

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

BLAIR DAVID HINES,

*Plaintiff,*

-against-

JERRY GOROVOY,

*Defendant.*

**COMPLAINT**

Plaintiff Blair David Hines, by and through his attorneys, Emery Celli Brinckerhoff Abady Ward & Maazel LLP, Shihata & Geddes LLP, and Scarola Zubatov Schaffzin PLLC, alleges as follows for his complaint:

**PRELIMINARY STATEMENT**

1. Defendant Jerry Gorovoy is famous for his representation of world-renowned artist Louise Bourgeois.
2. Mr. Gorovoy represented Ms. Bourgeois for decades until she died in 2010. Mr. Gorovoy owns one of the largest private collections of Louise Bourgeois art. Mr. Gorovoy also has long been the Art Advisor for Ms. Bourgeois's legacy foundation—the Easton Foundation—and continues to earn 15 to 25% of all Bourgeois art sold by the Foundation and a trust that Ms. Bourgeois had created.
3. Mr. Gorovoy is also a rapist.
4. Over the course of approximately 18 months between December 2000 and June 2002, Mr. Gorovoy groomed, sexually abused, and repeatedly raped Blair David Hines.
5. Mr. Hines first encountered Mr. Gorovoy when Mr. Hines was a 22-year-old socially-inexperienced aspiring artist. At the time, Mr. Hines had minimal connections to New York City and no connection to anyone in the City's insular art world.

6. Shortly after meeting Mr. Hines, Mr. Gorovoy told Mr. Hines that he had the potential to succeed as an artist, offered to assist him, and then methodically worked to gain and maintain complete control over Mr. Hines's life, including Mr. Hines's finances, professional opportunities, social interactions, housing, and immigration status.

7. In spring 2001, Mr. Gorovoy told Mr. Hines that he wanted a sexual relationship with Mr. Hines. In no uncertain terms, Mr. Hines told Mr. Gorovoy that he did not want a sexual relationship with Mr. Gorovoy (or any other man).

8. Thereafter, Mr. Gorovoy masturbated in front of Mr. Hines, forcibly and violently kissed him, and groped his genitals, all without Mr. Hines's consent.

9. Mr. Gorovoy engaged in a scheme to lead Mr. Hines to believe that if Mr. Hines did not adhere to Mr. Gorovoy's demands, Mr. Gorovoy could destroy Mr. Hines, including by taking away his ability to financially survive in New York and the roof over Mr. Hines's head, by removing Mr. Hines's ability to legally remain in the United States, and by blackballing him in the New York art world.

10. In summer 2001, Mr. Gorovoy raped Mr. Hines for the first time.

11. Between September 2001 and December 2001, Mr. Gorovoy repeatedly and systematically raped Mr. Hines.

12. In the spring of 2002, Mr. Gorovoy raped and sexually assaulted Mr. Hines on two final occasions.

13. Mr. Hines had never before and has never since had any sexual contact with a man.

14. The course of Mr. Hines's life was irreversibly altered by Mr. Gorovoy's abuse. In 2002, Mr. Hines started psychotherapy and confided in his therapist about Mr.

Gorovoy's abuse. He has been diagnosed with Post-Traumatic Stress Disorder ("PTSD") stemming from Mr. Gorovoy's abuse. For more than a decade, Mr. Hines was forced to retreat from the art world to focus on healing the deep psychological wounds he suffered.

15. Mr. Hines now brings this case pursuant to the New York Adult Survivors Act, the Victims of Gender-Motivated Violence Protection Law, and the New York City Victims of Violent Crime Protection Act to finally seek justice and accountability for the physical and emotional harm Mr. Gorovoy inflicted on him.

### **PARTIES**

16. Blair David Hines is a resident of Bronx County, New York.

17. Jerry Gorovoy is a resident of New York County, New York.

### **VENUE AND JURISDICTION**

18. Plaintiff designates New York County as the place of trial, pursuant to CPLR 503 and 509.

### **STATUTORY FRAMEWORK**

19. On May 24, 2022, the New York State Adult Survivors Act ("ASA") was signed into law, creating a one-year lookback window—commencing November 24, 2022—for survivors of sexual assault that occurred when they were over the age of 18 to sue their abusers regardless of when the abuse occurred.

20. The ASA lookback window applies to "every civil claim or cause of action brought against any party alleging intentional or negligent acts or omissions by a person for physical, psychological, or other injury or condition suffered as a result of conduct which would constitute a sexual offense" as defined in New York Penal Law Article 130. CPLR § 214-j.

21. The New York City Victims of Gender-Motivated Violence Protection Law (“VGMVPL”) provides a cause of action to “any person claiming to be injured by an individual who commits a crime of violence motivated by gender.” N.Y.C. Admin. Code. § 10-1104.

22. Under the VGMVPL, a “crime of violence” is defined to include “an act or series of acts that would constitute a misdemeanor or felony against the person as defined in state or federal law . . . if the conduct presents a serious risk of physical injury to another.” N.Y.C. Admin. Code § 10-1103.

23. The VGMVPL defines the term “crime of violence motivated by gender” as “a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim’s gender.” N.Y.C. Admin. Code § 10-1103.

24. “Without consent, sexual acts” such as sexual assault are “a violation of the victim’s bodily autonomy and an expression of the perpetrator’s contempt for that autonomy.” *Breest v. Haggis*, 180 A.D.3d 83, 95 (1st Dep’t 2019). Thus, for the purposes of the VGMVPL, “[m]alice or ill will based on gender is apparent from the alleged commission of [sexual assault] itself.” *Id.* “Animus inheres where consent is absent.” *Id.*

25. When the New York City Council passed the VGMVPL, it framed the law using gender-neutral terms and made clear that the Council’s legislative intent was “to cover all victims of gender-motivated violence” and “any variation of gender-motivated violence,” regardless of the gender of the victim or perpetrator.

26. The New York City Victims of Violent Crime Protection Act (“VVCPA”) provides a civil cause of action to “any person claiming to be injured by an individual who commits a crime of violence,” N.Y.C. Admin. Code. § 10-403, which is defined to include “an

act or series of acts that would constitute a misdemeanor or felony against the person as defined in state or federal law or that would constitute a misdemeanor or felony against property as defined in state or federal law if the conduct presents a serious risk of physical injury to another,” N.Y.C. Admin Code § 10-402.

## FACTS

### *Background*

27. Mr. Hines was born in 1978 in Halifax, Nova Scotia, Canada where he lived until his family moved to Toronto.

28. As a result of medical complications, Mr. Hines’s childhood was marred by extensive social isolation, which left him unable to socialize like a normal teenager.

29. Mr. Hines found an escape in learning about and creating art. He considered contemporary artists his heroes. Louise Bourgeois was one of Mr. Hines’s heroes.

### *Jerry Gorovoy Was an Influential and Powerful Member of New York’s Art Scene*

30. In the 1980s, Mr. Gorovoy ingratiated himself with Louise Bourgeois, a French-American interdisciplinary artist based in New York.

31. In 1982, Ms. Bourgeois quickly grew in fame following a retrospective at the Museum of Modern Art.

32. As Ms. Bourgeois grew older and more famous, she became increasingly reclusive—rarely leaving her Manhattan townhouse.

33. Mr. Gorovoy positioned himself as Ms. Bourgeois’s lifeline to the outside world and began exercising significant control over her life, including her personal life, artwork, and finances.

34. In 1997, Mr. Gorovoy helped found Cheim & Read, an art gallery in New

York, by orchestrating Ms. Bourgeois's move to the new gallery, further cementing Mr. Gorovoy's place as an influential force in New York's art scene.

***Mr. Hines Meets Mr. Gorovoy, and Mr. Gorovoy Starts Grooming Mr. Hines***

35. On September 10, 2000, Mr. Hines moved to New York.

36. Mr. Hines was 22 years old.

37. Mr. Hines struggled in New York and decided to return home to Canada in December 2000.

38. One night in December 2000, before Mr. Hines left New York, Mr. Hines was introduced to Mr. Gorovoy by an acquaintance.

39. Mr. Gorovoy was 47 years old at the time.

40. At all relevant times, Mr. Gorovoy was also significantly taller and heavier than Mr. Hines.

41. When Mr. Hines met Mr. Gorovoy, Mr. Gorovoy had been working with Louise Bourgeois for two decades.

42. Mr. Gorovoy offered to look at Mr. Hines's artwork. Mr. Hines readily agreed.

43. Mr. Hines idolized Louise Bourgeois and was thrilled by the prospect of having Mr. Gorovoy, Ms. Bourgeois's right-hand man, come see his artwork.

44. About two days later, Mr. Gorovoy came to Mr. Hines's small studio.

45. He glanced at Mr. Hines's paintings, told him his work was not interesting, and left.

46. A few days later Mr. Hines found a note from Mr. Gorovoy at his studio.

47. In the note, Mr. Gorovoy apologized for his rudeness, gave Mr. Hines his phone number, and proposed that they meet for a drink.

48. When Mr. Hines called the phone number, Mr. Gorovoy informed Mr. Hines that Mr. Gorovoy not only *liked* Mr. Hines's artwork, but Mr. Gorovoy also wanted to *buy* one of his paintings.

49. Mr. Hines was thrilled by the prospect of selling a painting to someone in the New York City art scene and in particular to someone of Mr. Gorovoy's stature in that scene.

50. Mr. Gorovoy paid Mr. Hines \$3,800 for a painting, titled "Stanza," and arranged for it to be picked up from Mr. Hines's studio.

51. Shortly thereafter, Mr. Hines moved back to Canada as he had previously planned to do.

52. In January 2001, Mr. Gorovoy began calling Mr. Hines in Canada.

53. Mr. Gorovoy campaigned to lure Mr. Hines back to New York by promising to support Mr. Hines's professional development as an artist and to help Mr. Hines find a job in the art world and studio space.

54. As part of the campaign, Mr. Gorovoy promised to introduce Mr. Hines to his connections in the art scene.

55. Mr. Gorovoy also sent Mr. Hines unsolicited expensive art books, including one personally inscribed to Mr. Hines by Ms. Bourgeois.

LOUISE BOURGEOIS The Insomnia Drawings

TO DAVID  
HINES.

Louise Bourgeois  
New York 2000 December 27

*Louise Bourgeois's book, The Insomnia Drawings, inscribed to Mr. Hines by Ms. Bourgeois on December 27, 2000*



56. Mr. Hines agreed to return to New York and accept Mr. Gorovoy's offer of help.

57. Upon Mr. Hines's arrival back in New York in early 2001, Mr. Gorovoy arranged for Mr. Hines to obtain a job, housing and a studio.

58. Mr. Gorovoy arranged first for Mr. Hines to work as an archivist for Ms. Bourgeois at Mr. Gorovoy's loft on 18th Street in Manhattan.

59. Mr. Gorovoy later arranged for Mr. Hines to work as an assistant for photographer Adam Fuss.

60. Mr. Gorovoy paid Mr. Hines's rent for an apartment and a studio for him to create his art.

61. Mr. Gorovoy began introducing Mr. Hines to famous artists.

62. In spring 2001, Mr. Gorovoy arranged for Mr. Hines to use Ms. Bourgeois's studio in Brooklyn to produce costly painting panels at no cost.

63. Mr. Gorovoy arranged to have Mr. Hines's art expenses charged to Ms. Bourgeois's account at the Modern Art Foundry in Queens, New York.

64. Mr. Gorovoy also arranged to have Mr. Hines included in the summer 2001 group show at Cheim & Read, alongside works by Louise Bourgeois, Andy Warhol, and other well-known artists.

65. Within a matter of months after Mr. Hines's return to New York, and by Mr. Gorovoy's design, nearly every aspect of Mr. Hines's personal and professional life—from his housing, to his work, to his art materials and career prospects—was provided by, controlled by, and could be taken away by Mr. Gorovoy.

***Mr. Gorovoy Continues to Groom and Begins to Sexually Exploit Mr. Hines***

66. Mr. Gorovoy started digging into Mr. Hines's past and learning about Mr. Hines's vulnerabilities, including the extensive social isolation he experienced during his childhood.

67. Mr. Gorovoy asked Mr. Hines for a key to Mr. Hines's apartment.

68. Mr. Hines, however, declined to give a key to Mr. Gorovoy.

69. At a dinner in spring 2001, Mr. Gorovoy informed Mr. Hines that he had no room for friends in his life—only for a lover.

70. Mr. Hines refused Mr. Gorovoy's advance and told Mr. Gorovoy that he was not gay.

71. Mr. Gorovoy retaliated: a week later, he told Mr. Hines that he could only finish one panel of a painting series he was working on and that Mr. Gorovoy would no longer financially support Mr. Hines.

72. Approximately one week later, Mr. Gorovoy said that he would resume his financial support of Mr. Hines.

73. One evening in summer 2001, Mr. Gorovoy and his close friend, the artist Roni Horn, invited Mr. Hines to Ms. Horn's apartment to watch a movie.

74. After the movie ended, Mr. Gorovoy and Mr. Hines left Ms. Horn's apartment, and Mr. Gorovoy told Mr. Hines that he wanted to go to Mr. Hines's studio to see some of his current art.

75. Upon arriving at Mr. Hines's studio, Mr. Gorovoy put his boot up on a chair, exposed his penis, and began masturbating in front of Mr. Hines.

76. Mr. Hines was mortified and frozen with shock.

77. Mr. Hines did not consent to or participate in Mr. Gorovoy's voyeuristic sexual act.

78. Mr. Gorovoy ejaculated on Mr. Hines's lounge chair and then left the studio.

79. In the wake of this incident, Mr. Hines felt humiliated and disgusted.

***Mr. Gorovoy Sexually Assaults Mr. Hines for the First Time***

80. Later in the summer of 2001, Mr. Gorovoy told Mr. Hines to come over and watch a movie at his loft.

81. When Mr. Hines arrived, Mr. Gorovoy explained that they were going to watch a Japanese film but did not reference its sexually explicit content.

82. The film—an erotic film featuring graphic unsimulated sex—made Mr. Hines deeply uncomfortable, but he felt he had no choice but to watch it with Mr. Gorovoy.

83. At some point during the movie, Mr. Gorovoy unexpectedly turned to Mr. Hines and began violently kissing his face.

84. Mr. Gorovoy forced his tongue into Mr. Hines's mouth.

85. Mr. Hines was repulsed.

86. Mr. Hines reacted by shoving Mr. Gorovoy away.

87. Mr. Hines did not consent to or participate in this sexual assault.

***Mr. Gorovoy Increases His Control Over Mr. Hines's Life By Getting Him a U.S. Visa***

88. As a Canadian citizen without a United States visa, Mr. Hines was permitted to stay in the United States for a period of six months and was not permitted to work during his stay.

89. Mr. Hines's six months in the United States was scheduled to end in July 2001.

90. Mr. Gorovoy arranged for Mr. Hines to obtain a United States visa so he could legally remain and work in the United States.

91. On July 25, 2001, at Mr. Gorovoy's direction, the Cheim & Read gallery submitted a petition for an H-3 visa for Mr. Hines.

92. Cheim & Read represented that Mr. Hines would work as an intern at the gallery, where he would participate in a training program and be compensated \$400 per week.

93. Mr. Gorovoy personally arranged for the \$400 per week internship, which was to be paid through the gallery out of Mr. Gorovoy's funds.

94. By facilitating and funding Mr. Hines's visa petition, Mr. Gorovoy now also had control over Mr. Hines's ability to legally live and work in the United States.

***Mr. Gorovoy Continues to Sexually Assault Mr. Hines***

95. One evening, after attending a dinner that Mr. Gorovoy had arranged with several accomplished artists in attendance, Mr. Gorovoy insisted that Mr. Hines come to his loft to sleep there.

96. Mr. Gorovoy told Mr. Hines that he only wanted Mr. Hines to sleep next to him and provide him company. Mr. Gorovoy insisted to Mr. Hines that he had no intention of pursuing Mr. Hines sexually.

97. Mr. Hines felt forced to go to Mr. Gorovoy's loft and sleep in his bed.

98. In Mr. Gorovoy's bed, Mr. Hines positioned himself such that he was as far away from Mr. Gorovoy as possible.

99. Without warning, Mr. Gorovoy grabbed Mr. Hines's genitals under the sheets and began masturbating Mr. Hines's penis.

100. Mr. Hines did not consent to or participate in this sexual assault.

101. Once again, Mr. Hines found himself paralyzed with fear.

***Mr. Gorovoy Rapes Mr. Hines for the First Time***

102. On one occasion in summer 2001, Mr. Gorovoy was at Mr. Hines's apartment on 7th Street in Manhattan.

103. Mr. Gorovoy forcibly unzipped Mr. Hines's pants and began to fondle Mr. Hines's genitals without his consent.

104. Mr. Gorovoy had brought a small bottle filled with lubricant, which he took out of his pocket.

105. Mr. Gorovoy then put liquid from the bottle on his own penis.

106. Mr. Hines did not understand what Mr. Gorovoy was doing.

107. Mr. Hines had never seen or used sexual lubricant before.

108. Mr. Gorovoy then told Mr. Hines that he "wanted" to put his penis inside of Mr. Hines.

109. Mr. Hines told Mr. Gorovoy that he did not want Mr. Gorovoy to do that.

110. Mr. Gorovoy answered that he "really wanted" to put his penis inside Mr. Hines, and Mr. Hines repeated that he did not want Mr. Gorovoy to do so.

111. Notwithstanding Mr. Hines's unequivocal statements that he did not consent to sexual contact with Mr. Gorovoy, Mr. Gorovoy pulled off Mr. Hines's pants and forcibly and violently penetrated Mr. Hines's rectum with his penis.

112. Mr. Hines did not consent to such penetration by Mr. Gorovoy.

113. Mr. Hines was paralyzed with fear and disbelief.

114. Mr. Hines had never before had anal sex and struggled to understand what Mr. Gorovoy was doing.

115. Mr. Gorovoy removed his penis and left Mr. Hines there in a state of shock.

***Mr. Gorovoy Systematically Rapes Mr. Hines Over the Course of Four Months***

116. At the end of August 2001, Mr. Hines's leases at his apartment and art studio were ending.

117. Mr. Gorovoy had possession of an additional full-floor loft right below his 18th Street loft and directed Mr. Hines to move into that space.

118. Mr. Hines was financially dependent on Mr. Gorovoy and believed he had no other choice but to comply.

119. Mr. Gorovoy had unfettered access to Mr. Hines, who was now living and working in the same building just one floor below Mr. Gorovoy.

120. Mr. Hines felt completely trapped.

121. Mr. Gorovoy regularly reminded Mr. Hines that he had the power to take away everything from Mr. Hines if he wanted to.

122. On one occasion, Mr. Gorovoy threatened to have Mr. Hines's visa taken away.

123. Mr. Hines knew that at any given moment and with no notice, Mr. Gorovoy could evict Mr. Hines from his apartment (leaving him homeless) and cut off the \$400 weekly payments he received from Cheim & Read (leaving him penniless). And he believed that Mr. Gorovoy had the power to ensure that Mr. Hines never succeeded in the art world.

124. Beginning shortly after September 11, 2001 and continuing through December 2001, Mr. Gorovoy repeatedly anally raped Mr. Hines at the loft on 18th Street.

125. There was never any discussion, foreplay, or romantic touching of any kind.

126. Mr. Gorovoy would position Mr. Hines so that Mr. Gorovoy could penetrate his rectum with his penis. Mr. Hines otherwise would lay still.

127. Mr. Gorovoy would penetrate Mr. Hines until Mr. Gorovoy was ready to ejaculate, at which point he would remove his penis and ejaculate onto Mr. Hines's chest.

128. After he ejaculated, Mr. Gorovoy would then start laughing.

129. Mr. Hines never consented to or participated in any manner in any of Mr. Gorovoy's sexual assaults.

130. Mr. Hines disassociated during the rapes to escape the trauma. He was shell-shocked. He felt he had been erased from the world.

131. In mid-to-late December 2001, Mr. Gorovoy's then-partner, Scott Lyon-Wall, returned to New York. His return put an end to Mr. Gorovoy's unfettered access to abuse Mr. Hines for a period of time.

***Mr. Gorovoy Anally Rapes Mr. Hines Again in April 2002***

132. In April 2002, Mr. Hines had a solo show at Xavier Hufkens's gallery in Belgium, which included several paintings by Mr. Hines and a series of photographs by Mr. Hines titled "Thousand Fragments" made in early 2001.

133. On or about the day that Mr. Hines was scheduled to fly to Belgium, Mr. Gorovoy used his key to let himself into Mr. Hines's loft without knocking or seeking Mr. Hines's permission to enter.

134. When Mr. Gorovoy entered Mr. Hines's apartment, Mr. Gorovoy was in a very agitated state, leaving Mr. Hines in fear of what Mr. Gorovoy might do.

135. Mr. Gorovoy then anally raped Mr. Hines.

136. Mr. Hines did not consent to or participate in any manner in Mr. Gorovoy's rape of Mr. Hines.

137. Like he did with the prior rapes, Mr. Hines disassociated while Mr. Gorovoy raped him.

***Mr. Gorovoy Sexually Assaulted Mr. Hines One Final Time in or About June 2002***

138. In or about June of 2002, Mr. Gorovoy raped Mr. Hines one final time.

139. Like he did in April 2002, Mr. Gorovoy let himself into Mr. Hines's loft without knocking or seeking his permission to enter.

140. When Mr. Gorovoy entered Mr. Hines's apartment, Mr. Hines was in bed.

141. Mr. Gorovoy walked over to the bed where Mr. Hines was sitting.

142. Mr. Gorovoy removed the sheet covering Mr. Hines's body, exposing Mr. Hines's genitals.

143. Mr. Gorovoy then began to perform oral sex on Mr. Hines.

144. As he did so, Mr. Hines cried, with tears visibly streaming down his face. Mr. Gorovoy did not stop and continued to sexually assault Mr. Hines.

145. Mr. Hines did not consent to or participate in this sexual assault.

146. In August 2002, Mr. Hines fled New York for Portugal to escape Mr. Gorovoy.

***Mr. Hines Consistently Reports the Sexual Abuse and Trauma He Experienced at the Hands of Mr. Gorovoy***

147. In Portugal, Mr. Hines struggled to recover from the many months of



deeply traumatic emotional abuse, sexual assaults, and rapes he had suffered at Mr. Gorovoy's hands.

148. A friend of Mr. Hines visited Mr. Hines while he was in Portugal in early 2003 and observed that Mr. Hines was in pain.

149. Mr. Hines explained to his friend that he had suffered greatly during his time in New York.

150. Later in 2003 or 2004, Mr. Hines confided in his friend more explicitly and explained that he had been raped and exploited by Mr. Gorovoy.

151. Mr. Hines's girlfriend also watched him struggle during his time in Portugal, which she later described in a letter as watching Mr. Hines being in "hell."

152. Mr. Hines has seen psychotherapists since 2002 and has consistently reported Mr. Gorovoy's abuse to them.

153. When Mr. Hines first sought treatment from a psychotherapist in 2002, he explained to his therapist at that time how Mr. Gorovoy had sexually preyed on him.

154. Mr. Hines's treating therapists and psychologists have concluded that, as a result of Mr. Gorovoy's sexual abuse, Mr. Hines struggled and continues to struggle with chronic PTSD, shame, anxiety, suicidal ideation, difficulty sleeping, difficulty maintaining relationships, difficulty working on his art and jewelry design, flashbacks of the abuse, and emotional pain and grief.

155. After several women publicly accused film producer Harvey Weinstein of rape and sexual assault in late 2017, sparking the #MeToo movement, the ensuing national conversation about sexual assault, power, and public accountability was inescapable. After privately struggling for over 16 years to survive the trauma wrought by Mr. Gorovoy's sexual

abuse and rapes, Mr. Hines sought a way to hold Mr. Gorovoy accountable for his actions.

156. With the passage of the Adult Survivors Act and the lookback window of the Gender-Motivated Violence Protection Act, Mr. Hines has the opportunity to bring his rapist to face justice in court.

**FIRST CAUSE OF ACTION**  
**Crime of Violence Motivated by Gender**  
**New York City Victims of Gender-Motivated Violence Protection Law**  
**N.Y.C. Admin. Code §§ 10-1102 *et seq.***

157. Mr. Hines realleges as if fully set forth herein the allegations contained in the preceding paragraphs.

158. Mr. Gorovoy's acts described above violate the VGMVPL, New York City Administrative Code § 10-1104.

159. Mr. Gorovoy's acts described above constitute crimes of violence and violations of New York Penal Law Article 130, including §§ 130.52 (forcible touching), 130.55 (sexual abuse), 130.20 (sexual misconduct), and 130.40 (criminal sexual act).

160. Mr. Gorovoy's crimes of violence against Mr. Hines were motivated at least in part by Mr. Hines's gender and animus based on Mr. Hines's gender.

161. As a result of Mr. Gorovoy's crimes of violence motivated by gender against Mr. Hines, Mr. Hines has been damaged and is entitled to compensatory damages in an amount to be determined at trial.

162. Mr. Gorovoy's actions in violation of the VGMVPL were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Mr. Hines's rights, for which he is entitled to an award of punitive damages.

163. Mr. Hines is also entitled to recover his attorneys' fees and costs pursuant to New York City Administrative Code § 10-1104(c).

164. This claim is timely pursuant to the New York Adult Survivors Act, N.Y. C.P.L.R. § 214-j, because the action alleges intentional and/or negligent acts or omissions and claims injury suffered as a result of conduct which would constitute a sexual offense under New York Penal Law Article 130, and Mr. Hines was eighteen years old or older when such conduct was committed against him.

**SECOND CAUSE OF ACTION**  
**New York City Victims of Violent Crime Protection Act**  
**N.Y.C. Admin. Code §§ 10-401 *et seq.***

165. Mr. Hines realleges as if fully set forth herein the allegations contained in the preceding paragraphs.

166. Mr. Gorovoy's acts described above constitute crimes of violence and violations of New York Penal Law Article 130, including §§ 130.52, 130.55, 130.20, and 130.40.

167. As a result of Mr. Gorovoy's acts, Mr. Hines suffered the damages alleged herein and is entitled to compensatory damages in an amount to be determined at trial.

168. Mr. Gorovoy's acts were intentional, done with malice, and/or showed a deliberate, willful, wanton, and reckless indifference to Mr. Hines's rights, for which he is entitled to an award of punitive damages.

169. Mr. Hines is also entitled to recover his attorneys' fees and costs pursuant to New York City Administrative Code § 10-403.

170. This claim is timely pursuant to the New York Adult Survivors Act, N.Y. C.P.L.R. § 214-j, because the action alleges intentional and/or negligent acts or omissions and claims injury suffered as a result of conduct which would constitute a sexual offense under New York Penal Law Article 130, and Mr. Hines was eighteen years old or older when such conduct was committed against him.

**THIRD CAUSE OF ACTION**  
**Battery**  
**C.P.L.R. § 214-j**

171. Mr. Hines realleges as if fully set forth herein the allegations contained in the preceding paragraphs.

172. Mr. Gorovoy's acts described above constitute violations of New York Penal Law Article 130, including §§ 130.52, 130.55, 130.20, and 130.40.

173. When Mr. Gorovoy forcibly anally penetrated Mr. Hines, performed oral sex on Mr. Hines against his will, masturbated Mr. Hines's penis without his consent, and forcibly kissed Mr. Hines without his consent, Mr. Gorovoy intentionally made bodily contact against Mr. Hines, that contact was harmful or offensive to Mr. Hines, and Mr. Hines did not consent to the contact.

174. As a result of Mr. Gorovoy's acts, Mr. Hines has been damaged and brings this civil claim for the physical and psychological injuries he suffered.

175. This claim is timely pursuant to the New York Adult Survivors Act, N.Y. C.P.L.R. § 214-j, because the action alleges intentional and/or negligent acts or omissions and claims injury suffered as a result of conduct which would constitute a sexual offense under New York Penal Law Article 130, and Mr. Hines was eighteen years old or older when such conduct was committed against him.

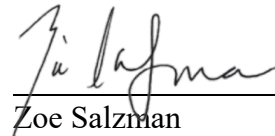
**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests judgment against Defendant as follows:

- a. Compensatory damages in an amount to be determined at trial;
- b. Punitive damages in an amount to be determined at trial;
- c. Reasonable attorneys' fees, costs and disbursements; and
- d. Such other and further relief as this Court deems just and equitable.

Dated: October 31, 2023  
New York, New York

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