

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

<p>“JANE DOE”,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">- against -</p> <p>YESHIVA UNIVERSITY and MARC GAFNI previously known as MORDECHAI WINIARZ,</p> <p style="text-align: right;">Defendants.</p>
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Index No:

**PLAINTIFF’S AFFIDAVIT**

STATE OF ARIZONA        )  
  : ss.:  
COUNTY OF MARICOPA    )

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 her 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 Arizona. I have personal knowledge of all facts stated herein, which are true and correct.

2. Defendant, YESHIVA UNIVERSITY, was a Private University in New York County, New York. During 1985 and 1986, defendant, YESHIVA UNIVERSITY, operated a Jewish Public School Youth Program based out of YESHIVA UNIVERSITY. Beginning at some point prior to 1985, and continuing until 1987, the school employed and/or sponsored the defendant MARC GAFNI as a youth group leader.

3. I participated in the youth program during the mid-1980s, and was mentored by defendant MARC GAFNI when I was 15 years of age.

4. Defendant MARC GAFNI developed an inappropriate relationship with me, inducing me as a young child, to look up to him, and to place absolute trust and confidence in him. In fact, I even stayed at the defendant’s home on many weekends during 1986. Defendant MARC GAFNI then abused that trust and confidence by sexually molesting me.

5. In 1986, when I was approximately 16 years of age, defendant MARC GAFNI repeatedly engaged in explicit sexual behavior and lewd and lascivious conduct with the me, including but not limited to fondling my genitalia and forcing me to fondle defendant MARC GAFNI's genitals and masturbate him and he also performed acts of stalking, intimidation and sexual harassment.

6. As a result of defendant Gafni's sexual abuse, I suffered and continue to suffer from physical, psychological and emotional injury. I have experienced feelings of guilt, loss of self-respect, shame, embarrassment, sadness, anger, depression, anxiety, and confusion resulting from defendant Gafni's abuse. I have developed lifelong problems including but not limited to issues with authority, 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.

7. 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 under "Jane Doe".

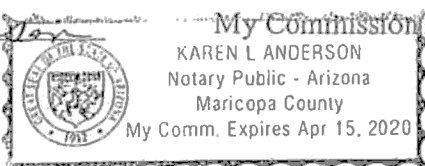
Dated: August 13, 2019



On the 13<sup>th</sup> day of August, in the year of 2019, before me the undersigned, personally appeared, personally known to me or proved to me on the basis of satisfactory evidence, to be the individual, whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity and her signature on the instrument, the individual executed the instrument and that such individual made such appearance before the undersigned in the State of Arizona and the County of Maricopa.

Sworn to before me this 13 day of August 2019.

Karen L Anderson  
NOTARY PUBLIC



My Commission Expires: 4/15/20