

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

<p>ANONYMOUS</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">- against -</p> <p>RICK JAMES by and through THE JAMES AMBROSE JOHNSON, JR., 1999 TRUST</p> <p style="text-align: right;">Defendant.</p>

Index No:

PLAINTIFF'S AFFIDAVIT

STATE OF NEW YORK)
 : ss.:
COUNTY OF ERIE)

BEFORE ME, the undersigned authority, on this day personally appeared [REDACTED] known to me to be the person whose name is subscribed hereto, and who upon his oath deposed and stated as follows:

1. My name is [REDACTED] I am over the age of eighteen and I am fully capable of making this affidavit. I am a resident of the State of New York. I have personal knowledge of all facts stated herein, which are true and correct.

2. In 1979, I was housed in a group home as part of the Youth Detention Center #6 Program. I was living on Richmond Avenue with the house parents, Willy & Sharon.

3. In the Spring of 1979, when I was 15 years old, Rick James (now deceased) came to the group home to meet with Willy. Rick James was brought through the dining room where all of the young female residents of the home were just finishing dinner. The girls were all introduced to Rick James by Willy and were all excited to meet him. I did not know who Rick James was and shrugged and said I don't know him. Almost immediately, Rick James was very suggestive and inappropriate towards me. He made me feel very uncomfortable. Rick and Willy excited the dining room and I finished cleaning up the kitchen. I then went upstairs to my room, changed into my nightgown and laid on my bed to read.

4. As I was laying on my belly on my bed, Rick James came into my bedroom and swiftly laid on top of me. He grabbed my hair and pushed my head into the pillow. I tried to

fight him off, but he told me to "shut up and quit moving or I'll cut you". He violently ripped off my underwear and proceeded to violent rape me and ejaculate inside of me. He then threatened me that if I told anyone, he would know where to find me.


5. As a result of defendant Rick James's violent rape, I suffered and continue to suffer from physical, psychological and emotional injury. I have experienced feelings of guilt, loss of self-respect, confusion, shame, embarrassment, sadness, anger, depression, anxiety, I abused alcohol briefly as a young teenager, used drugs, suffered from low self-esteem, had serious thoughts of suicide, and had difficulty concentrating, all from Rick James's rape. I have struggled since that day with numerous problems including but not limited to being trapped in two long-term abusive and unhealthy relationships, I have difficulty trusting people, I have issues with sex, and with being touched as a result of defendant's assault. I have experienced extreme emotional suffering including but not limited to nightmares, panic attacks and flashbacks.

6. This traumatic experience has caused me everlasting damage and I would like to preserve my privacy in this matter of a sensitive and highly personal nature. The identification of myself to my friends, family, and/or co-workers would certainly pose a risk to me of further mental harm, harassment, ridicule or personal embarrassment. It is for all these reasons that I would like this case to be brought anonymously.

Dated: 2/6/2020



Sworn to before me this 6th day of Feb. 2020


NOTARY PUBLIC

DARREN SEILBACK
Notary Public State of New York
No. 02SE6124082
Qualified in New York County
Commission Expires August 19, 2021