

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

AG1 DOE,

Plaintiff,

- against -

GEORGE MORRIS; THE UNITED STATES EQUESTRIAN FEDERATION, INC.; TOPPING RIDING CLUB, INC.; and DOES 1-5 whose identities are unknown to Plaintiff,

Defendants.

Index No. _____

SUMMONS

Date Index No. Purchased: August 5, 2020

TO THE ABOVE NAMED DEFENDANTS:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the Complaint, a copy of which is hereby served upon you, and to serve a copy of your Answer to the Complaint upon the undersigned attorneys listed below within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment by default will be taken against you for the relief demanded herein.

The basis of venue pursuant to CPLR § 503 is New York County because Defendant United States Equestrian Federation, Inc. is registered in New York County.

Dated: August 5, 2020
New York, New York

/s/ Michael Reck

Michael Reck
Trusha Goffe
Nahid Shaikh
JEFF ANDERSON & ASSOCIATES, P.A.
55 West 39th Street, 11th Floor
New York, NY 10018
Telephone: (646) 759-2551
Email: *MReck@AndersonAdvocates.com*
Email: *Trusha@AndersonAdvocates.com*
Email: *Nahid@AndersonAdvocates.com*

Matthew S. Ingles
GREENBERG GROSS LLP
01 S. Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (949) 383-2800
Email: *MIngles@GGTrialLaw.com*

Counsel for Plaintiff

Defendant(s)' Address:

George Morris
580 Sidney Rd., Pittstown, NJ 08867

The United States Equestrian Federation, Inc.
CT Corporation System, 38 Liberty St., New York, NY 10005

Topping Riding Club, Inc.
58 Daniels Lane, Sagaponack, NY 11962

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**COMPLAINT
AND DEMAND
FOR JURY TRIAL**

Plaintiff AG1 DOE (“Plaintiff”), by his attorneys, brings this action against Defendants George Morris (“Morris”), the United States Equestrian Federation, Inc. (“USEF”), Topping Riding Club, Inc. (“Topping”), and Does 1–5 (together, “Defendants”), and allege as follows:

NATURE OF THE ACTION

1. This case is about the sexual assault of a minor, male equestrian athlete by a world-revered trainer known by many in the equestrian sport, including Defendants, to sexually abuse and assault young male riders.

2. Plaintiff began riding horses at the age of seven, becoming an incredibly successful rider within the Long Island equestrian community. By the time Plaintiff was thirteen, he had attracted the attention of the most well-known and admired riding trainer in the country—Morris.

3. When Plaintiff was sixteen, he began to train at the exclusive and prestigious Hunterdon Farms (“Hunterdon”)—a barn and riding facility owned and operated by Morris.

Training at Hunterdon and working with Morris placed Plaintiff on the fast-track to becoming

one of the most successful and well-known riders in the Junior Ranks, with goals of national championships and a slot on the United States Olympic Team (“US Olympic Team”).

4. The chief differentiator between Hunterdon and its competitors, and the reason that so many young riders were drawn to Hunterdon, was Morris. Morris was—and still is—one of the most high-profile individuals in the equestrian sport, and considered the greatest coach of young equestrians in the United States. Morris was internationally known for shaping young equestrians into national champions and Olympic athletes. Due to Morris’s clout in the industry and access to world-class horses, training with Morris was considered an extraordinary privilege and a ticket to fame and success.

5. But amidst the admiration for Morris’s talent and stature, the equestrian community turned a blind eye to his well-known proclivities for sexual relationships with young boys. Morris was widely known for carrying on sexual relationships with young male riders, flaunting his “favorites” at riding shows, and living a playboy lifestyle, openly cavorting with minors at parties at night clubs.

6. Plaintiff, who was invited to ride at a demonstrative clinic for Mr. Morris in the Spring of 1978, became a victim of these very abuses. While under the care of Defendants, who invited Morris to teach a clinic at their facility, Plaintiff was brutally attacked and raped by Morris. But against the grandeur and celebrity of Morris, Plaintiff could only do what many of Morris’s victims did—stay silent so as not to risk his entire career within the equestrian community.

7. For decades, Morris sat in a position of power in the equestrian world, and was protected and empowered by Defendants, and the highest levels of the equestrian sport. Morris has long been a key source of donations for the United States Equestrian Team Foundation—the financing arm of the US Olympic Team. Ultimately, Morris served as the Chef d’Equipe (coach)

for the US Olympic team, during which time it was well-known in the industry that Morris had sexually abused many young, male riders.

8. Morris's stature within the horse riding world and status as an exemplary USEF trainer granted him unbridled access to the grounds of countless horseshow facilities, riding clubs and barns across the country, and the confidence of power-players throughout the industry.

9. USEF has long stood behind Morris as a pillar of the equestrian sport, lauding and profiting from his celebrity right up until the moment that Morris was forced out of the sport by a 2019 United States Center for SafeSport ("SafeSport") decision, finding that he violated, among other laws, New York Penal Laws and industry codes of conduct by his sexual abuse of Plaintiff and others.

10. Morris's sexual assaults of amateur athletes has been highly publicized in The New York Times and the prominent weekly equestrian magazine, the Chronicle of the Horse. Multiple athletes have now come forward to report Morris's sexual assaults at a litany of USEF sanctioned events. Yet despite the clarion voices of survivors and the SafeSport decision, the industry has continued to rally around Morris, claiming that his lifetime ban is "too severe" a punishment for his decades of abuse of children. Today, although Plaintiff is widely respected and upstanding, he faces constant scorn and exclusion by the industry that he has worked for his entire life, all because he dared to speak up against a perpetual abuser.

11. Plaintiff brings this action both to bring to light the systematic failures facing promising Olympic athletes and to seek redress for the years of physical and emotional harm he suffered at the hands of Defendants.

PARTIES

12. Plaintiff is an adult male born in 1960 and was a minor throughout the period of child sexual assault alleged herein. At all times, Plaintiff resided in Nassau County, within the

State of New York.

13. Plaintiff brings this Complaint pursuant to Civil Practice Law & Rules 241-g, for the child assault he suffered at the hands of Defendants. At all times material, Plaintiff was a minor under 18 years of age when the sexual assaults occurred. The conduct at issue constituted sexual offense against a minor in violation of a section within Article 130 and/or § 263.05 of the New York Penal Law, or a predecessor statute that prohibited such conduct at the time of the act, and resulted in physical, psychological, and emotional injuries. As a civil cause of action was previously time-barred prior to August 14, 2019, the terms of the Child Victims Act, CPLR § 214-g, revives the claims.

14. An Order to Show Cause is filed concurrently herewith if all Defendants have not consented to Plaintiff's use of a pseudonym.

15. Defendant George Morris is an adult male born in 1938 and was an adult throughout the period of child sexual assault alleged herein. At all relevant times, Defendant Morris resided in Pittstown, an unincorporated community in the State of New Jersey, owning and operating Hunterdon as an elite equestrian riding club and training facility. At all times relevant, Morris was a registered member of the USEF and operated as a trainer at USEF-sponsored events.

16. Defendant Topping is a not-for-profit organization incorporated in New York in 1971 with its principal place of business in Sagaponack, Suffolk County, within the State of New York. Topping is an elite equestrian riding club and facility on Long Island, and serves as a show riding and jumping arena, and is home to various riding competitions. At all times relevant hereto, Topping hosted, funded, and organized the Topping clinic run by Morris, during which Morris and the attendees of the clinic were under Topping's control and supervision. On information and belief, Topping has been operated by the same family since its inception.

17. At all times relevant hereto, Defendant USEF, a New York corporation, or its predecessors-in-interest, served, and USEF continues to serve, as the National Governing Body (“NGB”) for the equestrian sport, and trains, selects, and helps fund the United States Equestrian Team (“USET”), who compete at the Olympics and other notable events. Since 2003, USEF operates as the successor-in-interest to USA Equestrian, Inc., a New York corporation. USA Equestrian, Inc. governed the equestrian sport with the USET from 2001–2003 as successor-in-interest to the American Horse Shows Association, Inc. (“AHSA”), a New York corporation.

18. At all times relevant hereto, Defendant USEF and its predecessors-in-interest repeatedly conducted equestrian competitions throughout the United States, including, but not limited to, New York. As described herein, Plaintiff suffered sexual assault at the hands of Morris at a training clinic for USEF members that was conducted in New York and hosted by Topping. USEF, by holding Morris out as an elite trainer, established the need for and interest in clinics run across the country at his direction for the betterment of USEF members as competitive riders. USEF continues to serve as a resource center for members, clubs, fans, and equestrians throughout the United States. On information and belief, at all times relevant hereto, Morris was a member of USEF and Plaintiff was a minor amateur athlete participating in events sanctioned by USEF.

19. Plaintiff is informed and believes and thereon alleges that the true names and capacities, whether individual, corporate, associate, or otherwise of Defendants named herein as Defendant DOES 1 through 5, inclusive, are unknown to Plaintiff, who therefore sues Defendants DOES 1 through 5 by such fictitious names, and who will amend the Complaint to show their true names and capacities when such names have been ascertained. Plaintiff is informed and believes and thereon alleges that DOES 1 through 5 are legally responsible in some manner for the events, happenings, and/or tortious and unlawful conduct that caused the injuries

and damages alleged in this Complaint.

20. Whenever reference is made to any Defendant entity, such reference includes that entity, its parent companies, subsidiaries, affiliates, predecessors, and successors. In addition, whenever reference is made to any act, deed, or transaction of any entity, the allegation means that the entity engaged in the act, deed, or transaction by or through its officers, directors, agents, employees, or representatives while they were actively engaged in the management, direction, control, or transaction of the entity's business or affairs.

21. Each of the Defendants aided and abetted each other Defendant. Each Defendant knowingly gave substantial assistance to each other Defendant, and Morris, who performed the wrongful conduct alleged herein. Accordingly, each Defendant is jointly and severally liable for the damages proximately caused by Morris's and each other Defendant's wrongful conduct.

JURISDICTION

22. This Court has jurisdiction pursuant to CPLR § 301 as Defendant Topping is a New York corporation with its principal place of business in Sagaponack, New York and because some of the unlawful conduct complained of herein occurred in Sagaponack, New York.

23. This Court has personal jurisdiction over Morris because his assaults of Plaintiff occurred in New York.

24. Venue is proper pursuant to CPLR § 503 as Suffolk County because many of the events giving rise to this action occurred in Sagaponack, New York.

THE HISTORY OF DUTIES OF THE USEF IN TRAINING MINOR ATHLETES

A History of Equestrian Competition

25. The United States Olympic Committee ("USOC"), an organization created to govern amateur athletes, recognizes and oversees 47 National Governing Boards ("NGBs").

NGBs are organized at an individual sport level, including the equestrian sport.

26. USEF serves as the NGB for the equestrian sport, and trains, selects, and helps fund USET. USET competes at competitions throughout the world, including the Olympic Games.

27. USEF states on its website that it is an organization established in 1917 “dedicated to pursuing excellence and promoting growth, all while providing and maintaining a safe and level playing field for both its equine and human athletes.”

28. USEF operates as the modern successor of AHSA. In or around 2001, the AHSA changed its name to USA Equestrian. At that time, USA Equestrian was overseeing 26 breeds and disciplines of competition and had over 80,000 individual members, more than 2,700 member competitions, and 100 affiliate organizations.

29. On information and belief, in or around 2003, USA Equestrian and the USET merged together to create USEF, one unified governing body of the equestrian sport. As the NGB of the equestrian sport, USEF continues the duties of USA Equestrian, including overseeing equestrian competitions and affiliate organizations, and regulating membership.

30. On information and belief, USEF, and previously its predecessors-in-interest, must grant a license for any horse show in the United States if that horse show will serve as a qualifying event for more prestigious national competitions and Olympic qualifying events. USEF sanctioned events are the sole events at which a competitor can qualify for prominent national and international equestrian competitions and Olympic qualifying events.

31. In addition to the event itself needing to register with USEF, amateur athletes only receive credit for their performance if they are also a member of USEF.

The Long Ride to Accountability

32. In 1978, precisely when Morris was sexually assaulting Plaintiff and others, Congress codified and refined explicit duties of USOC and NGBs relating to athletes’ safety

while participating in amateur sports via the Amateur Sports Act, or “Ted Stevens Act.” The Ted Stevens Act now controls the USOC and the NGBs that operate as extensions or agents of the USOC.

33. Despite a Congressionally recognized duty and the utmost importance of protecting child athletes, the USOC and affiliated NGBs had to be forced into a world of accountability for the rampant problems with child sexual assault in their constituent sports. Since 1982 alone, over 290 coaches and officials associated with the USOC or with USOC organizations have been publicly accused of sexual misconduct.

34. Nevertheless, the USOC did not approve a plan to create an independent entity to address sexual assault throughout amateur sports until 2014. In or around 2017, SafeSport opened as an independent 501c(3) non-profit organization with the stated intention of preventing the sexual assault of amateur athletes.

35. On or about March 28, 2017, prior to Congress federally authorizing SafeSport, the Committee on the Judiciary in the United States Senate held a hearing on Protecting Young Athletes from Sexual Abuse. During this hearing, star Olympic athletes testified before Congress relating to USOC’s failure, and the failure of their NGBs, to protect amateur athletes from sexual assault. Rick Adams, USOC Executive in charge of USOC’s oversight and management of SafeSport, acknowledged “[t]he Olympic community failed the people it was supposed to protect.”

36. On information and belief, in or around 2018, the USEF considered a rule change proposal that would have required professionals and anyone who signs as a coach at a competition to undergo SafeSport training and a background check, among other things. The proposal was rejected. On information and belief, USEF currently only requires certain designees to undergo background checks.

37. On information and belief, the USEF has sole control over the access to and oversight of its own events. USEF's General Counsel has commented that the USEF "can control who has access to the showgrounds and who doesn't," speaking to the ability of the USEF to take legal action against non-members at its events in the past. USEF's purview over the behavior of member trainers, coaches, and amateur athletes is even greater than that towards non-members.

38. USEF has created its own rules and regulations requiring aspiring Olympians to become members of its organization, to train with individuals who are members of the organization, and to compete at events sanctioned by the organization. Yet, USEF has failed to create any meaningful rules or regulations protecting its athletes from sexual abuse and misconduct.

GEORGE MORRIS WAS THE CROWN JEWEL OF THE USEF

39. George Morris was a child star of the USEF, winning the Maclay Finals—the AHSA National Championship—at just fourteen years old, and later earning a place on the USET at age twenty-one and competing on behalf of the United States in the 1960 Rome Olympics.

40. Morris became a professional horse rider in his early twenties, disqualifying him from further USET competition. Though still quite young, Morris began coaching children from across the country to compete on the USEF, then AHSA, circuit.

41. Morris established himself quickly as indispensable to the USEF's international prestige, producing some of the nation's most talented riders. Soon, the vast majority of Maclay National Champions and members of the USET were current or former students of Morris.

42. Perhaps even more importantly to the USEF, Morris began to amass control over a collection of the best horses in the country. With his stable of horses and the access to the

stables of his rich and prestigious friends, Morris could not only get his students to the highest competitive ranks, but he could also ensure the success or failure of the USET. Without Morris's horses, the USEF could not compete on the global stage.

43. Throughout the 1960s, 1970s, and 1980s, Morris served in various elite positions within the USEF, often judging competitions, designing competition courses, selecting members of the USET, holding training clinics, or serving as a *de facto* Chef d'Equipe, co-Chef d'Equipe, or official Chef d'Equipe of the USET. The USET, in addition to competing on behalf of the United States at the Olympics, competed across the globe at competitions like the Nations Cup, the Pan American Games, the World Cup Finals, the World Equestrian Games, and a series of Grand Prix tournaments. At all of these events, some combination of Morris, his students, and his riders were always to be found.

44. In Morris's own autobiography, he notes that he "served in some kind of Chef d'Equipe type of capacity in international tours on and off from 1977 until 2012."

45. After Morris established his own training facility, Hunterdon Farms, in Pittstown, New Jersey in 1971, it became well-known throughout the equestrian world that the best chance to ride a great horse, to place at the Maclay Finals, or to make the USET, was to train with Morris at Hunterdon. In his autobiography, Morris explains that, in the 1970s, "Hunterdon built a national reputation for producing winners in hunters, equitation, and jumpers. Our riders under the Hunterdon banner had, for several years taken home the majority of Top Ten ribbons at both the AHSA Medal and the ASPCA Maclay Finals."

46. Hunterdon was the home of the US equestrian world's boom in the 1970s and 1980s, and Morris was at the center of all of it. The USEF needed Morris, needed his access to horses, and needed Hunterdon. In addition, any riding club that could bring the great Morris in for a training clinic could count on benefitting both in finance and reputation from his

association with their facility.

47. The book jacket for Morris's autobiography acknowledges that he "has been ever-present on the rarified stage of the international riding elite for most of the 70 years he's been in the saddle" and "[h]is approval can be a rainmaker; his derision can end a career." Indeed, Morris was at the center of the US equestrian world's boom in the 1970s and 1980s. Any riding club that could bring the great George Morris in for a training clinic could count on benefitting both in finance and reputation from his association with their facility.

48. Yet, while holding Morris aloft as the pinnacle of their sport, the equestrian world chose to look the other way from his self-described "wild playboy" ways with underage boys. Starting in his twenties, Morris became known as socially wild and promiscuous. Describing his sexual relationships in his memoir, Morris speaks of the 1960s and 1970s saying "[i]n those decades and since, I have had...well, let's say 10,000 and counting!" Moreover, with great regularity, he was conducting this lifestyle amidst and alongside other members of the equestrian community.

49. Throughout his memoir, Morris describes being open about his social relationships with other riders, trainers, and USEF members. He describes taking his own trainees to gay clubs and Studio 54, often when those students were still under eighteen years old, and Morris was in his thirties. Morris writes about a relationship he started with one of his young female students, who he thereafter took with another young student to a gay club for a wild night of partying in 1977, when the girls were roughly twenty years old and Morris was nearly forty. He writes, "it wasn't long after that [one of the students] was scooped up by her parents and shipped home from Hunterdon, which they felt was a place of ill repute!"

50. Morris did not hide his social life from anyone—including his minor students. Morris writes about an incident in 1964, when he was twenty-six years old, and he was training

his 13 year old student. Morris took his student to a show in Newburyport, Massachusetts, where, as Morris describes it, “[s]omehow I got the idea to teach the entire weekend in a bikini—a little black string bikini! . . . [the student] was totally mortified and didn’t want to admit to anyone that I was his trainer—and rightfully so!”

51. Upon information and belief, Morris had sexual relationships with minor students throughout the 1970s. These relationships were fostered during USEF horse shows, and Morris’s attachments to particular students or young riders with whom he was conducting sexual relationships was well known.

52. On information and belief, Morris’s sexual assaults were reported to at least one member of the Board of Directors for USEF who confirmed that Morris’s behavior of cavorting and grooming boys had been observed.

53. Morris’s sexual assaults of Plaintiff and of another minor child were detailed in Morris’s SafeSport proceedings. Reports from those proceedings concluded that Morris used his position of power to assault a minor male victim in 1973. The victim in question was approximately seventeen when Morris began paying him extraordinary attention at USEF events, including inviting the victim to his hotel room, while Morris would have been in his mid- to late-thirties.

54. The SafeSport report also notes that the minor in question avoided disclosing the abuse out of loyalty to Morris, who he saw as the reason for his professional success.

55. An August 8, 2019, New York Times article written in the wake of the SafeSport decision, made clear from its very title that such relationships were not secrets in the industry. The headline reads: “Whispers of Sexual Abuse Tailed an Equestrian Legend for Decades. At 81, He Was Barred for Life.”

56. In the article, the reporter describes interviewing 53 former students, competitors,

and other athletes for the story. Of these 53 individuals, the report noted that “many said they had long been aware of Mr. Morris’s relationships with minors, though few agreed to speak publicly, afraid of his status as equestrian kingmaker could wound their careers or chances to win ribbons in the horse show ring.”

57. Upon information and belief, the incidents reported in the SafeSport report, the New York Times article, and in this complaint were not isolated, but rather, Morris had engaged in a number of inappropriate and sexual encounters with child equestrian athletes while they were attending USEF events and club-sponsored clinics. Morris’s relationships with young boys were an “open secret.”

58. Upon information and belief, among those who knew this “open secret” were any number of USEF and Topping members, employees, agents, and representatives.

59. Upon information and belief, neither USEF, then AHSA, USET, nor Topping had a reporting mechanism in place at the time for any victim of minor sexual abuse to report Morris’s behavior.

60. Upon information and belief, neither USEF, then AHSA, USET, nor Topping engaged in any kind of background check or screening before allowing Morris to train and/or coach minor children.

61. Upon information and belief, neither USEF, then AHSA, USET, nor Topping had any policies or procedures established to ensure that the students attending their events were warned about or protected against pre-sexual grooming, sexual molestation, or sexual assault.

62. USEF and Topping either knew or should have known that George Morris was a risk to young boys, but chose either not to investigate or to ignore his predatory acts. To USEF, Morris meant winning. Winning meant money and prestige. Some were all too willing to sacrifice a few young boys for the sake of money and prestige.

GEORGE MORRIS'S SEXUAL ASSAULT OF PLAINTIFF

63. Plaintiff grew up on Long Island. Though his family was middle class, a neighbor had sparked Plaintiff's interest in riding horses, and from then on, there was nothing his parents could do to stop him from spending all of his spare time participating in the expensive and exclusive sport.

64. As a young teen, Plaintiff had become one of the best riders in the Long Island Junior Ranks. He was ambitious, dedicated, and dreamed of competing at the Maclay Finals at Madison Square Garden. Like all young equestrians, he admired Morris.

65. It was not long before Plaintiff caught Morris's eye. Morris attended two shows in Nassau and Southampton every year. At the age of fourteen and fifteen, Plaintiff performed at two shows where Morris attended, at which time Morris approached Plaintiff's parents and told them that he wanted to train Plaintiff, exclaiming "What I could do with your boy!"

66. Morris promised Plaintiff's parents that he could make Plaintiff an extraordinary and famous rider. However, despite Plaintiff's dreams, training with Morris was simply too expensive for the middle class family.

67. Morris did not give up. Every time he saw Plaintiff perform, he told Plaintiff's parents to send the Plaintiff to train with him.

68. Finally, in the summer of 1977, when he was just seventeen years old, Plaintiff was sent to train with Morris at Hunterdon. One of about forty students under the age of eighteen training with Morris, Plaintiff was completely unknown in the national circuits. Morris quickly changed this. Morris put Plaintiff on a well-known horse that had taken another young rider to second place at the Medal Finals the year before. Plaintiff travelled to Florida with Morris for the annual circuit and quickly became one of the best junior riders (i.e., eighteen and under) in the country.

69. In April 1978, Morris invited Plaintiff to come to a clinic being held at Topping in Sagaponack, New York. Clinics—hosted, organized, and funded by the riding clubs—were opportunities for students from around the country to learn from trainers that they otherwise did not have access to.

70. Upon information and belief, Topping arranged lodging for the two students riding as demonstrators at the April 1978 clinic—Plaintiff and a young female rider. The clinic lasted two days, and Plaintiff stayed at a motel near Topping for the intervening night.

71. Plaintiff participated in the first full day of the clinic, where roughly fifty auditors were in attendance. After the clinic, Plaintiff returned to the motel where he was to stay for the night. Plaintiff did not tell Morris where the motel was or his room number.

72. After dinner, Plaintiff heard a knock at his motel room door. Morris was standing in Plaintiff's doorway.

73. Without conversation, Morris forced Plaintiff onto the bed, pressed his body against Plaintiff to restrain him, pinned down his wrists, and forcibly raped Plaintiff by anal penetration.

74. Plaintiff attempted to fight Morris off, screamed in pain, and repeatedly yelled “No!” and “Stop! It hurts!” Morris refused to stop. Plaintiff felt powerless to stop Morris's rape.

75. Once Morris finished his assault, he dressed and left the motel room without any further conversation. Plaintiff, shaken and in pain, stood in the motel room shower for what he remembers felt like hours, attempting to wash away the horror that was just inflicted upon him.

76. The next day, Plaintiff returned to the clinic at Topping. He did not mention the assault to Morris, and Morris did not mention the assault to Plaintiff. Plaintiff had made previous arrangements to leave the clinic early to attend an event in Syracuse.

77. As Plaintiff was leaving the clinic to leave early, the students in attendance began

to applaud. Morris interrupted the applause, telling the students that Plaintiff did not deserve adulation, but was lucky to be able to participate. Plaintiff left the event without any further discussion with Morris.

FORTY YEARS OF FEAR

78. Plaintiff returned to train with Morris at Hunterdon for the rest of the 1978 season, never telling a soul what happened. For six months, Plaintiff had to take orders and instruction from Morris. Plaintiff believed that to do anything else—to say anything to anyone—would end his riding career and of any hope of a career in the equestrian industry.

79. At the Maclay Finals that year, Plaintiff rode to second place on a championship horse that Morris helped his family purchase, earning the Reserve Champion title.

80. Plaintiff then moved onto a career in business. In 1988, he and another of Morris's former students opened a riding training facility, training horses and riders for competitions across the country. Eventually, Plaintiff began training for two prestigious families in the industry. He is known as an upstanding, honest, and likeable man throughout the equestrian industry.

81. In truth, however, Plaintiff was never able to move on from Morris's assault. Plaintiff never developed a romantic relationship throughout his entire adult life. He buried himself in his work. Morris continued to grow in fame and adoration. More and more young boys trained with Morris, and Morris gained international acclaim for his Olympic feats as Chef d'Equipe of the USET.

82. Slowly, allegations about sexual assault of minors by esteemed coaches in the USEF began to seep into the world. Plaintiff, having never told a soul about his abuse, began to develop greater and greater stress as stories began to surface.

83. Finally, in July 2018, knowing that another victim of Morris had reported his

abuse to SafeSport, Plaintiff spoke to a SafeSport investigator. Plaintiff recounted the story of his own abuse, but still—even forty years later—knew how much damage his coming forward could cause him. Morris was beloved. Virtually everyone of repute in the equestrian world had learned from or benefitted from knowing Morris in some way. He was responsible for the careers of all the best equestrians in America.

84. Plaintiff asked the SafeSport investigator to delay filing a claim until he could further consider the ramifications. Before long, the anguish was quite literally destroying Plaintiff from the inside out. In the fall of 2018, Plaintiff was rushed to the hospital with a blood pressure of 195 over 110. He spent two days in the hospital with severe symptoms and pain. Doctors, unable to find any physical symptoms, told him that he had had symptoms of a stroke or a heart attack.

85. In Spring 2019, he went to the Florida Mayo Clinic. There were no physical signs of any deterioration of Plaintiff's body. He otherwise was in perfect physical health. The doctors at the Mayo Clinic had only one conclusion—his emotional and mental stress caused his body to have the same symptoms as a heart attack or stroke.

86. That Spring, despite the consequences that he knew could come, Plaintiff decided that enough was enough, and informed SafeSport to proceed with his claim against Morris.

87. Immediately, Plaintiff's worst fears were imagined. Within days, word had leaked that he had filed a claim with SafeSport. On information and belief, Plaintiff's name was leaked to an industry public relations manager. The executive director of the USET Foundation and former executive director of USEF received a call from an industry public relations manager, asking her about Plaintiff's claim. Word was out.

88. In May of that year, as the equestrian community underwent its yearly move to New York, Plaintiff remained in Florida, as the prospect of being in New York among all of his

friends whose careers had been built by Morris when the allegations became truly public was too terrifying for Plaintiff to take.

**GEORGE MORRIS IS BANISHED FROM THE UNITED STATES EQUESTRIAN
INDUSTRY BY SAFESPORT FOR HIS SEXUAL ASSAULTS**

89. On August 5, 2019, SafeSport released its decision on the allegations of Plaintiff and another of Morris's victims. After a thorough investigation and the questioning of many witnesses, SafeSport found, on a preponderance of the evidence, that Plaintiff's allegations, as well as those of the other victim, were true. Morris had sexually assaulted two minors, violating multiple state laws, and the codes of conduct of USEF.

90. On information and belief, the SafeSport decision comported with the beliefs of senior USEF officials, including an Officer with the U.S. Equestrian Team Foundation who described Morris as a pervert.

91. SafeSport issued a provisional lifetime ban against Morris based on his egregious acts, precluding him from coaching any USEF member. In November 2019, an independent arbitrator upheld the ban after hearing from Morris himself, as well as several industry participants who argued that a lifetime ban was too severe a sentence.

92. During this time, the equestrian community rallied around Morris. Facebook groups were established in support of Morris. A GoFundMe account was established to raise funds for Morris's defense. #IStandWithGeorge trended on Twitter. Superstars of the sport derided SafeSport as a sham process, demanding to know the identities of Morris's accusers.

93. USEF remained silent. No one in leadership—not even the organization that had been responsible for Plaintiff as a child and to whom he had given his entire career—stood up for Plaintiff and the other victims.

94. It was not until November 2019, and only after an independent arbitrator upheld the SafeSport decision banning Morris because of his abuse, that the United States Horse

Jumping Association removed Morris's and Hunterdon's names from two of its most prestigious awards.

95. A November 19, 2019, piece from the New York Times publicizing the decision of the independent arbitrator, titled "George Morris, Equestrian Legend, Is Permanently Barred From the Sport," noted that the arbitrator's decision only made public what the industry had known all along. The article states that Morris's "relationships with his young students have long been whispered about on horse show grounds," but that "few would speak publicly . . . partly because of deference to his status as an equestrian legend, and partly out of fear of his ability to make or break careers."

96. Though names from the SafeSport proceedings are intended to be kept confidential, there are still those who know that Plaintiff was a complainant. People who had been Plaintiff's friends no longer even acknowledged his presence at competition events. Old colleagues would look the other way when they saw him coming. It appeared that all of USEF and its members valued what Morris had done for their careers over his brutal rape of a young child.

FIRST CAUSE OF ACTION: SEXUAL BATTERY

(Against Defendant Morris)

97. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent paragraphs of this Complaint as if fully set forth herein.

98. In approximately April 1978, when Plaintiff was under the age of 18, Morris inflicted unpermitted, harmful, and offensive sexual contact upon the person of Plaintiff.

99. As a direct result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with severe mental and emotional distress including, but not limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or family,

hypervigilance, a lost sense of worth, a sense of being tainted, and other physical, emotional, and psychological injuries and other economic damages according to proof at the time of trial.

100. Plaintiff is therefore entitled to recover damages in an amount to be proven at trial, including compensatory damages, and any other relief that the court may deem proper.

101. Morris's conduct was intentional, extreme, and outrageous, entitling Plaintiff to an award of punitive damages.

SECOND CAUSE OF ACTION: NEGLIGENCE
(Against All Defendants)

102. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent paragraphs of this Complaint as if fully set forth herein.

103. Defendants' conduct, actions, and failure to act served to create an environment in which Morris was afforded years of continuous secluded access to minor children, including Plaintiff, who was 17 years of age at the time Morris sexually abused him.

104. Each Defendant owed Plaintiff a duty of reasonable care to protect Plaintiff from injury.

105. Defendants also had a duty arising from the special relationship that existed with Plaintiff, and other young, vulnerable children, to properly train and supervise its employees and agents. This special relationship arose because of the high degree of vulnerability of the children entrusted to their care. As a result of this high degree of vulnerability and risk of sexual abuse inherent in such a special relationship, Defendants had a duty to establish measures of protection not necessary for persons who are older and better able to safeguard themselves.

106. Each Defendant owed Plaintiff a duty to protect Plaintiff from harm because each Defendant also had a special relationship with Morris.

107. Each Defendant owed Plaintiff a duty to control the conduct of Morris because each Defendant had complete ability to control Morris's access to children like Plaintiff to

prevent the foreseeable harms associated with childhood sexual abuse, giving rise to a special relationship with Morris and a duty to control Morris's conduct.

108. Defendants owed Plaintiff a duty of reasonable care because they solicited youth and for participation in their Junior Riders leagues; encouraged youth and parents to have the youth participate in their programs; promoted their facilities and programs as being safe for children; held their agents and employees, including Morris, out as safe to work with children; encouraged parents and children to spend time with their agents; and/or encouraged their agents, including Morris, to spend time with, interact with, and recruit children.

109. Defendants, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted a position of empowerment over children at Defendants' events. Defendants, through their employees and agents, exploited this power over Plaintiff and, thereby, put the minor Plaintiff at risk for sexual abuse.

110. Defendants had a duty of reasonable care to enact policies and procedures to protect minor athletes, such as Plaintiff, from sexual assault and molestation by trainers and other persons in authority.

111. By virtue of his unique authority and position as an elite trainer within USEF and at Topping, Morris was able to take advantage of minor amateur athletes and their families, such as Plaintiff, upon which he could perform sexual assault; to manipulate his authority to procure compliance with his sexual demands from his victims; to induce the victims to continue to allow the assault; and to coerce them not to report it to any other persons or authorities. As an elite trainer, Morris had unique access to, and was in a position of authority among, minor amateur athletes who were actively involved in training at riding club clinics that he taught and competing at events sponsored by USEF and/or Topping.

112. While Plaintiff was a student of Morris's, as a member, employee, agent, or

representative of USEF, and an invitee of Topping, Morris engaged in an illegal, harmful, and offensive sexual assault against Plaintiff. Said conduct was undertaken after Defendants knew or should have known of the risk Morris posed to children as a member, employee, agent or representative, and while in the course and scope of Morris's role with Defendants, and/or was ratified by the actions of Defendants.

113. Defendants knew or should have known that Morris, as their member, employee, agent, or representative, was spending time, and would continue to spend time, in the company of and assaulting numerous children, including Plaintiff.

114. Defendants knew or should have known that Morris committed these acts against children throughout the country and the world as he travelled on their behalf and at their invitation to train child athletes for participation in their events, for competition in USEF tournaments, for qualification for the USET, and at the facilities that showcased the horses and talent used in their public demonstrations.

115. Defendants had or should have had notice of prior acts of misconduct by Morris due to the public knowledge of Morris's predilections, his well-known prior assaults of minors, and his public acts of indecency around minors. Morris's outrageous conduct was public and flaunted by Morris, but deliberately overlooked by Defendants for their own personal gain. Defendants, as employers and licensors of Morris, were well aware of his public persona and the pre-existing allegations of misconduct against Morris at the time of his assault of Plaintiff. At the very least, Defendants knew or should have known that they did not have sufficient information about whether or not their young competitors and people working at USEF and/or Topping events were safe.

116. Defendants knew or should have known that there was a risk of child sex abuse for children within the USEF. At the very least, Defendants knew or should have known that

they did not have sufficient information about whether or not there was a risk of child sex abuse for children within the USEF.

117. Defendants knew or should have known that children exposed to Morris were substantially certain to be at risk of sexual assault by Morris.

118. Despite this knowledge, however, Defendants negligently deemed that Morris was fit to work with children; and/or that any previous suitability problems Morris had were fixed and cured; and/or that Morris would not sexually molest children; and/or that Morris would not injure children.

119. Defendants knew or should have known, and had the opportunity to learn of, the intentional and malicious conduct of Morris, and thereby ratified and joined in said conduct by failing to terminate, bar, disinvite, publicly admonish, or discipline Morris and/or by failing to warn anyone of Morris's known behaviors and/or by preventing contact between Morris and children.

120. Each Defendant breached its duties to Plaintiff. Defendants' breach of their duties include, but are not limited to: failure to protect Plaintiff from a known danger, failure to have sufficient policies and procedures in place to prevent child sex abuse, failure to properly implement policies and procedures to prevent child sex abuse, failure to take reasonable measures to ensure that policies and procedures to prevent child sex abuse were working, failure to adequately inform families and children of the risks of child sex abuse, failure to investigate risks of child molestation, failure to properly train the employees at institutions and programs within Defendants' geographical confines, failure to train the minors within Defendants' geographical confines about the dangers of sexual abuse, failure to have any outside agency test their safety procedures, failure to protect the children in their programs from child sex 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 the institutions, programs, leaders and people as safe, and failure to train their employees properly to identify signs of child molestation.

121. Defendants also breached their duty to Plaintiff by failing to warn Plaintiff of the risk that Morris posed and the risks of child sexual abuse in the equestrian industry. They also failed to warn them about any of the knowledge that Defendants had about child sexual abuse.

122. Defendants breached their duties to Plaintiff by failing to use reasonable care. Defendants' failures include, but are not limited to, failing to properly supervise Morris and failing to protect Plaintiff from a known danger.

123. Defendants' actions created a foreseeable risk of harm to Plaintiff. As a vulnerable child who Morris had access to through Defendants' facilities and programs, Plaintiff was a foreseeable victim.

124. As a direct result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with severe mental and emotional distress including, but not limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or family, hypervigilance, a lost sense of worth, a sense of being tainted, and other economic damages according to proof at the time of trial.

125. Plaintiff is therefore entitled to recover damages in an amount to be proven at trial, including compensatory damages, and any other relief that the court may deem proper.

THIRD CAUSE OF ACTION: NEGLIGENT SUPERVISION/FAILURE TO WARN
(Against Defendants USEF, Topping, and DOES 1-5)

126. Plaintiff repeats, re-alleges and incorporates herein by reference all consistent paragraphs of this Complaint as if fully set forth herein.

127. As an elite riding club entrusted with the care of minors, where all minor amateur athletes are entrusted to trainers and coaches, Topping expressly and implicitly represented that these individuals, including Morris, were not a sexual threat to children and others who would

fall under Defendants' influence, control direction, and guidance.

128. As an organization designed to govern its members and protect amateur athletes, where all minor amateur athletes are entrusted to trainers and coaches at events, USEF expressly and implicitly represented that these individuals, including Morris, were not a sexual threat to children and others who would fall under Defendants' influence, control direction, and guidance.

129. At all times material, Morris was employed by or was an agent of Defendants and was under each Defendant's direct supervision, employ, and control when he committed the wrongful acts alleged herein. Morris engaged in the wrongful conduct while acting in the course and scope of his employment or agency relationship with Defendants and/or accomplished the sexual abuse by virtue of his USEF-created authority.

130. Defendants had a duty, arising from their employment or agency relationship with Morris, to ensure that he did not sexually molest children. Defendants also owed a duty to train and educate employees, administrators, and agents, and establish adequate and effective policies and procedures calculated to detect, prevent, and address inappropriate behavior and conduct with children.

131. The tortious conduct complained of herein occurred on Defendants' property, and/or with the use of their chattels, and/or at Defendants' events and competitions.

132. At no time did Defendants have a reasonable system or procedure in place to investigate, supervise, or monitor their staff and/or agents, including Morris, to prevent pre-sexual grooming and sexual harassment, molestation, and assault of children.

133. Defendants, by and through their agents, servants, and employees, knew or should have known of Morris's sexually abusive and exploitative propensities and/or that Morris was an unfit agent. Despite such knowledge, Defendants negligently failed to supervise Morris in his position of trust and authority as an elite trainer, in which position he was able to commit the

wrongful acts against Plaintiff alleged herein. Defendants failed to provide reasonable supervision of Morris, failed to use reasonable care in investigating Morris, and failed to provide adequate warning to Plaintiff and his family regarding Morris's sexually abusive and exploitative propensities and unfitness. Defendants further failed to take reasonable measures to prevent future sexual assault against minors.

134. Defendants breached their duty to Plaintiff by, *inter alia*, failing to adequately monitor and supervise Morris and failing to stop Morris from committing wrongful sexual acts with minors, including Plaintiff. Defendants also breached their duties to Plaintiff by actively maintaining an employment or agency relationship with Morris, who was in a position of power and authority through which Morris had access to children and power and control over children, including Plaintiff.

135. Defendants were negligent in the training, supervision, and instruction of their employees and agents. Defendants failed to timely and properly educate, train, supervise, and/or monitor their agents or employees with regard to policies and procedures that should be followed when sexual abuse of a child is suspected or observed. Defendants were additionally negligent in failing to supervise, monitor, chaperone, and/or investigate Morris and/or in failing to create, institute, and/or enforce rules, policies, procedures, and/or regulations to prevent Morris's sexual abuse of Plaintiff. In failing to properly supervise Morris, and in failing to establish such training procedures for employees and administrators, Defendants failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances.

136. As a direct result of the foregoing, Plaintiff sustained physical, emotional, and psychological injuries, along with severe mental and emotional distress including, but not limited to severe anxiety, feelings of self-blame, feelings of estrangement from friends and/or family, hypervigilance, a lost sense of worth, a sense of being tainted, and other economic damages

according to proof at the time of trial.

137. Plaintiff is therefore entitled to recover damages in an amount to be proven at trial, including compensatory damages, and any other relief that the court may deem proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief against Defendants:

1. For past, present, and future general damages in an amount to be determined at trial;
2. For past, present, and future special damages, including but not limited to past, present and future lost earnings, economic damages, and others in an amount to be determined at trial;
3. Any appropriate statutory damages;
4. For cost of suit;
5. For interest as allowed by law;
6. For any appropriate punitive or exemplary damages as to Defendant Morris; and
7. For such other and further relief as the Court may deem proper.

The amount of damages sought in this Complaint exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable. Pursuant to § 4 of the New York Child Victims Act, Plaintiff is entitled to a trial preference.

Dated: August 5, 2020
New York, New York

/s/ Michael Reck

Michael Reck

Trusha Goffe

Nahid Shaikh

JEFF ANDERSON & ASSOCIATES, P.A.

55 West 39th Street, 11th Floor

New York, NY 10018

Telephone: (646) 759-2551

Email: MReck@AndersonAdvocates.com

Email: Trusha@AndersonAdvocates.com

Email: Nahid@AndersonAdvocates.com

Matthew S. Ingles

GREENBERG GROSS LLP

01 S. Figueroa Street, 30th Floor

Los Angeles, CA 90017

Telephone: (949) 383-2800

Email: MIngles@GGTrialLaw.com

Counsel for Plaintiff