

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

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LG 46 DOE,

Plaintiff,

vs.

**SUMMONS**

JAMES B. JACKSON,  
41 Rovner Place  
Hamburg, New York 14075

Defendant.

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TO THE ABOVE NAMED DEFENDANT:

**YOU ARE HEREBY SUMMONED** to answer the Complaint in this action and to serve a copy of your answer, or, if the Complaint is not served with this Summons, to serve a notice of appearance, on the Plaintiff's Attorneys within TWENTY (20) DAYS after the service of this Summons, exclusive of the day of service (or within THIRTY (30) DAYS after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Erie County is designated as the place of trial on the basis on the Plaintiff's residence located in Buffalo, New York.

DATED: Buffalo, New York  
March 3, 2020

LIPSITZ GREEN SCIME GAMBRIA LLP

By:  \_\_\_\_\_

AMY C. KELLER, ESQ.  
CHRISTINA M. CROGLIO, ESQ.

Attorneys for Plaintiff  
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(800) 251-6990

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

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LG 46 DOE,

Plaintiff,

**COMPLAINT**

vs.

Index No.:

JAMES B. JACKSON,

Defendant.

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Plaintiff, above named, by her attorneys, LIPSITZ GREEN SCIME  
CAMBRIA LLP, for her Complaint against Defendant, alleges:

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST  
DEFENDANT, JAMES B. JACKSON, HEREIN,  
PLAINTIFF, LG 46 DOE, ALLEGES AS FOLLOWS:**

1. Plaintiff, LG 46 DOE, is a resident of the County of Erie and State of New York.
2. This action is commenced pursuant to the provisions of the Child Victims Act.
3. At the time of the incidents set forth herein, Plaintiff, LG 46 DOE, (hereinafter referred to as "THE CHILD") was an infant having been born in 1985.
4. Upon information and belief, Defendant, JAMES B. JACKSON (hereinafter referred to as "THE CHILD MOLESTER") resides in the Village of Hamburg and State of New York.
5. Upon information and belief, at all times herein mentioned, THE CHILD MOLESTER was hired by Young Men's Christian Association Buffalo Niagara and Alliance of New York State YMCAS, Inc., as a staff member.

6. Upon information and belief, at all times herein mentioned, the CHILD MOLESTER was assigned to Young Men's Christian Association Buffalo Niagara.

7. At times hereinafter mentioned, THE CHILD, was a member of Young Men's Christian Association Buffalo Niagara.

8. Beginning on or about the 1<sup>st</sup> day of January 1992, and continuing through sometime in 1999, the CHILD MOLESTER sexually assaulted and committed battery upon THE CHILD at Young Men's Christian Association Buffalo Niagara and said assault and battery constituted sexual offenses as defined in Article 130 of the Penal Law.

9. The sexual crimes by THE CHILD MOLESTER herein were willful, malicious and intentional and resulted in injury to THE CHILD.

10. As a direct result of conduct by THE CHILD MOLESTER as described herein, THE CHILD, has suffered, and continues to suffer great physical and emotional pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, flashbacks, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life, was prevented and will continue to be prevented from performing daily activities and obtaining full enjoyment of life, and has incurred and will continue to incur expenses for medical psychological treatment, therapy and counseling.

11. This action falls within one or more of the exceptions set forth in CPLR §1602.

12. As a result of the foregoing, THE CHILD, has sustained general and special damages in an amount which exceeds the jurisdictional limits of all lower

courts which would otherwise have jurisdiction.

13. As a result of the foregoing, THE CHILD, claims punitive damages in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff demands judgment against Defendant, in the First Cause of Action in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction, and for such other, further or different relief as the Court may deem just and proper, together with the costs and disbursements of the action.

DATED: Buffalo, New York  
March 3, 2020

LIPSITZ GREEN SCIME CAMBRIA LLP

By:   
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