

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

)	
JOHN DOE,)	
)	Case No. _____
Plaintiff,)	
)	
<i>-against-</i>)	
)	
BAILA SEBROW,)	<u>COMPLAINT</u>
)	<u>AND DEMAND</u>
)	<u>FOR JURY DUTY</u>
Defendants.)	
_____)	

Plaintiff JOHN DOE¹ (hereinafter “Plaintiff” or “JOHN DOE”), by his attorneys Borenstein, McConnell & Calpin, P.C., as and for his complaint against Defendant Betty Sebrow, aka Baila Sebrow (hereinafter “Defendant” or “Ms. Sebrow”), alleges as follows:

FIRST CAUSE OF ACTION

1. Since in or about October 2019, Ms. Sebrow has maliciously damaged JOHN DOE by causing to be posted on various major media outlets the allegation that Mr. is a “date rapist,” has date raped 100 women, has violated his own daughter, and in general is a very bad and evil man.

¹ Plaintiff is designated as “JOHN DOE” to avoid publicity and embarrassment as will be evident from the contents of this Complaint.

2. Ms. Sebrow has accomplished this by causing postings to the effect described in Paragraph 1 to be displayed prominently on Google.

3. Ms. Sebrow's scheme and plan to utilize the internet to damage JOHN DOE is called in this Complaint the "Sebrow Internet Plan."

4. Ms. Sebrow's malicious actions arise out of a former social relationship between JOHN DOE and Ms. Sebrow, which, after an attempt by JOHN DOE to break off the relationship, Ms. Sebrow converted into a threatening, abusive, and legally and emotionally damaging crusade of torment and intimidation of JOHN DOE culminating in the Google Postings described above.

5. JOHN DOE discovered the Google Postings made under the Sebrow Internet Plan in July 2021, by simply "googling" his own name and seeing them there.

6. In a domestic violence case in New Jersey now pending in the New Jersey Superior Court, Chancery Division, Family Part, Essex County, Docket # FV-07-xxx-22, Ms. Sebrow lied to the Superior Court of New Jersey in a Certification she signed under penalty of perjury, stating that, she did not know of the Google

Postings nor who created them.

7. These claims under penalty of perjury are false, because Ms. Sebrow, with knowledge and intent, is responsible for the Sebrow Internet Plan, whereby she induced and encouraged two individuals who are called in the Complaint “NK” and “MK” to post grossly disparaging media postings or cause them to be posted via various media so as to appear on Google, all in furtherance of Sebrow’s Internet Plan.

8. Ms. Sebrow has damaged and hurt JOHN DOE by the matters alleged herein, including, but not limited to the Sebrow Internet Plan, and is an ongoing menace to his well-being, and must be stopped, and must compensate him.

9. Plaintiff brings this action to stop Ms. Sebrow from her abusive actions and to recover the losses suffered by JOHN DOE at the hands of defendant Ms. Sebrow, for harassment, defamation, extortion, and mental and emotional distress.

10. JOHN DOE by this lawsuit seeks compensatory damages, punitive damages, injunctive relief, and declaratory judgment.

11. Upon information and belief, defendant Baila Sebrow is a citizen and resident of Lawrence, Nassau County, New

York.

12. Plaintiff JOHN DOE is a citizen and resident of New Jersey.

13. This Court has diversity jurisdiction and venue is proper in this District.

14. Upon information and belief, Ms. Sebrow is a well-known media personality in Jewish media, and is a professional matchmaker, with her emphasis in Orthodox Jewish dating and relationships.

15. Ms. Sebrow purports to be a Jewish Orthodox woman.

16. JOHN DOE is a parent of four (4) children, and of grandchildren, having been divorced for over ten (10) years.

17. JOHN DOE practices Orthodox Judaism and is involved in various activities in that social and religious environment.

18. In or about October of 2017, JOHN DOE and Ms. Sebrow began a social relationship with each other.

19. The social relationship was active for approximately four months.

20. In or about January 2018, JOHN DOE attempted to terminate the relationship.

21. The extent of their relationship included “dating” and being intimately involved with each other on several occasions, including New Year's Eve, 2017 into 2018.

22. JOHN DOE opened the relationship with Ms. Sebrow with an open mind, to see where things would go with Ms. Sebrow.

23. JOHN DOE and Ms. Sebrow never became engaged to be married, nor were they even married, civilly, or by a Jewish Marriage.

24. At some point in 2018, JOHN DOE decided and notified Ms. Sebrow that he did not see a long-term future in his relationship with Ms. Sebrow, and he therefore decided that the dating relationship should not continue.

25. JOHN DOE explained to Ms. Sebrow that he intended to remain civil with her, but that he could no longer date her in an intimate manner.

26. This rejection of Ms. Sebrow by JOHN DOE apparently

has triggered her actions described in the Complaint.

27. Since receiving that information from JOHN DOE, over approximately a period of about eight months in 2018, and culminating in the Google Postings referred to above, Ms. Sebrow has been engaging in a campaign of abuse and threats against JOHN DOE via emails, text messages, phone calls, and communications with JOHN DOE's employer, and the Google Postings.

28. The verbal abuse, threats and intimidation has become so severe, that JOHN DOE now asserts civil claims on his behalf have arisen for harassment, defamation, and tortious interference with business relationships.

29. JOHN DOE now seeks the intervention of this court to prevent any further verbal abuse, threats and intimidation, and for monetary damages relating to the verbal abuse, threats and intimidation that has taken place.

30. The following are several, among a multitude of emails and text messages containing outrageous, malicious, false and defamatory materials and accusations, sent by Ms.

Sebrow to JOHN DOE, after their breakup, designed to annoy, harm and/or injure JOHN DOE.

31. These emails and text messages are but a portion of the total number of emails and text messages sent by Ms. Sebrow.

32. Upon information and belief, the following are various electronic text messages which were sent to JOHN DOE, by Ms. Sebrow:

- (a) “I keep telling you that I don’t want to fight with you. You suggested we be friends. And I’m fine with that. But you can’t talk about me to others. Can we have that deal.”
- (b) JOHN DOE responded, saying, “I do NOT talk about you. Stop texting me. I am going to block you on my cell. I’ll leave what’s app open. I need my cell open for work.”
- (c) “To you its fine. You can go banging any tramp. I’m a religious woman and yes, a leader and respected person. I have to go by the book. I apologize for what I said about your picture. It’s not true. I said that because I was upset. You look very handsome there. I now have cause to sue. You made a big mistake talking about me to people in Israel.”
- (d) On or about September 23, “Are you ignoring my calls”
- (e) On or about September 26, 2018, “Your friends on Facebook with every woman you banged. Including those who disparage you! In fact, you

go back to banging them after you dump them. They're desperate enough to spread for you. I'm sure xxx [another woman named and redacted] will spread her overused rejected puss for you in exchange for dinner. You got yourself back on Facebook to arrange meeting up in Israel with puss! Just Know: When you stand before the Kotel – the holiest place, known as the Wailing Wall, know that the wall is “wailing” in defense of a widow you used like you used everyone else.”

- (f) On or about October 4, 2018, “Your lips look dry. Must be from overuse on.....but you still look handsome to me! Tell her I say Hi”
- (g) On or about October 4, 2018, JOHN DOE responded saying, “Please stop. It’s too much. You have hounded me the whole trip with my son. I’m not doing this anymore. Stop stalking me. The picture was to get you to stop. I’m done.”
- (h) On or about October 26, 2018, at 3:36pm, “You’re going back to the whore you made fun of. Now she’s a fat pig. You’re getting what you deserve.”
- (i) On or about October 26, 2018, at 3:37pm, “JOHN DOE is a rapist!”
- (j) On or about October 26, 2018, at 3:38pm, “I received a message from you that I should call you on your work number. So, I left you a message there.”
- (k) On or about October 26, 2018, at 3:39pm, “I’ll communicate as much as I want. And if you push me I will publish all emails about you. It’s legal for me to release personal emails. Ask Mr. xxx [redacted]. Just so you know, I’m friends with his niece xxx [redacted].”
- (l) On or about October 26, 2018, at 3:39pm, “I have

texts from your ex-wife about you. That should make your company happy. I have emails about your drugging women.”

- (m) “I have bad stuff about you. You can’t ever find a bad thing about me! I’ve been a model citizen my whole life. Not you. You’re as dirty as they come.”
- (n) “I’m very sorry that I said you raped me. I was upset, and not thinking clearly. It’s not true. I apologize for the grief it caused you.”
- (o) “If you want to settle this, then as I suggested months ago, we can meet with a neutral third party. I’m about to light candles. I’m very sorry for what I said. Maybe its not an excuse, but you have given me so much pain. And I’m having a very difficult time with that.”
- (p) “I don’t doubt you’re with your son. But, you’re not staying on in Israel so long for him. You’re being very secretive and that means a female. Especially cause you keep telling me its none of my business. Actually, the best thing would be for you to stay in Israel and marry some fish smelly bushy woman and remain there. At least the American women will be safe from your dick. Lol.”
- (q) “I love this picture. Gonna frame it for my toilet!.....As I said, a perfect picture for my toilet. Something to look at while I defecate.”
- (r) “I often publish real life stories how those who dump, beautiful, prominent, accomplished people end up with the undesirables. I typically entitle those articles “Karma”. So, just although we are just friends, I am following your love life for journalistic purposes.”

33. On November 3, 2018, JOHN DOE received the following

text message from the phone number (305) 396-8338:
“RAPIST[.]” Later, the same phone number texted him
another message: “GET GET GET[.]”

34. On November 5, 2018, JOHN DOE received the following
text message from the phone number (646) 343-9602: “GIVE
THE GETT[.]” Later, the same phone number texted him
another message: “ANEMAL[.]”

35. On October 3, 2019 at 5:41 pm, JOHN DOE received a text
message from an unknown number stating: “chaim zelig a
halachic annulment is being arranged by bais din you raped
her but you won’t keep her chained[.]”

36. On December 18, 2019 at 11:23 pm, JOHN DOE received a
text message from an unknown number: “GETT
REFUSER[.]” On January 27, 2020, the same number texted
him stating: “RAPIST MOLESTER SODOMIZER[.]”

37. On January 24, 2020 at 4:26 pm, JOHN DOE received a
text message from an unknown number stating: “RAPIST[.]”

38. On January 29, 2020 at 7:44 am, JOHN DOE received a
text message from an unknown number stating “The Rape,

Abuse & Incest National Network is an American nonprofit anti-sexual assault organization, the largest in the United States[.]”

39. On February 19, 2020 at 5:18 pm, JOHN DOE received a text message from an unknown number stating “JOHN DOE IS A RAPIST[.]”

40. On March 6, 2020 at 4:45 am, JOHN DOE received a text message from an unknown number stating “BUMBLE HELPING YOU FIND MORE RAPE VICTIMS?”

41. On April 13, 2020 at 7:04 pm, JOHN DOE received a text message from an unknown number stating “EVIL RAPIST[.]”

42. On April 30, 2020 at 12:50 pm, JOHN DOE received a text message from an unknown number stating “Still within statute of limitation for Rape Your atrocities will be brought to justice[.]”

43. On December 23, 2020, at 12:21 am, JOHN DOE received a text message from an unknown number stating “Victims never forget the date of their rape[.]” Notably, and mentioned for the sole purpose of tying Ms. Sebrow to the anonymous

text messages, an earlier e-mail from Ms. Sebrow had also referenced a date in December as the alleged date of her alleged rape.

44. On February 19, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“Did you block my calls? Because if you did, I’m going public with everything you did to me, and the truth about what happened in the past. One of the rabbis in my community did a major search on you. And it seems that xxx [another woman named and redacted] was quite abused by you. Not only that, but it seems that your daughter xxx [name redacted] frequently slept in your bed while she was a teenager. There are plenty of other stories. I was warned to stay away from you. But, I still insisted on dating you, claiming that they are all lies.
Now, I wonder!”

45. On or about May 17, 2018, Ms. Sebrow sent an email to JOHN DOE, stating as follows:

“Nope. You tend to bring up xxx [another woman named and redacted] (donkey face) [another woman] quite a bit in a positive way. Whether on a date or in bed. She's in your blood. But, you know that if you present her as wife #4 - you will be the laughing stock! She actually makes xxx [another woman named and redacted] look good. They're both trash. But, at least xxx [another woman named and redacted] comes from a good family. Xxx [another woman named and redacted] has faggots and goyim. What a beautiful example for your grandkids, that would be. Lol.”

So, instead you go after a woman who will make you

look good.

Remember this story?

Prince Charles was in love with Camilla, yet married Diana, because she was pure and good. And Camilla was trash. But, Camilla was in his blood, and as result could not make a happy home with Diane.

Eventually, they got divorced. Diane died. Charles married Camilla, who ended up embarrassing him with her drunken stupors.

Bottom line is you need to decide what you truly want, and make peace with it.

46. On or about July 24, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“As a relationship expert I totally understand what's going on. You felt compelled to break up with me for whatever reason. And you're scared to run into me (no pun intended) or communicate with me because you still have a thing for me! And when we communicate, it slows down your healing process. Otherwise, I would be like any other person to you.

Even if date or sleep with other women, you will always think about me. Gold always shines through!

Deny it all you like, JOHN DOE, baby. I'm in your blood!”

47. On or about July 24, 2018, JOHN DOE sent the following response to Ms. Sebrow:

“Baila.

I really need to be clear. With the greatest of respect you are way off base. I'm sorry you feel this way as I probably could have done a better job being clearer.

This is not true. I wish you well and you are an amazing

person. I'm sure the right person will be coming along.

Wishing you the Best”

48. On or about July 24, 2018, Ms. Sebrow sent the following response to JOHN DOE:

“I know that I'm an amazing person. At least we finally agree on something!

And that's why I would be amused to see who will be the next woman after me. Will be funnier than laughing-gas.”

49. On July 25, 2018, Ms. Sebrow threatened to send the following email to JOHN DOE at his Work work email address:

“I'm thinking of settling this situation in a Bais Din [Jewish Ritual Court].

Scenario:

Defendant: A 3 times divorced wealthy man who has a reputation for wining and dining women telling them he loves them, sleeps with them and dumps them.

Plaintiff: Newly widowed woman who was in a healthy marriage for 28 years, and a known devoted wife. She is an upstanding citizen known for her endless chesed. She is a respected leader in the Jewish community and admired by rabbis.

She was seeked out by defendant immediately following her husband's death by means of an esteemed rabbi and an organization. Defendant donated money on behalf of her husband's memory to an organization, and also to her personal charity for singles. Defendant persuaded plaintiff to date him. In her fragile vulnerable state, he sends her expensive gifts, wines and dines her, tells her he loves her

and wants to marry her. Brings her to a bar. She drinks. He convinces her to sleep with him all the while talking about marrying her and where they will live together. He introduces her to his friends and she believes everything while continuing as a serious couple including intimacy. One day, out of the blue, he breaks up with her telling her things that make no sense. Finally, he admits to never loving her, and that in essence she was nothing but a sex toy for him.

Witnesses to the character and behavior of defendant will be in attendance.

Plaintiff seeks compensation for emotional damage, and knowledge made public about the defendant's predatory actions.

What do you think?"

50. On August 29, 2018, Ms. Sebrow did send an email to

JOHN DOE at his Work account:

"Maybe it's time for Work to know that you're a sociopath. Maybe it's time that your predatory activities become public. Maybe it's time that the hundreds of your female victims come forward with their stories of sexual abuse.

As a journalist, I will be happy to publish all firsthand account tales.

In fact, why don't we publish how when you don't rape women, or stalk them - you abuse trust in emotionally vulnerable women in order to have sex with them?

What did you do to your own daughter, JOHN DOE?

Shouldn't be too difficult to find a large number of many victims. Isn't that correct, JOHN DOE?"

51. On or about August 29, 2018, Ms. Sebrow sent another

email to JOHN DOE at his Work account, this time seemingly conciliatory:

“I’m willing to straighten this out”

52. On or about August 29, 2018, Ms. Sebrow sent another email to JOHN DOE at his Work account, this time in the form of an apology:

“JOHN DOE, I am sorry about both emails on August 29. None of it was true. I was upset. I will not send again. I am sorry.
Baila Sebrow”

53. JOHN DOE alleges that the apology and attempt at conciliation, were not sincere.

54. On August 31, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“Not sending by text, in case you’re worried about your company seeing it.

When you unfriended me from Facebook, it was a tremendous public attack. I did nothing to you on Tuesday to deserve that. And you know it.

People check to see whose friends with whom, and who’s unfriended. You publicly attacked me. And then I reacted. Plus, it was on a day that was traumatic to me, and I didn’t feel well.

Why did you do that to me?

Do you know how embarrassing it is to me that you unfriended me?

That’s a huge attack, and I can’t deal with that.”

55. On or about September 7, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“This is not an "impulse control" email, nor do I have that Issue. You're just projecting.

However, crap I take from no one!

All that happened this morning is that at 7:49, I texted you "Good luck with your Dr. appt."

Instead of just saying thank you, you sent me a long email that you cannot communicate with me.

Would you have responded that way to any of your fuckaroos? No.

So, if you act insane towards me, then I respond in the language you understand.

I'm sorry about your ex-father in law, and the troubles that are coming along with it.

Regardless of everything, I was worried about your health and your return visit to the doctor today. And that's why I texted you. But, you can't help yourself turning everything into crazy drama.

Shabbat Shalom”

56. On or about September 7, 2018, JOHN DOE sent the following response to Ms. Sebrow:

“Baila.

I need to deal with a lot. I wish u a very happy healthy new year.”

57. On or about September 7, 2018, Ms. Sebrow sent the

following response to JOHN DOE:

“Thank you. Same to you.

And if you have sex with anyone else, may you contract a highly contagious incurable lifelong STD!

Amen Amen V'Amen Love and kisses!”

58. On or about September 26, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“My reason for wanting to remain friends is so that I don't feel compelled to take legal and halachic action against you. You might think that you can get away with saying that we had a relationship that didn't work out.

But, everyone knows that it's not true. What you did to to me, you have done to many others in the last 15 years you decided to join the Frum world. And only G-d knows what kind of havoc you created in the secular world that will one day hit the media.

What you did to me (and others) is called sexual coercion. That is a form of rape. I'm not sure if NY would try you criminally for what you did. But, a class action civil suit against you will definitely hold up.

I don't want to do that to you. My professional standing and reputation in coming forward with such charges will only ignite others to come forward. And the damage it will do to your entire life and all that you worked for will blow up.

I'm a victim. No different than a survivor of any other devious and sinister attack.

But, I have a soft spot for you. Maybe it's because I'm still a good person. Or maybe I am suffering from the Stockholm Syndrome. Not uncommon in such cases.

The bottom line is that I defended you in public. I didn't need to do that. I could've just kept quiet. And I shared with you what I did in your defense.

Then I opened Facebook, and saw that your account is very much active, with me still unfriended, while those who talk about you as a dirty joke are still your friends. And that was quite hurtful.

JOHN DOE, you have not turned over a new leaf just because Yom Kippur ended. As long as people still have a heavy heart against you, G-d has not forgiven you. That's a Torah fact.

I have not forgiven you. Nor will I ever. You used sexual coercion, and then, as your reputation precedes you - you threw me away.

Just so you know, I cry every day, and at every prayer I insert your name for the pain you caused me.

Again. I don't want to go public and cause you irreparable grief and embarrassment."

59. On or about October 2, 2018, JOHN DOE sent the following email to Ms. Sebrow:

"I've had enough. Do not email me anymore nor contact me."

60. On or about October 3, 2018, at 3:05am, Ms. Sebrow sent the following email to JOHN DOE:

"Hey JOHN DOE,

How could you have not known this?

You wrote several times by text and email that you want to marry me. That's a halachic contract by intent. You then consummated the union with intercourse.

That's Kiddushin!!! [marriage].

According to Torah law, there are three ways to betroth a woman:

1. A money transaction. The man gives to the woman money or any object of value.
2. A document. The man gives the woman a document which states his intention to marry her.
3. Sexual Intercourse

I'm going to keep quiet about this for now. But, if you ever get involved with another woman - you have my promise that I will take you to Bais Din.

Baila”

61. On or about October 3, 2018, at 3:16am, Ms. Sebrow sent the following email to JOHN DOE:

“It's not fair that you ruined my life. I didn't ask to date you. I was trying to gain some emotional footing after tragically enduring my husband's long illness and death.

You forcefully pushed your way into my life using money, charm, and false promises. You took my heart and dignity. Then you dumped me.

Do you think I'm going to sit on my tuches [derrelerle] and suffer silently while you're off finding new pussy to bang?

You are halachically [Jewish law] bound to answer for your actions!”

62. On or about October 5, 2018, Ms. Sebrow sent an email to JOHN DOE containing the following:

“Dear JOHN DOE,

You have no clue what our relationship did to me.

The brutality of the way you dealt with me... This time, I didn't survive.

Emotionally, I am finished. The tremendous pain of what happened even caused me to say things to you that I otherwise never would. I'm sorry.

Now, I understand how divorces can turn messy and ugly, even with nice people. You were not fair with me.

I trusted you when everyone begged me to stay away. I never told you this. But, at the FD weekend where it was clear we were together, several people warned me that you would hurt me. I shut them up. That's how secure I was about you.

At the end, all those who warned me, were accurate.

I don't want to be enemies with you. I want to be in your life, even as friends. Not sure why, but I still care about you. To me, love is eternal. Perhaps, that is the strongest difference between us.

Love,

Baila

63. On or about October 7, 2018, Ms. Sebrow sent the following email to JOHN DOE:

“You can ignore me all you like. This is a very serious matter. I won't let you ruin my life. You got me into bed many

times pledging marriage throughout. You backed out, not caring that you left me defiled.

As it is you've caused damage in that area, because I could never marry a kohen [priest].

We can solve this quietly. No one has to know our last names. A rabbi writes up a Get [divorce], and it's done.

You don't want this dragged into the streets, because it's going to become a muddy mess for you. You've worked hard to keep your nose clean from your past.

Unfortunately, you couldn't do that in your dating life. But, this will dredge up old stories.

My life has been clean until I allowed you into my life. The worst thing you will find about me is that I called the police on a Muslim cab driver who threatened me and where there is footage of him driving like a maniac to scare me. You already made a fool of yourself when you stated that I bullied him!

You've hurt me enough. I trust that you will do the right thing.”

64. On or about October 10, 2018, at 7:45am, Ms. Sebrow sent the following email to JOHN DOE:

“Coming soon to a newsstand near you!

"63 Year Old 4 times Divorced Bipolar Sex Addict...Meet JOHN DOE."

Read a woman's personal account about her nightmarish abusive relationship with this high-powered philanthropic man in finance and politics.

West Orange will finally be placed on the map when this story makes the headlines!”

65. On or about October 10, 2018, at 4:06pm, Ms. Sebrow sent the following email to JOHN DOE:

“You can block me. But, I will play back xxx [another woman redacted] voice on your work phone.”

66. JOHN DOE responded to that email on or about at 5:16pm, stating:

“I will advise them at work that you mentioned this.”

67. Ms. Sebrow responded to JOHN DOE’s email on or about at 5:22pm, stating:

“You really don't want that played back. And I don't want to hurt or embarrass you. I never have.”

68. On or about October 10, 2018, at 6:42pm, Ms. Sebrow emailed JOHN DOE again, stating:

“Proof that Hashem [God] protects widows is why I found out what you told that ugly jealous fat woman.”

69. On or about October 10, 2018, at 7:30pm, Ms. Sebrow sent an email to JOHN DOE containing the following:

May Hashem render your tongue and speech useless. Amen
Amen V'amen

Just remember "People in glass houses should not throw stones."

I have a very damaging recording about you that could destroy your family. I would hate to put it on social media."

70. On or about October 10, 2018, at 8:16pm, Ms. Sebrow sent the following email to JOHN DOE:

"You will be begging me to forgive you. I will now visit my husband's kever [grave] every day and cry about what you did to me. The earth will absorb my tears, as I will beg Hashem to punish you.

I'm not the first widow to cry about what you did to her.

This time Hashem [God] will stop you. All evil men have fallen. And so will you."

71. On or about October 10, 2018, at 11:17pm, Ms. Sebrow sent the following email to JOHN DOE:

"NORPAC will be hosting a pro-Israel fundraiser for Senator Robert Menendez (D-NJ) in Teaneck! October 21st at 12:30 PM.

I have family in Teaneck, and they know what you did to me and other women in NJ. Senator Menendez will be informed about your sick ways. I might forward xxx [another woman redacted] recording about what she witnessed while married to you, along with the testimony of other people."

72. On or about October 11, 2018, at 4:54am, Ms. Sebrow sent

the following email to JOHN DOE:

“Your new fat friend whom you spoke to about me will find out the truth about who you really are, and what you have done to women.

I'm not obsessed with you, as you want to believe. I'm just not letting you get away with what you did to me and others.

Finally, someone is standing up to you!”

73. On or about October 11, 2018, Ms. Sebrow sent the following email to JOHN DOE at his Work email address:

“JOHN DOE:

You have threatened me, sent me expensive gifts, and now the truth about how you tortured me has gone public. I was previously nice when you coached me to apologize to you at your work email to save you at your job. As your concern is that everyone is "dispensable."

You are also very clever calling me from various numbers and threatening me - leaving me no choice but to call you back as many times for a taste of your own medicine.

You want to give the impression that I am obsessed with you, or stalking you. But, you know it's not true. I'm just not taking crap from you anymore like everyone else.

Your sexual abuse of women is public knowledge, as well as the allegations about drugging and raping them. And that includes the allegations made by your ex- wives regarding your daughter in bed with you when she was 15.

I also have emails from the early days (when you tried to impress me) how you spoke about Work and your intentions, as you said "to screw them" and take your clients along in your own company when you make Aliya. Your dream, as you said was to move to Israel and start your own

company with the clients you-u acquired from Work and whom you brought along from Merrill Lynch.

Not only that, but you were dumb enough to boast how you go to events where the "rich Jewish people are" and convince them to invest with you. You named various investors and how much they invested with you. I was quite uncomfortable with that information, as I know many of them.

Furthermore, you spoke with incessant anger about your son-in-law, xxx [redacted] whom you always bitterly complained about having to support and give him a \$100,000 a year job with Work while his family does nothing. Additionally, you raised concern about his anger management issues where he beat up guys.

Oddly, you too, have anger management issues.

To be sure you understand, JOHN DOE. I am not threatening, nor blackmailing you in any shape or form.

You have repeatedly offered me money and used the word "remuneration". And I have refused. I want NOTHING from you.

You have targeted me for years while I was married, and more so, when my husband was ill. You then went after me in a big way immediately after his death, asking for the assistance of rabbis and organizational leaders to convince me to date and marry you. You donated money to their causes as well as mine. I tried to push you away, but you persisted.

Your claims about unending love for me while I was in deep grief for my husband, and your incessant calls, texts, and emails were overwhelming. So, in my vulnerable state I made the poor judgment of relenting. I should have known better, and listened to what other women have claimed about you for years.

And on that Sat. night in Dec. you drugged me too, as you have done to others. When you realized that I was making too much of a big deal you kept begging me saying you love me and want to marry me. Feeling that I stepped into borders I shouldn't have, and believing your claims of love - in my

emotional state as it was at the time - I continued my relationship with you.

The relationship became more volatile when you hit me. You apologized each time. Although I am an educated woman and founded an organization for victims of abuse, I should have known better. Yet, I took you back each time. As is common in such cases, the perpetrator eventually gets bored and leaves. But, you weren't content. You were afraid of what I know, my strong connections, and how that will impact your life. So, you made sure to still remain in my life.

Everyone warned me to break up with you. You took major advantage of me, as you have done with other women, including widows before me.

Your abuse of women needs to stop.

My only issue with you at this point is the halachic [Religious Jewish Law] matter that you refuse to address and that will have a huge permanent impact in my life (as well as yours).

I urge you to settle this matter, so that I can move on with my life. As I said, we need to meet with a neutral rabbi and clear the matter ASAP.

You can threaten me with a lawsuit, all you like. Once this story goes public, there will be many people with their own stories of your life-long abuse on them. And your \$7,000 payment to Reputation Savers will have gone down the drain. The only advantage will be that it will, at the very least, prevent more victims for you to abuse.

However, I'm not looking to do that to you. I'm also not seeking revenge. Nor, do I want a man with such a dirty record in my family, or in my life.

Please settle the halachic matter, so that I can move on and put this horrific nightmare behind me. That's all I want from you, and as a religious woman I have every right to demand it.

It is my hope that you will settle this matter quietly,

swiftly, and most importantly peacefully.

Sincerely, Ms. Sebrow”

74. In addition to personal text messages, and unreasonable and excessive phone calls, emails were sent by Ms. Sebrow to JOHN DOE, but sent to JOHN DOE’s work email address at his employer, Work, a major financial institution.

75. Work has an internal policy of potentially scrutinizing all incoming (and outgoing) emails of any nature.

76. Upon information and belief, Ms. Sebrow knew full well that JOHN DOE’s employer had access to his e-mails, and she sent the e-mail to that specific address with the purpose that they would, in fact, read it.

77. Upon information and belief, as a matter of business practice, Work tracks the various email accounts of their employees.

78. The e-mail sent to JOHN DOE at his Work email address, accused JOHN DOE of “sexual abuse[,]” claimed that he “drug[s]” and rape[s]” women, made an accusation that JOHN DOE molested his daughter when she was a teenager, stated that he broke confidentiality rules by disseminating private

client information, claimed that his son-in-law has anger management issues as does JOHN DOE, stated that JOHN DOE “drugged” her (Ms. Sebrow) “on that Sat. night in Dec.” and frequently hit her.

79. Ms. Sebrow further claimed in such e-mail that JOHN DOE “took major advantage of [her] as [he has] done with other women, including widows” and generally abuses women.

80. The e-mail further states that in order for the harassment to stop, “we need to meet with a neutral rabbi” so JOHN DOE would sign a “get,” i.e., a Jewish Divorce Document.

81. The demand for a Get was extortion by Ms. Sebrow.

82. Finally, the e-mail directly addressed Ms. Sebrow’s intention to disseminate her lies about JOHN DOE on the internet as she stated “[o]nce this story goes public, there will be many people with their own stories...” “and your \$7,000 payment to Reputation Savers will have gone down the drain.”

83. Ms. Sebrow’s decision to include false assertions about JOHN DOE’s business practices in an e-mail that she sent to JOHN DOE’s monitored work e-mail address – including that

he planned to leave his employer and steal clients, that he disclosed confidential client information to he, and that he induced his employer to hire his son-in-law who was violent abusive – was no coincidence.

84. After Work became aware of these communications, JOHN DOE was compelled to meet with a compliance team at Work to discuss the nature of these emails that were sent from Ms. Sebrow.

85. In addition to emails and text messages, Ms. Sebrow at various times would incessantly call JOHN DOE an inappropriate amount of times.

86. Ms. Sebrow called JOHN DOE on or about October 5, 2018, while he was in Israel, and she called him approximately 131 times in a row.

87. Ms. Sebrow called JOHN DOE on or about October 10, 2018, approximately 20 times.

88. In or about October 2018, Ms. Sebrow organized a scheme and plan complained of here (Sebrow Internet Plan) to damage harass and defame Plaintiff on the Internet.

89. Ms. Sebrow manipulated other persons to effectuate her plan.

90. When engaged in the Sebrow Internet Plan, Ms. Sebrow has attempted to mask her identity and responsibility for the Sebrow Internet Plan in multiple respects, including through the use of two individuals, who she, engaged and encouraged to create defamatory and harassing social media sites such as Twitter and at least one website concerning Plaintiff designed to appear on Google under JOHN DOE's name.

91. The two individuals Ms. Sebrow engaged for her Sebrow Internet Plan are NK a resident of Manhattan, New York, and MK, a resident of Langhorne, State of Pennsylvania.

92. NK and MK became co-conspirators of Ms. Sebrow in her Sebrow Internet Plan to damage JOHN DOE.

93. At all times relevant herein, NK and MK acted on behalf of Ms. Sebrow in furtherance of the Sebrow Internet Plan.

94. Ms. Sebrow and NK exchanged numerous text messages, emails and phone calls wherein Ms. Sebrow instructed NK to engage in the Sebrow Internet Plan and to engage MK to

participate with Ms. Sebrow and NK in the Sebrow Internet Plan

95. In or about July 2019 three websites were created concerning Plaintiff JOHN DOE in furtherance of the Sebrow Internet Plan.

96. The first was a Twitter account entitled “JOHN DOE and the Issues of Date Rape” and located at the Twitter handle @JOHN DOEDateRape and url [https://twitter.com/JOHN DOEDateRape](https://twitter.com/JOHNDOEDateRape) (the “Twitter Account”).

97. The second account website was also created in July 2020 and located at the url [www.instagram.com/JOHN DOE_daterape](http://www.instagram.com/JOHNDOE_daterape) with the account handle “@JOHN DOE_daterape” (the “Instagram Account”).

98. Both the Twitter Account and Instagram Account directed the readers to the third website, [www.realJOHN DOE.com](http://www.realJOHNDOE.com) (the “Website”).

99. The Twitter Account falsely stated: “JOHN DOE, of, NJ is accused by police of incapacitating 100s of victims by plying them with date rape drugs.”

100. The Twitter Account contained 11 “Tweets,” 10 of which directed the viewer to the Website.

101. Notably, the false statement includes JOHN DOE’s name, age, job description, and city and state, leaving no question that the man described by the account is, in fact, Plaintiff JOHN DOE.

102. The account also provides that JOHN DOE had been “accused by police of incapacitating 100s of victims by plying them with date rape drugs.” This allegation is unequivocally false.

103. The false and defamatory Twitter account has plagued a Google Search of JOHN DOE’s name, sometimes appearing as the first result, and still remains on the first page when searching his name and location.

104. The Website was registered to Wild West Domains and was issued a subpoena for account information.

105. Wild West Domains has identified to JOHN DOE’s investigators several individuals responsible for creating the website.

106. The first person listed was Mr. S, NY, with a work phone listed as (xxx) xx-6530. The e-mail provided for Mr. Solomon was xx@xxdefender.com; the response indicates that the individual had been “Verified by Fraud Dept – Customer OK[.]”

107. The second person listed was MK, who is identified as the Registrant Contact, Technical Contact, Administrative Contact, and Billing Contact.

108. On July 14, 2021 a Visa card ending in 2452 in MK’s wife’s name paid \$24.16 for domain name renewal and privacy and protection and on July 13, 2021 an American Express ending in 1090 also in MK’s wife’s name paid the same amount for the registration and one year of privacy and protection.

109. MK, is also named in the document provided by Wild West Domains by way of his e-mail address – xx@xxdefender.com, which is listed under Shopper Info, Shipping Information, and Billing Information for the domain.

110. At all relevant times, Ms. Sebrow knew of, encouraged and

fomented the Sebrow Internet Plan and was aware of the repercussions of posting falsities online.

111. Ms. Sebrow nevertheless engaged NK and MK to implement the Sebrow Internet Plan in an effort to hide her true identity while she posted and/or caused to be posted false and defamatory statements concerning JOHN DOE with impunity.

112. NK and MK, working in concert and for Ms. Sebrow, created the three websites at the exact same time and posted on a continuing basis in an effort to ensure their postings would be highly ranked in Google search results.

113. To facilitate the Sebrow Internet Plan, Ms. Sebrow encouraged NK and MK, to use a method which is called “search engine optimization” or “SEO” to have the benefit of publishing the false statements across multiple platforms using specific keywords to promote her lies.

114. Ms. Sebrow implemented, encouraged and fomented NK and MK to create the Sebrow Internet Plan with the knowledge of the falsity of the statements in the Sebrow

Internet Plan and the implications therefrom, with the reckless disregard for the truth, and/or with malicious intent, both presumed and actual, in knowingly publishing, posting, and widely disseminating such false statements to third parties.

115. JOHN DOE did not learn of the Sebrow Internet Plan until July 2021.

116. The social media accounts and website created at the behest of Ms. Sebrow via the Sebrow Internet Plan have appeared highly in JOHN DOE's Google Search results, often above his own work and personal accounts and as a result, Ms. Sebrow's false claims that JOHN DOE was under investigation for raping hundreds of women was visible to third parties before JOHN DOE's own professional accomplishments.

117. Ms. Sebrow's sole purpose of implementing the Sebrow Internet Plan to create the false website and accounts was to harass and/or embarrass JOHN DOE and publish for the whole world to see falsities about JOHN DOE.

118. Ms. Sebrow has undertaken implementing the Sebrow Internet Plan that was for the sole purpose of harming JOHN

DOE, a task which she has accomplished.

119. Ms. Sebrow's statements in the Sebrow Internet Plan have caused immense friction with JOHN DOE and members of his family, including his children, who have found the false statements being made about their father and, upon information and belief, confronted him about it.

120. Ms. Sebrow's statements in the Sebrow Internet Plan have also affected JOHN DOE's work life and, upon information and belief, have caused JOHN DOE to lose at least one client.

121. Ms. Sebrow's statements in the Sebrow Internet Plan have affected JOHN DOE's romantic life as they led to the end of a long-term relationship between JOHN DOE and another woman.

122. These known impacts of the Sebrow Internet Plan, as well as knowing these false and defamatory statements were online and being disseminated to the world at large have caused JOHN DOE to experience immense and severe emotional distress.

123. JOHN DOE has spent numerous sleepless nights tortured

by feelings of humiliation and embarrassment that third parties who Ms. Sebrow knows and perhaps some whom he does not yet know have read Defendants' statements and believe them to be true.

124. The numerous emails and text communications from Ms. Sebrow to JOHN DOE which include Whats App and standard text messages, as well as Facebook messages, in addition to engendering civil liability, are harassment which violate N.J. Stat. § 2C:33-4 and § 2C:33-4 1343, 18 USCS § 1343 and violates New York Penal Law § 240.21 - 240.32, which give rise to a civil cause of action by JOHN DOE against Ms. Sebrow.

SECOND CAUSE OF ACTION

125. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

126. Ms. Sebrow caused to be posted, disseminated, or caused to have disseminated on the internet in furtherance of the Sebrow Internet Plan knowing that such publication about JOHN DOE is false and defamatory, not the subject of any privilege, and is viewable by many third parties.

127. Ms. Sebrow had actual knowledge that the information they published, or caused to be published, by means of the Sebrow Internet Plan about Plaintiff was false and knew or should have known that the information published about Plaintiff was false and defamatory.

128. Ms. Sebrow acted with knowledge of the falsity of these statements and the implications therefrom, reckless disregard for the truth, and/or with malicious intent, both presumed and actual, in knowingly implementing, encouraging and fomenting the Sebrow Internet Plan using NK and Mk for the purpose, thereby publishing, posting, and widely disseminating such false statements to third parties.

129. These statements defame and otherwise impugn Plaintiff's character, integrity and reputation.

130. The statements go on to charge Plaintiff with serious crimes and ethical violations, and Defendants disparage the Plaintiff in his profession, trade and/or business. Such actions are libelous per se.

131. The statements are libelous per se, so that general damages

may be presumed as a matter of law.

132. The published false comments were made with the intent to harm Plaintiff and with actual malice.

133. The Defendants' unlawful conduct has caused and will continue to cause Plaintiff imminent, irreparable injuries for which there are no adequate legal remedies. Accordingly, Plaintiff is entitled to permanent injunctive relief.

134. Because Defendants have placed Plaintiff's personal character and reputation publicly at issue, Plaintiff is entitled to a declaratory judgment that Defendants' statements are false.

135. As a consequence of the Defendants' conduct, Plaintiff's reputation has been injured, and the Plaintiff has suffered economic loss.

136. That by reason of the foregoing, Plaintiff has been damaged in a sum of money having a present value which exceeds the jurisdictional limits of all lower courts which would have otherwise have jurisdiction of this matter, but not less than \$10,000,000.00.

THIRD CAUSE OF ACTION

137. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

138. Ms. Sebrow engaged in the intentional, extreme and outrageous conduct of cyber harassing via the Sebrow Internet Plan in an effort to destroy JOHN DOE's good name.

139. Ms. Sebrow engaged in and undertook all actions knowing the statements they were making about JOHN DOE were false and knowing that Plaintiff was not the one publishing the statements about date rape in his own name.

140. Ms. Sebrow's conduct has been so extreme in degree and so outrageous in character that it goes beyond all possible bounds of decency.

141. Ms. Sebrow intended to cause severe, emotional distress or recklessly disregarded the likelihood that such conduct would tend to cause severe emotional distress.

142. Such outrageous behavior is beyond the limits of decency and intolerable in a civilized society.

143. As a direct and proximate result of Ms. Sebrow's conduct,

JOHN DOE suffered severe emotional distress.

144. Ms. Sebrow acted with the intent to cause severe emotional distress, or alternatively, disregarded the substantial probability that their actions would cause severe emotional distress.

145. Here, the acts of Ms. Sebrow were so egregious and were done so clearly with malice and/or reckless indifference in the face of a perceived risk that their actions would harm JOHN DOE's reputation and mental wellbeing, that, in addition to all the damages inflicted upon JOHN DOE and in addition to all the measure of relief to which JOHN DOE may properly be entitled herein, Ms. Sebrow should also be required to pay punitive damages to punish them for their reckless conduct in the further amount greater than the jurisdictional limit of all lower courts to be determined by the trier of fact, in order to deter them and others similarly situated from engaging in such conduct in the future.

146. JOHN DOE demands judgment against Ms. Sebrow in an amount to be determined upon the trial of this action; said amount being sufficient to compensate JOHN DOE for his

severe injuries as well as an amount sufficient to punish Ms. Sebrow for her willful, wanton, reckless and unlawful conduct constituting a complete and reckless disregard for JOHN DOE, together with interest, attorneys' fees, costs and disbursements in this action; and said amount exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, but not less than \$10,000,000.00.

FOURTH CAUSE OF ACTION

147. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

148. On or about August 12, 2021, in a Certification signed by Ms. Sebrow (Called herein the "Sebrow Certification") in connection with an ongoing New Jersey Domestic Violence claim pending in the New Jersey Superior Court, Chancery Division, Family Part, Essex County, Docket # FV-07-487-22.

Ms. Sebrow certified as follows:

149. "I have seen the internet postings which are the subject of JOHN DOE's TRO Complaint, and I have absolutely no knowledge whatsoever as to who might be responsible for posting them."

150. “For whatever reason, JOHN DOE seems either to be convinced that I am responsible for the postings, or he is trying to use me as a scapegoat so he can have someone to blame.”

151. “However, I am hereby unequivocally asserting in this Certification, under penalty of perjury, that I have nothing to do with those internet posts, nor do I have any idea who might be responsible for them.”

152. The foregoing statements in the Sebrow Certification are false, and each statement is an act of perjury.

153. The Sebrow Certification was filed in the Superior Court of New Jersey electronically, over the wire system in New Jersey, New York, and the United States.

154. This electronic filing violates N.J. Stat. § 2C:28-1 and N.J. Stat. § 2C:28-2.

155. The Sebrow Certification was knowingly false when made and when submitted to the New Jersey Superior Court.

FIFTH CAUSE OF ACTION

156. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

157. Ms. Sebrow is guilty of tortious interference because she has interfered with JOHN DOE's business relationship with Work.

158. As alleged above, JOHN DOE asserts a claim for interference with his contractual relationship with Work because:

- (a) JOHN DOE has a valid agreement between at least two parties;
- (b) Ms. Sebrow had knowledge of the agreement;
- (c) The interference alleged herein caused employment stress and loss of reputation;
- (d) Ms. Sebrow's interference was intentional; and
- (e) Ms. Sebrow's, interference caused JOHN DOE to suffer damages.

159. Upon information and belief, Ms. Sebrow had unequivocal knowledge that JOHN DOE is a prominent financial advisor,

that his reputation has a long-lasting effect with regard to his professional success, and that if they were to damage his reputation, that could cause JOHN DOE irreparable damages to his professional career and personal life.

160. More particularly, JOHN DOE has a valid business agreement with Work, in which he produces a certain amount of gross production for Work on an annual basis, through his investing and financial planning with his numerous clients.

161. In order to maintain his standing at Work, JOHN DOE must retain all of his current clients, and given that this may not always be possible, then through bringing new clientele into his business at Work.

162. In order for JOHN DOE to continue to retain his current client base, and bring in new clientele, his clients and prospective clients must trust him to let him manage their financial assets.

163. Upon information and belief, by intentionally and/or grossly negligently sending the emails to JOHN DOE at JOHN DOE's Work email account and publishing real JOHN

DOE.com, Ms. Sebrow knew that they were potentially irreparably harming JOHN DOE with regard to his business relationships not just with clients, but also with his employer, Work.

164. Ms. Sebrow has engaged in tortious interference against JOHN DOE.

165. That, by reason of the foregoing, JOHN DOE has been damaged in a sum of money having a present value which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this matter, but not less than \$10,000,000.00.

SIXTH CAUSE OF ACTION

166. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

167. JOHN DOE relies on his good reputation online to obtain new business and clients.

168. Ms. Sebrow knew of the importance of JOHN DOE's reputation online and that creating a sustained campaign to place false information online would prevent Plaintiff from obtaining new clients.

169. Using this knowledge, Ms. Sebrow created a web of lies and websites to interfere with JOHN DOE's ability to be retained by new clients.

170. As a result of Ms. Sebrow's actions, JOHN DOE has been damaged.

171. That, by reason of the foregoing, JOHN DOE has been damaged in a sum of money having a present value which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this matter, but not less than \$10,000,000.00.

SEVENTH CAUSE OF ACTION

172. Plaintiff repeats and realleges the allegations stated above as if fully set forth herein.

173. Because Ms. Sebrow's conduct is malicious and oppressive, JOHN DOE is entitled to be awarded punitive damages to punish the Defendant for her wrongful conduct.

174. That by reason of the foregoing, JOHN DOE has sustained damages, both general and special.

EIGHTH CAUSE OF ACTION

175. Plaintiff repeats and realleges the allegations stated above

as if fully set forth herein.

176. JOHN DOE in this Complaint asserts a valid claim for defamation because Ms. Sebrow has made:

- (a) A false statement;
- (b) Published to a third party without privilege of authorization;
- (c) With fault amounting to at least negligence; and
- (d) That caused special harm or “defamation per se”.

WHEREFORE, JOHN DOE respectfully requests for relief against Ms. Sebrow as follows:

(a) injunctive relief against Ms. Sebrow in the form of a restraining order from this court against her:

i. preliminarily and permanently restraining Ms. Sebrow from:

(a) Maintaining the Sebrow Internet Plan the Sebrow Internet Plan;

(b) sending emails, text messages, Whats App messages, or any communication via electronic,

fax, telephone or any other means, to JOHN DOE, his children, his employer, or colleagues at Work;

ii. preliminarily and permanently restraining Ms. Sebrow from any postings or media dissemination to any form of social media, or print media, or electronic or air media, including but not limited to Facebook, Instagram, google apps, The Jewish Press, or Ms. Sebrow's blog(s);

(b) Damages for acts of harassment, defamation, and tortious

(c) interference committed by Ms. Sebrow;

(d) compensatory damages for acts of harassment, defamation, and tortious interference committed by Ms. Sebrow, in an amount to be determined at trial, in the amount of \$10,000,000;

(e) compensatory damage in an appropriate amount, for injury resulting from loss of current and prospective income, emotional distress, and loss of reputation from Ms. Sebrow;

(f) punitive damages in an appropriate amount, for the intentional, reckless, and negligent nature of Ms. Sebrow's conduct, to deter her from further such conduct;

- (g) interest, costs, and reasonable attorneys' fees incurred by JOHN DOE in commencement of this action from Ms. Sebrow;
- (h) any other such further relief as the court deems just and proper

Dated: December 23, 2021

Respectfully Submitted,



By: _____
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