

MONROE COUNTY CLERK'S OFFICE

THIS IS NOT A BILL. THIS IS YOUR RECEIPT.

Receipt #

Book Page

No. Pages: 21

Instrument: EFILING INDEX NUMBER

Control #: Unrecorded #8195558

Index #: Unassigned-1448746

Date:

Time:

Return To:
CHRISTOPHER J. O'BRIEN
4925 MAIN STREET, SUITE 222
BUFFALO, NY 14226

Ford, Nicolle

United States Olympic Committee
John Does 1-5

Total Fees Paid: \$0.00

Employee:

State of New York

MONROE COUNTY CLERK'S OFFICE
WARNING – THIS SHEET CONSTITUTES THE CLERKS
ENDORSEMENT, REQUIRED BY SECTION 317-a(5) &
SECTION 319 OF THE REAL PROPERTY LAW OF THE
STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

JAMIE ROMEO

MONROE COUNTY CLERK



**SUPREME COURT: STATE OF NEW
YORK COUNTY OF MONROE**

NICOLLE FORD,**SUMMONS****Index No.****Plaintiff,****-against-****UNITED STATES OLYMPIC
COMMITTEE, and JOHN DOES 1-5,****Defendants.**

Plaintiff, Nicolle Ford, by and through the undersigned attorneys, complains of United States Olympic Committee (hereinafter, "Defendant USOC") and John Does 1-5 and alleges, on personal knowledge as to herself and on information and belief as to all other matters, as follows:

1. Plaintiff Nicolle Ford is a thirty-five (35) year-old resident of Nevada. Plaintiff was approximately fourteen (14) years old when she experienced the sexual abuse alleged herein.

2. Defendant USOC is a not-for-profit corporation, having its principal place of business in the State of Colorado and its headquarters in Colorado Springs, Colorado. This Defendant may be served with process through its registered agent, National Registered Agents, Inc., 1999 Bryan Street, Suite 900, Dallas, Texas 75201, or wherever this Defendant and/or registered agent may be found.

3. Each of Defendants Does 1 through 5, inclusive, is being sued under fictitious names pursuant to CPLR §1024. Plaintiff does not know the true names, identities, and capacities of Does 1 through 5, whether individual, corporate, associate, or otherwise. When their true names, identities, and capacities are known to Plaintiff, Plaintiff will seek to amend this Complaint to identify them.

4. This Court has personal jurisdiction over Defendant pursuant to CPLR §§301 and 302, in that Plaintiff's claims arise from the tortious acts of Defendant that were committed in the State of New York.

5. The Court has jurisdiction over this action with regard to all causes of action because the amount of damages Plaintiff seeks exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

6. Venue is proper in the County of Monroe under CPLR §503 because it is the county in which a substantial part of the events or omissions giving rise to the claim occurred.

7. This is a civil action for declaratory, injunctive, equitable, and monetary relief for injuries sustained by Plaintiff as a result of the acts and omissions of Defendant United States Olympic Committee ("Defendant USOC") John Does 1-5, and their respective employees, representatives, and agents, relating to the sexual assault by Lawrence Gerard Nassar ("Nassar") against Plaintiff.

8. Up to and in 2003, Plaintiff was an elite minor gymnast who competed in national competitions as a member of USA Gymnastics.

9. In approximately August 1999, Plaintiff was competing in the 1999 U.S. Classic USA Gymnastics Qualifier in Rochester, New York, when she sought treatment with Nassar.

10. Nassar was appointed by the USOC as a member of the medical staff.

11. Plaintiff was scheduled with Nassar to receive treatment for an injury to her hamstring on two separate occasions during the U.S. Classic in Rochester, New York. On the two occasions, under the guise of treatment, Nassar sexually assaulted, battered, abused, and molested Plaintiff by digitally penetrating her vagina without the use of gloves or lubricant. Plaintiff was approximately fourteen (14) years old at the time of the assault. Nassar did not give prior notice or obtain consent from Plaintiff or her parents for digital penetration, and Plaintiff did not treat or intend to treat with Nassar for OB/GYN issues. Plaintiff believes the conduct of Nassar was for his pleasure and self-gratification, and constituted sexual assault, abuse, and molestation.

12. By way of background, Defendant USOC was originally chartered to organize and promote the United States' participation in international Olympic Competition. Among other powers, the USOC is authorized to recognize and control one eligible sports organization as a National Governing Board ("NGB") for each of the various sports represented in the Olympic Games. USA Gymnastics ("USAG") is one of 47 NGBs recognized by the USOC that sponsors or arranges amateur athletic competition. The USOC is responsible for the conduct of its NGBs and is required to make sure athletes are kept safe from sexual predators. At all times relevant to Plaintiff's claim, USAG was as an entity under USOC's control, and Nassar acted as an agent of USOC.

13. Defendant USOC has an extensive history concerning the sexual misconduct of its employees, agents, and representatives. In August 2016, The Indianapolis Star published a lengthy article regarding an investigation into USAG and its handling of sexual abuse complaints titled “A blind eye to sex abuse: How USA Gymnastics failed to report cases.” Following the Indianapolis Star article, former gymnast Rachael Denhollander, filed a criminal complaint with the Michigan State University Police alleging that in 2000, at the age of 15, she was sexually abused by Nassar during treatments for lower back pain. The following day, Michigan State University relieved Nassar of clinical and patient duties. On September 8, 2016, a former Olympic medalist filed a civil lawsuit in California, alleging sexual abuse by Nassar from 1994 to 2000. A few days later, The Indianapolis Star published a second article titled “Former USA Gymnastics doctor accused of abuse,” which included Denhollander’s allegations against Nassar. Following the September 2016 publication, other victims began coming forward after recognizing that they too were victims of sexual abuse at a time when most of them were minors.

14. In the summer of 2015, USAG relieved Nassar of his duties after becoming aware of concerns regarding his actions. However, USAG failed to inform its members, including Plaintiff, or the clubs/organizations affiliated with Nassar, of the allegations and potential harm to Plaintiff and others. Similarly, Defendant USOC failed to help facilitate awareness, despite being informed of Nassar’s abuse in 2015, 14 months prior to his arrest.

15. In late 2018, Nassar spent several weeks in Michigan courtrooms, receiving three sentences in criminal court. Following a multitude of charges, Nassar ultimately plead guilty to three charges of child pornography and ten counts of criminal sexual conduct, admitting that his sexual assaults were not done for a medical purpose. Nassar was sentenced to 720 months (60 years) in federal prison for the child pornography charges, and two prison terms of up to 75 and 135 years respectively, for the sexual conduct charges. Dozens of victims and other individuals provided victim impact statements at the sentencing hearings, and victims originally wanting to proceed in litigation anonymously chose to publicly identify themselves.

16. Fundamentally, the acts and omissions of Defendant USOC and its employees, agents, and representatives, in conjunction with USOC's policies, customs, and practices concerning the investigation of sexual assault allegations, severely compromised the health and safety of known and unknown victims. Specifically, the aforementioned practices resulted in repeated instances of sexual assault, abuse, and molestation by Nassar.

17. John Does 1-5 also participated in and/or facilitated the foregoing abuse of Plaintiff, each contributing to the harms suffered by Plaintiff set forth more fully hereinabove and below.

18. In the alternative, John Does 1-5 knew or should have known of the foregoing abuse of Plaintiff, and each owed a duty of care to Plaintiff, and each knew or should have known of the risk of harm to children such as plaintiff defendant Nassar posed.

19. Upon information and belief and as more fully detailed in the Causes of Action below, as a result of the actions or inaction of the Defendants, the Plaintiff has suffered damages including:

- a. Mental anguish, past and future;
- b. Physical pain and suffering, past and future;
- c. Loss of enjoyment of life, past and future;
- d. Medical expenses, past and future;
- e. Psychological pain and suffering, including depression, anxiety, self-blaming, feelings of unfulfilled life, feelings of anger, embarrassment, alcohol abuse, and self-esteem issues, past and future; and
- f. Lost wages/diminution of earning capacity, past and future.

**AS AND FOR A FIRST SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

20. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

21. Defendant USOC and John Does 1-5 owed Plaintiff a duty of ordinary care to ensure her safety and freedom from sexual assault, abuse, and molestation while being treated by its employees, representatives, and agents.

22. Defendant USOC and John Does 1-5 owed a duty of care to all minor persons, including Plaintiff, who were likely to come within the influence or supervision of Nassar and John Does 1-5, in his role as an athletic trainer, doctor, or other employee, agent, servant and/or volunteer.

23. Plaintiff, as a member of USAG, had a reasonable expectation that Defendant USOC and John Does 1-5 were recommending competent and ethical physicians and trainers for medical treatment who would carry out said treatment without sexual assault, abuse, and molestation.

24. By seeking medical treatment from Nassar in his capacity as an employee, agent, and/or representative of Defendant USOC and John Does 1-5, a special, confidential, and fiduciary relationship between Plaintiff and USOC and Plaintiff and Nassar was created, resulting in Defendant USOC, John Does 1-5, and Nassar owing Plaintiff a duty of care.

25. Defendant USOC and John Does 1-5 breached this duty by various acts of omission and/or commission, including but not limited to the following, each of which, individually and/or in the aggregate was a proximate cause of the incident in question:

- a. Failure to adequately train and supervise Nassar;
- b. Failure to properly investigate, address, and remedy complaints regarding Nassar's conduct;
- c. Failure to inform Plaintiff and the public of the allegations and concerns leading to Nassar's separation from USAG and USOC.
- d. Negligently hiring Nassar as they knew or should have known that Nassar posed a threat of sexual abuse to children;
- e. Negligently retaining Nassar as they knew or should have known that Nassar posed a threat of sexual abuse to children;
- f. Negligently directing Nassar as they knew or should have known that Nassar posed a threat of sexual abuse to children;
- g. Negligently supervising Nassar as they knew or should have known that Nassar posed a threat of sexual abuse to children;

- h. Failing to investigate the background of Nassar before placing him into close contact with Plaintiff;
- i. "Covering up" or otherwise failing to disclose the harmful acts of Nassar;
- j. Failing to warn Plaintiff, his parents and/or legal guardians of Nassar's conduct despite having constructive knowledge of sexual abuse;
- k. Failing to warn Plaintiff, her parents and/or guardians of Nassar's conduct despite having actual knowledge of sexual abuse;
- l. Assigning Nassar to have contact with Plaintiff despite having constructive and/or actual knowledge of sexual abuse;
- m. Minimizing, ignoring, or excusing sexual misconduct over a period of decades;
- n. Failing to implement and maintain effective policies and procedures to prevent sexual abuse and abuse of children;
- o. Failing to report Nassar's sexual abuse to appropriate law enforcement agencies; and
- p. Failing to exercise due care under the circumstances.

26. As a foreseeable, direct, and proximate result of the negligence of Defendant USOC and John Does 1-5, Plaintiff has suffered and will continue to suffer the injuries described herein.

**AS AND FOR A SECOND SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

27. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

28. Defendant USOC and John Does 1-5 owed Plaintiff a duty to use due care to ensure her safety and freedom from sexual assault, abuse, and molestation while interacting with their respective employees, representatives, and/or agents.

29. Plaintiff was a member of USAG and the USAG team, participated in USOC sanctioned events (events held by USAG), and was referred to Nassar through USOC affiliations.

30. Nassar owed Plaintiff a duty to use due care in his capacity as an employee, representative and/or agent of Defendant USOC and John Does 1-5.

31. By seeking medical treatment from Nassar in his capacity as an employee, agent and/or representative of Defendant USOC and John Does 1-5, a special, confidential, and fiduciary relationship between Plaintiff and Nassar was created, resulting in Nassar owing Plaintiff a duty to use due care.

32. The failure of Defendant USOC and John Does 1-5 to adequately supervise Nassar was so reckless as to demonstrate a substantial lack of concern for whether an injury would result to Plaintiff.

33. Nassar's conduct in sexually assaulting, abusing, and molesting Plaintiff under the guise of rendering medical "treatment" as an employee, representative, and/or agent of Defendant USOC and John Does 1-5 was so reckless as to demonstrate a substantial lack of concern for whether or not injury would result to Plaintiff.

34. The conduct of Defendant USOC and John Does 1-5 demonstrated a willful disregard for substantial risks to Plaintiff, and for necessary precautions to reasonably protect Plaintiff.

35. Defendant USOC and John Does 1-5 breached their respective duties to Plaintiff and were grossly negligent when they conducted themselves by actions described above, including but not limited to its failure to notify its member athletes about the issues surrounding sexual abuse in gymnastics, warnings signs, and reporting requirements.

36. The acts and omissions of Defendant USOC and John Does 1-5, as previously described, were committed with complete and reckless disregard for, and with willful, wanton, and actual conscious indifference to, the rights, safety, and welfare of Plaintiff.

37. The nature of Defendant USOC and John Does 1-5's acts and omissions constituted gross negligence and malice. Specifically, Defendant USOC and John Does 1-5 undertook a continuous course of action in the form of conscious decisions, with subjective knowledge and awareness of the risks and hazards presented by each decision as discussed above and incorporated herein, to expose Plaintiff and others to sexual abuse and/or sexual assault, and exercised not even slight care or diligence.

38. When viewed objectively from the standpoint of Defendant USOC and John Does 1-5 at the time of their occurrence, said acts and omissions involved reckless disregard of or indifference to an extreme degree of physical, mental, and psychological risk and danger, considering the probability and the magnitude of the potential harm to others. Defendant USOC and John Does 1-5 committed various acts and omissions constituting gross negligence, as outlined above. Such gross negligence was a

foreseeable, direct, and proximate cause of the occurrence and Plaintiff's injuries and damages.

**AS AND FOR A THIRD SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

39. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

40. For many years after Plaintiff's abuse at the hands of Nassar, Defendant USOC and John Does 1-5 engaged in a conscious, deliberate plan to conceal the abuse, including but not limited to:

- a. Concealing from the public the sexual abuse committed by Nassar;
- b. Concealing the identity of Nassar;
- c. Concealing from appropriate law enforcement officials the sexual abuse committed by Nassar against Plaintiff and/or other minors;
- d. Attacking the credibility of Plaintiff and/or other victims of Nassar; and
- e. Impeding or otherwise preventing Plaintiff and other victims from pursuing legal action against Defendant USOC and John Does 1-5.

41. Defendant USOC and John Does 1-5 had a duty to disclose the information it concealed in Paragraph 49, and its concealment therefore amounted to a misrepresentation.

42. Defendant USOC and John Does 1-5 concealed this information with fraudulent intent, with the goal of inducing reliance.

43. Plaintiff, and others, justifiably relied upon Defendant USOC and John Does 1-5's concealment of this material information.

44. As a foreseeable, direct, and proximate result of this concealment, Plaintiff suffered significant injuries.

**AS AND FOR A FOURTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

45. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

46. Plaintiff affirmatively pleads that any alleged tortious acts of Nassar were committed while he was acting in the course and scope of his employment with Defendant USOC and John Does 1-5, or while he was acting as an agent on or behalf of Defendant USOC and John Does 1-5, and are thus imputed to Defendant USOC and John Does 1-5 under a legal theory of respondeat superior.

**AS AND FOR A FIFTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

47. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

48. Defendant USOC and John Does 1-5 had a duty to provide reasonable supervision of Nassar as its employee, agent, and/or representative throughout the course of his work in such capacity, including his interactions with young female athletes such as Plaintiff.

49. It was reasonably foreseeable, given the known sexual abuse in youth sports, particularly gymnastics, that Nassar, having been the subject of prior allegations, had or would sexually abuse children such as Plaintiff, unless properly supervised.

50. Defendant USOC and John Does 1-5, by and through their employees, agents, managers, and/or assigns, knew or reasonably should have known of Nassar's conduct and/or his unfitness as an employee, agent, and/or representative due to his sexual interest in children and young adults.

51. Defendant USOC and John Does 1-5 breached their duty to provide reasonable supervision of Nassar and its failure permitted Nassar, who was in a position of trust and authority, to commit the acts against Plaintiff.

52. The aforementioned sexual abuse occurred while Nassar was acting in the course of his employment, agency, and/or representation of Defendant.

53. Defendant USOC and John Does 1-5 tolerated, authorized, and/or permitted a custom, policy, practice or procedure of insufficient supervision and failed to adequately screen, counsel or discipline Nassar, allowing him to violate the rights of persons such as Plaintiff with impunity.

**AS AND FOR A SIXTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

54. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

55. Given the direct or indirect knowledge of sexual abuse in youth sports, particularly gymnastics, it was reasonably foreseeable that sexual abuse of minors may occur if proper procedures were not taken by Defendant USOC and John Does 1-5.

56. Defendant USOC and John Does 1-5 knew or should have known that Nassar posed a risk of harm to Plaintiff and/or those in Plaintiff's situation.

57. Defendant USOC and John Does 1-5 had direct and/or constructive knowledge as to the dangerous conduct of Nassar and failed to act reasonably and responsibly in response.

58. Defendant USOC and John Does 1-5 knew or should have known that Nassar previously committed sexual assault, abuse, and molestation, and/or was continuing to engage in such conduct.

59. Defendant USOC and John Does 1-5 had a duty to warn or protect Plaintiff, as a USOC member, and others in Plaintiff's situation against the risk of injury by Nassar.

60. The duty to disclose this information arose from the special, trusting, confidential, and fiduciary relationship between Plaintiff and Nassar in his capacity as an employee, agent, and/or representative of Defendant USOC and John Does 1-5.

61. Defendant USOC and John Does 1-5 breached said duty by failing to warn Plaintiff of Nassar.

62. Defendant USOC and John Does 1-5 breached said duties to protect Plaintiff by failing to detect and/or uncover evidence of sexual abuse and sexual assault. Specifically, Defendant USOC and John Does 1-5 failed to investigate, adjudicate, suspend, and/or ban Nassar from USAG/USOC affiliation and sanctioned events.

63. Defendant USOC and John Does 1-5 failed to adequately screen, counsel, and/or discipline Nassar for physical and/or mental conditions that might have rendered him unfit to discharge the duties and responsibilities of a physician in his

capacity as an employee, agent, and/or representative of Defendant USOC and John Does 1-5, resulting in the violation of Plaintiff's rights.

64. Defendant USOC and John Does 1-5 willfully refused to notify, give adequate warning, and implement appropriate safeguards to protect Plaintiff from Nassar's conduct.

**AS AND FOR A SEVENTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

65. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

66. Defendant USOC and John Does 1-5 breached their duty to take reasonable protective measures to protect Plaintiff and other individuals from the risk of childhood sexual abuse and/or sexual assault by Nassar, such as failing to properly train or educate Plaintiff and others (including minors) about how to avoid such a risk.

67. Further, Defendant failed to implement reasonable safeguards to:

- a. Prevent acts of sexual assault, abuse, and molestation by Nassar;
- b. Avoid placing Nassar in a position that allowed unsupervised contact and interaction with Plaintiff and other young athletes; and
- c. Training or educating coaches and trainers to be aware of improper touching, especially in light of Defendant USOC and John Does 1-5's knowledge it was putting a predator such as Nassar in contact with young athletes.

68. Defendant failed to train or educate its members, including Plaintiff, regarding the foreseeability and danger of sexual abuse by adults holding positions of authority such as Nassar.

**AS AND FOR AN EIGHTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

69. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

70. Defendant USOC and John Does 1-5 breached their respective duties to exercise due care when credentialing, hiring, retaining, screening, checking, regulating, monitoring, and supervising its employees, agents, and/or representatives.

71. Defendant USOC and John Does 1-5 were negligent in the retention of Nassar as an employee, agent, and/or representative in its failure to adequately investigate, report, and address complaints about Nassar's conduct.

72. Defendant USOC and John Does 1-5 were negligent in the retention of Nassar after Defendant discovered, or reasonably should have discovered, that Nassar's conduct reflected a propensity for sexual misconduct.

73. The failure of Defendant USOC and John Does 1-5 to act in accordance with the standard of care permitted Nassar to sexually abuse and/or sexually assault Plaintiff and other individuals.

74. The aforementioned negligence in the credentialing, hiring, retaining, screening, checking, regulating, monitoring, and supervising of Nassar created a foreseeable risk of harm to Plaintiff and other minors/young adults.

**AS AND FOR A NINTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

75. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

76. Defendant USOC and John Does 1-5 allowed Nassar to be in a position where he could sexually assault, abuse, and molest children and young adults.

77. A reasonable person would not expect Defendant USOC and John Does 1-5 to tolerate or permit its employee, agent, or representative to commit sexual assault, abuse, or molestation.

78. The conduct of Defendant USOC and John Does 1-5 held Nassar in high esteem and acclaim which in turn encouraged Plaintiff and others to respect and trust Nassar, seek out his services, and not question his methods or motives.

79. Defendant USOC and John Does 1-5 protected Nassar in part to bolster their national and international reputation in the gymnastics community.

80. A reasonable person would not expect Defendant USOC and John Does 1-5 to be incapable of supervising and/or preventing Nassar from committing acts of sexual assault, abuse, and molestation.

81. The conduct of Defendant USOC and John Does 1-5 unreasonably endangered Plaintiff and caused her to fear for her safety.

82. As a direct result of the acts and omissions of Defendant USOC and John Does 1-5, Plaintiff suffered severe injuries, including but not limited to severe mental and emotional distress.

**AS AND FOR A TENTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

83. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

84. By allowing Nassar to be in a position where he could sexually assault, abuse, and molest children and young adults, Defendant USOC and John Does 1-5 were negligent.

85. The negligence of Defendant USOC and John Does 1-5 proximately caused Plaintiff to be sexually assaulted by Nassar.

86. As a direct result of the negligence of Defendant USOC and John Does 1-5, As a direct result of the acts and omissions of Defendant USOC and John Does 1-5, Plaintiff suffered severe injuries, including but not limited to severe mental and emotional distress, all of which are or may be permanent, and have required or will require Plaintiff to incur significant expenses in an effort to abate them through mental health treatment, counseling, and other necessary treatment.

**AS AND FOR A ELEVENTH SEPARATE AND DISTINCT CAUSE OF ACTION
AGAINST ALL DEFENDANTS**

87. Plaintiff realleges and incorporates by reference the allegations contained in the previous paragraphs.

88. Defendant USOC and John Does 1-5 represented to Plaintiff and the public that Nassar was a competent, ethical, and safe physician.

89. By representing that Nassar was the Team Physician for USAG, Defendant represented to Plaintiff and the public that Nassar was safe, trustworthy, of high moral and ethical repute, and that Plaintiff and the public need not worry about being harmed by Nassar.

90. The representations were falsely or recklessly made, as Nassar sexually assaulted, abused, and molested Plaintiff and others prior to making such representations, and was continuing to do so.

91. Additionally, complaints were made to Defendant USOC and John Does 1-5, either directly or through its agents, yet Defendant USOC and John Does 1-5 did not contact members, including Plaintiff, or any clubs/organizations affiliated with Nassar to inform them of the allegations and potential harm.

92. Defendant USOC and John Does 1-5 made false representations with the intention that Plaintiff would rely on those false representations.

93. Plaintiff relied on the assertions of Defendant USOC and John Does 1-5 and sought treatment from Nassar in the wake of concerns and dangers known to Defendant USOC and John Does 1-5.

94. Plaintiff was subjected to sexual assault, abuse, and molestation as a result of fraudulent misrepresentations of Defendant USOC and John Does 1-5 regarding Nassar.

WHEREFORE Plaintiff seeks judgment against each and all of the Defendants on each separate and distinct Cause of Action in an amount which exceeds the jurisdictional limits of all Courts of lower jurisdiction and such other and further costs as this Court deems just and proper.

Respectfully submitted,

Dated: August 27, 2020

The Simpson Tuegel Law Firm, PLLC

/s/ Michelle Simpson Tuegel
MICHELLE SIMPSON TUEGEL
New York ID No. 5733639
3301 Elm Street
Dallas, Texas 75226
(214) 774-9121; (214) 614-9218 – Facsimile
michelle@stfirm.com

O'Brien & Ford, PC

/s/ Christopher J. O'Brien, Esq.
CHRISTOPHER J. O'BRIEN
4549 Main Street, Suite 201
Buffalo, NY 14226
(716) 907-7777; (716) 768-0948 – Facsimile
cobrien@obrienandford.com

**Abraham, Watkins, Nichols, Sorrels,
Agosto, Aziz, & Stogner**

/s/ Muhammad S. Aziz
MUHAMMAD S. AZIZ
State Bar No. 24043538
800 Commerce Street
Houston, Texas 77002
(713) 222-7211; (713) 225-0827 – Facsimile
maziz@abrahamwatkins.com

ATTORNEYS FOR PLAINTIFF