

supervisors and attorneys, and/or other persons whose identities have not yet been ascertained and for whose culpable acts or omissions the Respondents are responsible.

Upon information and belief, the event(s) occurred between May 27, 2003 and May 26, 2004 at: the Allegheny County Court of Common Pleas; Families United Network, Inc. [FUN] then located at 1500 Ardmore Blvd., Suite 201, Pittsburgh, Pennsylvania; the residence of Lynn Ginn, 116 Cambridge Square, Apt E, Monroeville, Pennsylvania; the Allegheny County Office of Children, Youth and Family [CYF], Lexington Intake Office, 400 North Lexington Street, Suite 104, Pittsburgh, Pennsylvania; and at other places yet to be ascertained.

The events in question occurred at a time and place when Masha was under the exclusive care, custody and control of the Respondents acting as agents and/or state actors.

Upon information and belief, the facts giving rise to the Claimant's injuries are as follows:

1. Masha was trafficked into the United States from Russia at age five by a Pennsylvania pedophile named Matthew A. Mancuso and subjected to extensive sexual abuse and exploitation, including sadomasochism, starvation, and forced exhibitionism. Masha is pictured in hundreds of child pornography images which are highly sought by pedophiles worldwide. Her image sets are among the most popular in the world and are possessed by upwards of 80% of child predators apprehended in the United States and Canada. In the last decade, hundreds of child predators have been criminally prosecuted and imprisoned for possessing her images. (see http://en.wikipedia.org/wiki/Masha_Allen);
2. On May 27, 2003, the Federal Bureau of Investigation [FBI] raided Mancuso's home looking for child pornography;
3. When the FBI found Masha at Mancuso's home, they contacted the Allegheny County Office of Children, Youth and Family [CYF], which recommended an immediate evaluation by Children's Hospital of Pittsburgh and placement into foster care. A dependency petition was ultimately filed by the Respondents in the Allegheny County Court of Common Pleas docket number 1381-03;
4. Late in the evening of May 27, 2003, after Masha was evaluated by the Children's Hospital of Pittsburgh, the Respondents knowingly and intentionally placed Masha into the home of 26 year old Lynn Ginn, who was at the time a Families United Network [FUN] foster parent;
5. At the time of Masha's placement, Ms. Ginn was under investigation for allegedly abusing an infant foster child who was previously in her care. FUN had removed the child from her home and instructed staff not to place any more children with Ms. Ginn. The Respondents improperly deemed Ms. Ginn's home available to accept Masha since it was "closed;"

6. Before, during and after Masha's placement, the Respondents knew or should have known that Ms. Ginn was mentally ill and was unable to parent any child;
7. During the entire period of time she was a foster parent, Ms. Ginn never had a job. This was contrary to the Respondents' policies, practices and procedures. Her lack of employment rendered her financially incapable of caring for any child;
8. On or about December 1, 2003, the Respondents filed a court report that two foster children were removed from Ms. Ginn's home based on allegations of physical abuse. Despite these serious charges, Masha remained in Ms. Ginn's home;
9. On January 12, 2004, the Respondents filed a court report which stated that Masha's school was concerned because she was not completing homework and could do better on tests if she studied harder;
10. On April 1, 2004, the Respondents filed a court report which stated that mobile therapy for Masha was discontinued and that she was being treated by Minerva Lane. Minerva Lane is not currently licensed by the State of Pennsylvania to provide therapeutic services or counseling.
11. The April 1, 2004 report filed by the Respondents also states that Ms. Ginn's FBI clearances, which were legally required for her to adopt Masha, were not completed even though the adoption hearing was quickly approaching;
12. On May 14, 2004, Judge Cheryl Lynn Allen, sitting in the criminal court, presided at Ms. Ginn's adoption of Masha which was actively and enthusiastically supported and facilitated by the Respondents. The adoption was finalized on May 26, 2004;
13. In December 2004, Ms. Ginn and Masha suddenly relocated from Pittsburgh to Georgia;
14. In March 2006, Masha expressed a desire to commit suicide and was hospitalized with suicidal ideation and symptoms consistent with post-traumatic stress disorder at Summit Ridge Center for Psychiatry & Addiction Medicine in Lawrenceville, Georgia;
15. Summit Ridge recommended extensive therapy for Masha as well as a home therapeutic plan for Ms. Ginn to follow;
16. Masha received no mental health treatment of any kind between February and December 2006. Upon information and belief, she received no mental health treatment between December 2004 and September 2005;
17. Ms. Ginn and Masha came under the supervision of the Georgia Department of Families and Children on or around October 1, 2006.

From the moment Masha was placed into Ms. Ginn's home, she has been subjected to physical and psychological abuse and neglect on an ongoing and continuing basis. Despite her extensive

history of sexual abuse and exploitation, she has received little or no mental health treatment and her basic medical needs have been neglected. Masha has moved nine times since 2003 and attended five schools during that period.

The Respondents failed to adequately investigate and/or supervise Ms. Ginn and her home during the period of time in question and instead aggressively facilitated Masha's adoption by Ms. Ginn despite lacking Ms. Ginn's FBI clearance, a complete and competent adoption home study, a psychiatric evaluation of Masha and a thorough investigation of three abuse allegations against Ms. Ginn. As a result of these acts and omissions, Ms. Ginn's adoption of Masha was finalized on May 26, 2004.

The Respondents' actions have caused Masha substantial physical, psychological and emotional damage, as well as compensatory damages, since Masha is currently unable to collect millions of dollars in civil claims and criminal restitution under the federal "Masha's Law"—which was named for her—and federal criminal child pornography law.

The Respondents had a duty to thoroughly investigate and supervise any foster or adoptive placement for Masha when she was placed in their care. Under longstanding state and federal law, such foster and adoptive placements must be in the best interest of the child.

The Respondents also had a duty to Masha to reasonably investigate and supervise any potential adoptive home for her and to fully disclose to the court and other professionals any possible concerns prior to her adoption. The Respondents had a professional responsibility to Masha to protect her physical, psychological and emotional best interests. Each of these duties was breached and violated, resulting in extensive ongoing damage to Masha.

The Respondents knew that Masha was subject of unprecedented sexual abuse and exploitation when they placed her in Ms. Ginn's home. The Respondents knew or should have known that Ms. Ginn would further abuse, neglect and exploit her and that adoption by a young, unemployed, unstable, and troubled foster mother was not in Masha's best interest.

The Respondents' acts and omissions constitute a knowing, willful and/or reckless disregard for Masha's physical, psychological and mental well-being from the date she came into their exclusive custody, care and control.

The Respondents' acts and omissions violated Masha's constitutional and civil rights under state and federal law. In addition the Respondents have committed numerous tortuous acts against Masha, including but not limited to intentional infliction of emotional distress, gross and ordinary negligence, professional malpractice and wrongful adoption.

The full nature and extent of 14 year old Masha's injuries as a result of the foregoing are currently unable to be ascertained since she remains in Ms. Ginn's care and is unable to assist herself or obtain an appropriate mental health evaluation and treatment.

On information and belief, at minimum Masha has suffered severe ongoing psychological and emotional anguish, personal injuries and psychological abuse and neglect that will require long-term remedial measures to ameliorate, potentially including but not limited to long-term therapy and psychiatric/psychological services. Based on the foregoing, damages are presently estimated at no less than \$40 million. In addition, the Claimant shall assert and seek to recover at least \$100 million in punitive damages against the above-named Respondents.

Dated: February 2, 2007
White Plains, New York



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[ADMITTED ONLY IN NY AND DC]

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