, intoxicated and even raped" students, according to the complaint. [nytimes.com](https://www.nytimes.com)

1 Retweet Like Share



Schrödinger's Criminologist @anarkriminology · Sep 21, 2019

6. It took many years for the survivors of #JeffreyEpstein's #SexTrafficking ring to have their stories heard; many of us, who can relate to these women's ordeals, feel a sense of relief that Epstein was exposed. In some ways, there's hope for justice.

1 Retweet Like 1 Share



Schrödinger's Criminologist @anarkriminology · Sep 21, 2019

7. "social constructionism" will not erase the patterns of predatory sexual behavior carried out by powerful & privileged men, all which we are seeing emerge from these many cases. This applies to @ManhattanDA too, since cover up for Epstein and others, was the goal. #MeToo 🙄

Retweet 1 Like 1 Share

Exhibit "G"

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

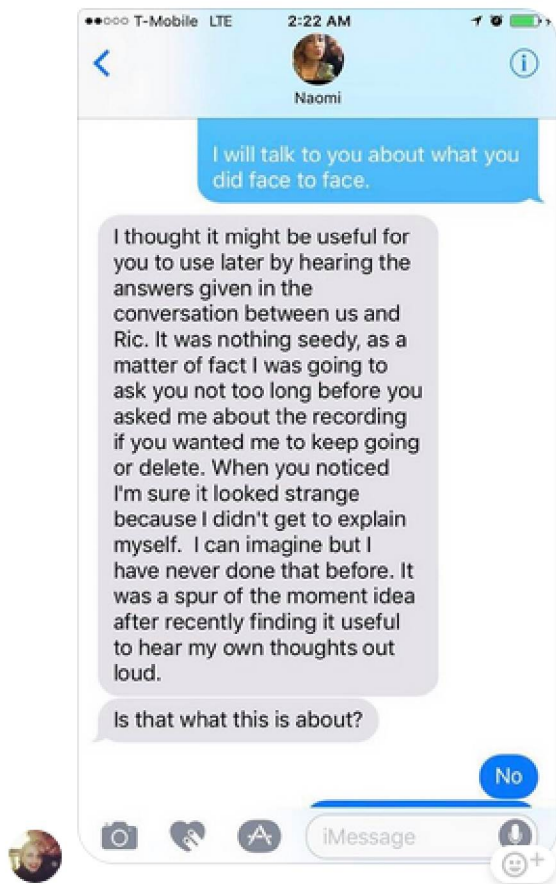
And I never lied to anyone



So yeah

well hopefully he sees for himself





now that he knows he'll be conscious of it ✓

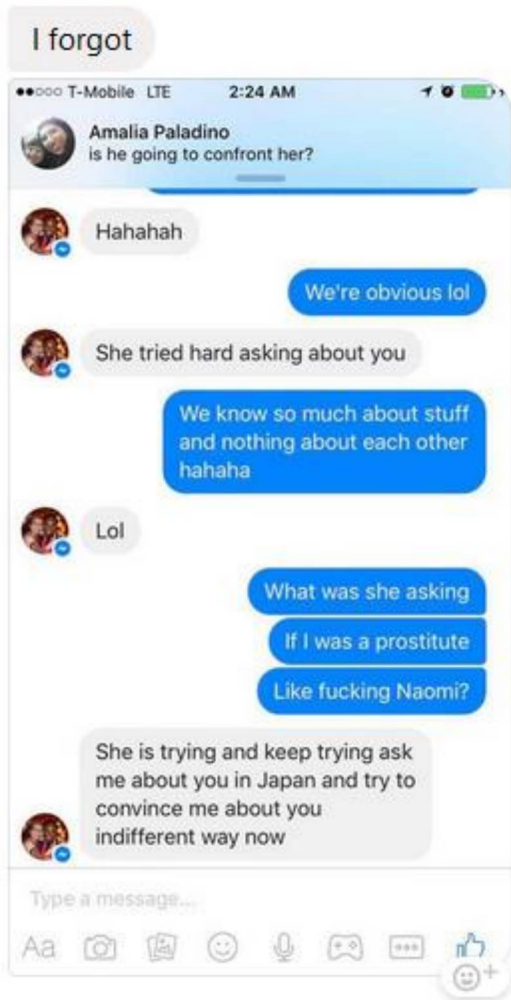
This bullshit

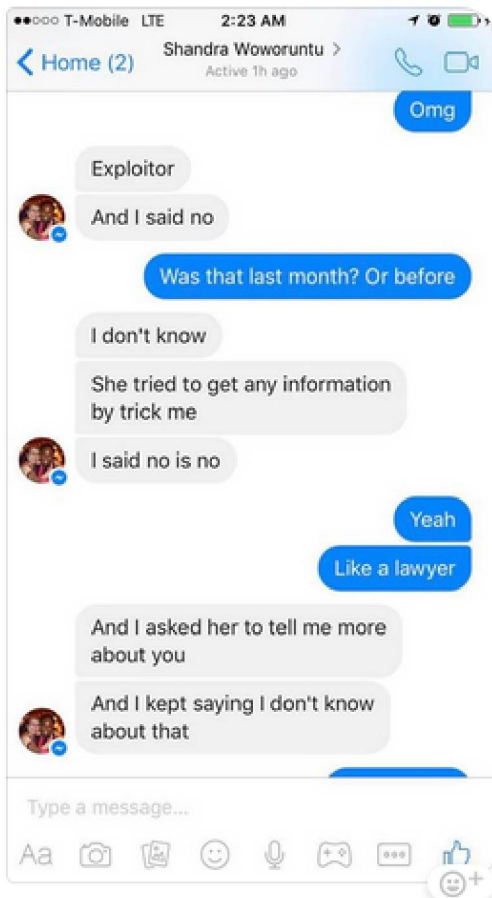
yeah ✓

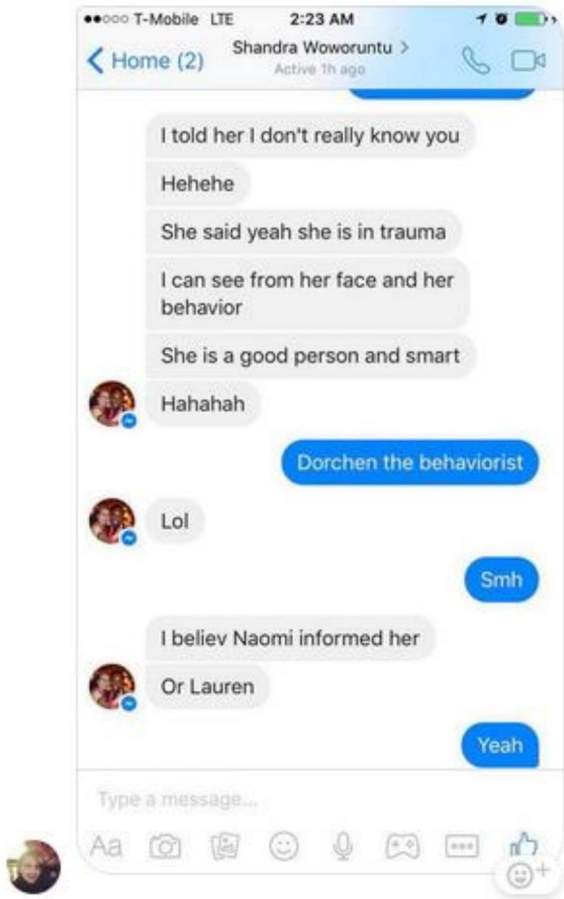
you showed him? ✓

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

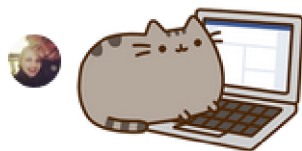
Whatever



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

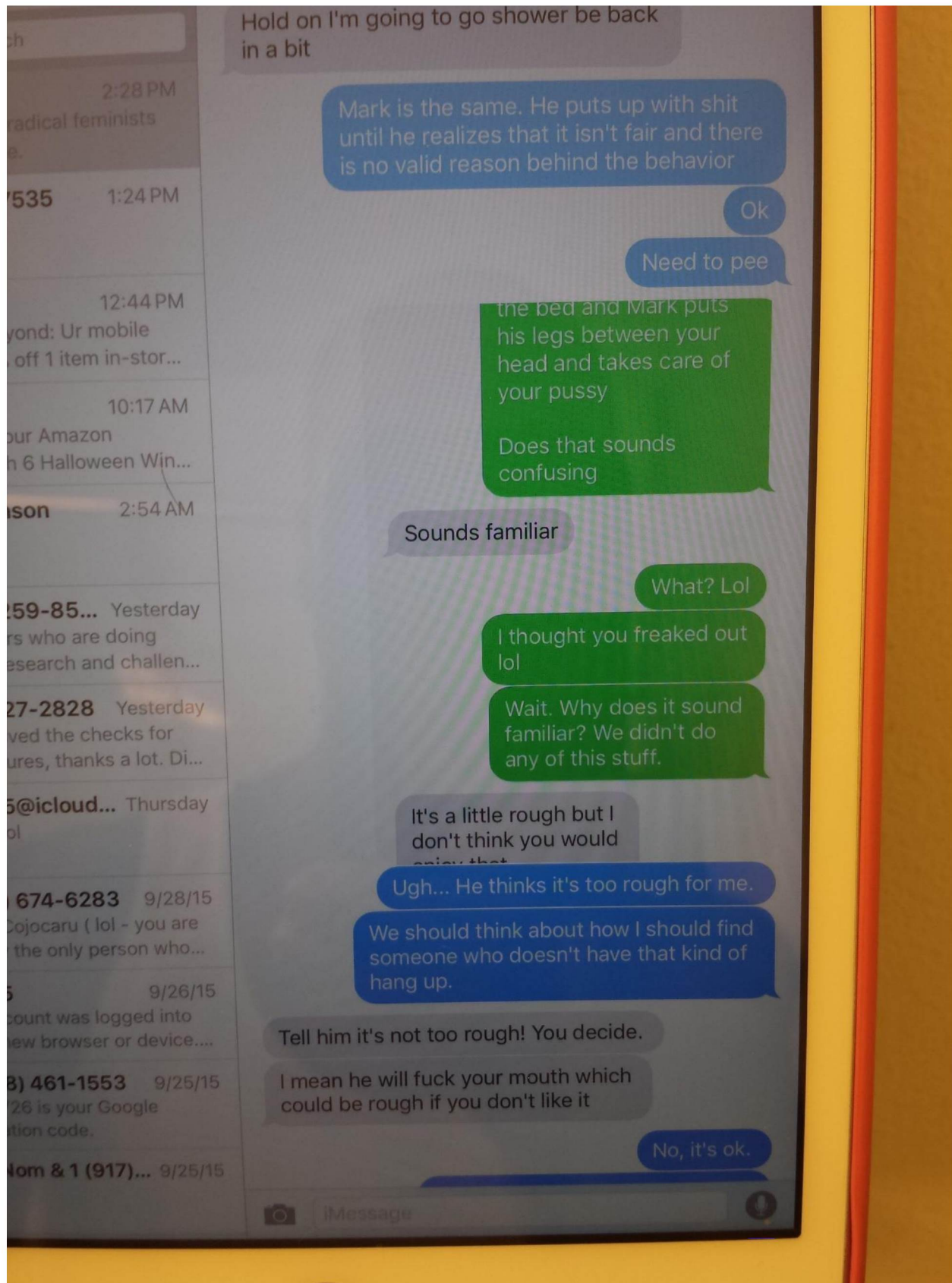
well, to answer your question about when i'll be in ✓

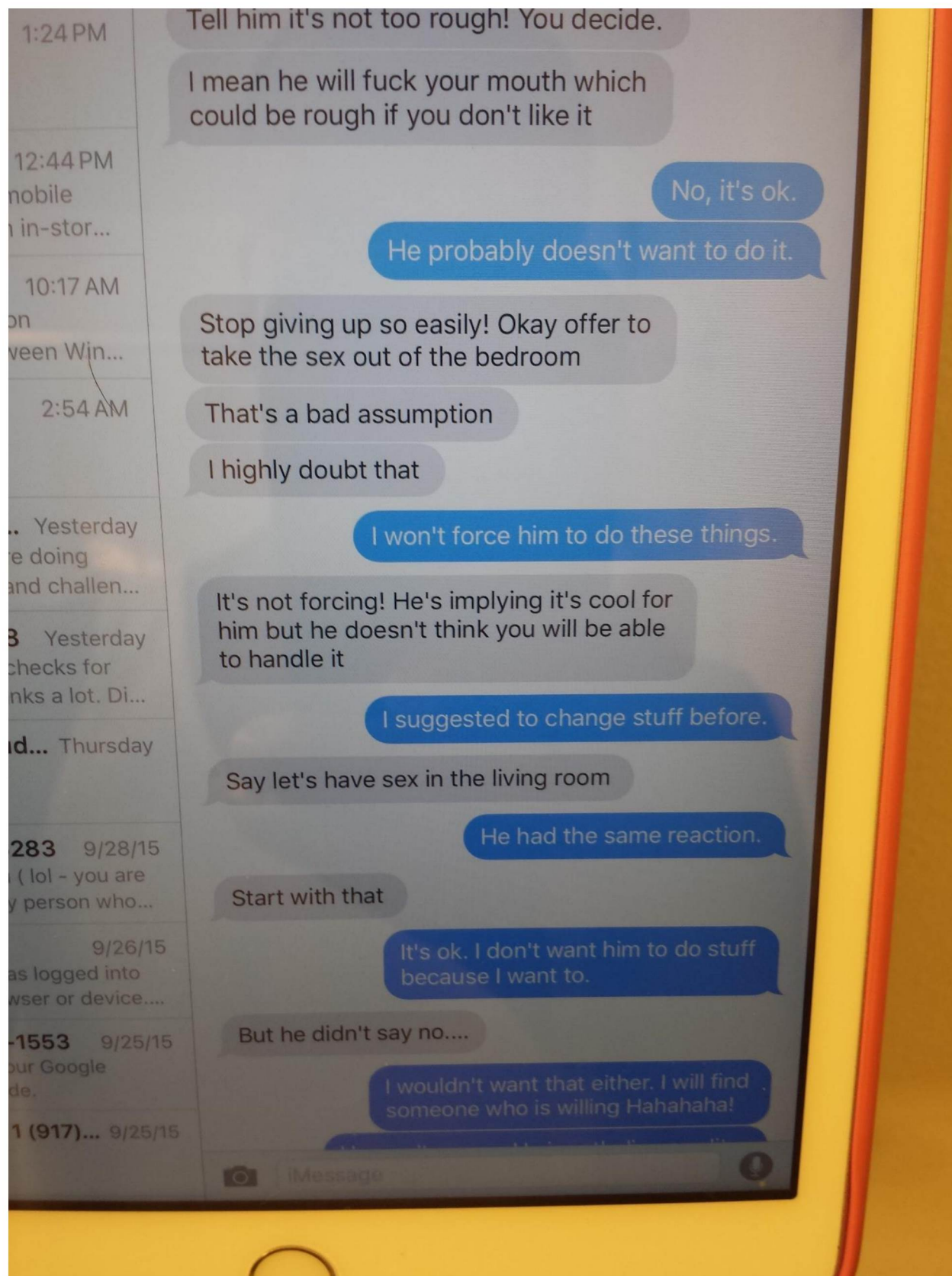
next tues ✓

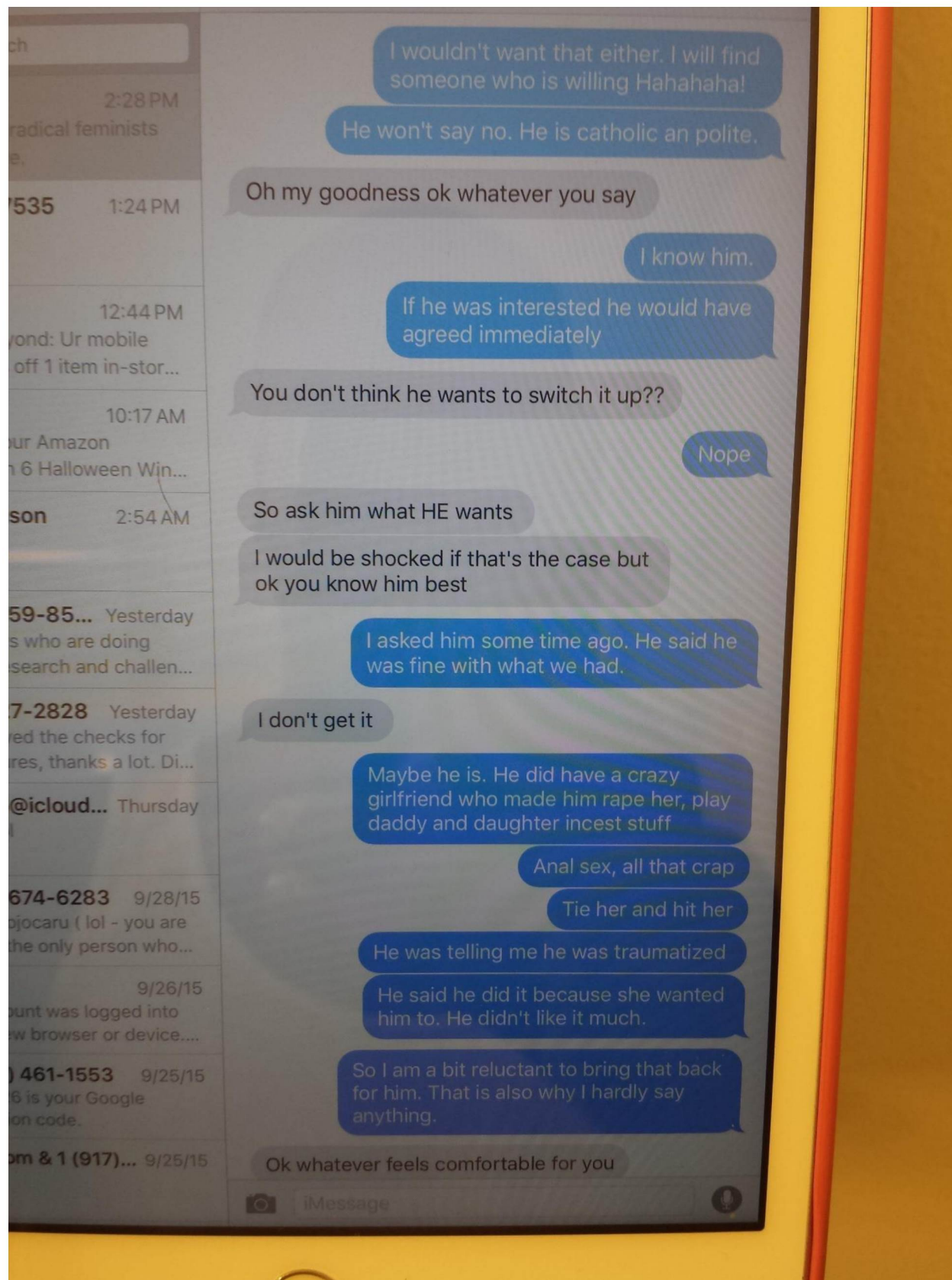
i gotta teach ✓

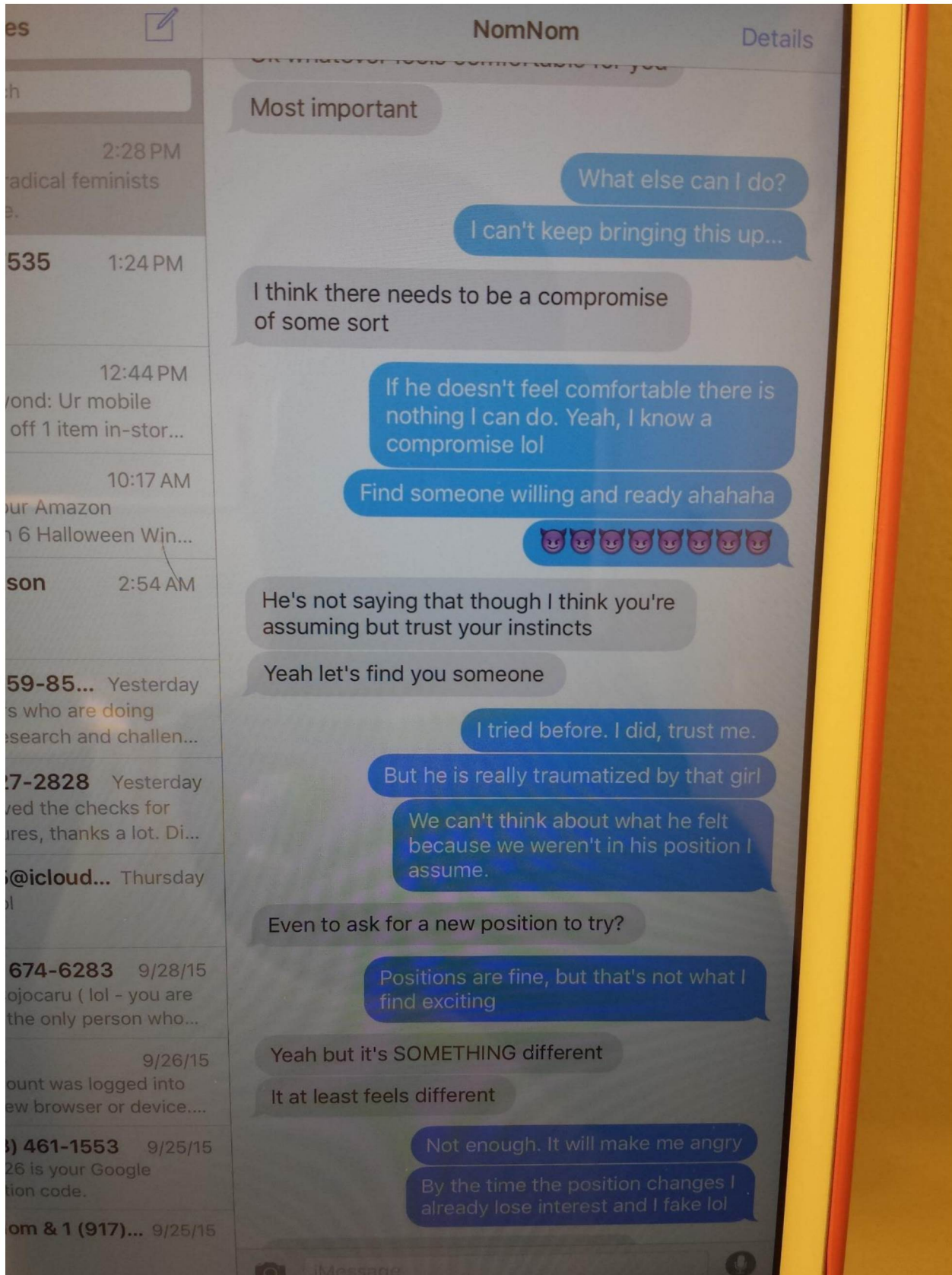
She still owes me money lol

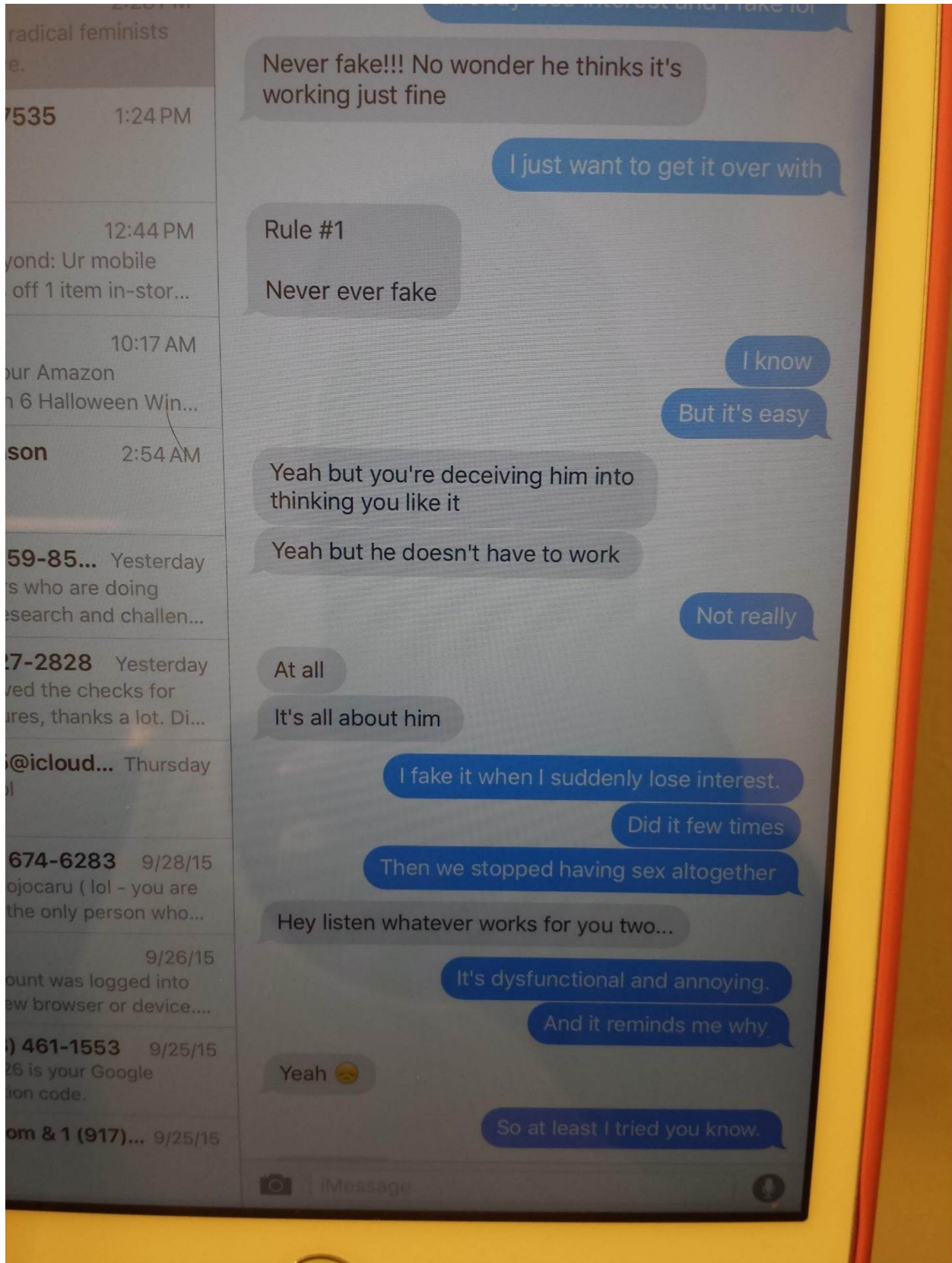
Exhibit "H"

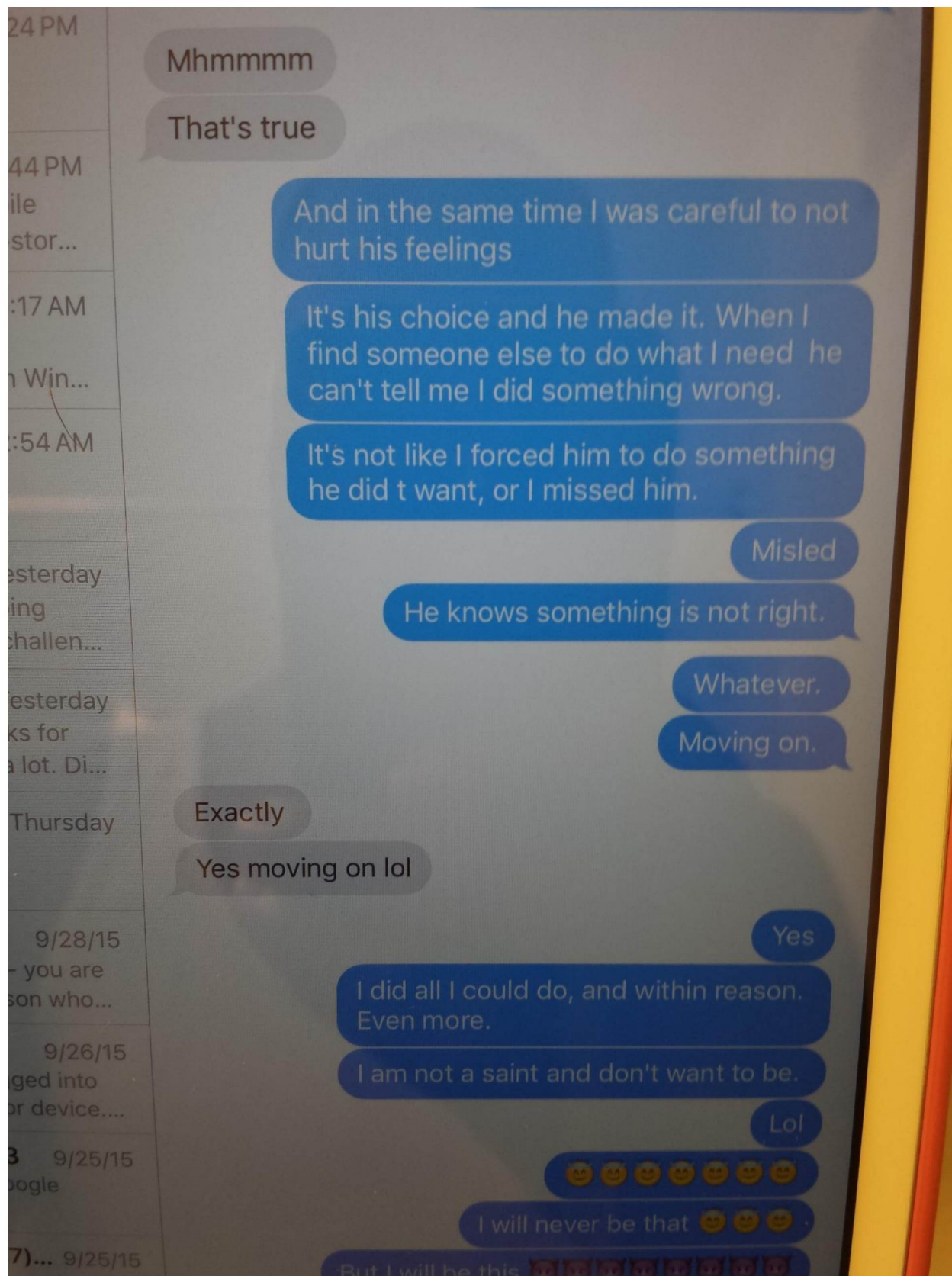


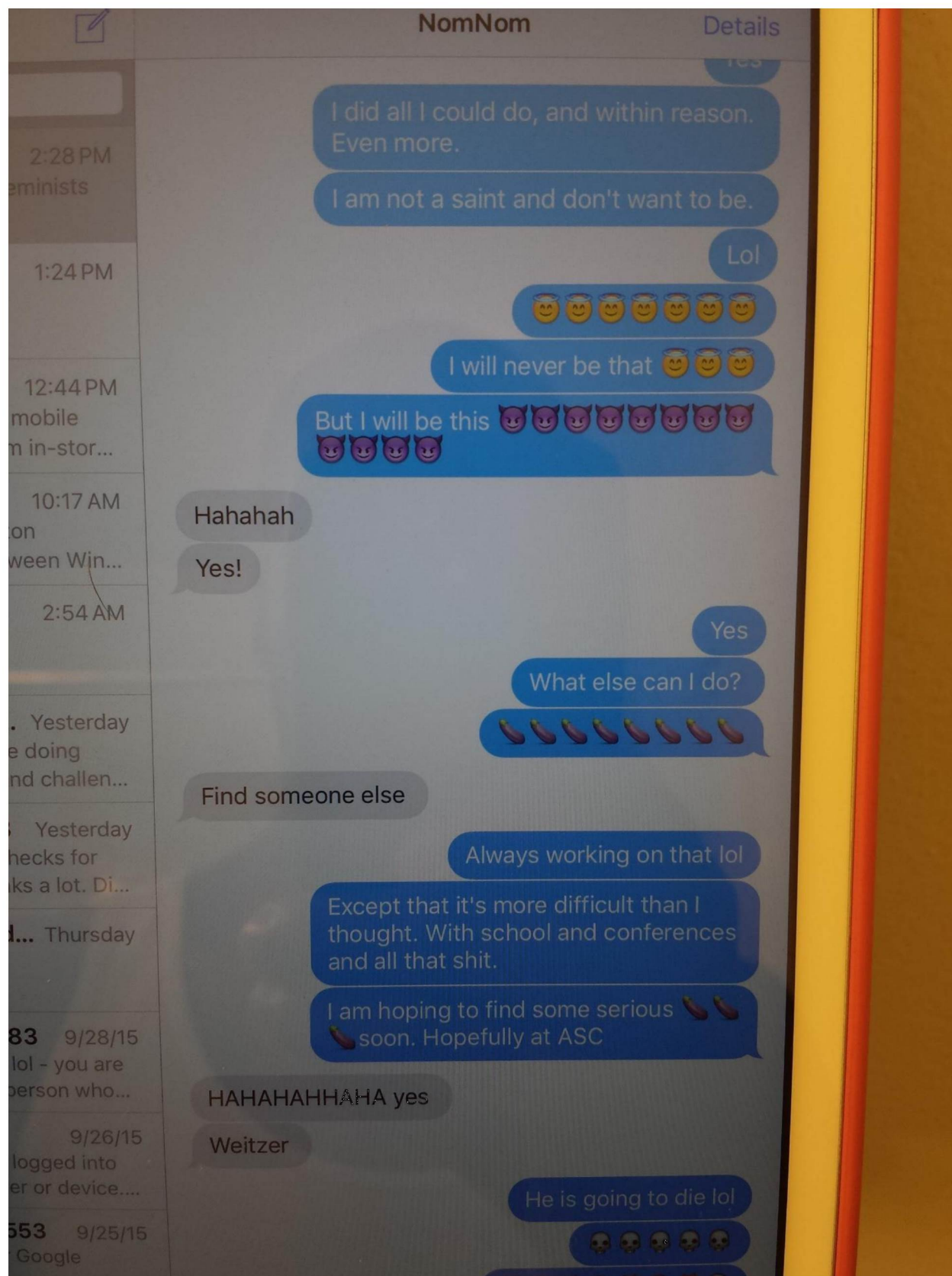


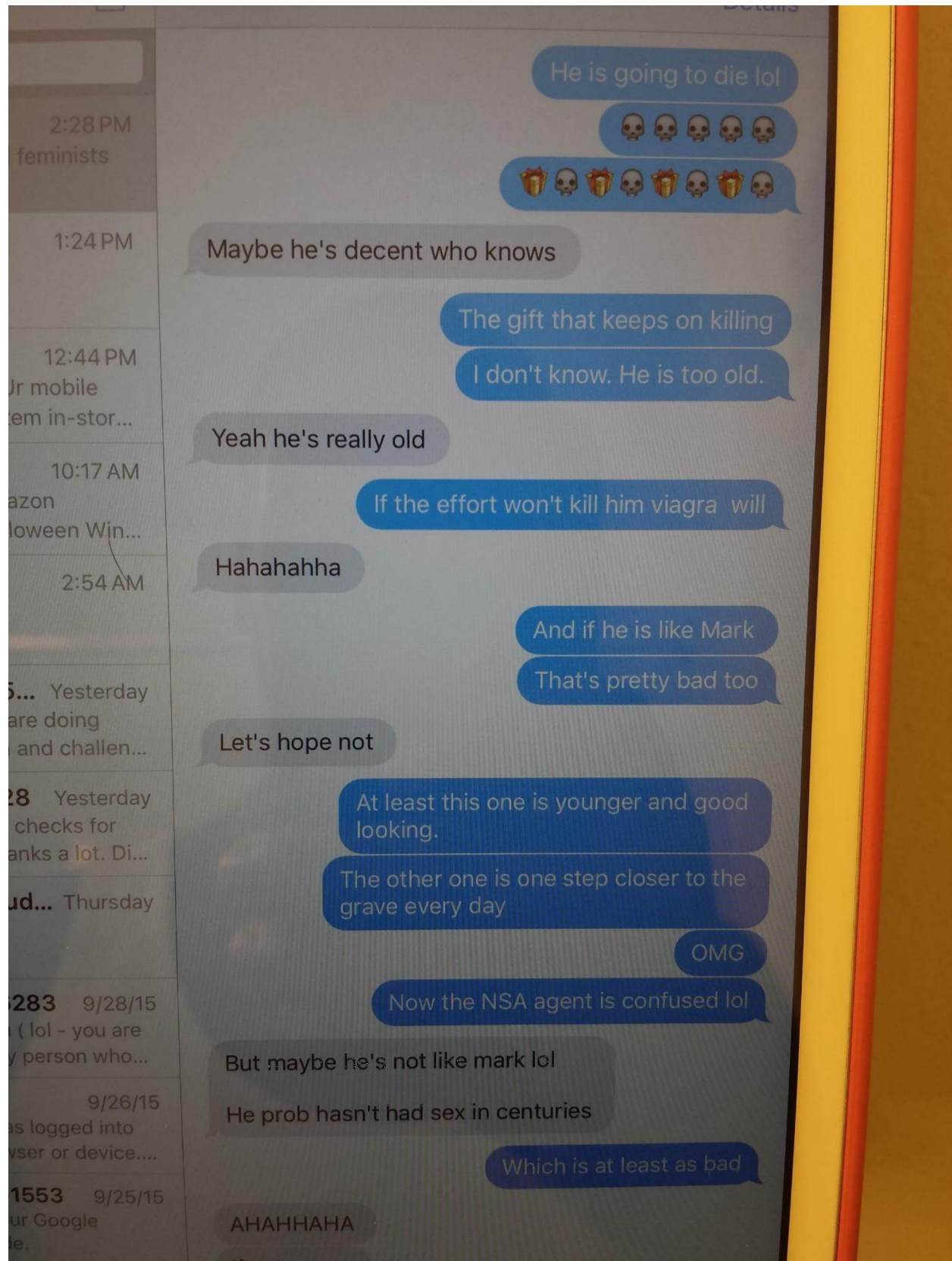


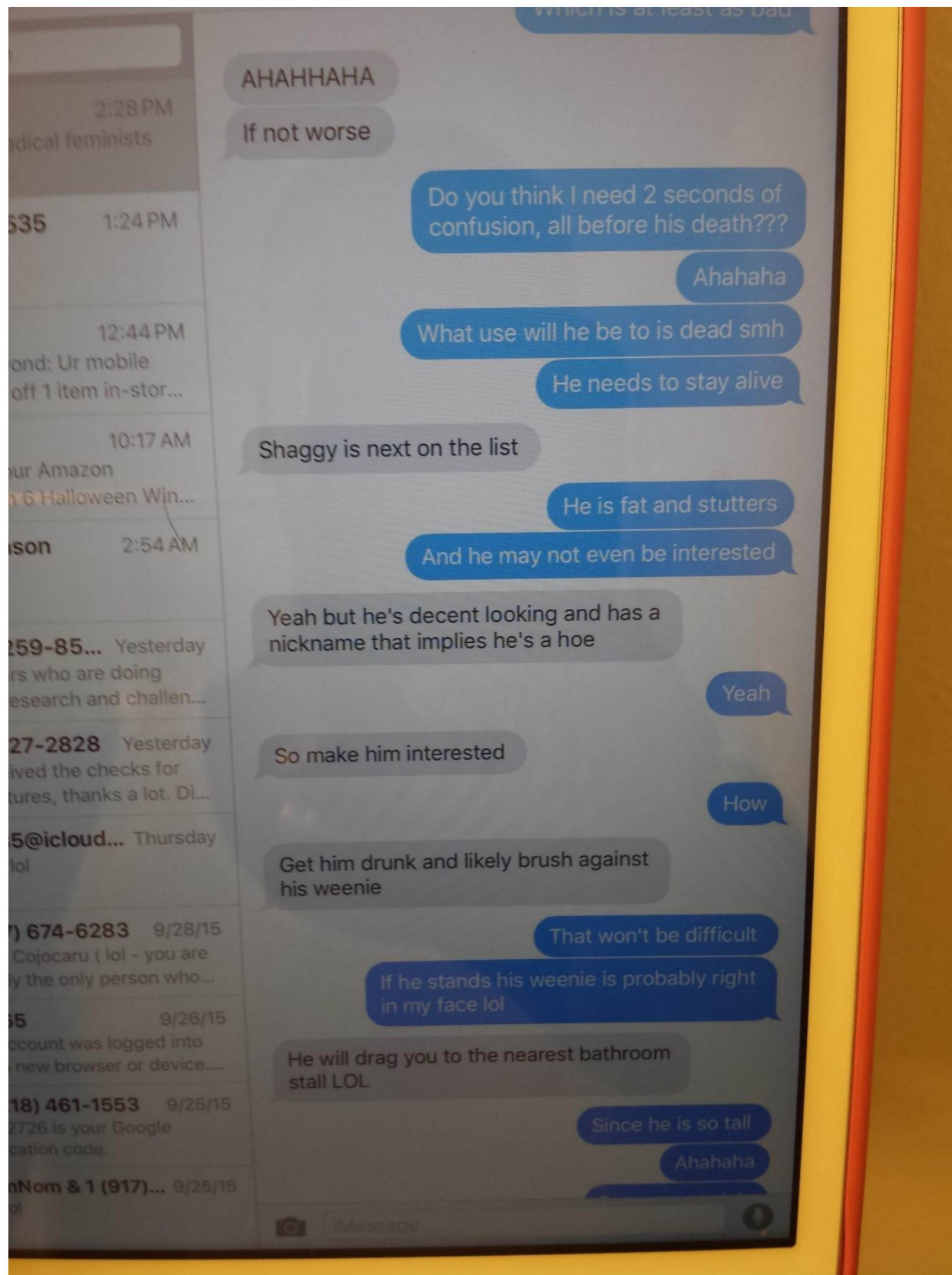


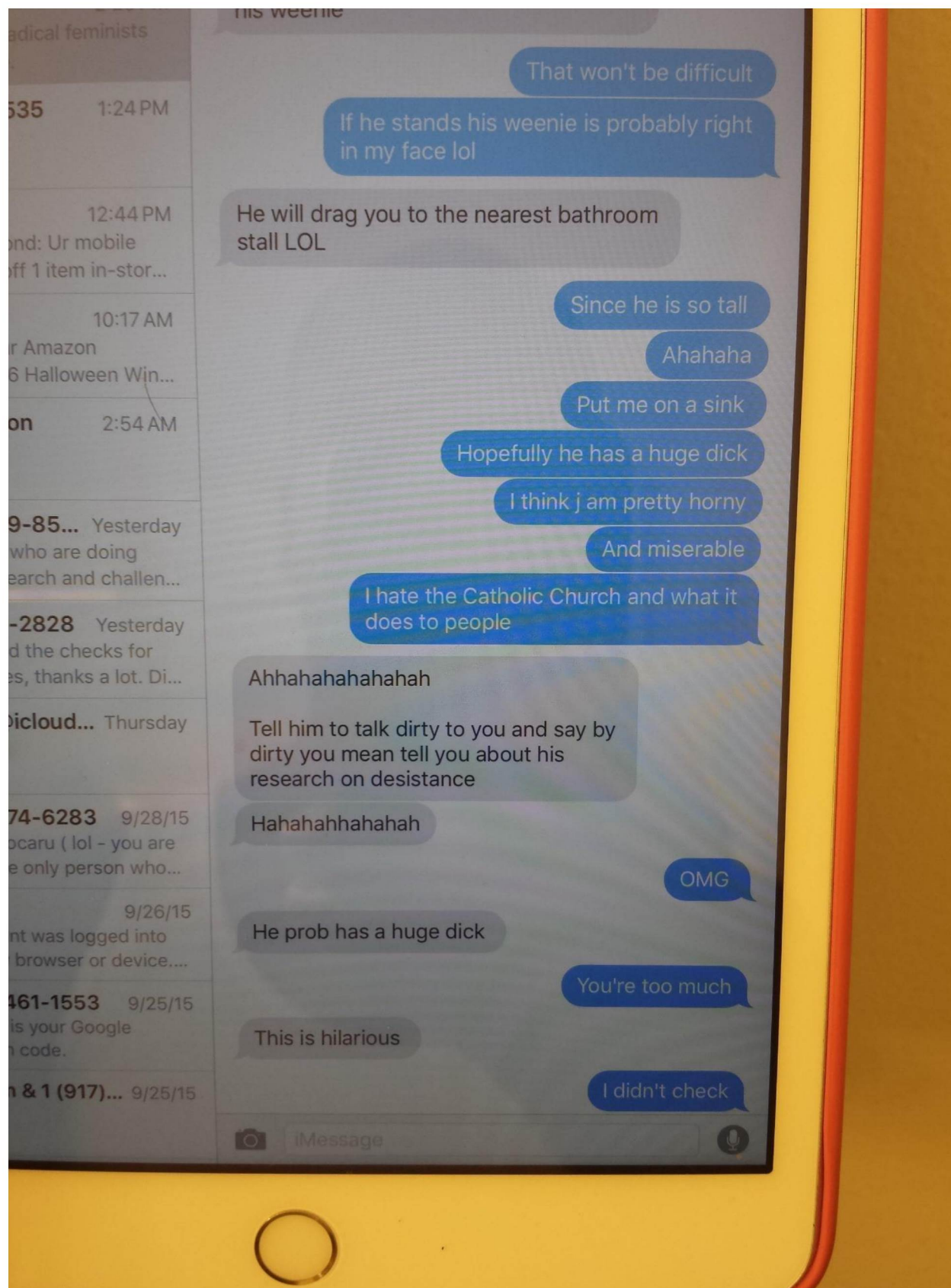












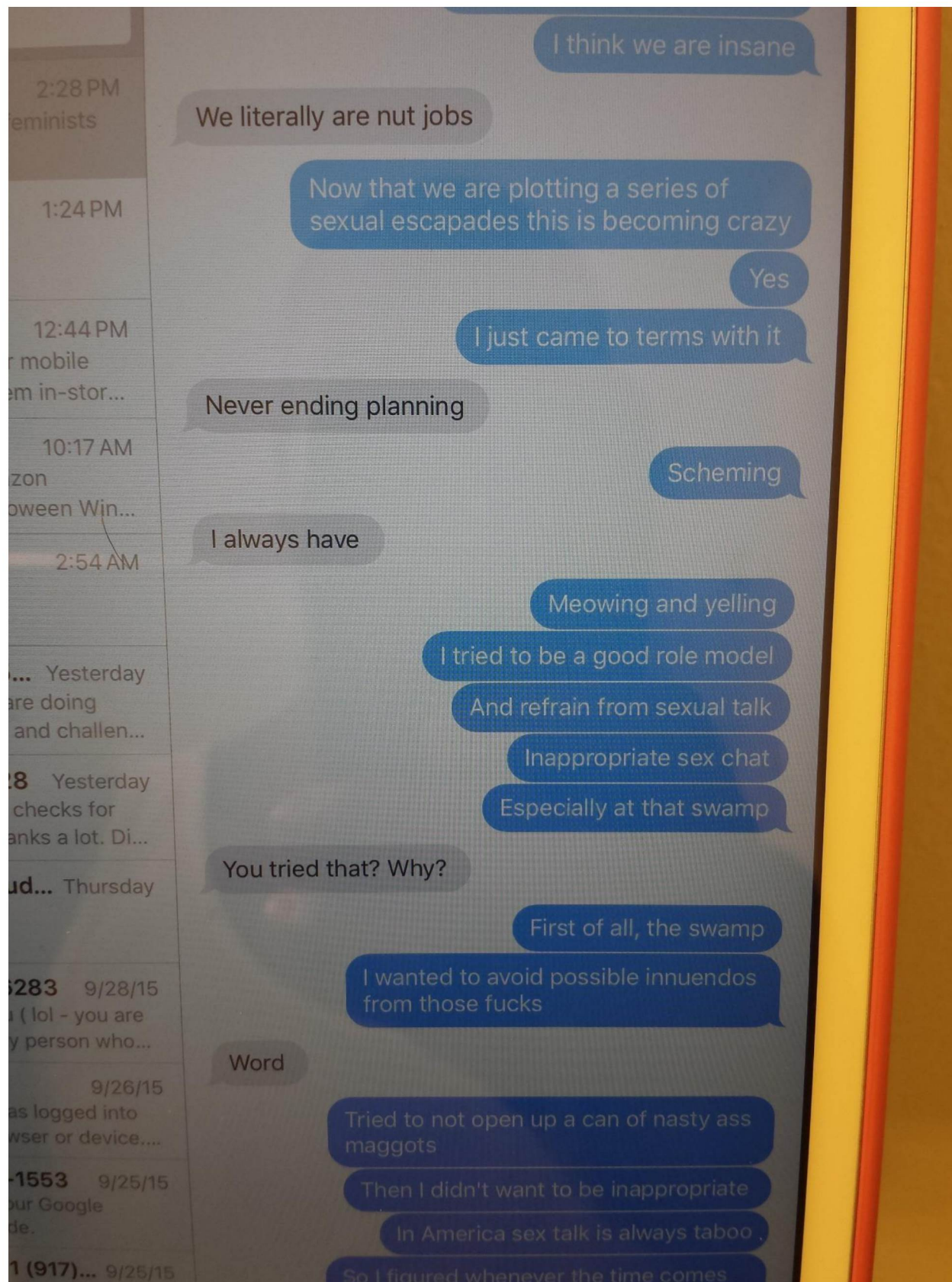
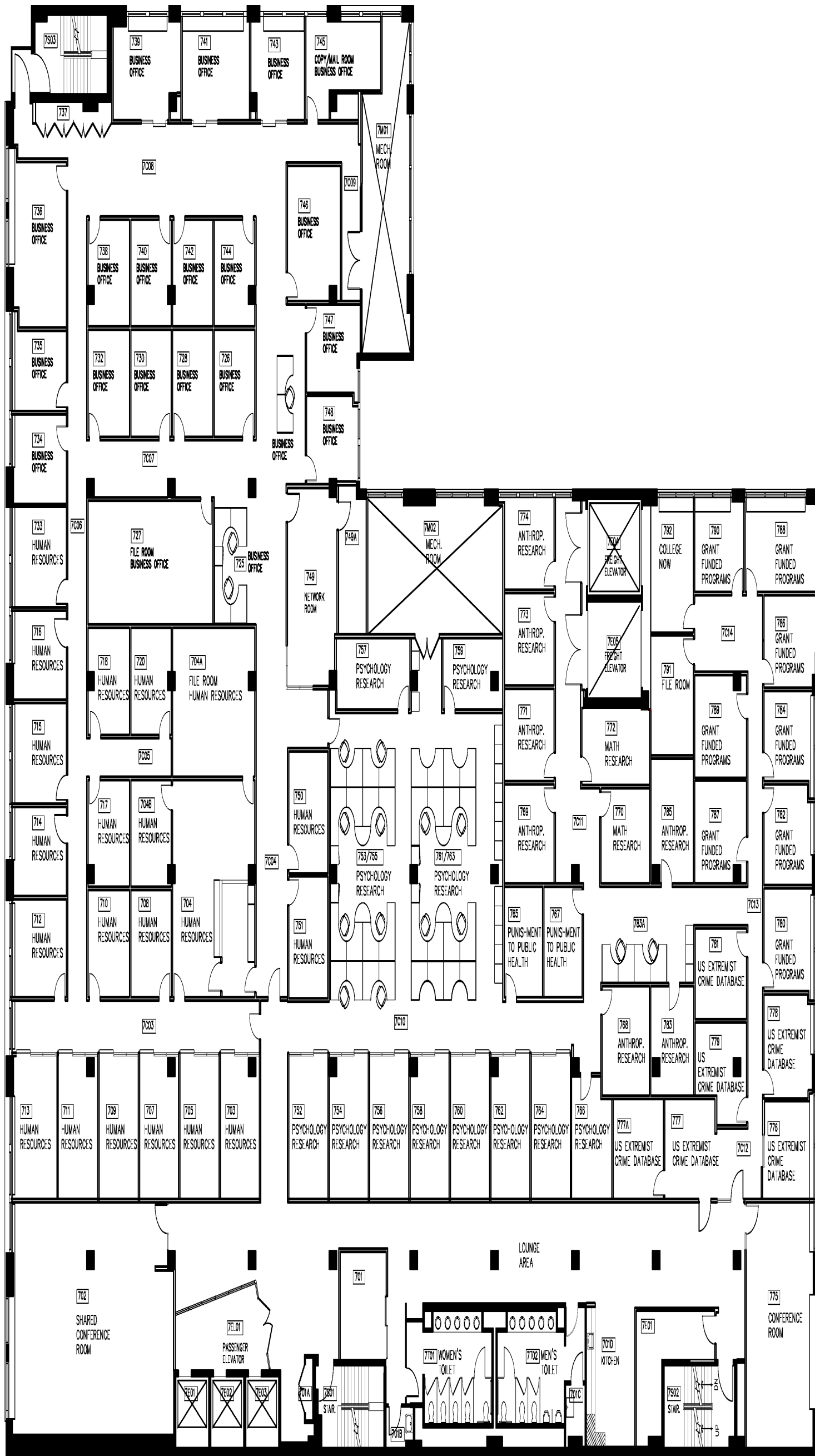
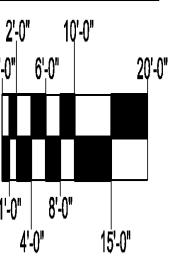


Exhibit "I"



GRAPHIC SCALE



54TH STREET BUILDING

JOHN JAY COLLEGE OF CRIMINAL JUSTICE
619 WEST 54TH STREET NEW YORK, NY 10019

Scale: Not to Scale Release Version: 11/6/17



Exhibit "J"

From: Kinya Chandler
Sent: Friday, January 26, 2018 11:42 AM
To: Richard Curtis
Cc: Anthony Carpi; Daniel Stageman; Debra Hairston
Subject: Research office assignments

Hi Ric,

I need to confirm room assignments down in your 54th Street research area.
Would you please provide the missing information?

ROOM	LAST NAME	FIRST NAME	EMPLOYMENT STATUS
769	PALADINO	AMALIA	PT RA
771			
773	CURTIS	RICHARD	FT FACULTY
774			
783B*			

*cubicle

Thanks for your quick attention to this,
Kim

Kinya Chandler
Senior Director of Operations
Office of Academic Affairs



524 West 59th Street
Room 606A BMW
New York City, NY 10019
Tel. 212.237.8498
Fax. 646.557.4601
www.jjay.cuny.edu

Exhibit "K"



Exhibit "L"

6/18/18, 9:16 PM



A contact is waving at you!



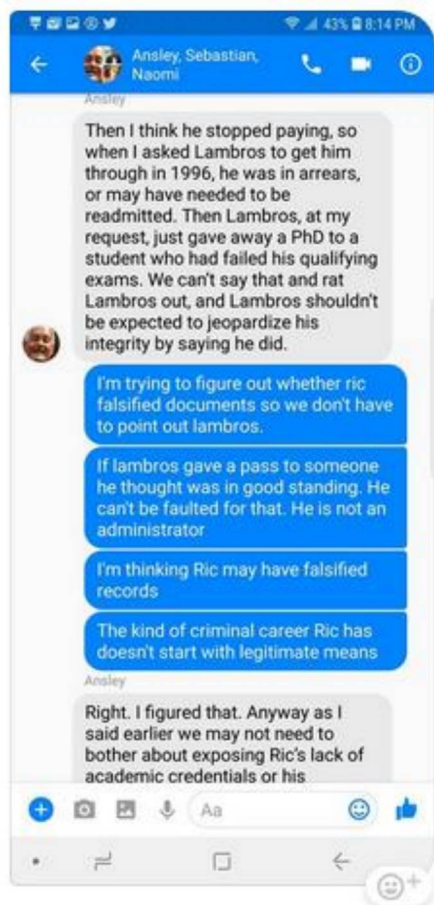
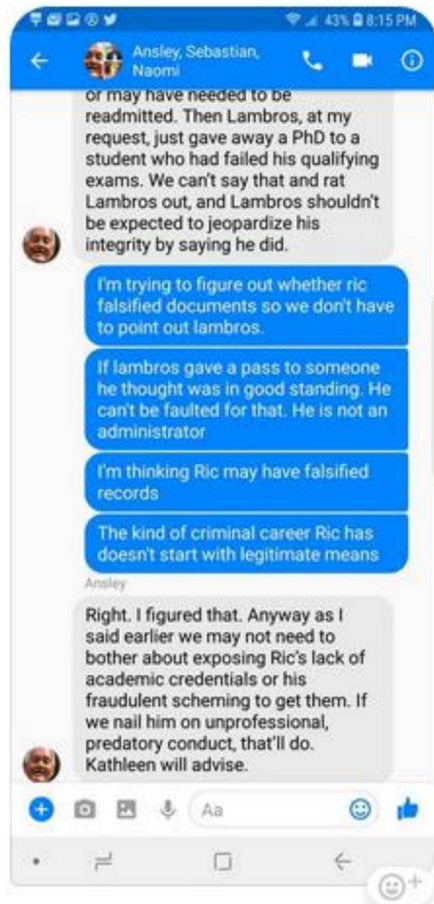
Wave

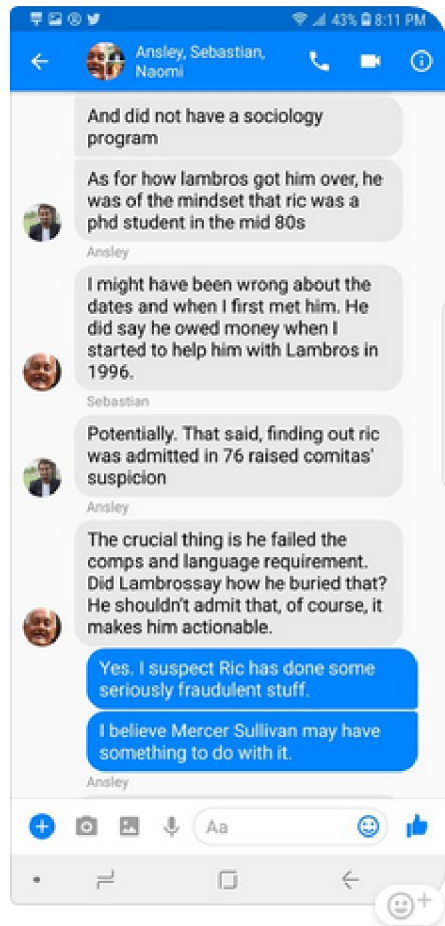


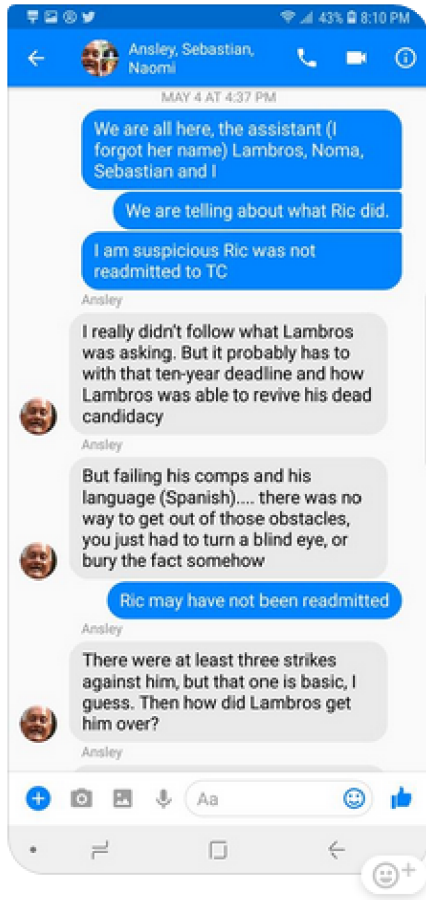
I wanted to tell you that I saw Gabrielle Salfati last week and, as you can imagine, I talked to her about you a little. I know you probably hate me, and want to kill me, but I want you to know that whatever I said, and will say in the future, is because I have no other choice. I did the best I could 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 committee

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.

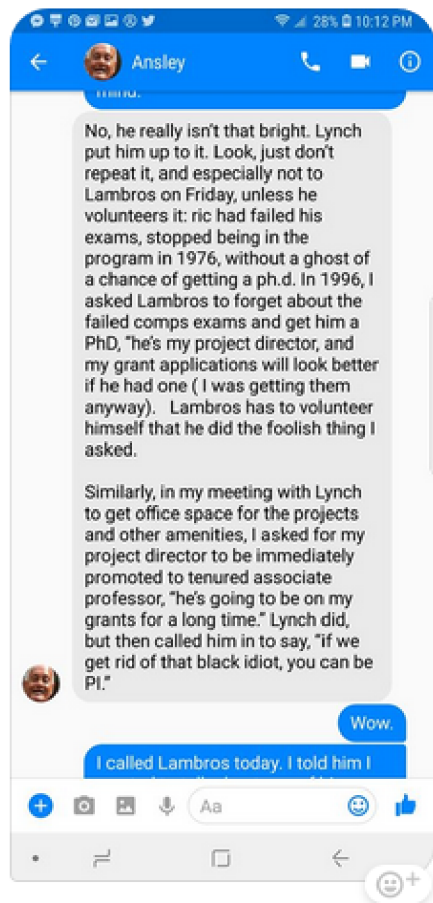
don't*

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

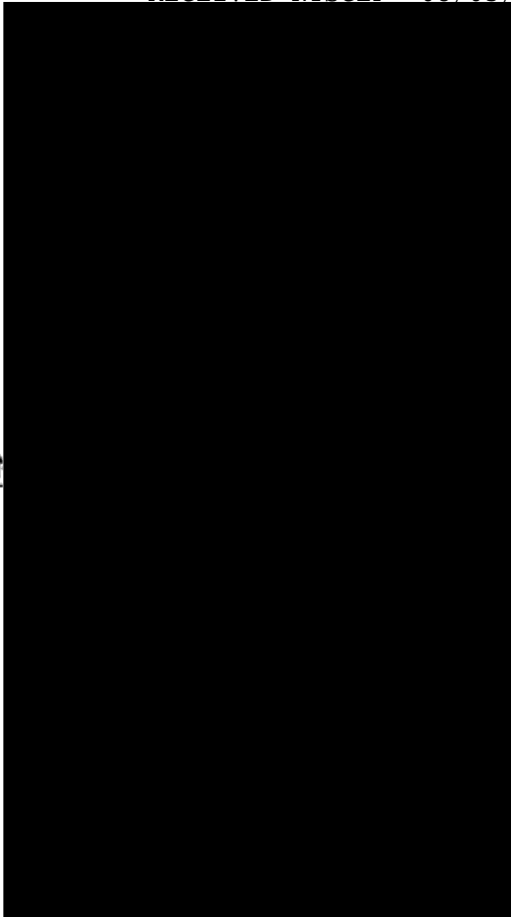
and [redacted] issue

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

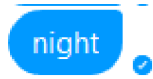
and remember.....avoid my name. i will not like that. i'm trusting you again...please respect that boundary.



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](https://www.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.

Index No.: 156016/2020

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

AMALIA S. PALADINO,

Plaintiff,

-against-

CLAUDIA COJOCARU,

Defendant.

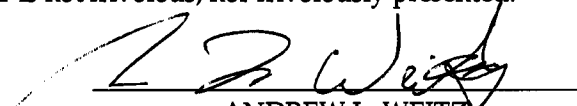
SUMMONS & VERIFIED COMPLAINT

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 **SUMMONS & VERIFIED COMPLAINT** is not frivolous, nor frivolously presented.

Dated: Mineola, New York
August 3, 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 08/03/2020 07:20 PM. Please keep this notice as a confirmation of this filing.

Index Number NOT assigned
Amalia S. Paladino v. Claudia Cojocar
Assigned Judge: None Recorded

Documents Received on 08/03/2020 07:20 PM

Doc #	Document Type
1	SUMMONS + COMPLAINT Summons & Verified Complaint
2	EXHIBIT(S) A May 30, 2019 Tweet
3	EXHIBIT(S) B Herbst Letter to CUNY Community (with Relevant Exhibits Only)
4	EXHIBIT(S) C June 21, 2019 & June 22, 2019 Tweets
5	EXHIBIT(S) D July 19, 2019 Tweet
6	EXHIBIT(S) E (Redacted per 202.5(e) or 206.5(e)) July 30, 2019 Tweet
7	EXHIBIT(S) F September 21, 2019 Tweet
8	EXHIBIT(S) G January 26, 2017 Facebook Messenger Conversation
9	EXHIBIT(S) H October 7, 2015 Facebook Messenger Conversation
10	EXHIBIT(S) I Floor Plan 54th Street Building, 7th Floor
11	EXHIBIT(S) J Email from Ric Curtis Confirming Room Assignment
12	EXHIBIT(S) K Screenshot of Cojocar
13	EXHIBIT(S) L (Redacted per 202.5(e) or 206.5(e)) June 18, 2018 Facebook Messenger Conversation

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



Index Number NOT assigned
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 08/03/2020 07:20 PM:

BRIAN C. PASCALE - bcpascale@weitzpascale.com

Email Notifications NOT Sent

Role	Party	Attorney
Respondent	Claudia Cojocaru	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

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