

DOCKET NO: LLI-CV-21-5014019-S

JON A. GOODWIN	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	JUDICIAL DISTRICT
v.	:	OF LITCHFIELD
	:	
RAYMOND J. MILOT, JUNIOR;	:	
JOANNE M. IURATO;	:	
KAREN HARDY-MASSARO;	:	
<i>Defendants</i>	:	OCTOBER 19, 2022

Plaintiff Jon A. Goodwin as and for causes of action against the above-named defendants alleges as follows:

COUNT ONE

1. Plaintiff, Jon A. Goodwin, is and has, at all times relevant hereto, been a private citizen of the United States and a resident of the State of Connecticut residing in New Milford. The plaintiff has enjoyed an excellent reputation for being an honest, fair and law-abiding person.

2. Defendant, Joanne M. Iurato ("Joanne Iurato"), is an adult citizen of the United States who resides in Ridgefield, Connecticut and operates a place of business in Brookfield, Connecticut.

3. On October 10, 2019, in the State of Connecticut, defendant Joanne Iurato falsely stated orally to Raymond J. Milot and the Connecticut Department of Children and Families ("DCF") that the plaintiff abused minor child Boy N, including by placing him in a "basket hold."

4. Defendant Joanne Iurato knew her statement was false or acted with reckless disregard for its truth when she made it.

5. As a direct and proximate result of defendant Joanne Iurato's actions, the plaintiff was subjected to investigative proceedings by DCF, has been assaulted, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for slander per se.

COUNT TWO

1 – 5 Paragraphs 1 through 5 of the First Count are incorporated into this Second Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THREE

1 – 5. Paragraphs 1 through 5 of the First Count is incorporated into this Third Count as if fully set forth herein.

6. The actions of defendant Joanne Iurato were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

7. As a result of the foregoing acts and/or omissions, defendant Joanne lurato caused the plaintiff to suffer severe mental and emotional distress and has therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Joanne lurato for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT FOUR

1 – 7. Paragraphs 1 through 7 of the First Count are incorporated into this Fourth Count as if fully set forth herein.

8. At the time she her said false accusation, defendant Joanne lurato knew, or in the exercise of reasonable care, should have known the accusations were not true.

9. At the time she made her said false accusations, defendant Joanne lurato knew, or in the exercise of reasonable care, should have known that her conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

10. As a result of the foregoing acts and/or omissions, defendant Joanne lurato caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne lurato for compensatory and special damages for negligent infliction of emotional distress.

COUNT FIVE

1 – 10. Paragraph 1 of the First Count is incorporated into this Fifth Count as if fully set forth herein.

11. Defendant Raymond J. Milot, Junior ("Milot"), is an adult citizen of the United States residing in New Milford, Connecticut.

12. Defendant Raymond Milot is the ex-husband of Christine Jowdy ("Jowdy").

13. Plaintiff has known Ms. Jowdy since 1995.

14. Defendant Raymond Milot and Ms. Jowdy were divorced June 20, 2019.

15. The plaintiff began living with Ms. Jowdy in late September 2019.

16. During their marriage, plaintiff, and defendant Raymond Milot, had three children, a male child born June 9, 2004 ("Boy C"), a female child born December 27, 2006 ("Girl H"), and a male child born June 19, 2009 ("Boy N"), collectively the "JM Children."

17. Defendant Raymond Milot has waged a custody battle with Ms. Jowdy.

18. At all times relevant hereto, Ms. Jowdy has shared physical custody of defendants Boy N, Girl H and Boy C (the "Jowdy/Milot Children") with defendant Raymond Milot.

19. To further a defamation campaign, he has waged against the plaintiff, frame the plaintiff for abusing the JM Children, and cause plaintiff to move out of the community in which he lives with Ms. Jowdy, defendant Raymond Milot has:

- a. Encouraged Girl H and Boy N to instigate fights at Ms. Jowdy's home in order to precipitate complaints of abuse or neglect of the JM Children to the Connecticut Department of Children and Families ("DCF");
- b. Encouraged the JM Children to take photos and videos of plaintiff's and Ms. Jowdy's reaction and restraint of the JM Children;

- c. Encouraged Girl H and Boy N to violently attack Ms. Jowdy to cause the plaintiff to intercede and restrain them;
- d. Encouraged the JM Children to provide him information regarding the whereabouts and activities of the plaintiff and Ms. Jowdy;
- e. Used photographs and videos taken inside and around the plaintiff's and Ms. Jowdy's residence, without their authorization, to instigate reports to the Connecticut Department of Children and Families through mandated reporters i.e., school staff, therapists, law enforcement personnel, etc.;
- f. Undermined Ms. Jowdy's authority with the JM Children;
- g. Interferes with Ms. Jowdy's custody of Girl H and Boy N;
- h. Used Girl H and Boy N to communicate threats to plaintiff, including on:
 - (i) October 31, 2019 that defendant Raymond Milot is going to "get" plaintiff; and (ii) November 2, 2019 that defendant Raymond Milot is going to obtain a restraining order against the plaintiff, and that defendant Raymond Milot "is going to use poison on" the plaintiff;
- i. Instructed Girl H to destroy evidence;
- j. Encouraged Girl H and Boy N to battery Ms. Jowdy when they are being disciplined to get what they want and/or to cause the plaintiff to restrain them;
- k. Encouraged Girl H and Boy N to battery the plaintiff to attempt to cause him to restrain them; and
- l. Encouraged Boy H to battery the plaintiff when being restrained by him.

20. From September 30, 2019, in the State of Connecticut, defendant Raymond Milot stalked the plaintiff obtaining private information regarding the plaintiff supplied him by Boy C, Girl H and Boy N which information included: (i) photographs and videos of the plaintiff and the plaintiff's personal property, taken within the plaintiff's residence, without the plaintiff's consent or knowledge; and (ii) information regarding the plaintiff's whereabouts, movements and plans.

21. The plaintiff is informed and believes and thereon alleges that, despite knowing defendant Joanne Iurato's reporting of the plaintiff to DCF, described in paragraph 3, was based on the false allegation the plaintiff abused Boy N including by placing Boy N in a "basket hold," or, acting with reckless disregard for whether defendant Joanne Iurato's said reporting to DCF regarding plaintiff was truthful that, from on or after October 10, 2019 until a date uncertain, in the State of Connecticut, defendant Raymond Milot maliciously, orally stated, to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives, that the plaintiff "abused" Boy N and is subject to an investigation by DCF for abusing Boy N.

22. On November 1, 2019, when Girl H was staying at Ms. Jowdy's and the plaintiff's residence, in New Milford, Connecticut, defendant Raymond Milot met with Girl H in his vehicle outside Ms. Jowdy's residence.

23. Upon information and belief, during their meeting, defendant Raymond Milot encouraged Girl H to instigate a physical altercation with Boy N, to cause the plaintiff to restrain him so Girl H could use her phone to create a video of such restraints to be used to initiate a false report of child abuse to the DCF and law enforcement agencies.

24. Immediately upon her returning from meeting defendant Raymond Milot, Girl H began agitating Boy N.

25. At approximately 19:25 EDT on November 1, 2019, Boy N attacked Girl H with a weapon he manufactured with bolts he taped between his fingers in a manner that they protruded from his fist approximately one inch.

26. Ms. Jowdy, blocked Boy N from assailing Girl H then summoned the plaintiff to assist her.

27. As soon as the plaintiff removed the bolts from Boy N's fists, using her phone, Girl H began videoing the plaintiff, who was working to restrain Boy N to prevent him from continuing to attack Ms. Jowdy and Girl H.

28. At approximately 19:28 EDT on November 1, 2019, Girl H texted defendant Raymond Milot at video of the plaintiff restraining Boy N.

29. At approximately 19:32 EDT on November 1, 2019, Girl H texted defendant Raymond Milot a link to a photograph or video file that Girl H took of the plaintiff that was stored in an Apple, Inc. iCloud account.

30. While the plaintiff restrained Boy N, Ms. Jowdy summoned the New Milford Police by calling 911 dispatch.

31. After investigation the New Milford Police officers who responded to Ms. Jowdy's 911 call did not find there was any crime committed by an adult.

32. Plaintiff did not authorize defendant Raymond Milot or Girl H to video or photograph him in his residence.

33. During the morning of November 3, 2019, defendant Raymond Milot, in the presence of Girl H and Boy N, falsely stated to officer Dylan McIntyre of the New Milford Police Department that the plaintiff is a “psycho,” “abusive” and “under investigation by DCF.”

34. In the presence of Girl H and Boy N, defendant Raymond Milot encouraged Dylan McIntyre to “file a report with DCF” against the plaintiff.

35. Defendant Raymond Milot knew his statement that the plaintiff abused Boy N and is a psycho was false or acted with reckless disregard for its truth when he made it.

36. Despite his knowing the New Milford Police cleared the plaintiff of any wrongdoing on the evening of November 1, 2019, on November 4, 2019, defendant Raymond Milot encouraged and/or aided, Girl H to report to a member of her school’s staff, known only to plaintiff as “Mrs. Hamilton,” that plaintiff “abused” Boy N on November 1, 2019.

37. Plaintiff is informed and believes and thereon alleges that Girl H showed “Mrs. Hamilton” the video she made of plaintiff restraining Boy N November 1, 2019.

38. Mrs. Hamilton contacted DCF and reported defendant Raymond Milot’s and Girl H’s false allegations to them.

39. Plaintiff is informed and believes thereon and alleges that DCF employees reviewed Girl H’s false accusations and the video she took of the incident.

40. Defendant Raymond Milot knew that the allegation that plaintiff abused Boy N was false or acted with reckless disregard for its truth. Despite that defendant Raymond Milot encouraged and/or aided Girl H to repeat the false allegation plaintiff “abused” Boy N and to publish the video she took without plaintiff’s consent.

41. The plaintiff is informed and believes thereon and alleges that, defendant Raymond Milot encouraged Girl H to maliciously, repeat the false accusation that the plaintiff abused Boy N to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives as follows:

- a. On November 11, 2019, Girl H falsely and maliciously stated in writing to a person identified as "Victor-in-Secret" that the plaintiff "held [Boy N] back in a way that could've broken his neck"; and
- b. On March 21, 2020, Girl H stated in writing to persons known and unknown to the plaintiff that the plaintiff is: (i) "abusive ... and trying to take [her] phone", (ii) she couldn't go back to her [mother's] house [because the plaintiff is] abusive" and (iii) the plaintiff "bullies [her] all the time.

42. Defendant Raymond Milot, in the State of Connecticut, knowingly, willfully, and, with malicious intent, encouraged, instigated, coordinated, participated in or monitored threatening, assaultive and violent incidents by Boy N and Girl H at the plaintiff's and Ms. Jowdy's residence to unjustly vex, annoy, trouble, harass, assault and battery the plaintiff, to video the plaintiff's responses, for use to instigate complaints of child abuse against the plaintiff to DCF which incidents included:

- a. During the evening of October 8, 2019, defendant Boy N, intending to cause harmful contact with the plaintiff's person, without the plaintiff's consent, kicked him numerous times;

- b. During the evening of October 31, 2019, Boy N informed the plaintiff, that defendant Raymond Milot intended to “get him”;
- c. During the evening of November 1, 2019, while grappling with his mother, and attempting to attack Girl H with an improvised weapon, Boy N, intending to cause harmful contact with the plaintiff’s person, without the plaintiff’s consent, kicked the plaintiff numerous times;
- d. During the evening of November 3, 2019, Boy N and Girl H informed the plaintiff that defendant Raymond Milot was obtaining a restraining order against him;
- e. On March 15, 2020, Boy N informed the plaintiff that Raymond Milot was going to “use poison on him and [Ms. Jowdy]”;
- f. On March 21, 2020, during an altercation with her mother, Girl H, intending to provoke the plaintiff into restraining her, shoved the plaintiff and poked at his chest, without the plaintiff’s consent; and
- g. On March 22, 2020, in defiance of Ms. Jowdy’s directive for her to remain outside Ms. Jowdy’s and the plaintiff’s residence until she returned, Girl H entered the residence and harassed the plaintiff, screaming at him that he is a “bitch” and an “imposter” while he was eating dinner which, upon information and belief, was an attempt to cause the plaintiff to physically remove her from his residence which the plaintiff did not.

43. To fraudulently cause Boy N’s psychiatrist, Dr. Khalil, to allege to DCF that the plaintiff abused Boy N, on November 26, 2019, defendant Raymond Milot knowingly or

recklessly misrepresented to Dr. Khalil that plaintiff “abused” Boy N, “threatened to break [Boy N’s] neck;” and “picked [Boy N] up by his shins[,] held him upside down & dangled him over the porch”.

44. On November 26, 2019, defendant Raymond Milot caused Boy N to:

(i) misrepresent to Dr. Khalil that Mr. Goodwin “dangled me from my ankles off the fence of the porch”; (ii) caused Boy N to misrepresent to Dr. Khalil that Mr. Goodwin threatened to “lift me upside & drop me off the porch;” (iii) caused Boy N to misrepresent to Dr. Khalil that Mr. Goodwin “pushed” Boy N around; (vi) and caused Boy N to ask Dr. Khalil “will you let him do it again ... John?” to fraudulently cause Dr. Khalil to report plaintiff to DCF.

45. Dr. Khalil was so outraged by defendant Raymond Milot’s and Boy N’s false statements, that he reported Mr. Goodwin to DCF and, to ensure DCF investigated his report, Dr. Khalil knowingly and falsely informed a DCF staff member that “[Boy N] is not a violent child.”

46. Upon information and belief, on or about March 21, 2020, defendant Raymond Milot caused Girl H, in the State of Connecticut, to falsely and maliciously orally state to John Sands and Leslie Sands that the plaintiff “threatened” her.

47. Upon information and belief, in or after April 2020, defendant Milot falsely accused or caused the plaintiff to be falsely accused of abusing Boy H to members of the Giordano, Claxton, Sands and/or Sopko families.

48. Plaintiff is informed and believes and alleges thereon that on or after September 16, 2020, defendant Raymond Milot published or caused to be published a Connecticut Juvenile

Court document falsely referring to the plaintiff as a “party” to the action to persons not permitted by law to receive the document.

49. The plaintiff has never been a party to any juvenile court action in Connecticut or anywhere.

50. Defendant Raymond Milot knew that plaintiff was not a party to the juvenile case to which the document is related.

51. Defendant Raymond Milot’s disclosure of the document violated C.G.S. § 46(b) – 124 (b), (c).

52. At the time defendant Raymond Milot published the juvenile court document containing the false statement that the plaintiff is a party to the juvenile action, defendant Raymond Milot knew or in the exercise of reasonable care should have known the said statement in the document regarding the plaintiff was false or acted with reckless disregard for its truth when he made it.

53. As a direct and proximate result of defendant Raymond Milot’s actions, the plaintiff was subjected to investigative proceedings by DCF, has been assaulted, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander per se.

COUNT SIX

1 – 53. Paragraphs 1 through 53, inclusive, are incorporated into this Sixth Count as if fully set forth herein.

54. Defendant Raymond Milot without the plaintiff's knowledge or consent, published, caused, or agreed to publish the said private information above regarding the plaintiff to DCF and other third parties, including neighbors and members of the community in which the plaintiff resides, falsely informing them or causing them to be falsely informed that DCF is investigating the plaintiff for abusing Boy N, thereby violating the plaintiff's right to privacy.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT SEVEN

1 – 54. Paragraphs 1 through 54, inclusive, are incorporated into this Seventh Count as if fully set forth herein.

55. Defendant Raymond Milot's intentional intrusions, upon the plaintiff's private affairs and concerns, would be highly offensive to a reasonable person.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT EIGHT

1 – 55. Paragraphs 1 through 55, inclusive, are incorporated into this Eighth Count as if fully set forth herein.

56. Defendant Raymond Milot without the plaintiff's knowledge or consent, published, caused, or agreed to publish the said private information above regarding the plaintiff to DCF and other third parties, including neighbors and members of the community in which the plaintiff resides, noting to them DCF investigating the plaintiff for abusing Boy N, thereby violating the plaintiff's right to privacy.

57. Defendant Raymond Milot obtained, published caused, or agreed to publish the said private information to place the plaintiff in false light with third parties causing them to file false reports regarding the plaintiff with DCF and causing DCF personnel to investigate the plaintiff.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT NINE

1 – 56. Paragraphs 1 through 56, inclusive, are incorporated into this Ninth Count as if fully set forth herein.

58. Through his coordination of Boy N's and Girl H's actions, defendant Raymond Milot, intended to cause and did cause plaintiff to suffer apprehension of immediate harmful contacts.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for assault.

COUNT TEN

1 – 58. Paragraphs 1 through 58, inclusive, are incorporated into this Tenth Count as if fully set forth herein.

Through his coordination of Boy N's and Girl H's actions, defendant Raymond Milot, intended to cause and did cause plaintiff to suffer apprehension of immediate harmful contacts.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for battery.

COUNT ELEVEN

1 – 58. Paragraphs 1 through 58, inclusive, are incorporated into this Eleventh Count as if fully set forth herein.

59. Defendant, Karen Hardy-Massaro ("Karen Hardy-Massaro"), is an adult citizen of the United States who resides in Cheshire, Connecticut.

60. On June 11, 2021, in the State of Connecticut, during a public, virtual school meeting regarding Boy N, attended by approximately thirteen (13) persons, defendant Karen Hardy-Massaro orally informed meeting attendees that, pursuant to an order of the Juvenile Court, the plaintiff is not allowed around the Milot children.

61. Karen Hardy-Massaro's public disclosure of information pertaining to juvenile court orders violated C.G.S. § 46(b) – 124 (b), (c).

62. Defendant Karen Hardy-Massaro knew her statement was false or acted with reckless disregard for its truth when she made it.

63. As a direct and proximate result of defendant Karen Hardy-Massaro's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

64. Upon hearing defendant Karen Hardy-Massaro's false accusation, during the meeting, the plaintiff informed Karen Hardy-Massaro that her statement was defamatory. Despite that, Karen Hardy-Massaro refused to retract her statement.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for slander per se.

COUNT TWELVE

1 – 64. Paragraphs 1 through 64, inclusive, are incorporated into this Twelfth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THIRTEEN

1 – 64. Paragraphs 1 through 64, inclusive, are incorporated into this Thirteenth Count as if fully set forth herein.

65. The actions of defendant Karen Hardy-Massaro were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

66. As a result of the foregoing acts and/or omissions, defendant Karen Hardy-Massaró caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaró for compensatory, special, and punitive damages for intentional infliction of emotional distress

COUNT FOURTEEN

1 – 66. Paragraphs 1 through 66, inclusive, are incorporated into this Fourteenth Count as if fully set forth herein.

67. As a result of defendant Raymond Milot's aforesaid malicious actions targeting the plaintiff, opportunities for the plaintiff to raise capital for his venture and engage in business opportunities with members of his community are forever severely impeded.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Girl H for compensatory, special, and punitive damages for tortious interference with business relationships and expectations.

COUNT FIFTEEN

1 – 67. Paragraphs 1 through 67, inclusive, are incorporated into this Fifteenth Count as if fully set forth herein.

68. Despite knowing, on or about November 4, 2019, of a pending or impending civil action involving the plaintiff, defendant Raymond Milot destroyed, agreed to destroy or caused the destruction of evidence, in bad faith, with the intent to deprive the plaintiff of causes of action against him and others with whom he has confederated to damage the plaintiff.

69. Without the plaintiff's inability to establish *prima facie* cases of libel *per se* and related claims of false light invasion of privacy, invasion of privacy, tortious interference with

business relationships and expectations and intentional infliction of emotional distress without the spoliated evidence.

WHEREFORE, the plaintiff claims judgement for compensatory, special, and punitive damages against defendant Raymond Milot for the intentional spoliation of evidence.

COUNT SIXTEEN

1 – 69. Paragraphs 1 through 69, inclusive, are incorporated into this Sixteenth Count as if fully set forth herein.

70. The conduct of defendant Raymond Milot described above was extreme and outrageous and was carried out for the purpose of inflicting emotional distress and injury upon the plaintiff.

71. Defendant Raymond Milot by his said actions intended to cause the plaintiff emotional distress or were reckless in their failure to realize that emotional distress was a likely result of this conduct.

72. As a result of the foregoing acts and/or omissions, defendant Raymond Milot caused the plaintiff to suffer severe mental and emotional distress and have therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT SEVENTEEN

1 – 72. Paragraphs 1 through 72, inclusive, are incorporated into this Seventeenth Count as if fully set forth herein.

73. At all times relevant herein, defendant Raymond Milot: (a) knew or had reason to know of the necessity for him to control Girl H, Boy N and Boy C; (b) had the ability or opportunity to control Girl H, Boy N and Boy C; and (c) did not exercise reasonable care to prevent injuries to the plaintiff by Girl H, Boy N and Boy C.

74. At all times relevant herein, the defendant Raymond Milot was the natural guardian and natural parent of Girl H, Boy N and Boy C, who were members of Raymond Milot's household and/or over who defendant Raymond Milot could exercise control at the time of their intentional, wanton and malicious actions toward the plaintiff which resulted in the plaintiff's injuries and damages described above.

75. The plaintiff's injuries and damages were caused by defendant Raymond Milot's misuse of Girl H, Boy N and Boy C as confederates and proxies to willful and maliciously commit unlawful and tortious acts.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for vicarious liability for the torts of minors.

COUNT EIGHTEEN

1 – 75. Paragraphs 1 through , inclusive, are incorporated into this Eighteenth Count as if fully set forth herein.

76. The plaintiff's injuries and damages were caused by the negligence of defendant Raymond Milot, in that he failed to restrain Girl H, Boy N and Boy C, failed to exercise reasonable care in controlling them, and failed to properly supervise them despite his knowledge of their injurious propensities, or should have known of their injurious propensities.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, and special damages for negligent supervision of minors.

THE PLAINTIFF

BY _____ /s/ (#067962)
JOHN R. WILLIAMS (#67962)
51 Elm Street
New Haven, CT 06510
203-562-9931
Fax: 203-776-9494
jrw@johnrwilliams.com

CERTIFICATION OF SERVICE

On the above date, copies hereof were sent to: Rebecca Mayo Goodrich, LLC, P. O. Box 1420, New Milford, CT 06076, rmg@mayogoodrichlaw.com; and <mailto:lwaltman@danaherlagnese.com>; <mailto:pderiso@danaherlagnese.com>; <mailto:mkiwczun@danaherlagnese.com>; Samantha C. Wong, Esq., and James M. Belforti, Esq., Assistant Attorneys General, 110 Sherman Street, Hartford, CT 06105, james.belforti@ct.gov; samantha.wong@ct.gov; <mailto:estockman@stockmanoconnor.com>; <mailto:vruszkowski@stockmanoconnor.com>;

/s/ (#067962)
JOHN R. WILLIAMS