

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

Index No.: _____/19

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ARNE HAUGHWOUT,

Plaintiff designates
NEW YORK COUNTY
as place of trial.

Plaintiff,

The basis of venue is
defendants' principal place
of business

-against -

ARCHDIOCESE OF NEW YORK, ST. SYLVESTER
CHURCH and EDWARD WEBER,

SUMMONS

Plaintiff's residence
address is
31 SE Flamenco Way
Port St. Lucie, FL 34952

Defendants.

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To the above-named defendants:

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 20 days after the service of this summons, exclusive of the day of service (or within 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 your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC



By: _____
Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:

ARCHDIOCESE OF NEW YORK

1011 1st Avenue,
New York, New York 10022

ST. SYLVESTER CHURCH

854 Targee Street
Staten Island, New York 10304

EDWARD WEBER

452 Madison Avenue
New York, New York 10022

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

Index No.: _____/19

-----X
ARNE HAUGHWOUT,

Plaintiff,

**VERIFIED
COMPLAINT**

-against -

**ARCHDIOCESE OF NEW YORK, ST. SYLVESTER
CHURCH, and EDWARD WEBER**

Defendant.

-----X
Plaintiff(s), above named, complaining of the defendants, by **MERSON LAW,
PLLC.**, respectfully allege(s):

NATURE OF THE CLAIM

1. This is a case of plaintiff Arne Haughwout who was sexually abused as a child by Monsignor Edward Weber (“Weber”) at and of St. Sylvester Church (“Church”) and Archdiocese of New York (“Archdiocese”).
2. Weber was a priest at St Sylvester Church in Staten Island, New York which was part of the Archdiocese. Weber was known among the community and the children as a sexual predator.
3. Despite the Archdiocese and Church’s knowledge that Weber sexually abused children and/or had the propensity to sexually abuse children, the Archdiocese and Church allowed Weber unfettered access to children, on Diocese premises without supervision.
4. Beginning in or about 1978 and continuing until approximately 1983, Weber, while under the scope of employment with the Archdiocese and Church and while acting on behalf of the Archdiocese and Church, Weber would sexually abuse Plaintiff, then between eleven and sixteen years old, by fondling, rubbing and/or groping Plaintiff’s

penis, forcing Plaintiff to engage in oral sex, digitally penetrating and otherwise sodomizing Plaintiff's anus and otherwise sexually abusing him.

5. Plaintiff was sexually abused by Weber at least one hundred and fifty times.
6. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he endured because of the negligence of the Archdiocese of New York and St. Sylvester Church and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

7. At all times herein mentioned defendant **ARCHDIOCESE OF NEW YORK** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
8. At all times herein mentioned, defendant **ARCHDIOCESE OF NEW YORK** was located at 1011 1st Avenue, New York, New York 10022.
9. At all times herein mentioned, Weber was a priest operating under the direction and control of defendant **ARCHDIOCESE OF NEW YORK**, and its agents, servants and/or employees.
10. At all times herein mentioned, Weber was an agent, servant and/or employee of defendant **ARCHDIOCESE OF NEW YORK**.
11. At all times herein mentioned, defendant **ARCHDIOCESE OF NEW YORK** controlled and/or operated St. Sylvester Church located at 854 Targee Street, Staten Island, New York 10304.
12. At all times herein mentioned defendant **ST. SYLVESTER CHURCH** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.

13. At all times herein mentioned, defendant **ST. SYLVESTER CHURCH** was located at 854 Targee Street, Staten Island, New York 10304.
14. At all times herein mentioned, Weber was a priest operating under the direction and control of defendant **ST. SYLVESTER CHURCH**, and its agents, servants and/or employees.
15. At all times herein mentioned, Weber was an agent, servant and/or employee of defendant **ST. SYLVESTER CHURCH**.
16. At all times herein mentioned, defendants **ARCHDIOCESE OF NEW YORK** and **ST. SYLVESTER CHURCH** were agents, servants, employees and/or alter egos of each other.

FACTS OF THE CASE

17. Defendants **ARCHDIOCESE OF NEW YORK** and **ST. SYLVESTER CHURCH**'s negligence and recklessness caused Weber to have access to children without supervision, including on Defendant's Premises, despite its knowledge that Weber sexually abused children and/or had the propensity to sexually abuse children and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **ARCHDIOCESE OF NEW YORK** and **ST. SYLVESTER CHURCH**'s negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by Weber. Defendant's gross negligence, reckless, wanton, and/or willful conduct supports punitive liability.
18. Weber sexually assaulted Plaintiff and many other young patrons of St. Sylvester Church in Staten Island, New York. Nonetheless, defendants **ARCHDIOCESE OF NEW YORK** and **ST. SYLVESTER CHURCH** failed to remove Weber from his position as a priest or to take any steps to keep the dangerous predator away from

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