

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

JONATHAN SORESI,

Plaintiff,

- against -

GEORGE MORRIS; THE
UNITED STATES
EQUESTRIAN FEDERATION,
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 and many of the events giving rise to this action occurred in New York, New York.

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

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**COMPLAINT
AND DEMAND
FOR JURY TRIAL**

Plaintiff Jonathan Soresi (“Mr. Soresi” or “Plaintiff”), by his attorneys, brings this action against Defendants George Morris (“Morris”), the United States Equestrian Federation, Inc. (“USEF”), and Does 1–5 (together, “Defendants”), and alleges 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. Mr. Soresi began competing in horse shows around the Virginia area at the age of eight or nine. By his sophomore year in high school, Mr. Soresi was a working student at Stonehedge Farms in Chicago, Illinois, and he regularly participated in horse-riding competitions around the country. As a young, dedicated, aspiring equestrian, Mr. Soresi’s goal was to go to the Olympics as an equestrian. To achieve his goal, Mr. Soresi attended USEF events as an employee of Stonehedge Farms so that he could also compete at the events, and hopefully qualify for the National Horse Show, and the Olympics thereafter.

3. At this time, Mr. Soresi attracted the attention of the most well-known and

admired riding trainer in the country—Morris. Over the next year, Mr. Soresi met Morris at various clinics taught by Morris and at horse shows, including in Pennsylvania, Ohio, and New York. At these venues, Morris would provide Mr. Soresi with mentorship and assistance, including providing horses or using his connections to get good horses for Mr. Soresi to ride, thereby increasing Mr. Soresi’s chances of performing well at the shows and securing a coveted spot in the final McClay championship.

4. 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 world. Indeed, he has been dubbed the “Equestrian Kingmaker.” 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 a world-class inventory of horses, training with Morris was considered an extraordinary privilege and a ticket to fame and success.

5. Amidst the admiration for Morris’s talent and stature, the equestrian industry 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 nightclubs and parties.

6. Mr. Soresi, taken under Morris’s wing, became a victim of these very abuses. While attending USEF horse shows, Mr. Soresi, then a minor, was sexually assaulted by Morris on numerous occasions. Morris used his mentorship, free help, advice, and a horse he provided to improve Mr. Soresi’s riding skills and profile in the equestrian community to gain access to sexually assault Mr. Soresi and keep him quiet about the assaults.

7. Mr. Soresi was an obvious mark for a pedophile like Morris—he was very attractive, ambitious, poor, and isolated as he attended shows without his parents. Against the

grandeur and celebrity of Morris, Mr. Soresi could only do what so many of Morris's victims did—stay silent, so as not to risk their entire career within the equestrian community.

8. For decades, Morris was highly influential and sat in a position of power in the equestrian world, and was protected and empowered by the USEF, 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.

9. 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.

10. 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 through his sexual abuse of Mr. Soresi and others.

11. 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 events. Yet despite the clarion voices of survivors and the SafeSport decision, the equestrian community has continued to rally around Morris, claiming that his lifetime ban is "too severe" as punishment for his decades of sexual abuse of children.

12. Mr. Soresi 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

13. Plaintiff Jonathan Soresi is an adult male born in 1955 and was a minor child throughout the period of child sexual assault alleged herein. Plaintiff currently resides in Flemington, New Jersey.

14. Plaintiff brings this action pursuant to Civil Practice Law & Rules 241-g, for the child sexual 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.

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 times relevant, Defendant Morris resided in Pittstown, an unincorporated community in the State of New Jersey. At all times relevant, Morris was a registered member of the USEF and trainer at USEF-sponsored events.

16. At all times relevant, 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.

17. At all times relevant, Defendant USEF and its predecessors-in-interest conducted equestrian competitions throughout the United States, including, but not limited to, New York. As described herein, Mr. Soresi suffered sexual assault at the hands of Morris at multiple horse shows sponsored by USEF, including the National Horse Show in New York. USEF relied on Morris’s reputation and stature as an elite trainer to obtain donations for USEF and establish 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, Morris was a member of USEF and Mr. Soresi was a minor amateur athlete participating in events sanctioned by USEF. Mr. Soresi participated in these events as a “Junior Rider” in the Junior Division, which was limited to riders under the age of 18.

18. Mr. Soresi 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 Mr. Soresi, 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 pursuant to CPLR § 1024. Mr. Soresi 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.

19. 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.

20. 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

21. This Court has jurisdiction pursuant to CPLR § 301 as Defendant USEF is a New York corporation; AHSA was a New York Corporation; the conduct alleged (both intentional and negligent decisions/actions) occurred in New York and because unlawful sexual conduct complained of herein occurred in New York.

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

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

THE HISTORY OF DUTIES OF THE USEF IN TRAINING MINOR ATHLETES

A History of Equestrian Competition

24. The United States Olympic Committee ("USOC"), an organization created to govern amateur athletes, recognizes and oversees approximately 45 NGBs. NGBs are organized at an individual sport level, including the equestrian sport.

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

26. 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.”

27. 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.

28. 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.

29. 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.

30. 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

31. In 1978, 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.

32. 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. On information and belief, since 1982 alone, over 290 coaches and officials associated with the USOC or with USOC organizations have been publicly accused of sexual misconduct.

33. 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.

34. 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."

35. 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.

36. 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.

37. 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

38. 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.

39. 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.

40. Morris established himself quickly as indispensable to the USEF's international prestige, producing most 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.

41. Perhaps even more importantly to the USEF, Morris began to amass 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 and clients, Morris could not only get his students to the highest competitive ranks, but he could also ensure the success or failure of the USEF. Without Morris's involvement, the USEF could not compete on the global stage.

42. 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.

43. 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."

44. 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.

45. 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.

46. 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 did not hide his social life from anyone—including his minor students. Morris writes about an incident in 1964, when Morris was twenty-six years old, and he was training a 13-year-old student. Morris took the child, as 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! . . . [he] was totally mortified and didn’t want to admit to anyone that I was his trainer—and rightfully so!”

47. Upon information and belief, Morris sexually assaulted minor students, including Mr. Soresi, 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.

48. Morris’s sexual assaults of Mr. Soresi and of another minor child were detailed during Morris’s SafeSport proceedings. Reports from those proceedings concluded that Morris used his position of power to assault a minor male victim in 1973. Mr. Soresi was between sixteen and seventeen when Morris began paying him extraordinary attention at USEF events, while Morris would have been in his mid- to late-thirties. One of the individuals the SafeSport investigator interviewed stated that other people would have noticed and questioned why Morris was paying attention to a young, unknown male rider, such as Mr. Soresi, given the great disparity in their age and stature in the equestrian community.

49. 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.

50. 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.”

51. 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 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.”

52. 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 was “the best kept secret everyone knew.”

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

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

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

56. Upon information and belief, neither USEF, then AHSA and USET, 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.

57. USEF 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. Moreover, some were all too willing to sacrifice

a few young boys for the sake of money and prestige.

GEORGE MORRIS'S SEXUAL ASSAULT OF JONATHAN SORESI

58. Jonathan Soresi grew up in McClean, Virginia. Though he came from a broken home and his family was working class, Mr. Soresi had been involved with showing and riding horses since he was a young boy. Beginning at approximately 5 years old, Mr. Soresi would come home from school and go directly to the stables to ride horses. At approximately age 8 or 9, Mr. Soresi began competing in horse shows around the Virginia area.

59. Mr. Soresi's love of the sport only grew, and at approximately age 13, he began attending Cardinal Cushing Academy, one of the few boarding schools with an equestrian program. While attending the boarding school, Mr. Soresi entered several riding competitions.

60. Approximately two years later, when the boarding school closed, Mr. Soresi continued to pursue his passion and began working for Stonehedge Farms near Chicago, Illinois. At Stonehedge Farms, Mr. Soresi would groom horses, muck out the stalls, and perform other chores in order to get lessons and ride horses.

61. Mr. Soresi was a poor boy in a rich man's sport, but he worked tirelessly so he could pursue his passion—riding horses. Mr. Soresi's sole goal as a young rider was to compete at USEF events and qualify for the National Horse Show, and then go to the Olympics as an equestrian.

62. When Mr. Soresi was approximately 16 years old, Mr. Soresi went to the Chagrin Falls Horse Show in Ohio. It was at the Chagrin Falls Horse Show that Mr. Soresi first met Morris. Morris was approximately 30 years old at the time.

63. Mr. Soresi saw Morris a few months later at the National Horse Show in New York. Morris was friendly and made a point of welcoming Mr. Soresi and being approachable.

64. Like all young equestrians, Mr. Soresi idolized Morris and knew that Morris

could make or break a young rider's career. Mr. Soresi hoped he could become one of Morris's "working students," whereby he could work for Morris at his stable and also train, which would greatly assist his goal of competing at the National Horse Show at Madison Square Garden, ultimately fast-tracking him to the Olympic team. It was well known that Morris had trained more winners of the National Horse Show than any other trainer, and winning in one's class would establish a young rider a real name in the equestrian sport.

65. At the time, Mr. Soresi did not ride on behalf of any particular horse owner or trainer. Mr. Soresi, a young, poor, ambitious rider, who attended the shows without parental supervision, was an easy target for Morris. On information and belief, Morris preyed upon young riders, like Mr. Soresi, without money or important sponsors, and would encourage riders of this profile to become his student as a pretext to sexually assaulting the young boys.

66. In in approximately 1972 or 1973, Mr. Soresi again met Morris at the Devon Horse Show in Devon, Pennsylvania. The Devon Horse Show was an important show to qualify to compete at the National Horse Show at Madison Square Garden. During the Devon Horse Show, Mr. Soresi stayed in an Airstream camper near the show grounds, and Morris stayed at the Inn at King of Prussia.

67. One the afternoon while at the Devon Horse Show, Morris gave Mr. Soresi his hotel room number, and told him to come to his hotel room after dinner. Mr. Soresi was excited to spend time with his idol, and hoped to foster a mentorship relationship with Morris. Unfortunately, for Mr. Soresi, however, when Mr. Soresi arrived at Morris's hotel room, Morris sexually assaulted Mr. Soresi by anal sex. After Morris finished his assault, Morris immediately took a shower and instructed Mr. Soresi to leave.

68. After the Devon Horse Show, Mr. Soresi encountered Morris at various horse shows and riding clinics. At these events, Morris would find Mr. Soresi on the side of the ring

and strike up conversations with him. During these conversations, Morris would gossip with Mr. Soresi and would ask Mr. Soresi's opinion on whether he thought particular young male riders were gay. Morris would frequently engage Mr. Soresi in conversation, share meals with him, and invite him to social gatherings. Through these interactions, Morris gained Mr. Soresi's trust, who was also flattered that the world-renowned trainer had taken an interest in him. It became clear to Mr. Soresi that Morris would offer his mentorship and celebrity status in exchange for sex.

69. Later, Mr. Soresi again saw Morris at the Chagrin Falls Horse Show in Chagrin Falls, Ohio. Like the Devon Horse Show, the Chagrin Falls Horse Show was an important qualifier to compete in the National Horse Show finals. Morris invited Mr. Soresi to his hotel room at the Holiday Inn in Shaker Heights. Once Mr. Soresi entered the room, Morris sodomized Mr. Soresi. When the act was completed, Morris took a shower while Mr. Soresi dressed and left to go back to his room. At this show, Morris arranged for Mr. Soresi to ride in the competition with one of his wealthier client's best horses, and therefore increase his chances of competing in the National Horse Show finals. This also demonstrated to Mr. Soresi, as a child, that Morris required sex in exchange for furthering Mr. Soresi's career by providing access to good horses and mentorship. Knowing his riding career would never reach the elite level without Morris's assistance, Mr. Soresi was forced to comply with his demands. In addition to being a minor child, in practical effect, Mr. Soresi was unable to deny the sexual assaults by Morris and was subject to coercion and duress because of the authority and power Morris held over Mr. Soresi and Mr. Soresi's career.

70. Mr. Soresi again met Morris at the National Horse Show at Madison Square Garden in Manhattan, New York. During that horse show, Morris had a room at the Statler Hilton hotel, where key industry players stayed during the show. One evening during the

National Horse Show, there was a large and exclusive Exhibitor's party at the Statler Hilton. Mr. Soresi attended the party and spoke with Morris, who invited Mr. Soresi to attend an after-party at a club, Le Jardin. Morris, Mr. Soresi, and Marion Hulick, a renowned trainer and then-member of USEF, shared a cab to the party. During the cab ride, Morris pushed his leg against Mr. Soresi, foreshadowing his planned sexual assault. Mr. Soresi, a minor child consumed alcohol including, but not necessarily limited to either whisky and cola and/or vodka and orange juice. As was now customary, after the party, Morris invited Mr. Soresi to his hotel room where he sexually assaulted Mr. Soresi by anal sex. In addition to the duress and coercion detailed above, because of the effects of the alcohol consumption, Plaintiff was further unable to resist the assault and/or unable to meaningfully consent to the acts perpetrated upon him as a child. This authority and power was instilled by and provided by all Defendants because of the stature and authority given by Defendants to Morris when Defendants knew or should have known that Morris was a danger to children.

71. At the time, approximately 1 out of 10 young competitors in the equestrian world were male. Thus, it was noteworthy for the elite equestrian community to see the top trainer in the world repeatedly working with Mr. Soresi, a relatively unknown, underage rider. Accordingly, Morris's fixation with Mr. Soresi did not go unnoticed by the equestrian community. A fellow rider, Patty Shanenberg, noted that Morris was "fawning all over" Mr. Soresi. Mr. Soresi informed Ms. Shanenberg that he had a sexual relationship with Morris. On information and belief, Morris would brag about having sex with Mr. Soresi to friends and colleagues. Morris would revel in telling others that he had sex with Mr. Soresi when Mr. Soresi was 14 or 15 years old, a statement based on Mr. Soresi's extremely youthful look, which made him appear 14 or 15 at the time Morris had sexually assaulted Mr. Soresi as a minor.

GEORGE MORRIS BRINGS JONATHAN SORESI INTO THE FOLD

72. In approximately 1975, once he was an adult, Mr. Soresi began working for Morris as his assistant. Morris taught Mr. Soresi the business of the sport and became his mentor. For some time thereafter, Morris continued to request sex from Mr. Soresi. Due to Morris's mentorship and his status in the equestrian community, Mr. Soresi remained quiet about Morris's sexual demands and assaults.

73. As Morris's assistant, Mr. Soresi observed that Morris would notice a good-looking young boy walk past him at a horse show and typically would call out, "What's your name, young man? You're trouble. I know you're trouble."

74. Over the course of his time working with Morris, Mr. Soresi also noticed that people would frequently comment on Morris spending time with young, unknown male riders, asking about the "cute boy with George."

75. On information and belief, Morris continued his pattern of abusing vulnerable minor boys at USEF events, including when attending events overseas.

76. Although Mr. Soresi was able to have a successful career in the equestrian sport, Morris's sexual assaults when he was a child had a long-lasting, destructive impact, including emotional distress, embarrassment, feelings of shame and lack of self-worth, suicidal thoughts, depression, and relationship issues. As a result, Mr. Soresi had a troubled life that included self-medication, drugs, and acting out sexually in an attempt to cope with his emotional trauma.

77. Between approximately 2003 and 2016, Mr. Soresi gathered the courage disclose Morris's sexual assaults to his close confidants.

78. In approximately 2006, Plaintiff's brother reported the sexual assaults to the New York County District Attorney's Office. When Mr. Soresi arrived at the office for his interview, he saw a file, approximately one inch thick, which was he was informed was Morris's file. On

information and belief, the office declined to prosecute the case due to a statute of limitations issue.

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

79. 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.

80. In August 2012, USEF started an investigation into Morris's sexual assaults of Mr. Soresi, and later, another of Morris's victims. In approximately 2013, and after receiving therapy and realizing that Morris's conduct was reprehensible and criminal, Mr. Soresi finally summoned the courage to speak the truth about Morris's sexual assaults, at which time he reported Morris to USEF.

81. On August 5, 2019, SafeSport released its decision on the allegations of Mr. Soresi and another of Morris's victims. After a thorough investigation and the questioning of dozens of witnesses, SafeSport found, on a preponderance of the evidence, that Mr. Soresi'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.

82. SafeSport issued a provisional lifetime ban against Morris, 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.

83. 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.

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

85. It was not until November 2019, and only after considerable pressure following a New York Times article publicizing Morris’s abuse, that the United States Horse Jumping Association removed Morris’s name from two of its most prestigious awards.

86. 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.”

87. It appeared that all of USEF and its members valued what Morris had done for their careers over his repeated sexual assaults of a young child.

FIRST CAUSE OF ACTION: SEXUAL BATTERY

(Against Defendant Morris)

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

89. In approximately 1972 or 1973, when Plaintiff was under the age of 18, Morris inflicted unpermitted, harmful, and offensive sexual contact upon the person of Plaintiff. Plaintiff was unable to and did not give meaningful consent due to his consumption of alcohol and/or the coercion and duress created by Morris and the authority vested in him by Defendants. Plaintiff subjectively and reasonably believed that Defendant Morris had the ability and the

motivation to ensure that he would never reach the elite level of his career without Morris's assistance and Morris's assistance would be withheld if Plaintiff did not acquiesce to the sexual acts required by Defendant Morris. As a child, Plaintiff was required to provide sex to Morris in exchange for furthering Plaintiff's career by providing access to good horses and mentorship. Knowing his riding career would never reach the elite level without Morris's assistance, Plaintiff was forced to comply with Morris's demands. In addition to being a minor child, in practical effect, Plaintiff was unable to deny the sexual assaults by Morris and was subject to coercion and duress because of the authority and power Morris held over Plaintiff and Plaintiff's career. This authority and power was instilled by and provided by all Defendants because of the stature and authority given by Defendants to Morris when Defendants knew or should have known that Morris was a danger to children.

90. 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.

91. 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.

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

SECOND CAUSE OF ACTION: NEGLIGENCE
(Against All Defendants)

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

94. 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 a child at the time Morris sexually abused him.

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

96. 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.

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

98. 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.

99. Defendants owed Plaintiff a duty of reasonable care because they solicited youth 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.

100. 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

USEF events. Defendants, through their employees and agents, exploited this power over Plaintiff and, thereby, put the minor Plaintiff at risk for sexual abuse.

101. 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.

102. By virtue of his unique authority and position as an elite trainer within USEF, 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.

103. While Plaintiff was a member of USEF and attended USEF events, Morris, as a member, employee, agent, or representative of USEF, engaged in illegal, harmful, and offensive sexual assaults 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.

104. 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.

105. 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.

106. 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 events were safe.

107. 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.

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

109. 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.

110. 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.

111. 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.

112. 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.

113. 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.

114. 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.

115. 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.

116. 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 and Does 1-5)

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

118. 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.

119. 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.

120. 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.

121. 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.

122. 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.

123. 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.

124. 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.

125. 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.

126. 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.

127. 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 of 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