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RICHARD HALVORSON,
Plaintiff,

v.

THE NATIONAL BOY SCOUTS OF
AMERICA FOUNDATION d/b/a THE
BOY SCOUTS OF AMERICA,

and

JERSEY SHORE COUNCIL, INC., BOY
SCOUTS OF AMERICA, f/k/a ATLANTIC

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: ATLANTIC COUNTY
:
: DOCKET NO.: _____

CIVIL ACTION

COMPLAINT, JURY DEMAND, AND
DEMAND FOR PRODUCTION OF
DOCUMENTS

AREA COUNCIL, INC., BOY SCOUTS :
 OF AMERICA, a/k/a ATLANTIC AREA :
 COUNCIL NO. 331, :
 :
Defendants. :
 :

Plaintiff, Richard Halvorson, by way of Complaint against the Defendants, brings this action and alleges as follows:

THE PARTIES
AS TO ALL COUNTS

1. Plaintiff Richard Halvorson is an adult citizen and resident of the State of New Jersey, Atlantic County. Plaintiff was a minor during the incidents described herein.

2. At all times material, the National Boy Scouts of America Foundation d/b/a The Boy Scouts of America (“BSA”) was and is a congressionally chartered corporation, authorized to do business in New Jersey, with its principal place of business located at 1325 W. Walnut Hill Lane, Irving, Texas 75038.

3. This court has personal jurisdiction over BSA based on its contacts with New Jersey relating to the subject matter of this action and because BSA has continuous and systematic contacts throughout the State of New Jersey, including but not limited to Atlantic County. On information and belief, members of BSA continuously communicate with members that reside and are citizens of the State of New Jersey.

4. At all times material, Defendant Jersey Shore Council, Inc., Boy Scouts of America (“JSC”) was and continues to be a non-profit corporation authorized to conduct business and conducting business in the state of New Jersey, with its principal place of business at 1518 Ridgeway Road, Toms River, New Jersey 08755. Upon information and belief, Atlantic Area

Council, Inc., Boy Scouts of America, a/k/a Atlantic Area Council No. 331, merged with Ocean City Council to create the Jersey Shore Council, Inc., Boy Scouts of America, in 1992. Under the doctrine of de facto merger, Defendant JSC is liable for the negligence of Atlantic Area Council, Inc., Boy Scouts of America, a/k/a Atlantic Area Council No. 331. Defendant JSC is a wholly owned subsidiary of Defendant BSA.

5. JSC is a resident of the State of New Jersey because its principal place of business is in the state.

6. Venue is proper in this county pursuant to Rule 4:3-2 because the Defendants are doing business within Atlantic County, the Plaintiff resides in Atlantic County, and events that are relevant to this action occurred within Atlantic County.

FACTUAL BACKGROUND

7. In approximately the 1980s, Angelo “Skip” Dellomo (hereinafter “Dellomo”) was an adult leader and scoutmaster of Boy Scout Troop No. 6 in Atlantic Area Council No. 331 in Atlantic County, New Jersey. At all times material, Dellomo remained under the direct supervision, employ and control of Defendants. Defendants placed Dellomo in positions where he had access to and worked with children as an integral part of his work.

8. Plaintiff was a member of Troop No. 6 in approximately the 1980s and came into contact with Dellomo through Defendants. Through his participation in the Boy Scouts, Plaintiff developed great admiration, trust and respect for scouting and came to know and trust Dellomo as his scoutmaster, a mentor and authority figure.

9. In approximately 1981 to 1983, when Plaintiff was approximately 10 to 11 years old, Dellomo engaged in unpermitted and illegal sexual contact with Plaintiff.

10. Before Dellomo molested Plaintiff, Defendants knew or should have known that Dellomo was a danger to children.

11. Defendants negligently or recklessly believed that Dellomo was fit to work with children and/or that any previous problems he had were fixed or cured; that Dellomo would not sexually molest children and that Dellomo would not injure children; that Dellomo would not hurt children; failed to all reasonable measures to protect the health, safety, and well-being of Plaintiff; and/or was negligent in the hiring, supervision, control and retention of Dellomo.

12. By holding Dellomo out as safe to work with children, and by undertaking the custody, supervision, and/or care of the minor Plaintiff, each Defendant entered into a fiduciary relationship with the minor Plaintiff. As a result of Plaintiff being a minor, and by Defendants undertaking the care and guidance of the then vulnerable minor Plaintiff, Defendants held a position of empowerment over Plaintiff.

13. Further, Defendants, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted this position of empowerment. This empowerment prevented the then minor Plaintiff from effectively protecting himself and Defendants thus entered into a fiduciary relationship with Plaintiff.

14. Each Defendant had a special relationship with Plaintiff.

15. Defendants owed Plaintiff a duty of reasonable care because they had superior knowledge about the risk that Dellomo posed to Plaintiff, the risk of abuse in general in its programs and/or the risk that their facilities posed to minor children.

16. Defendants owed Plaintiff a duty of reasonable care because they solicited youth and parents for participation in their programs; encouraged youth and parents to have youth participate in their programs; undertook custody of minor children, including Plaintiff; promoted

their facilities and programs as being safe for children; held their agents, including Dellomo out as safe to work with children; encouraged parents and children to spend time with their agents; and/or encouraged their agents, including Dellomo, to spend time with and recruit children.

17. Defendants had a duty to Plaintiff to protect him from harm because Defendants' actions created a foreseeable risk of harm to Plaintiff.

18. Defendants' breach of their duties include, but are not limited to: failure to have sufficient policies and procedures in place to prevent child sexual abuse, failure to properly implement policies and procedures to prevent child sexual abuse, failure to take reasonable measures to make sure that the policies and procedures to prevent child sexual abuse were working, failure to adequately inform families and children of the risks of child sexual abuse, failure to investigate risks of child molestation, failure to properly train the workers at institutions and programs within each of Defendants' geographical confines, failure to have any outside agency test their safety procedures, failure to protect children in their programs from child sexual abuse, failure to adhere to the applicable standard of care for child safety, failure to investigate the amount and type of information necessary to represent scouting programs, leaders and people as safe, failure to train their employees to properly identify signs of child molestation by fellow employees, failure to adequately supervise, hire and control its scouting programs and leaders, and failure to take all reasonable measures to protect the health, safety, and well-being of Plaintiff.

19. Defendants failed to use ordinary care in determining whether their programs were safe and/or determining whether it had sufficient information to represent their programs as safe. Defendants' failures include, but are not limited to: failure to have sufficient policies and procedures to prevent sexual abuse in their programs, failure to investigate risks in their programs, failure to properly train their employees working in their programs, failure to have any outside

agency test their safety procedures, failure to investigate the amount and type of information necessary to represent its programs as safe, failure to train their employees to properly identify signs of child molestation by fellow employees, and failure to supervise and control its scouting programs and leaders.

20. Defendants also breached their duties to Plaintiff by failing to warn him and his family of the risk that Dellomo posed and the risk of child sexual abuse in scouting.

21. Defendants also failed to warn Plaintiff and his family about any knowledge that Defendants had about child sexual abuse, including but not limited to, knowledge as reflected in the Ineligible Volunteer Files.

22. Defendants have known for decades that sexual predators had infiltrated scouting, desiring positions around children, due in part to their sexual interest in children. Defendants knew or should have known of the danger that pedophiles presented to children participating in scouting before Plaintiff was abused.

23. Defendants' own "Ineligible Volunteer Files," including a subcategory referred to as the "Perversion Files," collected and maintained in secrecy for at least seventy years, reveal that pedophiles are drawn to scouting and that the Boy Scouts is a sanctuary for child molesters.

24. Defendants' "Perversion Files" demonstrate that the Boy Scouts are aware and have been aware that pedophiles are attracted to scouting, the distinctive characteristics of scouting render scouts particularly susceptible to pedophiles who are given authority, and the actual and apparent authority of persons who serve in scoutmaster roles are used by pedophiles to sexually abuse young scouts in and out of scouting.

25. Defendants knew or should have known that scouting attracts pedophiles because a) by requiring overnight trips in order to participate, scouting provides a pedophile with access to

boys who are alone and away from their parents in secluded settings; b) scouting provides opportunities for a pedophile to sexually abuse a boy by getting him in situations where the boy has to change clothing or spend the night with him; c) a pedophile given authority in scouting can volunteer for, and have access to, boys of only a certain age or age range; d) scouting cloaks scoutmasters with authority that gives scoutmasters the ability to exploit trust and groom parents and scouts to sexually abuse scouts in and out of scouting; e) scouting conditions boys to the concept of strict obedience to the scout authority and a bonding mechanism that pedophiles are known to exploit; f) scouting promotes the idea of secret ceremonies, rituals and loyalty oaths, all of which help facilitate a pedophile's efforts to keep the victims silent and compliant; g) scouting provided insufficient oversight and supervision to scoutmasters enabling them to isolate with scouts; and h) at the time of the Plaintiff's abuse, background checks were not conducted or insufficient.

26. Defendants were aware prior to 1981 that it had removed numerous pedophiles from its ranks of leadership in local scout troops. Defendants concealed a known danger of leaders grooming scouts and their families to access scouts and sexually abuse them in and out of scouting.

27. Defendants knew or should have known that the "Ineligible Volunteer" system of tracking pedophiles infiltrating its ranks did not function to protect children who participated in scouting from sexual abuse. The "Ineligible Volunteer" system operated only to keep a record of abuse that had already occurred.

28. Defendants also violated a legal duty by failing to report known and/or suspected sexual abuse of children by its volunteers and agents to the police and law enforcement.

29. Upon information and belief, in approximately 1987 Defendants placed Dellomo in its confidential "Ineligible Volunteer" files.

30. Defendants knew or should have known that some of the leaders and people participating in Scouting were not safe to work with children.

31. Defendants knew or should have known that they did not have sufficient information about whether their leaders and people participating in Scouting were safe.

32. Defendants knew or should have known that there was a risk of child sexual abuse for children participating in Scouting.

33. Defendants knew or should have known that they did not have sufficient information about whether there was a risk of child sexual abuse for children participating in their programs and activities.

34. Defendants knew or should have known that they had numerous agents who had sexually molested children. They knew or should have known that child molesters have a high rate of recidivism. They knew or should have known that there was a specific danger of child sexual abuse for children participating in scouting programs.

35. Defendants held their leaders, agents, and employees out as people of high morals, as possessing superior power, instructed families and children to respect, obey and revere these leaders, agents and employees, soliciting youth and families to their programs, marketing to youth and families, recruiting youth and families and holding out the people that worked in their Scouting programs as safe.

36. Defendants were negligent and/or made representations to Plaintiff and his family during each and every year of his minority.

37. In 2012, Defendant BSA was ordered to disclose the Ineligible Volunteer Files of 1247 alleged child sexual abusers who worked for the Boy Scouts of America between 1965 and 1985 by the Oregon Supreme Court. BSA continues to conceal information about the ineligible

volunteers that have been disclosed and the files of, and information about, ineligible volunteers not included in the 2012 release. As a result, children are at risk of being sexually molested.

38. Specifically, in 2019, Dr. Janet Warren, a professor of psychiatry and neurobehavioral sciences employed at the Institute of Law, Psychiatry and Public Policy at the University of Virginia, and who is contracted by BSA to review all of the Ineligible Volunteer Files beginning in 1944 through 2016, testified that BSA knew about 7,819 perpetrators who they believed had been involved in sexually abusing a child. A review of the BSA files revealed identification of 12,254 victims.

39. Upon information and belief, prior to and since 2012, Defendants failed to report multiple allegations of sexual abuse of children by their agents to the proper civil authorities. As a result, children continue to be at risk of being sexually molested.

40. Defendants continue to conceal important information about the agents and volunteers accused of sexual misconduct with minors. As a result, children are at risk of being sexually molested.

41. As a direct result of Defendant's conduct described herein, Plaintiff has suffered, and will continue to suffer, great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, physical, personal and psychological injuries. Plaintiff was prevented, and will continue to be prevented, from performing normal daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for psychological treatment, therapy, and counseling, and, on information and belief has and/or will incur loss of income and/or loss of earning capacity.

EQUITABLE TOLLING OF APPLICABLE STATUTES OF LIMITATIONS

42. Plaintiff asserts all applicable state statutory and common law rights and theories related to the tolling or extension of any applicable statute of limitations, including the discovery rule and/or fraudulent concealment.

43. Plaintiff files this lawsuit within the applicable statute of limitations period of first suspecting or having reason to suspect any wrongdoing, and within the applicable limitations period of first discovering the cause of his injuries and the wrongful conduct that caused such injuries. Plaintiff could not by exercise of reasonable diligence have discovered any wrongdoing, nor could have discovered the causes of Plaintiff's injuries at an earlier time because some injuries occurred without initial perceptible trauma or harm, and when Plaintiff's injuries were discovered, their causes were not immediately known. Consequently, the discovery rule should be applied to toll the running of the statute of limitations until Plaintiff discovered, or by the exercise of reasonable diligence should have discovered, that Plaintiff may have a basis for an actionable claim.

44. The discovery rule should be applied to toll the running of the statute of limitations until the Plaintiff discovered or reasonably should have discovered Plaintiff's injury and the causal connection between the injury and Defendants' conduct.

45. Information sufficient to ascertain the cause of Plaintiff's injury had not been discovered, identified, or determined prior to the expiration of the period within which the action or claim would have been authorized. Therefore, under the appropriate application of the discovery rule, Plaintiff's suit was filed well within the applicable statutory limitations period.

46. Defendants are estopped from asserting a statute of limitations defense because Defendants fraudulently concealed from Plaintiff the truth, quality and nature of Plaintiff's injuries

and the connection between the injuries and Defendants' tortious conduct. Defendants, through their affirmative misrepresentations, concealment, and omissions, actively concealed from Plaintiff the risk their abusers continued to pose.

47. Defendants were under a duty to disclose the true character, quality and nature of the risks associated their agents and volunteers accused of sexual misconduct with children as this was non-public information over which Defendants had and continue to have exclusive control and because Defendants knew that this information was not available to Plaintiff. In addition, Defendants are estopped from relying on any statute of limitation because of their intentional concealment of these facts.

48. Plaintiff had no knowledge that Defendants were engaged in the wrongdoing alleged herein. Because of the fraudulent acts of concealment of wrongdoing by Defendants, Plaintiff could not have reasonably discovered the wrongdoing at any time prior.

COUNT I: NUISANCE (COMMON LAW)
AGAINST DEFENDANTS

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

49. Defendants BSA and JSC continue to conspire and engage and/or have conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of Dellomo and BSA's other accused volunteers and agents; and/or 2) conceal from proper civil authorities sexual assaults and abuse committed by BSA's volunteers and agents against minor children in violation of law, including but not limited to New Jersey Statutes § 9:6-8.14; and/or 3) attack the credibility of victims of BSA's volunteers and agents; and/or 4) protect BSA's volunteers and agents from criminal

prosecution for their sexual assaults and abuse against children; and/or 5) allow known child molesters to live freely in the community without informing the public; and/or 6) after receiving reports or notice of misconduct by agents and volunteers such as Dellomo, failing to warn the public or BSA members of the threat posed by such agents and volunteers; and/or 7) make affirmative representations regarding Dellomo's and Defendants' other pedophilic and/or ephebophilic agents' fitness for employment, in positions that include working with children, while failing to disclose negative information regarding sexual misconduct by such agents and volunteers.

50. The negligence and/or recklessness and/or deception and concealment by Defendants constitutes an unreasonable interference with a right common to the general public in that Defendants' conduct involves a significant interference with the exercise of the common rights of the health, safety, and welfare to the citizens of New Jersey, and has maintained or permitted a condition which unreasonably endangers the safety and health of the members of the general public in New Jersey, including, but not limited to, children and residents in New Jersey and other members of the general public who live in communities where Defendants' agents who molested children live. Defendants' failure to report multiple allegations of sexual assault and abuse of children to proper authorities, as well as its failure to inform the public about sexual abuse, or agents and volunteers accused of sexual abuse of minors has prevented the public from knowing of a real danger, and has thereby endangered the safety and health of the members of the general public by allowing child molesters to avoid prosecution and remain living freely in unsuspecting communities and working with and around children. These child molesters, known to Defendants but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

51. The negligence and/or recklessness and/or deception and concealment by Defendants was and is injurious to the health and/or indecent or offensive to the senses of the general public including, but not limited to, residents in New Jersey and other members of the general public who live in communities where Defendants' accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that many in the general public cannot trust Defendants to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' volunteer histories, nor to disclose their patterns of conduct in grooming and sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in New Jersey and throughout the Eastern United States where Defendants conducted, and continue to conduct, their business.

52. The Defendants' negligence and/or recklessness and/or deception and concealment is of a constant and continuing nature.

53. The Defendants know or have reason to know that their actions interfere with the citizens of New Jersey's public health, safety and welfare and the public's right to be free from unnecessary danger.

54. The negligence and/or recklessness and/or deception and concealment by Defendants was specially injurious to Plaintiff's health and/or Plaintiff's personal enjoyment of life as Plaintiff was sexually assaulted by Defendants' agent, Dellomo.

55. The negligence and/or recklessness and/or deception and concealment by Defendants also was specially injurious to Plaintiff's health and/or Plaintiff's personal enjoyment of life in that when Plaintiff finally discovered the negligence and/or recklessness and/or deception

and concealment of Defendant BSA, Plaintiff experienced mental, emotional and/or physical distress that he had been the victim of Defendants' negligence and/or deception and concealment.

56. Plaintiff has suffered and/or continues to suffer special, particular, and peculiar psychological and emotional harm and/or peculiar pecuniary harm, different in kind from the general public, after learning of Defendant BSA's concealment of names and information about volunteers accused of sexually molesting minors and as a result of the dangerous condition maintained and/or permitted by Defendant BSA, which continues as long as decisions are made and actions are taken to keep the information about the abuse and/or the accused volunteers concealed. As a result of the negligence and/or deception and concealment, Plaintiff has suffered and continues to suffer lessened enjoyment of life, and/or impaired health, and/or emotional distress, and/or physical symptoms of emotional distress and/or pecuniary loss including medical expenses and/or wage loss.

57. Plaintiff was unable to disclose the abuse he suffered for years after the abuse occurred, in part because of Defendants' concealment of information and records pertaining to Defendants' sexually abusive agents. Defendants' concealment made Plaintiff even more inclined to suppress his thoughts and feelings related to the abuse, and caused Plaintiff to feel invalidated and dismissed. Plaintiff's injuries were exacerbated by Defendants' concealment, which caused him to feel betrayed by the institution that he had idealized as a child.

58. Plaintiff has suffered anxiety, anger and stress-related illness as a result of Defendants' concealment.

59. Plaintiff has suffered special and peculiar injury in the form of pecuniary and economic harm as a result of Defendants' concealment.

60. Plaintiff's injuries are also particular to him and different from certain members of

the public who have not been harmed by the nuisance. People who have not been harmed by the nuisance include those who have not suffered any injury at all, those who are unaware of the nuisance, those who do not believe that Defendants ever concealed anything about child sex abuse, and those who think that any concealment only occurred decades ago.

61. The continuing public nuisance created by Defendants was, and continues to be, the proximate cause of Plaintiff's special injuries and damages as alleged.

62. In doing the aforementioned acts, Defendants acted negligently and/or recklessly and/or intentionally and/or maliciously and with conscious disregard for Plaintiff's rights.

63. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

64. This public nuisance can be abated, in part, through public release of all of the identities and Ineligible Volunteer Files and/or Personnel Files of Defendants' agents and volunteers who have been accused of sexual misconduct with minors.

COUNT II: CIVIL CONSPIRACY AGAINST DEFENDANTS

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

65. Defendants entered into an express or implied agreement with the common purpose of concealing from the public the true nature and scope of the sexual abuse of minors in the BSA across the State of New Jersey.

66. Each Defendant has committed overt acts, as described above, in furtherance of the aforementioned agreement, including, but not limited to, the following: 1) concealing the sexual assaults of and the identities and patterns of its sexually abusive agents and volunteers; 2)

concealing sexual assaults and abuse committed by its agents and volunteers from proper civil authorities in violation of law, including but not limited to New Jersey Statutes § 9:6-8.14; 3) attacking the credibility of victims of Defendants' agents and volunteers; 4) protecting Defendants' agents and volunteers from criminal prosecution for sexual assaults and abuse against children; 5) allowing known child molesters to live freely in the community without informing the public; 6) after receiving reports or notice of sexual misconduct by agents and volunteers, failing to warn parents and minors involved in BSA or the public of the threat posed by such sexual abusers in violation of law; 7) making affirmative representations regarding Defendants' agents' and volunteers' fitness for employment in positions that include working with children, while failing to disclose negative information regarding sexual misconduct by agents and volunteers; and 8) concealing Defendants' actions and their agents' and volunteers' actions from survivors of past abuse, thereby causing separate, current harm.

67. Each Defendant acted in concert in performing the overt actions set forth above to inflict a wrong against or injury upon children and other members of the general public across the State of New Jersey who would come in contact with Defendants' sexually abusive agents, including Plaintiff.

68. As a proximate result of Defendants' actions, each Plaintiff has suffered the injuries and damages described herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants, jointly, severally and/or in the alternative, for punitive damages, together with interest and costs in an unspecified amount, plus costs, disbursements, reasonable attorneys' fees, interest, and such other and further relief as

the court deems just and equitable.

Plaintiff requests an order requiring that Defendants abate the public nuisance their conduct has created by: 1) publicly releasing the Ineligible Volunteer Files maintained by BSA; 2) publicly disclosing the names of all agents and volunteers accused of child molestation, each agent and volunteer's history of abuse, each such agent and volunteer's pattern of grooming and sexual behavior, and his last known address, including releasing of Defendants' documents on the agents and volunteers; and 3) that Defendants discontinue their current practices and policies of dealing with allegations of child sexual abuse by its agents and volunteers secretly, and that it work with civil authorities to create, implement and follow a policy for dealing with such molesters that will better protect children and the general public from further harm.

DEMAND FOR JURY TRIAL

The Plaintiff demands trial by jury on all of the triable issues of this Complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

DEMAND FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 4:18-1, Plaintiff demands the production for purposes of inspection and copying at the offices of Robins Kaplan LLP, 399 Park Avenue, Suite 3600, New York, New York 10022, within 45 days after service of the within pleadings, of the following items pertaining to the allegations of this Complaint:

1. All "Ineligible Volunteer Files" (also known as "red list files," "red flag files," "perversion files" and "confidential files") maintained by Defendants, from 1916 to present, including the file of Angelo Dellomo.
2. All documents sent from or to Defendants pertaining to the Ineligible Volunteer files, (also known as "red list files," "red flag files," "perversion files" and

“confidential files”) maintained by Defendants, from 1916 to present.

3. The names and identities of all individuals affiliated with Defendants who have had their registration with the BSA revoked because of allegations of child sexual abuse.
4. The names and identities of all agents and volunteers affiliated with Defendants who have been accused of child molestation or sexual misconduct with children.
5. The personnel and Ineligible Volunteer File of all individuals affiliated with Defendants who have had their registration with the BSA revoked because of allegations of child sexual abuse.
6. All documents pertaining to any adult volunteer, agent or employee who was reported to Defendants for sexual abuse or alleged sexual abuse of a minor scout during the time period 1916 to present, and any such file(s) compiled or maintained as a result of the report.
7. All documents pertaining to efforts independently made by Defendants to measure or document the extent of the problem of scouts being sexually abused by adult volunteers, agents and employees during the time period 1916 to present.
8. All documents pertaining to Defendants’ policies for evaluating, screening, and/or selecting individuals to participate as adult volunteers or agents in a Boy Scout Troop as a Scoutmaster and/or an Assistant Scoutmaster during the time period 1916 to present.
9. All documents pertaining to how reports of alleged sexual abuse perpetrated by adult volunteers against scouts should be reported, investigated, and/or otherwise addressed by Defendants and/or Boy Scout troops during the time period 1916 to present.
10. All documents pertaining to sexual abuse prevention training of adult volunteers and employees involved in Scouting, at any level, during the years 1916 to present.
11. All documents pertaining to sexual abuse prevention and/or risk of sexual abuse of scouts by adult volunteers and employees, which were distributed to adult volunteers, parents or guardians and/or scouts in BSA and in JSC during the years 1916 to present.
12. All documents by which disclosure was made to parents of the risk of sexual abuse by Boy Scout staff or volunteers.
13. All written policies and procedures that were implemented during the years 1916 to present by Defendants to avoid the incidents described in the Complaint.
14. Defendants’ Articles of Incorporation and Congressional Charter.

15. All versions of the BSA produced document known as the "Boy Scout Handbook" effective during the time period 1981 to present.
16. All versions of the BSA produced document known as the "National Council Professional/Professional-Technical Organization Chart" in effect during the time period 1981 to present.
17. All versions of the BSA produced document known as "Procedures for Maintaining Standards of Leadership" in effect at any time, during the time period 1981 to present.
18. All versions of the BSA produced document known as the "Scoutmaster's Handbook" effective during the time period 1981 to present.
19. All versions of the BSA produced document known as the "Standard Local Council Articles of Incorporation and By-Laws" in effect during the time period 1981 to present.
20. All versions of any BSA produced Documents and/or videos from 1981 to present, related to child sexual abuse.
21. Produce all editions of Scouting Magazine and Boys Life Magazine that contain any material pertaining to the subject of child sexual abuse, published during the time period 1981 to present.
22. All documents showing the organizational chain of command and/or structure for The Boy Scouts of America during the years 1981 to present.
23. All versions of the personnel lists containing the names of employees and executives of The Boy Scouts National Council during the time period 1981 to present.
24. All minutes of all meetings of the National Office, Boy Scouts of America, and Management Executive Staff from 1916 to present, which pertain to the sexual abuse of a minor involved in scouting by an employee, agent, or adult volunteers.
25. All versions of the adult volunteer application forms effective during the time period 1981 to the present including any and all forms completed and/or signed by Angelo Dellomo.
26. All (blank) forms which were in use during the time period 1981 to present, which adult volunteers registered with Defendants and any documents that were required to be signed evidencing that they subscribed to the principles, practices, regulations, by-laws, etc., of BSA.

27. All documents pertaining to any alleged incident of child abuse, child sexual abuse, or attempted child sexual abuse by Scoutmasters, or Assistant Scoutmasters, or adult volunteers in all Troops in the Jersey Shore Council, or predecessor New Jersey Councils, which are not reflected in the Ineligible Volunteer Files for the period 1916 to present.
28. All documents pertaining to any adult volunteer who was reported by the Jersey Shore Council or predecessor councils to the BSA Director of Registration Services, or any other division of BSA, for sexual abuse or alleged sexual abuse of a scout during the time period 1916 to present, and any such file, during any time period that relates to Angelo Dellomo.
29. All documents pertaining to the business, financial, and/or corporate relationship between Jersey Shore Council and predecessor councils and BSA, from 1981 to present.
30. All troop rosters for Atlantic Area Council No. 331 Troop No. 6 including both adult volunteers and youth, (including Cub Scouts, Boy Scouts, and Explorer Scouts), for the years 1981 to present.
31. All documents, excluding troop rosters, naming or referencing any of the persons comprising Troop No. 6 during the time period in which Angelo Dellomo was employed by or volunteered for the Defendants.
32. All documents pertaining to Angelo Dellomo's assignments and/or work on behalf of Defendants.
33. All documents naming or referencing Angelo Dellomo in any way including any documents which contain any reference to any act of sexual misconduct by Angelo Dellomo during the time he was an employee or adult volunteer as well as any documents pertaining to his resignation or termination of Angelo Dellomo as an employee or adult volunteer.
34. All "annual applications" for certification and/or re-certification by Angelo Dellomo with Defendants for the year beginning with the first of such applications filed by Angelo Dellomo and continuing through the time of his termination from affiliation or association with Defendants.
35. All documents that have previously been, but no longer are, a part of Angelo Dellomo's Ineligible Volunteer File or Confidential File.
36. The entire personnel and/or adult volunteer files for Angelo Dellomo, including, but not limited to:
 - a) All applications for volunteer and/or paid employment;
 - b) Employment and/or volunteer contracts;

- c) Background checks;
 - d) Questionnaires completed at the time Angelo Dellomo applied to become an adult volunteer in any capacity;
 - e) Job evaluations;
 - f) Psychological or psychiatric reports;
 - g) Disciplinary actions;
 - h) Letters of commendations;
 - i) Prior employment records.
37. All documents pertaining to any arrests and/or criminal investigations or prosecutions of Angelo Dellomo.
38. All documents pertaining to allegations of sexual misconduct by Angelo Dellomo against any individuals other than Plaintiff.
39. All documents provided by Defendants' Troops' sponsoring organizations, notifying the latter of any allegations against Angelo Dellomo and/or the threat he posed to children and scouts.
40. All documents provided by Defendants Troops' Scoutmasters, Assistant Scoutmasters, Troop Chairpersons, Troop Committee Members, or any other adult volunteer, giving notice of any allegations against Angelo Dellomo and/or the threat he posed to children and scouts.
41. Complete copies of all documents or correspondence of any kind that pertain in any way to any state, federal government or agency investigation of the circumstances concerning the allegations in Plaintiff's Complaint. Your response should include, but not be limited to, citations, summons, letters, memorandums, photographs, videos, statements, reports, or investigative materials provided to or received from any state or federal agency or any other agencies in connection with any investigation conducted as a result of the events alleged in the Complaint.

Dated: April 29, 2019

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/Rayna E. Kessler

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Attorneys for Plaintiff

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Rayna E. Kessler, Esq. is hereby designated as trial counsel for Plaintiff.

/s/Rayna E. Kessler
Rayna E. Kessler, Esq.

Dated: April 29, 2019

CERTIFICATION PURSUANT TO RULE 4:5-1

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

/s/Rayna E. Kessler
Rayna E. Kessler, Esq.

Dated: April 29, 2019

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-000887-19

Case Caption: HALVORSON RICHARD VS THE NATIONAL BOY SCO UTS OF

Case Initiation Date: 04/29/2019

Attorney Name: RAYNA ELIZABETH KESSLER

Firm Name: ROBINS KAPLAN LLP

Address: 399 PARK AVENUE STE 3600

NEW YORK NY 10022

Phone:

Name of Party: PLAINTIFF : HALVORSON, RICHARD

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: TORT-OTHER

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Other(explain) Plaintiff was a member of Defendants' Boy Scout Troop.

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

04/29/2019

Dated

/s/ RAYNA ELIZABETH KESSLER

Signed