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Attorney for Plaintiffs

W. M.,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: WARREN COUNTY
Plaintiff,	:	
	:	DOCKET NO.: L-000135-13
-vs-	:	
	:	CIVIL ACTION
THE ESTATE OF EDWARD	:	
BULLOCK; and the COUNTY OF	:	SECOND AMENDED COMPLAINT
WARREN,	:	
	:	
Defendants.	:	

The Plaintiff, W. M., by way of complaint against the Defendant, says:

Preliminary Statement

1. The Plaintiff brings this action to recover damages for the sexual abuse, including sexual penetration, fellatio, and rape, perpetrated by the then Warren County Sheriff, when the Plaintiff was eleven (11) years old. The Plaintiff also brings this action against the County of Warren and the employee/agents of the County who received direct notice of the sexual abuse outlined herein and permitted/acquiesced by refusing to take a reporting of the sexual abuse/rape, failing to take any action against the abuser, failing to protect the child victim, covering up the sexual abuse/rape, and for directly physically and verbally assaulting the eleven (11) year old victim for daring to report the horrific abuse he endured.

The Parties

2. In accordance with N.J.S.A. 2A:61B-1(f), the specific identity of the victim and Defendant individuals are withheld herein. However, because former Sheriff Edward Bullock previously filed an Answer identifying himself as John Doe 1, his identity is not withheld.

3. The Plaintiff, W.M., is a victim of various acts of sexual abuse as described in greater detail below, when he was a young child. At all material times herein, the eleven (11) year old Plaintiff was without parental supervision or a place to live and dependent upon the Warren County Children's Shelter for food, shelter, and the basic necessities of life.

4. Defendant Edward Bullock was an adult male employed by the County of Warren in the capacity of Sheriff.

5. John Doe 2, at all relevant times herein, was an adult male employee/agent of the Warren County Shelter in or about the last week of December 1987. John Doe 2 had a dark mustache at all times relevant herein.

6. John Does 3 – 10, at all relevant times herein, were employees/agents of the County of Warren who knew or should have known of the sexual abuse of children at the hands of Defendant, Edward Bullock. Defendants, John Does 3 – 10 turned a blind eye to the sexual abuse of the Plaintiff and other child victims and despite a general awareness of the sexual pedophilic tendencies of the Defendant Sheriff.

7. John Does 2-10 are referenced herein for purposes of respondeat superior and/or vicarious liability against the County of Warren, but not for individual liability.

8. Defendant, County of Warren, at all relevant times herein, owned and operated the Warren County Children's Shelter (hereinafter the "Shelter").

9. The Shelter was vested with the authority and assumed the correlative duty and role of taking care of W.M. as an eleven (11) year old shelter resident devoid of parental supervision or guidance.

10. The Shelter provided for the child's basic needs of shelter, clothing, bedding, discipline, food, medical needs, etc. and was entrusted with his health, safety, and overall care.

Background Facts Common to All Counts

11. As a young adolescent, W. M.'s life was replete with parental abandonment and the struggle to procure sustenance.

12. Abandoned by his father at age one (1), W. M. was raised by a single mother who persistently abused alcohol, barely providing for W. M. and constantly abandoning his care on numerous occasions throughout his childhood. By the age of nine (9), W. M. was left without food or adequate shelter and was forced to fend for himself in order to survive. Given these conditions, a good part of his early life was spent at Warren County Children's Shelter and at the adjacent facility, Warren Acres.

13. As an adolescent with no parental supervision or direction, W. M. acted out and began having interactions with the criminal justice system.

Abuse in the Sheriff's Office

14. Between the ages of eight (8) and ten (10), W. M. was brought to the Warren County Courthouse on two (2) separate occasions to participate in legal proceedings. On both occasions, W. M. was placed in the "holding cell" for periods of time prior and subsequent to his respective legal proceedings.

15. While in the holding cell on two (2) separate occasions, the then Warren County Sheriff, Edward Bullock, personally removed W. M. from the cell, removed any restraints on W. M. and escorted the boy to the Sheriff's personal office.

16. On each of the above-mentioned occasions, the former Warren County Sheriff, Edward Bullock, would position W. M. on his lap.

17. At all relevant times herein, the former Warren County Sheriff, Edward Bullock, was approximately six foot, six inches (6'6") tall, weighted three hundred (300) pounds, was fully uniformed, and adorned with his county issued firearm.

18. While positioned on his lap, W. M. was touched and fondled upon his genitals.

19. On the latter of these occasions, in addition to being fondled, W. M. was physically forced by the Sheriff to touch the Sheriff's genitals. The Sheriff manipulated the young boy's hand in such a way as to stroke the Sheriff's genitals until the Sheriff's penis became erect.

20. In addition to the fondling and the physical manipulation, the former Sheriff, who always wore a cowboy hat, would position the eight (8) to ten (10) year old on his lap to pretend W. M. was a cowboy. During these sessions, W. M. was required to "ride" the Sheriff's leg. The Sheriff would also show W. M. the various stuffed animals which were openly displayed on a shelf in the Sheriff's personal office.

Transfer to the Children's Shelter

21. Just after turning eleven (11) years old, in or about December of 1987, W. M. was apprehended by the Hackettstown Police Department relating to minor vandalism.

22. Without any parents assuming custody of W. M., the Hackettstown Police Department arranged for his release to the Warren County Children's Shelter.

23. In or about late December of 1987, the Warren County Sheriff, Edward Bullock, volunteered to personally transfer W. M. from the Hackettstown Police Department to the Shelter.

24. In or about the last week of December 1987, the Sheriff of Warren County appeared at the Hackettstown Police Department for the purpose of transporting W. M. to the Warren County Children's Shelter.

25. The Sheriff, Edward Bullock, was in full police uniform, was visibly carrying a firearm, and was operating his county owned vehicle when transporting W. M.

26. Instead of transporting W. M. directly to the Warren County Children's Shelter; however, the Sheriff pulled off on a secluded trail road and parked the vehicle.

27. The Sheriff then positioned himself and the young boy in the back seat and undressed both himself and W. M.

28. After removing the eleven (11) year old W. M.'s pants, the Sheriff performed fellatio on the child.

29. Thereafter, the Sheriff, Edward Bullock, forced W. M. to perform fellatio on the Defendant.

30. Throughout this encounter, the Sheriff engaged in inappropriate touching of the private areas of the child.

31. Eventually, Edward Bullock sexually penetrated W. M. through anal intercourse, while the child screamed and pleaded for him to stop.

32. After raping the eleven (11) year old boy, he commanded the child never to speak of the incident and further told the child he would "take care of him."

33. Subsequently, Edward Bullock completed his transport of the minor child, W. M., by relinquishing his care to the Warren County Children's Shelter.

Residence at the Children's Shelter

34. Upon his arrival, W. M. was in the custody and control of the Warren County Children's Shelter.

35. During his residence at the Children's Shelter, W. M. had no parental supervision, oversight, or contact.

36. The Shelter was responsible for, and provided, the eleven (11) year old's basic needs of shelter, clothing, food, bedding, and was entrusted with his health, safety, and overall care. The Children's Shelter established when W. M. was to wake up, what time lights were turned off at night, when he was allowed to shower, and authorized individual trips to the restroom.

37. The Children's Shelter also provided items of everyday living, such as a toothbrush, soap, shampoo, conditioner, deodorant, clothing, etc. to W. M. Daily chores were assigned to each child, and each child, including W. M., was assigned to a room with a bunk and dresser.

38. After two (2) days of living in the Shelter, the eleven (11) year old boy, W. M., worked up enough courage to report the incident to a County shelter employee/agent (John Doe 2).

39. Upon being advised by W. M. of the sexual assault and rape perpetrated by the Sheriff, the employee/agent of the Shelter (John Doe 2) punched W. M. in the abdomen with enough force to knock the wind out of him, called him a "fucking faggot," and told him to "never to speak about that again."

40. In so doing, the County employee/agent not only acquiesced in the sexual abuse, but took direct action against the victim to ensure the abuse would not come to light.

41. The Warren County Children's Shelter additionally failed to report the incident, take proper actions, ensure the child's safety, and/or in any way address the known sexual tendencies of fellow County employee, Edward Bullock.

42. On or about March 11, 1992, Edward Bullock pled guilty to the criminal charge of official misconduct stemming from the sexual abuse of various boys during his tenure as Sheriff.

43. At the time of the sexual assault of the Plaintiff, other employees/agents of the Warren County, including members of the Warren County Sheriff's Department, knew or should have known of the sexual tendencies of the then active Sheriff in targeting young boys, including W. M., and acquiesced in the abuse by failing to take remedial actions.

COUNT I: CHILD SEXUAL ABUSE ACT (N.J.S.A. 2A:61B-1)

(W. M. v. Edward Bullock)

44. Plaintiff incorporates by reference Paragraphs 1 – 43 as though fully set forth herein.

45. The New Jersey "Child Sexual Abuse Act", NJSa 2A:61B-1 *et seq.* (hereinafter the "Act"), provides for civil damages for a child victim of sexual abuse.

46. "Sexual abuse" pursuant to the Act means an act of sexual contact or sexual penetration between a child under the age of eighteen (18) years and an adult.

47. At all times relevant herein, W. M. was under the age of eighteen (18) years.

48. At all material times herein, Defendant Edward Bullock was an adult.

49. On various occasions as more fully set forth above, Defendant Edward Bullock

engaged in acts of sexual contact and sexual penetration with W. M., within the meaning ascribed under the Act.

50. As a direct and proximate result of the sexual abuse of the Plaintiff at the hands of Defendant Edward Bullock, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, Edward Bullock, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT II: BATTERY/ASSAULT

(W. M. v. Edward Bullock)

51. Plaintiff incorporates by reference Paragraphs 1 – 50 as though fully set forth herein.

52. The Defendant, Edward Bullock, in sexually fondling, manipulating, performing fellatio, and sexually penetrating the Plaintiff, did engage in an offensive and harmful touching of the Plaintiff's person.

53. The sexual assault and battery was perpetrated by Defendant Edward Bullock despite the screaming protests of the Plaintiff to stop.

54. The Plaintiff, W. M., did not consent to the offensive assault and battery and, as a minor child, lacked the requisite capacity to establish consent.

55. As a direct and proximate result of the sexual assault and battery by Defendant, Edward Bullock, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together

with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, Edward Bullock, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(W. M. v. Edward Bullock)

56. Plaintiff incorporates by reference Paragraphs 1 – 55 as though fully set forth herein.

57. The sexual abuse of Defendant, Edward Bullock, against the Plaintiff, as more fully set forth above, constitutes intentional and outrageous conduct.

58. As a direct and proximate result of the Defendant's intentional and outrageous conduct by way of sexual abuse and rape, the Plaintiff was caused to suffer severe emotional distress as a child, and will continue to suffer severe emotional distress and serious psychological sequelae, which no reasonable person could be expected to endure.

Wherefore, Plaintiff demands judgment against Defendant, Edward Bullock, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT IV: NEGLIGENCE PER SE

(W. M. v. Edward Bullock)

59. Plaintiff incorporates by reference Paragraphs 1 – 58 as though fully set forth herein.

60. The New Jersey Criminal Code at N.J.S.A. 2C:14-2(a) designates "aggravated sexual assault" as a crime of the first degree.

61. An actor is guilty of aggravated sexual assault pursuant to N.J.S.A. 2C:14-2(a) if he

commits an act of sexual penetration with a victim who is less than thirteen (13) years old.

62. As more fully set forth above, the Defendant, Edward Bullock, did sexually penetrate and rape W. M., a young child who had just turned eleven (11) years old in or about December of 1987.

63. The New Jersey Criminal Code at N.J.S.A. 2C:24-4A designates “endangering the welfare of children” as a crime of the second degree.

64. Any person having a legal duty for the care of a child, or who has assumed responsibility for the care of a child, who engages in sexual conduct which would impair or debauch the morals of the child or who causes the child harm that would make the child an abused or neglected child is guilty of a crime of the second degree.

65. A “prohibited sexual act”, in relevant part, includes sexual intercourse, anal intercourse, fellatio, and/or any act of sexual penetration.

66. As more fully set forth above, the sexual abuse and rape perpetrated by Defendant, Edward Bullock, constitutes direct violations of endangering the welfare of a child pursuant to the New Jersey Criminal Code.

67. The New Jersey Criminal Code at N.J.S.A. 9:6-3 designates “cruelty and neglect of children” as a crime of the fourth degree.

68. Any person having the care, custody or control of any child, who shall abuse, abandon, be cruel to or neglectful of such child, or any person who shall abuse, be cruel to or neglectful of any child shall be deemed to be guilty of a crime of the fourth degree, pursuant to N.J.S.A. 9:6-3.

69. As more fully set forth above, the sexual abuse and rape perpetrated by Defendant, Edward Bullock, constitutes direct violations prohibiting cruelty and neglect of children pursuant to the New Jersey Criminal Code.

70. W.M., as a minor child, was in the class of persons designed to be protected and/or suffered the type of harm the above-referenced criminal statutes were designed to prevent.

71. The violations of the above-referenced criminal statutes constitute negligence per se on the part of Defendant, Edward Bullock.

72. As a direct and proximate result of the negligence per se of Defendant, Edward Bullock, W. M. was caused to suffer and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, Edward Bullock, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT V: NEGLIGENCE AND BREACH OF FIDUCIARY DUTY

(W. M. v. Edward Bullock)

73. Plaintiff incorporates by reference Paragraphs 1 – 72 as though fully set forth herein.

74. As more fully set forth above, the uniformed Sheriff, Edward Bullock, in transporting the eleven (11) year old Plaintiff, W. M., from the Hackettstown Police Department to the Warren County Children's Shelter, assumed sole responsibility for the safety and welfare of the child.

75. As more fully set forth above, the sexual abuse and rape perpetrated by Defendant, Edward Bullock, constitutes a breach of the duty of reasonable care, breach of the fiduciary relationship as a temporary guardian assuming responsibility and care of an eleven (11) year old child and a breach of the authority of the Warren County Sheriff.

76. As a direct and proximate result of Defendant's, Edward Bullock, negligence and breach of fiduciary duty, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, Edward Bullock, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT VI: CHILD SEXUAL ABUSE ACT (N.J.S.A. 2A:61B-1)

(W. M. v. County of Warren)

77. Plaintiff incorporates by reference Paragraphs 1 – 76 as though fully set forth herein.

78. During his tenure as Warren County Sheriff, Edward Bullock continually demonstrated abnormal interest in and attention to young male adolescents, including W. M.

79. During his tenure as Warren County Sheriff, Edward Bullock continually and consistently, in addition to openly displaying abnormal attention to and interest in young males, utilized every opportunity to isolate and remove young boys in order to satisfy his purulent and pedophilic ideations.

80. During his tenure as Warren County Sheriff, Edward Bullock openly utilized his County position, and the access it provided, to groom and sexually abuse adolescent boys in the custody or control of County facilities.

81. The conduct and activities of Defendant, Edward Bullock, was committed during his duties as Warren County Sheriff and in the presence of numerous county employees and colleagues, including sworn law enforcement officers.

82. The extensive abnormal conduct of Defendant, Edward Bullock with young adolescent males was representative of preliminary grooming and pedophilic ideations which led to sexual assaults and rape of numerous children who were in the custody and *in loco parentis* with the Defendant, Warren County.

83. The Defendant, Warren County, by its agents, employee, and representatives, knew or should have known that the abnormal activities and attention of Defendant, Edward Bullock, while performing his duties as Warren County Sheriff, was representative of grooming and the obtainment of access for purposes of committing sexual acts upon W. M. and other children in a similar position as W. M., as wards of Warren County.

84. The Defendant, Warren County, by its agents, employee, and representatives, knew or should have reasonably should have known that the actions and activities of Defendant, Edward Bullock, as Warren County Sheriff, involved pedophilic conduct, sexual assault, and rape.

85. Warren County, by and through Edward Bullock and other County employees/agents present, were *in loco parentis* of the minor child, W. M., “within the household” as ascribed by the Act, while W. M. was in the Warren County Courthouse and the custody, authority and control of the County.

86. In or about December of 1987, the County of Warren owned and operated the Warren County Children's Shelter.

87. In or about December of 1987, the County of Warren operated the Shelter by and through its employees/agents, including John Doe 2.

88. In or about December of 1987, the County of Warren operated the Shelter by and through its employees/agents, including John Does 3 - 10.

89. In or about December of 1987, the Shelter assumed all control and responsibility of W. M., representative of a guardian or other person standing "*in loco parentis*" "within the household", as ascribed by the Act.

90. Within two (2) days of being subjected to a violent rape of his person, the eleven (11) year old W. M. directly reported the full details of the sexual assault incident and the identity of the perpetrator to John Doe 2, an employee/agent of the Shelter responsible for the safety and wellbeing of the children housed in said facility.

91. Upon being directly notified of the details of the sexual abuse and identity of the abuser (a fellow county employee), the County of Warren, by and through its employees/agents purposely turned a blind eye to the sexual abuse, did not document said abuse, did not report said abuse to any authority, failed to protect the safety and wellbeing of W. M., failed to investigate and/or covered up the incident, verbally intimidated the eleven (11) year old victim by calling him a "fucking faggot", verbally intimidated the eleven (11) year old victim by telling him to "never speak of this again", and physically assaulted and intimidated the eleven (11) year old victim by punching him in the abdomen with enough force to knock his wind out.

92. The actions and inactions of the County of Warren, as set forth in the preceding paragraphs, constitutes knowingly permitting and/or acquiescing in the sexual abuse perpetrated by Edward Bullock, against the Plaintiff, within the meaning ascribed by the Child Sexual Abuse Act.

93. As a direct and proximate result of the Defendant's actions and omissions in knowingly permitting and/or acquiescing in the sexual abuse, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, County of Warren, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

**COUNT VII: NEGLIGENCE, BREACH OF FIDUCIARY DUTY,
AND VIOLATIONS OF RESTATEMENT § 214**

(W. M. v. County of Warren)

94. Plaintiff incorporates by reference Paragraphs 1 – 93 as though fully set forth herein.

95. Warren County by and through Edward Bullock and other County employees/agents present, stood *in loco parentis* of the minor child, while W. M. was in the Warren County Courthouse and under the authority, custody and control of the County.

96. Warren County, by and through Edward Bullock, the Warren County Sheriff in full County uniform, also stood *in loco parentis* of the minor child, W. M., for purposes of transporting the child to the County shelter via the Sheriff's County issued vehicle and while on duty.

97. As more fully set forth above, the County of Warren, by and through the Warren County Children's Shelter, operated in an *in loco parentis* capacity with respect to the adolescent residents of the Shelter.

98. Warren County, by and through John Doe 2 and other employees/agents present at the Warren County Children's Shelter, also stood *in loco parentis* of the minor child, W. M., for the period in late December 1987 when the child resided there.

99. The fiduciary relationship and responsibility for the custody and control of the minor child, W. M., created a non-delegable duty of care upon employees/agents of Warren County, including the Sheriff (Edward Bullock), those responsible for the child's care while held at the Warren County Courthouse on the dates where the sexually abusive incidents occurred, John Doe 2 and other Shelter employee/agents.

100. The actions and inactions of the employees/agents of Warren County, including the Sheriff, Edward Bullock, and the Shelter employees/agents, including John Doe 2, violated a non-delegable duty of their employer, the County of Warren, against the Plaintiff, W. M.

101. As a direct and proximate result of the County of Warren's violation of the non-delegable duty owed to the minor Plaintiff, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, County of Warren, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT VIII: NEGLIGENT SUPERVISION / FAILURE TO ACT

(W. M. v. County of Warren)

102. Plaintiff incorporates by reference Paragraphs 1 – 101 as though fully set forth

herein.

103. During his tenure as Warren County Sheriff, Edward Bullock continually demonstrated abnormal interest and attention to young male adolescents, including W. M.

104. During his tenure as Warren County Sheriff, Edward Bullock continually and consistently, in addition to openly displaying abnormal attention to and interest in young males, utilized every opportunity to isolate and remove young boys in order to satisfy his purulent and pedophilic ideations.

105. During his tenure as Warren County Sheriff, Edward Bullock openly utilized his County position, and the access it provided, to groom and sexually abuse adolescent boys in the custody or control of County facilities.

106. The conduct and activities of Defendant, Edward Bullock, was committed during his duties as Warren County Sheriff and in the presence of numerous county employees and colleagues, including sworn law enforcement officers.

107. The extensive abnormal conduct of Defendant, Edward Bullock with young adolescent males was representative of preliminary grooming and pedophilic ideations which led to sexual assaults and rape of numerous children who were in the custody and *in loco parentis* with the Defendant, Warren County.

108. The Defendant, Warren County, by its agents, employee, and representatives, knew or should have known that the abnormal activities and attention of Defendant, Edward Bullock, while performing his duties as Warren County Sheriff, was representative of grooming and the obtainment of access for purposes of committing sexual acts upon W. M. and other children in a similar position as W. M., as wards of Warren County.

109. The Defendant, Warren County, by agents, employee, and representatives, knew or should have reasonably should have known that the actions and activities of Defendant, Edward Bullock, as Warren County Sheriff, involved pedophilic conduct, sexual assault, and rape.

110. During the tenure of Defendant, Edward Bullock, as Warren County Sheriff, Defendant, Warren County, failed to reasonably and properly supervise, restrict, and/or remove Edward Bullock from his duties and further failed to reasonably and properly protect W. M. and other male adolescents from sexual conduct and rape committed by Defendant, Edward Bullock.

111. As a direct and proximate result of the reckless/gross negligent and/or negligence of the Defendant, Warren County, in failing to supervise, take any action to restrict, remove, or discipline Edward Bullock, or to protect W. M. and other adolescents, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, County of Warren, for compensatory damages, punitive damages, interest, attorneys' fees, and cost of suit.

COUNT VIII: NEGLIGENCE PER SE

(W. M. v. County of Warren)

112. Plaintiff incorporates by reference Paragraphs 1 – 111 as though fully set forth herein.

113. N.J.S.A. 9:6-8.10 requires that “any person having reasonable cause to believe that a child has been subjected to child abuse or acts of child abuse shall report the same immediately to the Division of Child Protection and Permanency by telephone or otherwise.”

114. The Plaintiff, W. M., as a “child” that “has been subjected to child abuse or acts of child abuse”, was in the class of persons designed to be protected by the statute.

115. Despite receiving direct reporting from the minor victim, the County of Warren, by and through its employees/agents, failed to report the known sexual abuse and acts of sexual child abuse to the proper authorities pursuant to the statute.

116. As a direct and proximate result of the County’s breach of its statutory obligations to report child sexual abuse, the Plaintiff has suffered and will continue to suffer severe physical and emotional trauma, psychological dysfunction, a diminished childhood, diminished enjoyment of life, together with severe and substantial pain and suffering.

Wherefore, Plaintiff demands judgment against Defendant, County of Warren, for compensatory damages, punitive damages, interest, attorneys’ fees, and cost of suit.

JURY DEMAND

The Plaintiff, W. M., hereby demands a trial by jury as to all issues of the within matter.

DESIGNATION OF TRIAL COUNSEL

Brad M. Russo, Esquire, is hereby designated as trial counsel in this matter.

CERTIFICATION

The matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding and no other action or arbitration proceeding is contemplated.

RUSSO LAW OFFICES, LLC

By: s/ Brad M. Russo
BRAD M. RUSSO, ESQ.
Attorney for Plaintiff

Dated: May 21, 2018