

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

JEFFREY WAITROOB ROBERTS, ALEXANDRA
CARMİ ROBERTS (a minor), and JUDAH
WAITROOB ROBERTS (a minor)

Plaintiff(s)

v.

ANJALI MARIA STOKES, LOUISE MOYA STOKES,
ANIL KUMAR STOKES, RABBI SAMUEL OHANA,
THE STATE OF ISRAEL, MACHON MAAYAN, INC.
a NY Corp., and FRUMSTER, INC. a NY Corp.

Defendant(s)

Civil Action No. 17-CV-81107-BLOOM/JMH

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* STATE OF ISRAEL
CONSULATE GENERAL OF ISRAEL
100 BISCAYNE BLVD
MIAMI, FL 33132

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jeffrey Waitroob Roberts
Roberts Attorneys, P.A.
4440 PGA Blvd. Suite 204
Palm Beach Gardens, FL 33410

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: Oct 2, 2017



Steven M. Larimore
Clerk of Court

SUMMONS

s/ Doris Jones
Deputy Clerk
U.S. District Courts

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

17 CV- 81107- BLOOM/ HOPKINS

JEFFREY WAINTROOB ROBERTS,

ALEXANDRA CARMİ ROBERTS (a minor), and

JUDAH WAINTROOB ROBERTS (a minor),

Plaintiffs

v.

ANJALI MARIA STOKES,

LOUISE MOYA STOKES,

ANIL KUMAR STOKES,

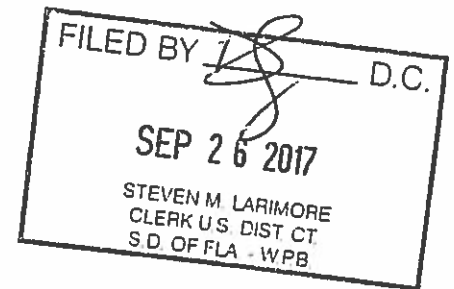
RABBI SAMUEL OHANA,

THE STATE OF ISRAEL,

MACHON MAAYAN, INC., a New York Corporation, and

FRUMSTER, INC. , a New York Corporation,

Defendants.



COMPLAINT

Plaintiffs, JEFFREY WAINTROOB ROBERTS (“Jeffrey”), ALEXANDRA CARMİ ROBERTS (“Alexandra”), and JUDAH WAINTROOB ROBERTS (“Judah”), sue Defendants ANJALI MARIA STOKES (“Anjali”), LOUISE MOYA STOKES (“Louise”), ANIL KUMAR STOKES (“Anil”), RABBI SAMUEL OHANA (“Rabbi Ohana”), the STATE OF ISRAEL, MACHON MAAYAN, INC., a New York Corporation (“Machon Maayan”), and FRUMSTER, INC., a New York Corporation, (collectively, the “Defendants”), and allege:

PRELIMINARY STATEMENT

- 1) This is an action in original, supplemental, and diversity jurisdiction, involving both common law and statutory claims for Fraud under Florida Statutes § 817.034, claims for Assault and Battery, Invasion of Privacy, Intentional Infliction of Emotional Distress, the Tort of Stalking under California Civ. Code, § 1708.7, violation of the Bane Act, California Civil Code § 52.1 (providing civil remedies for victims of “hate violence”), Malicious Conspiracy, Tortious Conspiracy Founded on Criminal Acts, Aiding and Abetting Tortious and Criminal Acts, Gross Negligence, Simple Negligence, Breach of Contract, and the Tort of Deceit per California Civil Code §§ 1709-1710.
- 2) This Complaint describes five and a half years of systematic, methodical, sociopathic abuse through the vehicle of a “romance scam” perpetrated by Anjali Maria Stokes and supported by her co-conspirator, mother, and accomplice Louise Moya Stokes. Anjali and Louise defrauded Plaintiffs of gifts and money. Their primary goal, however, was to deceptively manipulate Jeffrey into believing he and Anjali were in a mutually loving, profound, and authentic romantic relationship as a means to further manipulate, abuse, control, humiliate, socially isolate, and harm Plaintiffs, physically, financially, and most of all, psychologically. They succeeded.
- 3) Anjali targeted Jeffrey because he is an Orthodox Jew. Anjali has spent the past eight years immersing herself in Jewish religion and culture for sinister motives. She spent a year at an Orthodox Jewish seminary in Israel, purported to convert to Orthodox Judaism, and then attended an Orthodox Jewish University in New York — all to gain access, knowledge,

acceptance, and become part of the Orthodox Jewish community for the true purpose of defrauding, manipulating, and psychologically harming Orthodox Jews.

- 4) The terms “sociopath” is an updated version of the term “psychopath”, meant to disassociate this non-correctable disorder from the “psycho” popularized by the Alfred Hitchcock movie of the same name. The disorder is identical. Some psychiatrists prefer “antisocial personality disorder”.
- 5) Anjali is a sociopath.
- 6) Anjali has absolutely no conscience whatsoever.
- 7) Anjali is a stone-cold pathological liar. She could pass a lie detector test.
- 8) Anjali is an anti-semite.
- 9) Anjali had a disingenuously deep and loving relationship with Plaintiff’s children for five and a half years in order to obtain property and psychologically damage Jeffrey and Jeffrey’s children Alexandra and Judah.
- 10) Anjali targeted, initiated contact with, and entered into a relationship with Jeffrey via a for-marriage internet dating site for Orthodox Jews in September 2011.
- 11) Over the next five-and-a-half years, Anjali communicated with Jeffrey for hours nearly every day, feigned genuine love and romantic interest in him, created a fake narrative of herself as the victim of a series of brutal childhood rapes, created a fake persona with which to have a relationship with Plaintiffs, twice falsely pretended that she was committed to a mental-health facility associated with Stanford University for Post-Traumatic Stress Disorder for extended periods, and spent two years pretending to live, have a job, be a member of a synagogue, have co-workers with specific names, spouses, personalities, and backstories, go on weekend trips, have friends that didn’t exist, pretend her father was

suffering from Parkinson's disease and that she was caring for him, and pretending to work for Johnson & Johnson at their contact lens regulatory facility in Irvine, California — while actually living in New York and then Sacramento and Los Angeles and leading a life utterly different than that which she and her mother Louise represented to Plaintiff.

- 12) Over their five and a half year relationship, Anjali induced Plaintiffs into spending countless hours waiting for her at their home, airports, bars, restaurants, and synagogues she was never at, have Jeffrey travel to meet her several times in Washington D.C. and Irvine, CA when she wasn't in those locations at all, pretend to attempt to meet Jeffrey four separate times in New York, NY while instead deliberately avoiding him, induce Jeffrey to send her gifts and cash, spend in excess of 5000 hours on the phone with her over the course of the relationship, text with Anjali throughout the day, almost every day, for five and a half years, and spend countless hours, year after year, counseling and helping her through psychological trauma and related personal problems for a horrific series of childhood rapes she made up from whole-cloth.
- 13) In five and a half years, Anjali never once broke character.
- 14) Anjali's goal was the systematic, methodical control and destruction of Jeffrey's psychological and emotional well-being in order to vindicate her desire to hurt Orthodox Jews. In June 2017, Anjali admitted this to Jeffrey verbatim.
- 15) Anjali admitted targeting Orthodox Jewish men other than Jeffrey for "romance scams."
- 16) Anjali traumatized Jeffrey so badly that she caused him trips to the emergency room in 2013, 2014, and 2015 for medical conditions with no apparent trigger other than the psychological torment to which she subjected him. Jeffrey suffers severe psychological and emotional trauma caused by Anjali's and Louise's actions even as of this Complaint.

- 17) Jeffrey began uncovering Anjali's deception in March 2017, when he discovered that Anjali had been in a relationship with a boyfriend (now fiancé) for nearly a year and was living with him in San Diego. Anjali's fiancé is a secular Jewish fundraiser for an Orthodox Jewish outreach organization and son of a wealthy gynecologist.
- 18) Anjali has positioned herself as a wolf in sheep's clothing, unimpeachable as future wife of a man whose profession necessarily insinuates her socially inside the Orthodox community so she may continue harming more Orthodox Jews.
- 19) On discovering Anjali's authentic Facebook page in June 2017, Jeffrey found out that Anjali's entire relationship with him had been a deception from the beginning. Plaintiff contacted Anjali's fiancé, Alan Levine, and informed him regarding Anjali's abusive relationship with Plaintiff first via postal letter and later via email. In response, Anjali phoned Plaintiff, as if to apologize. When Plaintiff suggested he was so depressed he did not want to continue living, Anjali tried to convince Plaintiff to kill himself while she stayed on the phone to encourage and guide him through the suicide.
- 20) This Complaint seeks relief at law and equity. A criminal complaint has been filed with the FBI.

PARTIES

- 21) Jeffrey is a natural person and resides in Palm Beach County, Florida.
- 22) Alexandra is a natural person and resides in Palm Beach County, Florida.
- 23) Alexandra is a minor, aged 11 as of this Complaint.
- 24) Judah is a natural person and resides in Palm Beach County, Florida.
- 25) Judah is a minor, aged 10 as of this Complaint.

- 26) Jeffrey, Alexandra, and Judah are all citizens of Florida.
- 27) Jeffrey, Alexandra, and Judah are all dual citizens of the United States and Israel and hold passports issued by both the United States and Israel.
- 28) Jeffrey is a divorced father of Judah and Alexandra, now aged 10 and 11 respectively. Plaintiffs are observant Orthodox Jews. Jeffrey spent the majority of the period 2000-2008 in intensive rabbinic studies in Jerusalem, Israel. In Spring 2013 Jeffrey received Orthodox Rabbinic Ordination. In September 2011, Jeffrey was living with his children at his parents' home in Palm Beach Gardens, Florida, in the wake of his divorce.
- 29) Plaintiffs all currently reside at 552 NW 39th Cir, Boca Raton, FL 33431.
- 30) Defendant Anjali is a natural person and is a citizen of California.
- 31) Anjali Maria Stokes is twenty-five years old. She resides with her fiancée, Alan Levine, at the home of his parents, Dr. Mauricio and Hila Levine, at: 1467 Country Vistas Lane, Bonita, CA 91902.
- 32) Defendant Louise is a natural person and a citizen of California.
- 33) Defendant Anil is a natural person and a citizen of California.
- 34) Defendants Anil Stokes (Father) and Louise Moya Stokes (Mother) are the parents of Anjali Maria Stokes. Anil and Louise have been married approximately 35 years and live together at: 2175 Coyote Creek Ct., Gold River, CA 95670-8125.
- 35) Anjali and Anil are both Citizens India.
- 36) Rabbi Ohana is a natural person and a citizen of California.
- 37) Rabbi Ohana resides at 12555 Huston ST, Valley Village, CA 91607.
- 38) The State of Israel is a foreign sovereign state.

- 39) The State of Israel maintains a regional branch of its Embassy to the United States at the Consulate General of Israel to Florida and Puerto Rico in Miami, Florida at 100 Biscayne Blvd, Miami, FL 33132.
- 40) The State of Israel is a signatory to the Hague Service Convention.
- 41) Rabbi Ohana is an agent of the State of Israel for purposes of certifying converts to Judaism.
- 42) MACHON MAAYAN, INC. is a New York corporation. Its principal place of business is at 3209 AVENUE L, BROOKLYN, NEW YORK, 11210.
- 43) Machon Maayan, Inc. is the corporate entity through which Machon Maayan women's seminary operates in the United States for purposes of fundraising, recruitment, and other business functions. Machon Maayan seminary is located at Midreshet Maayan, Givat Washington Educational Institutions, D.N. Evtah, Israel 79239.
- 44) Defendant FRUMSTER, INC. is owner of the jwed.com.
- 45) Frumster, Inc. is a New York corporation.
- 46) Frumster, Inc. has its principal place of business at 55 W. 39TH ST., SUITE 605, NEW YORK, NEW YORK, 10018.

JURISDICTION

- 47) The Court has subject matter jurisdiction in this action pursuant to 28 U.S.C. §§ 1331, 1332, and 1367. The Court has original jurisdiction pursuant to 28 U.S.C. § 1331 because Plaintiffs assert claims that arise between Citizens of Florida and a Foreign State under the laws of the United States, namely, 28 U.S.C. § 1605(a)(5), *General Exceptions to the Jurisdictional Immunity of a Foreign State*. The Court has supplemental jurisdiction over

- Plaintiffs' state-law claims pursuant to 28 U.S.C. § 1367 because those claims are so related to Plaintiffs' federal-question claims that they form part of the same case or controversy.
- 48) This Court also has jurisdiction under 28 USC § 1332 because this is a civil action between citizens of different States and more than \$75,000 is in controversy, exclusive of costs and interest.
- 49) Complete diversity exists between the parties.
- 50) This Court has personal jurisdiction over all Defendants per Florida Statutes § 48.193(1)(a)2 because each Defendant committed tortious acts or omissions within this state.
- 51) This Court also has personal jurisdiction over Frumster Inc., per Florida Statutes § 48.193(1)(a)6(b) because Jeffrey used and consumed Frumster Inc.'s products, materials, and things processed, serviced, and manufactured by the Frumster Inc. within Florida in the ordinary course of commerce.
- 52) This Court also has personal jurisdiction over Frumster Inc., per Florida Statutes § 48.193(1)(a)6(b) because Frumster Inc. breached a contract in this state by failing to perform acts required by contract to be performed in this state.
- 53) The State of Israel is subject to civil suit in the United States for tortious acts alleged in this Complaint per 28 U.S.C. § 1605(a)(5).
- 54) Venue is appropriate in this Court under 28 USC § 1391 because the Southern District of Florida is the judicial district in which a substantial part of the events and omissions giving rise to the claim occurred.

FACTS COMMON TO ALL COUNTS

2011

- 55) Anjali initiated communications with Jeffrey September 7, 2011 by messaging him through frumster.com (now jwed.com), a internet dating website specifically for Orthodox Jews. Anjali messaged Jeffrey about his “adorable” daughter Alexandra, then 5 years old, referencing a picture on his dating profile.
- 56) At this time, Anjali was 19 years old and lived at her parents’ house at 2175 Coyote Creek Ct., Gold River, CA 95670-8125, while attending nearby Folsom Lake Community College. She had spent the 2010-2011 academic year at the Machon Mayan religious seminary for Orthodox Jewish women, then located in Bet Shemesh, Israel.
- 57) Machon Mayan is a religious seminary geared for women from Orthodox backgrounds that attended Orthodox Jewish day schools with intensive in-Hebrew religious studies. It is not an institution geared for brand-new converts or newly-religious Jews with no educational background. Enrollment here suggests familiarity with Jewish practice and study, and more to the point, that the enrollee is actually Jewish.
- 58) Anjali misrepresented herself online and to Plaintiff verbally as having converted to Orthodox Judaism shortly after graduating high school in June 2010 through the Los Angeles Religious Court officiated by Rabbi Shmuel Ohana, several months prior to attending Machon Mayan over the 2010-2011 academic year.
- 58) Defendants targeted Plaintiff for a “romance scam” a full year before actually receiving certification of conversion from Rabbi Ohana.
- 59) Defendants’ goal was to dupe Plaintiffs to believe that Jeffrey was in a mutually loving, committed relationship with Anjali, while actually using Plaintiffs as objects to deceive.

manipulate, control, physically and psychologically abuse, humiliate, to invade Plaintiffs' privacy, and from whom to extract money, gifts, favors, adoration, and all personal dignity.

- 60) Jeffrey learned in June 2017 that Anjali purports to have actually converted to Orthodox Judaism in the late July or August of 2012 through a Los Angeles Rabbinic Court headed by Rabbi Ohana, almost a full year after she first contacted him.
- 61) Defendants were in the process of scamming Plaintiffs, and possibly other Jewish men, for a full year before, for four and a half years after, and on literally the same day as her putative conversion to Orthodox Judaism before Rabbi Ohana.
- 62) Defendants pulled off their scam right under Rabbi Ohana's nose because he failed to investigate her.
- 63) Neither Rabbi Ohana, nor any other Orthodox Rabbinic Court, would have certified Anjali's conversion were he aware of her ongoing romance scams targeting Plaintiff and other Orthodox Jewish men, her non-observance of Orthodox ritual practice documented by Jeffrey, or her true motive in converting to Orthodox Judaism as a subterfuge to gain access to and harm Orthodox Jews such as Plaintiff.
- 64) Rabbi Ohana was not aware of Anjali's activities that should have disqualified her application for conversion because he made no genuine effort to investigate Anjali.
- 65) It is axiomatic that an applicant to any religious, cultural, or social group must be rejected if their true intent in joining that group is to harm members of that group.
- 66) Rabbi Ohana was negligent, or grossly negligent, in certifying Anjali as a legitimate convert to Orthodox Judaism.

67) Plaintiffs were damaged by Rabbi Ohana's certification of Anjali as Jewish because this affiliation enabled her to intentionally misrepresent herself to Jeffrey as a legitimate prospective marriage partner.

68) Both Anjali and her mother Louise are psychopaths.

69) Sociopathy (psychopathy) is a non-correctable disorder.

70) A 2012 FBI Law Enforcement Bulletin defines the term:

"The term psychopathy refers to a personality disorder that includes a cluster of interpersonal, affective, lifestyle, and antisocial traits and behaviors.¹ These involve deception; manipulation; irresponsibility; impulsivity; stimulation seeking; poor behavioral controls; shallow affect; lack of empathy, guilt, or remorse; sexual promiscuity; callous disregard for the rights of others; and unethical and antisocial behaviors.²

71) If permitted to continue representing herself as a convert to Judaism, Anjali will continue harming Orthodox Jews.

72) The FBI has published numerous news reports and public notices about the rapid proliferation of internet-enabled romance scams. A February 13, 2017 FBI Report notes: "In 2016, almost 15,000 complaints categorized as romance scams or confidence fraud were reported to IC3 (nearly 2,500 more than the previous year), and the losses associated with those complaints exceeded \$230 million." Numerous news outlets have run stories on the proliferation of this scam and the harm it is causing the victims.

73) These scams, typically orchestrated by foreign nationals, are emotionally compelling and often target the religiously observant as a means of gaining their confidence. The above-cited FBI report brings one Texas woman as an example:

Even now, though, she remains conflicted. A part of her still wants to believe that Charlie is real and that their relationship was real—that the e-mail exchanges about church and the phone calls when they sang together and prayed together meant as much to him as they did to her. She even holds out hope that one day Charlie will repay her, as he promised to do so many times. Other wise, there is no doubt that he is a heartless criminal who robbed her and broke her heart—and who is almost certainly continuing to victimize other women in the same way. “I can’t even imagine a man, a person, that could be this bad,” she said. “I can’t think of him that way. ... There can’t be a man in this world that could be this horrible to have purposefully done what he’s done to me.”

74) A July 20, 2017 USA Today article notes:

The abundance of social media platforms, chatrooms and dating apps has led to a rise in romance scams where people pretend to be potential suitors to solicit money. In 2016, the FBI's Internet Crime Complaint Center reported 14,546 people were victims of romance or confidence scams, up from 5,791 people in 2014. The financial loss keeps growing as well: victims lost nearly \$220 million in 2016, more than double the nearly \$87 million lost in 2014, according to the FBI. The Federal Trade Commission also had a spike in the number of complaints about possible romance-related scams, up more two-fold to 11,149 from 2014 levels. And those numbers likely represent just a sliver of the swindles. Shame and embarrassment keep many people from coming forward.

"This is a hugely underreported crime," said Special Agent Christine Beining, of the FBI's Houston branch. "We're anticipating that number rising in the future."

75) A Federal Trade Commission study published in 2013 found another telling commonality among all kinds of fraud victims: People who had experienced a negative life event in the previous 24 months — lost a spouse, divorced, separated or lost a job — were twice as likely to become the victim of a scam.

76) Jeffrey’s divorce was finalized 15 months before Anjali approached him. His recently-divorced status was displayed on his online dating profile.

77) Anjali targeted Plaintiffs because of the emotional vulnerability implied by Jeffrey’s recently-divorced, single-father status displayed on his dating profile, and because of the photos of his children Alexandra and Judah.

78) Anjali’s initial September 7, 2011 message to Plaintiff through the frumster.com dating site picked up on this, saying: “The old ladies in the supermarket are correct, your daughter is

adorable”. She engaged Plaintiff’s children on the phone, then aged 4 and 5, talking to them several times a week, every week, throughout the nearly the entire relationship, as if she were truly interested in them as their prospective step-mother.

79) A 2012 FBI Law Enforcement Bulletin explains:

Many of the attitudes and behaviors of psychopaths have a distinct predatory quality to them. Psychopaths see others as either competitive predators or prey. To understand how psychopaths achieve their goals, it is important to see them as classic predators. For instance, they surf the Internet looking for attractive persons to con or, even, murder and target retirees to charm them out of their life savings for a high-risk investment scam, later blaming them for being too trusting. Most psychopaths are skilled at camouflage through deception and manipulation, as well as stalking and locating areas where there is an endless supply of victims.⁵ The psychopath is an intraspecies predator. . . . The psychopath’s egocentricity and need for power and control are the perfect ingredients for a lifetime of antisocial and criminal activity.

80) In her 2008 book, Truth, Lies and Trust on the Internet, psychologist Monica Whitty

explained that computer-mediated relationships “can be ‘hyperpersonal’ — more strong and intimate than physical relationships.” Participants can control how they present themselves, creating “idealized avatars” that elicit more trust and intimacy than their real-life, face-to-face selves. “What happens is, you can see the written text and read it over and over again, and that makes it stronger,” wrote Whitty, who focuses on how cyber technologies affect human beings and now works at the University of Warwick in England.

81) Dr. Cassandra Cross, who has studied the impact on romance scam victims, noted in a 2016 paper that they are “rarely afforded ideal victim status.” This kind of fraud is “unique,” she wrote, in that there is always “communication between the victim and offender,” and the victims “willingly ... albeit under false pretences” send their abusers money and share personal information. “Victims of fraud are seen to actively violate the notion of an ideal victim and hence, are typically understood as blameworthy and culpable for their own

victimisation,” Cross wrote. But she added, “Do not confuse the word ‘typically’ in the last sentence with ‘correctly.’”

- 82) Although many of the elements of a typical romance scam exist here, most of the warning signs flagged by the FBI and other law-enforcement agencies were absent.
- 83) Defendants Anjali, Louise, and Anil are wealthy. Obtaining gifts and money from Plaintiff was their objective only as a component in their broader purpose of control, manipulation, deceit, and psychologically harming Plaintiff as representative of Orthodox Jewish men.
- 84) Defendants are college-educated. Anil is an engineer. They live in a single-family home in the USA. Their identities and home address were easily verifiable. They appeared in numerous photos published on the Facebook page of the Sacramento Chabad near their home and at Jewish religious events at verifiable locations in Israel and in Sacramento, CA. Anjali appeared in photos, Youtube videos, and alumni groups indicating that she really did attend her local high school, Mira Loma. Anjali appears in group photos and videos at Machon Mayan Women’s Seminary in Bet Shemesh Israel, and later Stern College, and often sent photos of herself wearing clothing from these two institutions and with friends of hers that verifiably attended those institutions along with her. Anjali and her mother Louise’s detailed conversations about these places matched physical reality. Her family has Wikipedia pages and a series of books and third-party internet articles describing her family’s history, background, ancestry, and their family estate (“Harmony Hall”) in India. The photos and videos she sent, and conversations she had with Plaintiff were all consistent with the story that highly detailed third-party news articles attribute to her and her family. Her knowledge of Orthodox Jewish practice was clearly that of an insider. Defendants’ identities and backgrounds checked out with third parties. She was utterly credible because

she initially represented her true identity, true social circles, and true personal circumstances — the typically things misrepresented by fraudsters seeking to avoid identification and prosecution (and therefore red flags).

- 85) Anjali casually revealed countless personal details about her family, as if actually interested in a relationship with Plaintiff — stories about her brother Arjun’s bungling incompetence with women, his obsession with Kate Upton sex videos, his stock trading and investment moves, or her brother Sanjay’s binge drinking, wild partying, debauchery, and “frat-boy lifestyle” well into his 30’s, a slew of his more embarrassing incidents involving alcohol and gambling, and how he had made money in college selling knock-off pro-sports memorabilia on the internet.
- 86) Anjali related stories about her father to Plaintiff, ranging from his time at British boarding school in India to his awkward social interactions with other kids’ parents during her childhood, where her mother Louise took the lead because her father Anil simply didn’t fit socially into mainstream American society.
- 87) Throughout the relationship, Anjali forwarded photos of and discussed highly personal, detailed information about her friends Esther Tsvaygenbaum, Sarah Alt (now Sarah Alt Weinstein), Naomi Alt, Julia Siegel, Gabs Resmovits, Meredith Lane, Miriam Aitch, Ray Nov and others from Machon Mayan Seminary and later Stern College. Anjali discussed these women so often that Jeffrey had the experience of actually knowing Anjali’s friends and family vicariously through Anjali, down to their personalities, sense of humor, tones of voice, annoying habits, and countless incidents relating things they had said or done that Anjali found amusing, offensive, or hurtful.

- 88) Anjali revealed extremely detailed information about these and other friends, and discussed at length the dynamics of her relationships with them, just as she did about her brothers and other family members.
- 89) At all times, Anjali and Louise communicated, coordinated, and reinforced each other's lies to Plaintiff because they correctly calculated that Plaintiff would not suspect a sincere-seeming convert to Orthodox Judaism and her own mother as likely perpetrators of a criminal romance scam.
- 90) At all times Anil was aware of and financially enabled his wife (Louise) and his daughter's (Anjali) deceptive relationship with Plaintiff.
- 91) Plaintiff had no reason to think Defendants were con artists. Anjali, her family, and her friends's identities were easily verifiable as being who they said they are. There were no initial red flags.
- 92) The damage to victims of romance scams isn't limited to the money they lost. Research indicates that fraud victims experience post-traumatic stress disorder on par with those who have suffered from violent crime. They develop depression and psychological trauma. Some have attempted or died by suicide.
- 93) A July 27, 2017 Huffington Post article relates the experience one fraudster put several women through:

Victims suffered emotionally and psychologically. A few had even purchased wedding dresses. Two told the court they had seriously contemplated killing themselves. For at least two of the women, the abuse was sexual as well: ...[the con artist] stole pictures of their naked bodies that he used to extort money from them and then posted those images online for anyone to see, said the U.S. attorney's office.

Whitty testified that the victims had suffered severe psychological damage. "They've in many ways experienced potentially permanent, life-altering changes in their lives. The long-term effects remain, years and years later," she told the court.

- 94) Anjali and Louise intended to cause exactly this sort of severe psychological damage in Plaintiffs.
- 95) Anil is a wealthy land baron in India. Anjali travels internationally several times a year, wears designer clothing, and attended expensive private colleges and seminaries. Insofar as swindling gifts and money from Plaintiff was Defendants' objective, it was more about the depraved thrill of causing Plaintiff to unknowingly squander his money, emotional energy, thought, and misplaced love that went into the many gifts and cash he sent Anjali than it was about obtaining the items, which meant nothing to her.
- 96) Anjali and Louise misrepresented Anjali's interest in and her intentions toward Plaintiffs. After three or four months interacting with and carefully observing Plaintiff, Defendants begin slowly, methodically recreating Anjali's persona into Plaintiff's idealized-but-traumatized "dream girl" — a part played by Anjali for the sole purpose of manipulation, deceiving, abusing, invading the privacy of, defrauding, and psychologically battering Plaintiff.
- 97) Anjali purchased a three-month membership to frumster.com in August 2011, a full year before she purports to have converted to Judaism, because she was specifically looking for Orthodox Jewish men to target. Frumster.com (now renamed jwed.com) is an internet dating site "exclusively" for Orthodox Jews seeking a marriage partner.
- 98) Frumster.com misrepresented to Jeffrey in September 2011 that Anjali was Jewish.
- 99) Anjali lied to Jeffrey in September 2011 about being Jewish, falsely claiming that she had converted in June 2010.
- 100) The acts described in this complaint constitute hate crimes and torts motivated by hate because Anjali and Louise targeted Jeffrey because he is an Orthodox Jew.

- 101) Defendants have committed analogous hate-motivated acts against other Orthodox Jewish men.
- 102) Anjali's brothers Sanjay and Arjun were at all times aware of Anjali's deceptive relationship with Plaintiff. Anjali has told Jeffrey many times over the past six years that her brother Sanjay "hates Orthodox Jews".
- 103) Defendants targeted Jeffrey because he is a devout Orthodox Jew.
- 104) Defendants targeted Jeffrey because he is a father to two small children.
- 105) Defendants targeted Jeffrey because he is divorced. Defendants saw this as signaling an emotional vulnerability, and also as suggesting fertile grounds for invasion of Plaintiffs' privacy regarding Jeffrey's relationships with his ex-wife regarding Judah and Alexandra.
- 106) Anjali and Louise have received cash from Plaintiffs under fraudulent or deceptive pretenses.
- 107) Anjali and Louise have received gifts from Plaintiff under fraudulent or deceptive pretenses.
- 108) Anjali and Louise have caused Plaintiff to waste money, to travel, make preparations for visits she fraudulently represented herself as intending to make or actually making, provide her with thousands of hours of professional counseling, and spend other valuable resources under fraudulent or deceptive pretenses.
- 109) Anjali and Louise have knowingly and intentionally damaged to Plaintiff's physical health.
- 110) Anjali and Louise have knowingly and intentionally caused severe damage to Plaintiff's mental health.
- 111) Anjali has admitted to knowingly and intentionally causing severe damage to Plaintiff's mental health.

- 112) Anjali has admitted to owing Jeffrey financial compensation for the emotional damage she caused him.
- 113) Anjali and Louise have run analogous “romance scams” against other Orthodox Jewish men.
- 114) Anjali has admitted to having run analogous “romance scams” against other Orthodox Jewish men.
- 115) Anjali has targeted other men because they are divorced men with small children.
- 116) Anjali has received cash from other men under fraudulent or deceptive pretenses.
- 117) Anjali has received gifts from other men under fraudulent or deceptive pretenses.
- 118) Anjali has caused other men to waste money, to travel, and spend other valuable resources under fraudulent or deceptive pretenses.
- 119) Prior to contacting Plaintiff in September 2011, Anjali set up a second version of her social media accounts, specifically her Facebook account. Soon after initiating communication, she blocked Plaintiff from her authentic account at [facebook.com/Anjali092](https://www.facebook.com/Anjali092) and sent Plaintiff a ‘Friend’ request from her second Facebook account as [facebook.com/Smolieday](https://www.facebook.com/Smolieday).
- 120) Within a week after initial contact, Anjali and Jeffrey were speaking on the phone about 20 hours per week, texting frequently throughout the day — every day — and occasionally emailing or communicating through Facebook Messenger and other similar services. Jeffrey felt he had never connected with someone so deeply. Anjali consistently confirmed and reaffirmed her feelings for him.
- 121) This amount and intensity of communication would be the approximate norm throughout all of Plaintiff’s 5.5 year relationship with Anjali, September 2011 through April 2017.
- 122) Martha Stout, Ph.d explains:

The intense charm of people who have no conscience, a kind of inexplicable charisma, has been observed and commented on by countless victims, and by researchers who attempt to catalog the diagnostic signs of sociopathy. It is a potent characteristic. Most of the victims I have known in my work have reported that their initial involvement with a sociopathic person, and their continued association even through she or he caused them pain, was a direct result of how charming she or he could be. Countless times, I have watched people shake their heads and make statements such as, "He was the most charming person I ever met," or "I felt like I'd known her forever," or "He had an energy about him that other people just don't have."

I liken sociopath charm to the animal charisma of other mammals who are predators...

123) Anjali reinvented her personality to conform to Jeffrey's ideal woman. She never, at any time, over five and a half years of essentially daily communication, broke character.

124) Dr. Martha Stout, Ph.D explains:

Robert Hare, [author of the] "Psychology Checklist", now accepted as a standard diagnostic instrument for researchers and clinicians worldwide... writes "Everyone, including the experts, can be taken in, manipulated, conned, and left bewildered by them. A good psychopath can play a concerto on anyone's heartstrings... Your best defense is to understand the nature of these human predators." (The Sociopath Next Door, page 12)

125) Anjali's authentic Facebook page reflects a personality utterly different than the person

Anjali presented herself as to Plaintiff for hours and hours nearly every day for five and a half years. Instead of the deeply thoughtful, spiritual, introverted, socially awkward person she presented herself as to Plaintiff, she presents herself on her authentic Facebook page as an outgoing, ditzy "party girl" type with over 1000 Facebook friends making funny faces in photos at a seemingly endless stream of social events. Even her tastes in music, movies, and books is totally different than what she presented to Plaintiff.

126) A 2012 FBI Law Enforcement Bulletin warns:

Psychopathy has been described as the single most important clinical construct in the criminal justice system. More recently, it is considered "the most important forensic concept of the early 21st century." Because of its relevance to law enforcement, corrections, the courts, and others working in related fields, the need to understand psychopathy cannot be overstated. This includes knowing how to identify psychopaths, the damage they can cause, and how to deal with them more effectively.¹

¹<https://leb.fbi.gov/2012/july/psychopathy-an-important-forensic-concept-for-the-21st-century>

127) In April 2017, Plaintiff discovered Anjali's authentic [linkedin.com](https://www.linkedin.com) account and found that her work history for the previous 2 years was radically different than what Anjali had communicated to him.

128) In June 2017, Plaintiff discovered Anjali's authentic Facebook page, at [facebook.com/Anjali092](https://www.facebook.com/Anjali092). The postings on her page showed that Anjali had been at different locations than the locations she had represented herself as being at to plaintiff for the entirety of the relationship.

129) Anjali created and maintained her second Facebook account at [facebook.com/smolieday](https://www.facebook.com/smolieday) as a front through which to have a disingenuous romantic relationship with Plaintiff. She shut it down in March, 2017 when Plaintiff began discovering social media and other sources that reflected serious discrepancies with the stories she and Louise had been representing to him for years.

130) Anjali created and maintained this second Facebook account as a front through which to have disingenuous romantic relationships with Orthodox Jewish men in addition to Jeffrey.

131) Anjali admitted to Plaintiff in February 2017 that she has a serious psychiatric disorder "like bipolar" that has been diagnosed by a M.D. psychiatrist. She refused to specify the diagnosis.

132) Anjali is a psychopath.

133) Anjali is a human predator.

134) Louise is a psychopath.

135) Louise is a human predator.

- 136) Anil, and Anjali's brothers Arjun and Sanjay, have known about Anjali and Louise's fraudulent relationship with Plaintiff since the 2011, and found it amusing because they hate Orthodox Jews.
- 137) Within a few weeks of Anjali first contacting him, September 7, 2011, Plaintiff began sending gifts to Anjali.
- 138) Anjali's initial message contacting Plaintiff through the frumster.com (Orthodox Jewish) dating website referenced his children. Anjali always expressed a keen interest in Plaintiff's children and constantly described herself as impressed by Plaintiff's care, concern, and involvement as a father. Plaintiff began allowing Anjali to speak with his children in or around November 2011.
- 139) Anjali displayed incredible interest in Jeffrey's children Judah and Alexandra and would spend typically 20 or 30 minutes talking to them once and later several times weekly. She was incredibly engaged with them and seemed truly interested in knowing and caring for them. This would continue for the entirety of her relationship with Plaintiffs. Her relationship with them seemed to Jeffrey almost miraculous. Anjali became a central personality in their lives. In the years 2011-2017, Jeffrey took thousands of photos and videos of himself and his children for Anjali. He shared all of their "first" life events with her — learning to ride bicycles, ice skate, create art projects, celebrate birthday parties, build sand castles on the beach, fly kites, participate in school performances and events, and go through all of Judah and Alexandra's life events from ages 4 and 5 through 10 and 11 respectively. They opened up to Anjali and talked to her about issues that had personal meaning and importance to them because they understood that she was their father's significant other. They developed their own intense bond and feelings with and for her.

140)Anjali's relationship with Judah and Alexandra was disingenuous. Her true purpose was using the children as a tool to ingratiate herself to Plaintiff as a mother figure to his children, and also hurting the children directly by pretending to love them and then failing to appear in person. She was extremely successful. This bait-and-switch with Plaintiff's children would get progressively more malicious as the relationship progressed. She would successfully reduce them both to tears numerous times numerous times of the coming years.

141)Dr. Martha Stout, Ph.d explains, "When a sociopath identifies someone as a good game piece, she studies that person. She makes it her business to know how that person can be manipulated and used, and, to this end, just how her chosen pawn can be flattered and charmed. In addition, she knows how to promote a sense of familiarity or intimacy by claiming that she and her victim are similar in some way."

142)One of Anjali's prime studies was Jeffrey's children. Utterly lacking any sense of morality or human decency, she deliberately used his children as a way of manipulating him for no reason other than malice.

143)Louise (Anjali's mother) first contacted Jeffrey through Facebook December 11, 2011, inquiring about Plaintiff's relationship with her daughter.

144)Louise began speaking regularly with Jeffrey in her capacity as Anjali's mother, but also regarding her own longings to convert to Orthodox Judaism, and her profound yearning to become Jewish, but unable to convert because she was married to Anil, a Hindu. Her frustration and sincerity were palpable to Jeffrey. Louise and Jeffrey had long, multi-hour talks about Jewish practice, belief. Louise' spiritual longings, desires, and personal spiritual predicament. Anjali reported her mother as "elated" whenever she got off the phone with

Plaintiff. Louise's representations to Jeffrey regarding her interest in Judaism were false.

Her only interest was winning Jeffrey's sympathy, empathy, and trust in order to harm him.

145) Anjali presented her mother Louise as sincerely yearning to convert to Orthodox Judaism along with her daughter, but ambivalent about her prospective conversion because of the obvious consequences within her family.

146) Louise represented herself as being an active member of and financial contributor to the Sacramento Chabad house (outreach synagogue). Convincingly, she appears in numerous photos on the Sacramento Chabad Facebook page attending various religious and social events.

147) Defendants have their own Wikipedia page and are minor celebrities in northern India. Anil is the grandson of Satyananda (originally Samuel) Stokes, a Christian missionary to India in the early 20th century, hailing from an ultra-wealthy Quaker family based in Philadelphia. He eventually converted to Hinduism, meditated in a cave in the Himalayas for an extended period, married a local woman, became personal friends of Mahatma Gandhi, was imprisoned by the British for his role in the Indian Revolution, and finally established a large commercial apple orchard in India's far northern Himchal Pradesh region in the Himalayan Mountains. The Stokes family returns to their estate almost every fall, employs hundreds of workers, and derive in excess of U.S. \$1 Million yearly net profit from their apple farm. Louise and Anjali explained that Anil came to the USA and got a job as an engineer because living full-time in the Himalayas overseeing apple harvests was boring.

148) Both Anjali and Louise portrayed Anil as aloof, sarcastic, foreign, both physically and emotionally cold, and incredibly stingy with money. They described weekly meetings where Anil would demand an accounting of all expenses. Anil is about 10 years older than

Louise. Anjali claimed to be drawn to Jeffrey because he was such a loving, involved father, a welcome contrast to her father Anil who was socially awkward, stingy, aloof, never hugged her, and constantly put her down.

149) Anjali deliberately misled Jeffrey to believe that she was an Orthodox Jew and therefore did not use the internet or do other forbidden actions on the Jewish Sabbath. On November 28, 2011, Anjali responded to Plaintiff's surprised inquiry about her having changed her Facebook profile picture on Shabbat:

"I can't sleep because your email has me baffled, perturbed, and quite frankly, peeved. First off, I don't play games. I don't expect anyone to chase me, least of all a smart, intelligent, divorced man with 2 kids. Our lives are so busy, your work, my school, just no time for tennis matches. Why would I play games? I like you, you like me, end of story. NO GAMES JEFFREY. Secondly, I didn't change my photo on Shabbat, Arjun did. And thirdly, I do love you. I wish we would've spoken before your Shabbat started, but I was with the family, time did not allow for any privacy to call.

150) Plaintiff gave Defendants about \$500 in gifts in 2011. These gifts consisted mostly of religious books, food gift-baskets, and jewelry. Plaintiff gave Anjali these gifts because of her representations to him that she was sincerely interested in him romantically.

2012

151) Anjali indicated she wanted to come to visit Plaintiffs. She allegedly purchased a ticket from Sacramento to Palm Beach International, January 26-31, 2012. She emailed Plaintiff her e-ticket with a note reading: "Jeffrey, I have finally booked my ticket to come see ya!!!!!! I can hardly wait, dust off the red carpet babe."

152) Plaintiff rented Anjali a room at FAU University guest housing, a few minutes' walk from the local Chabad Synagogue, and made plans for activities together.

153) When the travel dates came, Anjali allegedly contracted a severe urinary tract infection and had to cancel her flight. She rescheduled and rebooked her ticket for the beginning of March. Anjali continued talking with Jeffrey, about 20 hours per week, texting throughout the day, and sending sexy photos of herself.

154) A week or two before her March 2012 flight, Anjali confessed her love for Plaintiff. She had gone to her doctor, gotten a prescription for birth control pills, and wanted to be with Plaintiff on her upcoming trip. She represented to Plaintiff that she had spent approximately \$650 on a beachfront suite at the Omphoy Ocean Resort Hotel, and Plaintiff received the hotel booking and a paid, non-refundable room confirmation "cc" email from a third-party booking service.

155) For months, Anjali had been verbally, texting, and emailing Plaintiff expressions of her love on a daily basis. For example, on February 15, 2012, Anjali emailed: *"Jeffrey, I read your words and the most wonderful feeling went through my body. I truly felt your energy, love, spirit. You are my soul mate. Love, Anjali"*

156) On the way to the airport, Louise allegedly discovered Anjali's birth control pills. She allegedly ordered Anjali turned the car around and drove a sullen, humiliated Anjali back home. Louise messaged Plaintiff on Facebook that evening:

Jeff,

Yes, I will explain as long as everyone is being truthful....

She was driving to SFO and asked for a stick of gum from her purse. I opened her purse, reached into one of the pockets and found the birth control pills. It was the last thing I expected to find in Anjali's possession. I asked her why she had them, she explained on her last visit to her physician they discussed birth control. Her doctor wrote out the prescription, and Anjali had it filled. This was some time in the middle of February, two weeks before her visit to see you. My question to Anjali was "are you planning to become sexually active with Jeff? She said yes. I was quite taken back, more like shocked and sadden because she had always spoke of the virtue of not crossing those sexual boundaries until marriage. What made her change her mind? Had you spoken to her about it? She made it very clear it was her decision alone, you didn't know anything about it.

What was she going to do, surprise you? She was genuinely very sincere in her reasons for wanting to consummate your relationship ie..she loves you very much, has a very deep connection with you, she trust you, feels safe with you, you have guided her through some difficult situations, you have taught her so much about Judaism, and she believes you are her soul mate. I tried to explain to her those are all wonderful reasons to love someone, but does Jeff feel the same way? Does he want to complicate his life by bonding to someone so deeply when the relationship is by long distance? And the fact you have never met in person, never touched each other, held each other's hand and then upon meeting for the first time, make love to him? Then she said she had booked a hotel room, and I practically lost it. What was she THINKING? As I understood it, this trip was to meet each other face to face, share a shabbat meal with your family, go to the beach, just enjoy each others company. A very nice, respectable first "date". I knew her flight was nearing, but as her mother, I felt I needed to make sure she knew all the ramifications of her actions. Because if she were to bond to you in sexual way, it would bring about a very real commitment and responsibility to the relationship.

In any event, it was not a good night for anyone, including you. Anjali is upset, you are upset and I am just wondering what is going on. You have every right to be upset and frustrated. I am sorry for that. I wish Anjali had come to me sooner. I wish we had this discussion before the trip. I am not so angry about the birth control pills contrary to what you may think. I'm glad Anjali had the foresight to think of protecting herself from an unwanted pregnancy.

I can't help but look out for Anjali, for her well being, happiness. I love her more than anything. Anyway, its late and my mind is numb. Lets talk later.

*Best,
Louise*

157) While essentially a work of fiction, Louise truthfully acknowledged the destructive

psychological impact Anjali's fake trips were having on Jeffrey, because creating this destructive psychological impact was her and Anjali's whole, disingenuous purpose in having the relationship at all.

158) Despite not coming, Anjali sent Plaintiff a basket of home-made *hamantashen* (traditional Jewish cookies) for Purim, a lovely Hallmark card expressing her love for him, and an unsolicited photo of herself nude in the bathtub. On March 5, 2012 Anjali emailed Plaintiff:

Dear Jeffrey,

Okay, maybe not the greatest pic, but you know how much I love my bath time. Hopefully, you'll be in the tub with me soon.

*Love you so much,
Anjali*

159) Anjali's flirtatiousness and racy photos aside, Anjali spent hours with Jeffrey discussing Judaism, spirituality, meditation, and studying and discussing sacred texts together, in addition to just talking about life. She presented herself as shy and inexperienced, but somehow also coy and exciting.

160) Plaintiff had grown to authentically love Anjali and interpreted the photos she sent him as sincere expressions of her love and reflecting her stated desire to have a lifelong relationship with him.

161) Around this time, Anjali confessed to Plaintiff that she had been raped as a five-year-old child while at summer swim camp. The fourteen-year-old son of a family friend, a boy named Andrew Patel ("Andy"), was a counselor at the camp. Over the course of the two week session, Anjali tearfully, in a broken voice, described how Andy had repeatedly raped her in the locker room and while holding her under water in the pool. She had told no one, ever, including her mother. Despite crying every night after camp, her mother didn't pick up any clues and kept making her go back the next day, thinking she was simply afraid of the water or being difficult. Over a series of heartbreaking, sobbing conversations in a broken voice, she described Andy wiping blood off her leg and making her shower so no one would know. She had suffered with this trauma inside her for years. She battled anorexia, severe insomnia, depression, and anxiety throughout high school and never had any normal relationships with boys. She had several nervous breakdowns during high school that caused her to be unable to attend school for extended periods. She still did not know how to swim because of her fear associations with water and swimming pools. She'd battled anorexia and bulimia in as a teenager and slept typically only a few hours every night. Plaintiff believed this was true because Anjali had called and texted Plaintiff

nearly every day at odd hours throughout the night since soon after meeting. Plaintiff only now understands that Anjali's years of all-night texting and calling were a form of harassment, not expressions of intimacy.

162) Anjali placed herself at the age of five in her rape story, the same age as Jeffrey's daughter Alexandra, in order to illicit the maximum empathy from and emotional impact on Plaintiff.

163) Jeffrey began counseling Anjali and urging her to seek help. Eventually, Jeffrey convinced Anjali to tell her mother. She did, and Louise allegedly began bringing Anjali to a therapist specializing in survivors of childhood sexual assault in Walnut Creek, about an hour from their home in Sacramento, CA. In March 2012, Louise texted Plaintiff via Facebook:

I want to thank you again for caring for Anjali. It just shows how open and big your heart is. And she is a terrific girl. Not just saying because she is my daughter, but everyone loves her. She is a gem, inside and out, and it is absolutely horrible the trauma she went through when she was 5. It's trapped her, haunted her and kept her shackled. It's time she break free and live the life HaShem has destined for her.

*Shabbat Shalom,
Louise*

164) It appears that her alleged rapist "Andy" Patel was a fictional character Anjali and Louise created based on Anjali's high-school boyfriend Andrew Patel. In June 2017, Plaintiff discovered photos on Anjali's authentic Facebook page of Anjali in a strapless red party dress attending her Junior Prom with Andrew Patel. That Andrew Patel precisely matches the physical description, social, and educational background of the "Andy" presented to Plaintiff as Anjali's childhood rapist.

165) On discovering Anjali's authentic Facebook Page in June 2017, it was quickly apparent that Anjali has no authentic problem with men or sexuality.

166) Anjali has had normal relationships with men throughout high-school, college, and since college, typical of a secular woman that grew up in California.

- 167) Anjali has been living at the same address as her current real-life boyfriend and fiancé, Alan Levine, since at least March 2017, at 1467 Country Vistas Lane, Bonita, CA 91902. The property is owned by her fiancé's parents, Dr. Mauricio and Hila Levine.
- 168) Anjali created her story about having been raped as a child only as a device to illicit sympathy to manipulate, abuse, control, and obtain gifts and money from Plaintiffs. Jeffrey would only discover this fraud in June 2017.
- 169) On Plaintiff's advice, in early March 2012, Anjali began working with Navah Verhoeven, a spiritual healer and psychotherapist in Israel, via phone or Skype sessions in addition to her alleged sessions with her therapist in Walnut Creek. Weekly sessions with Navah cost over \$100 US dollars per session. Louise paid these bills. The therapist did not discuss details of the session with Jeffrey, but did confirm that Anjali was participating regularly. Anjali underwent this therapy to help her deal with trauma she didn't have, only to convince Jeffrey into believing that she really had been raped as a five-year old.
- 170) Anjali's therapy with the Navah Verhoeven continued over the course of about 15 months. Defendant's purpose in receiving this therapy was to induce Jeffrey to believe that she had been raped by a child, that this (fictional) rape caused severe psychological problems that prevented her from seeing Jeffrey in person, and that she was serious about getting help in order to see Jeffrey in person.
- 171) Jeffrey invited Anjali and Louise to spend Passover 2012 with him in Washington DC. Anjali and Louise declined because they were allegedly committed to spending the holiday with Louise's elderly parents in Albuquerque, New Mexico, who were not expected to live much longer. On April 3, 2012 and continued on April 6, 2012 (the first night of Passover) Louise messaged Plaintiff via Facebook:

[April 3, 2012]

Dear Jeff,

Lets deal with Pesach first. Pesach will be here in Albuquerque with my family. I talked to my sisters and we felt it would be important for my dad. I contacted Chabad and Anjali has a place to go as she wants Pesach to be meaningful, spiritual as opposed to boring, rushed, unfilled with my family. She has a point.

Now to Anjali. We made an appointment to see a new therapist. She seems very excited and ready to conquer and heal the past trauma. I know she wants to go to Florida, but whats holding her back, I don't know. I don't know her thoughts, feelings, only when she opens up. I ask her frequently about you and she has the biggest smile. This morning she went off early to meditate. I assumed all was well with the relationship, other than her not seeing you.

I would love to talk. Anjali said you were upset we haven't talked. Sorry! I thought fb was OKAY! I will be free later in the afternoon. 12pm mst

Louise...

[April 6, 2012]

..Dear Jeff,

I just couldn't carry on my busy day without wishing you a wonderful Pesach. Anjali said you are in DC by yourself and I feel badly about that. I wish we could have shared this wonderful holiday with you. Things have gotten a little worse with my dad. He is back in the hospital. But Anjali has planned a wonderful Pesach dinner enlisting the help of her aunts, cousins, brothers. She is a force of nature at times.

*All my best for happiness, and lots of love,
Chag Pesach Sameach.*

Louise

172) Plaintiff discovered Anjali's authentic Facebook page in June 2017. She posted photos of herself running around Manhattan participating in the "Amazing Race" reality TV show on April 6, 2012, the evening Passover started.

173) Anjali told Jeffrey in July 2017 that she lied to him about being in New Mexico because she did not want to risk him traveling to New York from Washington DC to meet her because she never intended to meet him. .

174) Anjali and Jeffrey talked naturally for hours and hours daily. For example, on April 16, 2012 Anjali emailed Jeffrey shortly after he took the DC Bar Exam:

Dear Jeffrey,

Just wanted to say have a safe flight back home. Having you with me on those late night/early morning chats were the BEST. I never felt so close and connected to you. You are my soul mate, my protector, my lover. I want to have those late night chat sessions in person. I spoke with mom, I think in 2 weeks I will come to see you. No promises, but thats the plan.

This pic was taken today in the garden. The climbing rose is called "Joseph's Technicolor Coat" and I love its colors. Today I was beaming, from the inside out. I am so happy to have you in my life.

*Love you always,
Anjali*

175) April 25, 2012, Anjali emailed Plaintiff another photo of herself nude in the bathtub.

176) In May 2012, Anjali and Louise purchased and had Plaintiff sent a \$488.00 Roots-brand leather briefcase as a congratulations gift to Plaintiff for passing the DC Bar Exam.

177) The gift receipt was blacked-out, but still legible. Defendants really spent \$488.00 on their gift to Plaintiff. The charge was to Defendant's American Express Card number:
3717*****1000.

178) Anil knew about and supported his wife and daughter's deceptive relationship with Plaintiffs. Anil paid for this gift and all the other expenses incurred in course of the scam. Anjali and Louise presented Anil as cold, aloof, distant, and financially very stingy. Louise mentioned to Jeffrey that she was slowly draining a retirement account she had from a job she'd had years before in order to pay for Anjali's therapy.

179) Defendants' gifts and overtures appear to have been an attempt to 'prime' Jeffrey to reciprocate financially. The trips Anjali was pretending to take and the therapy she was pretending to have were extremely expensive. Louise began communicating to Jeffrey how much they cost and how financially devastating this relationship was on her, and how hard-pressed she was personally, with money being the primary barrier stopping her from converting to Judaism.

180) On May 17, 2012 Louise texted Plaintiff via Facebook:

Louise Moya Stokes 3:17am May 17

Unfortunately, I don't think I will be able to make Pinchus's wedding. I feel torn only because he is a good friend and I was looking forward to meeting and going to the wedding with you and Anjali. But, for now, too many other obligations and money is tight. Anjali had a talk with me just moments ago regarding my plans for conversion. She is offering her support and unconditional love in what may be a very hard break for the family. She suggest I get a move on with the divorce/conversion as it would be less painful for all. First time she has ever been so open and forth coming. Its very hard accepting the Torah and embracing Judaism knowing it's going to tear my family apart. This is gut wrenching and I am feeling so miserable.

181) The next day, Louise continued:

Louise Moya Stokes 3:20am May 18

Hi Jeff,

Concerning Anjali- The Jerusalem In July program is not at all what I had in mind for her. I read the calendar and I told her it's a condensed version of what she did in seminary. She needs to learn Hebrew and do "real" learning, not going on tiyul and shabbatons. She agree's and we are looking at changing the program. She said you had some good options and places to learn. Like to hear about any ideas.

Concerning Louise- I am conflicted. On one hand I would like to move on as quickly as possible, but the money situation is taking longer than I thought. I have no way to access the BIG money. Anil has that in his name only. AND I feel I need to settle Anjali in college first. Make sure Anil pays her YU tuition, make sure she is happy, whole and moving forward in her life. AND I am feeling guilty leaving Anil. Today is his 64th birthday and I really hate to leave him. He is a good, proud man. He has worked hard to provide a good life for our family. One can't just ignore 33 years of a good marriage (maybe last few years not so great) but he is not to blame. I AM and it feels horrible. I know I will go through with the conversion but still hurts.

The plan to attend Pinchus's wedding in Baltimore went "KAPUT". I really wanted to dance at his wedding and meet you! Next time.

Going to bed now. Have a good day.

*Love,
Louise*

182) On May 14, 2012 Anjali emailed Plaintiff her itinerary for her next trip, May 24-31. The

flight left at 6:00 am. At 1:30 am, Anjali emailed Plaintiff:

Hi Sweet Jeffrey,

Can't sleep. Not sure if I am just too excited or too scared to see you in Florida. Can I be both? Truth is, I feel like I can't live up to your expectations of me. That is why I keep telling you to have LOW expectations, but do you listen to me???

To be honest, I am not sure if I am ready for living or loving or being loved. I am very good from a distance, like 3000 miles away. But pretty sure a failure in face time. I kid when I say I want to be put on a pedestal, because I have tenderly and lovingly reserved that spot for you a long time ago. You are too wonderful for words, even in your most "brutally truthful" chats, I still am drawn to you, listening, learning, loving. What is so scary about going on a plane and seeing the man I love? I should be running into your strong arms, instead, I'm fumbling, plummeting and mucking up the best thing in my life. What are you going to do with me Jeffrey?

*Love you,
Anjali Shoshana*

183) By May 2012, Anjali and Louise had led Plaintiff to believe that Anjali was in a serious relationship with Plaintiff, to the point that Plaintiff sent Louise a mothers' day gift in her capacity as Plaintiff's future mother-in-law. On May 15, 2012 Louise responded via Facebook:

THANK YOU. THANK YOU, THANK YOU!! I love the Book of Our Heritage. A friend suggested I buy the set many moons ago. Why I never did is lunacy. It is probably one of the first books I should have bought. Anjali is already reading the 3rd book which talks about Shavuot. I am happy she's going to be spending the chag with you. I am sure you will discover more about each other that you never knew before.

How's your mother feeling? Give her our best.

Thank you for your kindness and generosity.

*Love,
Louise*

184) Around 5:30 am May 24, 2012, Anjali called Jeffrey from the airport, trembling and in the midst of a severe panic attack, allegedly from a bathroom stall near her gate. Her call lasted about 20 minutes. She vomited while on the phone. It ended with a stammered "I fail" and Jeffrey beside himself with concern. Louise called about an hour later on the way to pick her up at the airport.

185) Jeffrey was sick with concern for Anjali. He had begun reading and studying popular and academic texts on the impact childhood sex abuse on women, and seeing it in the woman he loved was simply devastating.

186)Anjali never had a ticket to fly to Florida on May 24, 2012. Her flight and panic attack at the airport were staged.

187)Dr. Martha Stout, Ph.d explains:

Sociopathy stands alone as a "disease" that causes no dis-ease for the person who has it, no subjective discomfort. Sociopaths are often quite satisfied with themselves and with their lives, and perhaps for this very reason there is no effective "treatment". Typically, sociopaths enter therapy only when they have been court-referred, or when there is some secondary gain to be had from being a patient. Wanting to get better is seldom the true issue. (The Sociopath Next Door, Page 13).

188)A week after the failed flight, Louise texted Plaintiff via Facebook on May 31:

Jeff,

Anjali is going through a hard time, emotionally, spiritually, physically. I am trying to get her to a better place. We went to the gym, shopping, salon. I have been talking to her, telling her to open up and stop trying to thwart people who are there for her. Stop trying to control situations, to be honest with herself about her ordeal.

I agree, she needs to be on a schedule and she is working on one. I am not going to allow her to mope around, feeling sorry for herself. So she had a setback last Thursday, its OKAY. WE don't hate her for it.

189)Anjali regularly visited the Orthodox Jewish community in Los Angeles the first year of her relationship with Plaintiffs to purchase kosher meat and participate in activities with the Jewish community there. Whenever in Los Angeles, Anjali would text or email Plaintiff sexy photos of herself. For example, making a pun on the 'spiritual growth' she and Plaintiff talked about frequently, Anjali emailed Plaintiff an photo of herself on June 10, 2012:

Hello Mr. Roberts,

Here is a photo from my last trip to LA. See, I am growing in all the right places. Just for you.

*Love you plenty,
ASS*

190)Plaintiff now understands that these visits to Los Angeles were to Rabbi Ohana's Rabbinic Court in that city regarding her conversion, which Anjali lied to Plaintiff about having

already completed in June 2010. The sexy photos she sent Plaintiff during her visits to Los Angeles were sent in mockery of her conversion process.

191) Anjali allegedly tried to set another trip over the July 4th Holiday. Plaintiff offered to fly to California. Louise intervened, annoyed, scolding Anjali for making plans that conflicted with a major family gathering and bought Anjali a July 31, 2012 ticket to go see Plaintiff.

192) The day of the flight, Plaintiff texted Louise:

Mrs. Stokes,

..Anjali is doing better this time I think, but she is very nervous. You may want to be sure she's on the anti-anxiety meds starting this morning and that the meds are peaking when she's getting on the plane and transferring in Los Angeles. I'm really looking forward to seeing her. Hope all is well!

Jeff

193) Six hours later, Louise replied:

Hi Jeff,

Having a problem with Anil regarding Anjali's trip to Florida. He knew she was going and I told him she was going to visit a friend. I specifically said a guy friend whom she has been talking to for a year. I also said there wasn't going to be any hanky panky because it wasn't that kind of visit. He understands and appreciates Anjali's viewpoint concerning sex before marriage and knows she would not do anything to compromise that. Not sure why he is acting like I have never talked to him about the trip.

He has gone for a walk with Priya and I am just helping Anjali pack. She is quite nervous and I think having her dad yell was not good.

I am hoping Anil calms down and Anjali is even calmer. She didn't want to take her medication until dinner time.

194) Anjali allegedly flew to Los Angeles the evening of July 31, 2012 without incident. She landed in LAX at 9:35 pm PST, or 12:35 am in Florida, Plaintiff's time. There, at LAX, she suffered another horrific panic attack, this time far worse than before. Anjali kept Plaintiff up all night receiving calls every hour or two from a panicking, hysterical Anjali. On August 1, 2012 Louise texted Plaintiff via Facebook:

UPDATE: Leaving for LA and decided to spend a few days there. She is tired, hungry but otherwise so-so. She doesn't want to see anyone including you. Coming home Friday, seeing therapist.

195) Louise allegedly got in the car and drove to LAX from Sacramento overnight to fetch her.

After Louise arrived, they decided to stay a few days in Los Angeles to give Anjali some space to mentally recover away from her father and to give Louise time to recover from her all-night drive.

196) On August 2, 2012, Louise texted Plaintiff via Facebook:

Jeff.

We're going back to Sacramento this morning. I spoke with her therapist and it was decided that Anjali would do well in a treatment center that offered a program specializing in trauma-Post Traumatic Stress Disorder. They have a comprehensive treatment plan for young adults. She is not very happy about it and would rather deal with this on her own. She is feeling very bad about Florida and letting you, your children and parents down again. I tried telling her it doesn't matter what people think, just focus on yourself and getting well.

I need to go. Hope all is okay with you.

197) Anjali and Louise actually went to Los Angeles this trip, but Anjali never had any intention of continuing on to Florida. She traveled to Los Angeles to finalize her deceptive conversion with the Los Angeles Rabbinic Court headed by Rabbi Shmuel Ohana.

198) Anjali concealed information highly relevant information from the Rabbinic Court.

199) Anjali lied to the Rabbinic Court.

200) Anjali converted to Orthodox Judaism for the true purpose of entering the Jewish community to hurt, deceive, manipulate, defraud, steal from, and otherwise damage Orthodox Jews.

201) Rabbi Ohana was duped because he made no authentic effort to investigate Anjali, even though investigating her is the very essence of his job as head of a Rabbinic Court certifying a conversion to Judaism.

202) On August 5, 2012 Louise texted Plaintiff via Facebook:

Hi Jeff.

I understand from Anjali you are upset with me for not calling/not keeping you informed/not heeding your advice????

The treatment center in Palo Alto cannot accept Anjali at this time. Possibly in a week unless they get a opening which could happen. The other possibility is the facility in Tucson, AZ. They could take Anjali as early as Tuesday. The only down side is that it is a 3 week program and \$\$\$\$.
There is another facility in Southern Cal that can take Anjali as an out patient. She would be in a structured program for 6 hours, Mon-Friday. I am checking out other places as well. It's a real eye opener how damn expensive these treatment centers are.

Anjali mentioned it's your son's birthday party tomorrow. Enjoy all their birthdays, recitals, school programs. They will feel so loved and special. Childhood should only be happy memories.

Louise

203) Louise had been complaining about the cost of Anjali's flights, treatment, therapy, and upcoming college tuition bills since around March 2012. Louise regularly hinted or suggested outright that Jeffrey contribute. Louise got into great detail about how Anjali's flights and therapy were destroying her savings.

204) A spot allegedly opened up at the Palo Alto facility and Anjali checked in on August 7, 2012. Plaintiff texted Louise via Facebook on August 9, 2012:

She left a phone message on Tuesday at the last minute saying she was turning on her phone. That was just after filling out the paperwork on check-in. I haven't heard anything since. I got the impression from the message that she wasn't going to be allowed to use her phone for the entire stay. I'm pretty concerned about her.

205) On August 11, 2012 (Saturday night), Plaintiff again texted Louise via Facebook:

Mrs. Stokes.

Anjali called me just before Shabbat. She sounds like she's doing well with the program. They're obviously starting to address the issue and not letting her divert the attention onto some other true-but-irrelevant issue. The major breakthrough I'm seeing so far is that she told me without me asking her that she now is truly motivated to get over this issue. She's never said that so directly before. There's always been language to the effect of 'getting over/around/dealing with etc' it, but always trying to avoid addressing the actual trauma.

I'm not optimistic that she's going to walk out of here and that everything will suddenly be OK, but I am optimistic that this program is finally getting her to admit to herself that she can't address all the symptoms and ignore the actual trauma any more. This is clearly going to be a long process but I think it's fair to say she's reached a turning point toward actually starting to heal.

*Shavua Tov!
Jeff*

206) In June 2017, Plaintiff found photos Anjali had posted on her authentic Facebook page photos of herself on a three-week vacation in Israel on the dates she had allegedly been at the mental health facility in Palo Alto, California receiving treatment for PTSD.

207) On discovering Anjali's authentic Facebook page in June 2017, it was obvious that Anjali has never observed the ritual or ethical precepts of Orthodox Judaism for the entire period of Plaintiff's relationship with Anjali, September 2011 through April 2017. She regularly called and texted Plaintiff at times it was Shabbat or a Holiday in the time zone she was actually in to maintain the ruse that she was in another time zone that she was lying to Plaintiff about being in, where it was not Shabbat or a Holiday. "Just before shabbat" (referenced above in Jeffrey's email quoted in paragraph 205) in August, 2012 in Florida (sunset is about 8:00 pm that time of year) was around 3:00 am Saturday morning in Israel — Anjali's actual location on August 10, 2012.

208) Use of the telephone on Shabbat and Holidays is considered a serious violation of Jewish ritual law. Anjali spoke or texted with Jeffrey on the phone Friday afternoons immediately before Shabbat, and Saturday nights immediately after Shabbat, every Shabbat September 2011 through April 2017 with almost zero exceptions.

209) Anjali called Plaintiff almost every day during her "dinner break" at 6:30 pm PST at the treatment center in Palo Alto, and typically several other times throughout the day as well. 6:30 pm PST was 4:30 am in Israel, her actual location. Anjali woke up when everyone else

on her trip was asleep to avoid detection. She spent significant amounts on international cellular roaming charges, all in order to cause Jeffrey to believe she was in California at a mental treatment facility.

210) Anjali made these calls in order to misrepresent to Jeffrey that she was an observant convert to Orthodox Judaism Jew, at a mental health facility in California. She called when everyone else on her trip was asleep so they would not overhear and question her about her relationship with Jeffrey.

211) Anjali spent several hours daily having Jeffrey help her cope and get through her fear, trauma, and abject terror she was pretending to have, while pretending to be at a psychiatric treatment facility she wasn't at... while actually in Israel pretending to be a pious convert with an Orthodox Jewish women's college group touring ancient synagogues, visiting graves of Jewish saints, and participating in charity projects and religious events. She texted and had shorter calls with Plaintiff throughout her days, every day, whenever she wasn't "in a session".

212) Dr. Martha Stout, Ph.D explains:

Singular in its ability to unnerve even seasoned professionals, the concept of sociopathy comes perilously close to our notions of the soul, of evil versus good, and this association makes the topic difficult to think about clearly. (The Sociopath Next Door, Page 13)

213) On August 12, 2012, Louise texted Plaintiff via Facebook:

I'm praying Anjali will walk out feeling confident, stronger, and healed from her fears. Is that asking too much? I think so, but I don't want her to suffer anymore. I'm hoping they have given her the tools necessary to live and love as she was meant to.

I am excited for her starting Stern! A new chapter in her life. I was tempted to buy her dorm bedding/school supplies, but decided to let her choose it herself. I want her to enjoy college life, even the most mundane.

*Have a good day!
Louise*

214) While allegedly at the treatment facility, Anjali continued her relationship with Judah and Alexandra, talking to them several times a week on the phone just as she had for most of the past year. Jeffrey regularly sent Anjali photos and videos of them learning to ride bicycles, ice skate, do art projects, and build legos.

215) On August 15, 2012, birthday presents for Judah and Alexandra, then aged 4 and 5 years old, arrived in the mail from Anjali. She sent beautifully wrapped toys for each of them, gourmet jelly beans, and a Spiderman birthday card for him, and a Disney Princess card for her, both containing stickers. They were incredibly thoughtful, beautifully presented gifts. The children still have the toys proudly displayed in their rooms. Plaintiff filmed 7 videos of the children unwrapping the presents and emailed them to Anjali. Judah and Alexandra are on video absolutely delighted and telling Anjali they love her without prompting from Jeffrey. They had developed a genuine bond with Anjali that would only deepen in the coming years.

216) Anjali claimed to have skipped a morning of therapy to go shopping for the kids, with whom she had developed a real relationship and who had for a long time had been thinking of her as their step-mother-to-be. Jeffrey was blown away by Anjali's consideration, love, and selflessness. He truly believed Anjali was one of the kindest, most loving women he had ever known. He felt truly blessed to have her in his life, and was committed to helping her through the sexual violence that had been so terribly haunting her since childhood.

217) Martha Stout, Ph.D. explains:

Sociopaths are noted especially for their shallowness of emotion, the hollow and transient nature of any affectionate feelings they may claim to have, a certain breathtaking callousness. They have no trace of empathy and no genuine interest in bonding emotionally with a mate. If a marriage partner has any value to the sociopath, it is because the partner is viewed as a possession... (The Sociopath Next Door, Page 7).

218)Anjali had apparently prepared the gifts and written out the cards before her vacation to Israel and had her mother Louise mail them to Plaintiffs about a week after she had left.

219)The point of the gifts was to reinforce her deception to Jeffrey and his children that she truly loved and cared for his Judah and Alexandra, and to reinforce the emotional bond she was creating in her regular conversations with them — all for the purpose of disappointing, betraying, creating expectations she planned on breaking, harassing, stalking, and causing severe emotional an psychological damage in both Plaintiff and his children.

220)Anjali is a pathological liar.

221)Louise is a pathological liar.

222)Anjali described her therapy in detail, including “Prolonged Exposure”, Cognitive Processing Therapy (CPT), Eye-Movement Desensitization and Reprocessing (EMDR), and extensive journaling, group therapy, and confrontational forms of therapy such as confronting her with photos of men’s genitals, which she had allegedly never seen before, having been terrified of men growing up, in high school, and never having had a boyfriend. She described the therapy she was receiving in great detail and talked with Plaintiff every day for several hours daily, just as before her alleged admission into the facility.

223)Martha Stout, Ph.d explains:

The covetous sociopath thinks that life has cheated her somehow, has not given her nearly the same bounty as other people, and so she must even the existential score by robbing people, by secretly causing destruction in other lives. Retribution, usually against people who have no idea that they have been targeted, is the most important activity in the covetous sociopath’s life, her highest priority. (Stout p. 76)

224)Louise and Plaintiff communicated regularly about Anjali and her progress. On August 21 and 22, Plaintiff and Louise texted:

Louise Moya Stokes

11:44pm Aug 21

No call! I'm not her favorite person anymore. I think I've been replaced by someone more to her liking. Laila Tov

Jeffrey Waintroob-Roberts

11:47pm Aug 21

Sorry mom. Not cool. I'll twist the screws.

Louise Moya Stokes

11:52pm Aug 21

No, its okay. I rather her talk to you then anyone else. The heart needs what is most soothing in troubled times.

Louise Moya Stokes

3:24pm Aug 22

Hate to bother you, but have you heard from Anjali? For some reason she is avoiding me like the plague. She is suppose to come home soon and I don't want any awkwardness between us.

225)On or about August 25, 2012, Anjali arrived at and started school in New York City at Stern College for Women, part of Yeshiva University. Stern is the all-women's undergraduate college of Yeshiva University that combines secular university studies with religious studies for Orthodox Jewish women.

226)The first week in September, Louise pretended she doubted Anjali and urged her to break off her relationship with Jeffrey. Louise and Jeffrey got in a bitter dispute about this by phone and email, Jeffrey believing Louise was enabling Anjali's fears and non-functioning. The true purpose of this "fight" was strictly to aggravate Jeffrey and to ensure he was still emotionally charged up about meeting Anjali.

227)On September 4, 2012, Louise made her first explicit request for money via Facebook:

hi...

I really, really don't want Anjali to be missing so many classes. Its not a good way to start off the school year.

I dont understand why she can't fly out after classes Thur or Friday and return Sun even.

And on top of everything else, I am paying through my teeth for a ticket.

I just spent enough money on buying her books, and other necessities for school. I just think its unfair I have to be put in this position the cash flow is already very depleted.

There is no consideration for money, or school, or anything else. Just seeing Jeff at any cost. It's very unfair and inconsiderate.

Louise Moya Stokes

1:03pm Sep 4

I have no problem if she wants to visit you, both then you two need to work it out. Either she gets a job or you pay her way.

228) Plaintiff sent Louise money for Anjali's ticket.

229) Louise allegedly bought Anjali a ticket to Florida from New York for September 5-9, 2012.

Both Anjali and Louise allegedly wanted to get a first meeting over and accomplished before their annual trip to India.

230) AT 4:30 am September 4, 2012, Anjali messaged Plaintiff via Facebook, "I can't stop

thinking of you...dreaming of you....I love you Jeffrey. I can't get this song outta my head.

But it should be titled: THIS GIRL'S IN LOVE WITH YOU". She included a love song by Oasis.

231) The flight September 5, 2012 was faked. Anjali didn't answer her phone for about 12 hours,

then finally answered long after the alleged flight, sobbing in apology to Plaintiff.

232) On Thursday September 13, 2012, Louise texted Plaintiff via Facebook just before

Defendants' annual trip to India and suggested that Plaintiff come to New York to meet

Anjali:

Thank you for being a very good friend. You have given me sound and solid advice on how to deal with Anjali's issue and my journey to complete my conversion into Judaism. It's quite a remarkable friendship we have struck up, through Anjali, and it's high time we meet face to face soon. I am done packing, just taking care of last minute details. Anjali should be landing soon in SFO and Anil and Arjun went to pick her up. I am sure she'll be exhausted and ready to sleep in her own cozy bed.

I like the idea of you meeting her at Newark and accompanying her to FL. Such a chivalrous gesture and it would calm my nerves to know she is in safe company. I just wonder if the element of surprise would upset her. But I agree it would be best not to tell her before reaching Newark. After a long flight, she may feel "icky" and shy to see you.

She may be discussing this with her dad from SFO. But I will talk to him ASAP, because the ticket date would have to change to the 10 Oct.

I'll call you in the morning.

Thanks for the birthday wishes. I wasn't kidding about you delivering my birthday cake to Sacramento. One day....

I only wish the best for you in the new year. Lots of mazel, love, and good health.

*Love,
Louise*

233) Friday September 14, 2012, Defendants flew from San Francisco to New Delhi. Jeffrey,

under the false impression that Anjali was an Orthodox Jew, was beside himself to see that Anjali's flight was on-time, had no delays, departed Friday and landed as scheduled on Saturday afternoon. Anjali blamed her father Anil for making her fly on Shabbat when Plaintiff eventually confronted her on the phone.

234) Anjali appears to have had just as much fun duping her "friends" in New York into thinking she was an Orthodox Jew as she did duping Jeffrey into believing he was in a relationship with her.

235) A few minutes before Rosh HaShana, starting the evening of September 16, 2012, Louise messaged Plaintiff via Facebook:

Hello Jeff,

We reached India into Shabbat and it was horrible. Not a good way to start off the trip. But we managed to have Shabbat and we rested and said tehillm as best we could before the jet lag would take over. Anjali's is having some problems with her foot when she fell a week back. We have her in bed with her foot propped up with cushions. The shul is a good 40 min walk and she needs to rest it if she wants to go.

Her phone is not working properly, so not sure if she's receiving your text messages. We'll buy a phone after Wednesday. Okay I need to go. Have an awesome Rosh HaShanna.

Anjai sends her love and is throwing you a big kiss.

*Lots of love,
Louise and Anjali*

236) Martha Stout, Ph.d. explains:

You [the sociopath] manipulate and bully the people who are under your thumb, as often and as outrageously as you can without getting fired or held accountable. You do this for its own sake, even when it serves no purpose except to give you a thrill. Making people jump means you have power—or this is the way you see it—and bullying provides you with an adrenaline rush. It is fun. (The Sociopath Next Door, Page 4)

237)Anjali told Jeffrey she was returning to New York on October 15, 2012.

238)In October 2012, Jeffrey returned to Israel to complete his rabbinic ordination program

(*smicha*) and made arrangements to meet Anjali in New York shortly after she returned there from India.

239)Jeffrey purchased a flight with a 24-hour layover in New York specifically to visit Anjali.

Jeffrey believed that Anjali's stay in August at the mental health facility associated with Stanford University had made a real difference, and that now there was the real possibility of meeting.

240)The day before Plaintiff's flight, Louise emailed Jeffrey that she wanted Anjali to stay in India another week and that she had changed her return ticket.

241)Jeffrey ended his relationship with Anjali. Louise called Jeffrey from Defendants' estate in India and begged him not to leave Anjali. She blamed herself for keeping Anjali in India longer, her missing a week of school, and her standing him up in New York. About a week after arriving in Israel, Jeffrey messaged Anjali on Facebook:

...So I delayed my trip to Israel and booked a flight that would allow me to see you in New York. I don't think you can understand just how profoundly kicked I felt, when, less than 24 hours before I was going to surprise you at Stern, your mom finally responds to an email of mine and lets me know that you'd decided at least a week earlier to stay in India and hadn't even bothered to tell me. I mean, hey, it's not like you though I'd be wondering where you were or something. I guess you were just planning on showing up a week or two after you told me you would be back and then announcing your arrival with a poke on FB?

My flights were non-refundable, and I ended up sitting there at JFK all day just letting the fact that I'd been jilted, again, just sort of sit there. If you have to ask, it was horrible. I felt like a complete moron.

Why did you do this to me? I love you, and the fact that you love me only makes it worse. I just got back from the Kotel a few minutes ago. I cried. And yes, it was about you...

...I love you.

Jeff

242) Anjali wrote Jeffrey back:

I love you. Miss you. No one can replace you. I think of you all the time, wondering if you know I'm thinking of you. Can he feel my soul calling out for him? Or has he completely slammed the door shut? India was loud, crazy, congested, hard to communicate as freely. But living in the mighty Himalayas kept me isolated, disconnected from the everyone, including you. No excuses, mind you, but I felt transported into a different world and just went with the flow. You have no idea how sorry I am or how much guilt I bear, maybe you do know, since you know me pretty damn well. Rather just coil up like a cobra and wait it out.

*Love you too,
Anjali*

243) Anjali's posted on her authentic Facebook page that she was touring South Korea on a layover from India on September 13, 2012. Crossing the international date line and gaining a day, it is apparent that she had returned to New York by September 15, 2012 as originally planned and had deliberately left Jeffrey sitting at the airport nearby, roses in hand, believing her and her mother's lie that she was still in India. Jeffrey incurred unnecessary expense, travel, a 24 hour layover, and approximately 50 hours travel time to Israel because of Defendant's misrepresentations.

244) Anjali called and texted Jeffrey repeatedly. Jeffrey relented, rationalizing that Anjali still had some kind of fear she hadn't processed, and continued the relationship, talking with Anjali several hours on the phone every day as usual.

245) Anjali claimed to feel horrible about standing Jeffrey up in New York. She discussed her desire to come see him in Israel over Thanksgiving, again asking Jeffrey for money for the ticket.

246) On October 29, 2012, Plaintiff responded to Anjali by email (in relevant part):

Hey Beautiful...

*..Re the flight - prices are cheap now but that \$925 ticket
Will be \$1200 within a week if not sooner. Again, I will pay half
As soon as you land. You should understand that I'm not
Helping you pay for the flight, but am rather paying for kisses etc
Long overdue.*

*I'd love to call you but don't want to wake you up.
I think about you all the time and can't wait to take
Our relationship to the next stage.*

*Love,
Jeff*

247) On November 20, 2012 Anjali emailed Jeffrey:

Dear Jeffrey,

I'm packing my suitcase for Israel and realizing I don't need to pack very much. It's such a short trip. I can be a real pain in the ass when it comes to controlling situations. In school, food, exercise, relationships and even in romance. I don't want anything from anyone, even if they are trying to help me. Keeping you at arms length has given me a sense of control. My biggest fear is meeting you and losing all control. I don't know where that comes from. Almost like opening the flood gates and letting the water wash away who I am. In your presence I will feel so meek, small, not smart, so unholy. I can't for the life of me understand why you are even interested in someone like ME. You could do so much better, find a real holy woman in Jerusalem. I did badly on my exam on music theory, and history of Israel. I won't even tell you what one of them said. I am fearful I will do badly in my Hebrew and bio lab exam. If I do, I don't even know what will happen.

*Love,
Anjali*

248) A few minutes later, Anjali followed up:

Jeffrey,

I love you. Maybe too much. I am forcing myself to go to Israel. It's killing me. The other girls are asking if everything is alright, guess I have such a glum look. Failure at mid term. Don't understand, I studied hard. Just spoke to Mom. She read me the riot act if I don't get on the plane. Life sucks.

249) The next day, November 21, 2017, Anjali emailed, acknowledging the head-trip she was causing Jeffrey:

I didn't get on the plane. I'm tired of making excuses. Been walking around, then went to a shiur. The best part of living in NYC are no storages of shiurim on every corner. First one I went to was

about laws of basar b'chalav...meat/milk not together. It was very interesting but the rabbi spoke too fast and to much yiddish I think. It wasn't exactly what I felt like learning. I wanted a shiur to teach me how to have strength, courage, not give up when you fail. Never found one. But I did walk and walk and walk and not think. I dread writing this to you. I dread calling my mom. I've used up all my chances. No more plans.

No more calls. No more putting you through hell and making you hurt over and over. I am done hurting people. If I were 21, I'd be at a bar drinking a gin and tonic and thinking the bar tender must think I look way out of place in a bar. Young, pathetic, orthodox girl drinking her troubles away.

Instead of a bar, going back to my dorm, and study my f#!? brains out for bio lab and hebrew. After mid term, I need to decide if this is the place for me. Maybe go back to California. I don't know anymore.*

Please keep working hard, keep impressing your rav's, keep soaring spiritually, keep seeking your other soul mates, and keep forgiving others, especially me.

*Love,
Anjali Shoshana*

250)Anjali never had a ticket to fly to Israel. Louise, pretending to be heartbroken over Anjali's inability to see Jeffrey, allegedly flew to New York to be with Anjali for Thanksgiving.

251)At this point, Louise took over, refocusing the deception on her (false) desire to convert to Judaism and again soliciting Jeffrey's help. She had been talking about visiting Israel since she began communicating with Jeffrey, and now she was serious and had the freedom to come because Anjali was no longer living at home.

252)The plan became for Louise to spend Thanksgiving in New York with Anjali, then continue on to Israel. She had Jeffrey run around working out her accommodations, itinerary, checking out seminaries she could attend, and even set up a one-on-one meeting with Lori Palatnik, an internationally recognized speaker affiliated with Aish HaTorah in Jerusalem. Louise was allegedly a big fan.

253) Allegedly the stress of dealing with Anjali in New York was overwhelming and Louise simply couldn't leave her. Dealing with Anjali was absolutely exhausting. Louise allegedly spent her time in New York helping Anjali find a new Therapist.

254) On November 30, 2012, Louise texted Jeffrey via Facebook:

Sorry I'm writing this message late. I overslept this morning, but it was a much needed sleep.

I thought long and hard about going to Israel NOW. I could go, but I would only stay just a few days. I would rather go in January, stay longer and learn much. I'm heading back to Sactown Sunday morning.

I want to thank you for EVERYTHING you've done for Anjali and me. You have been this bright guiding light in our lives. Sometimes we haven't always seen eye to eye, but the more I get to know you, the more I respect and admire you.

I shall see you soon my friend. Best to Navah as well.

Shabbat Shalom,

Louise

255) Jeffrey sent Anjali about \$2000 in gifts and cash over 2012. For example, in on or about May 10, 2012, Jeffrey sent Anjali earrings that cost about \$180. All of these were given because Anjali told Jeffrey she loved him, was sincerely working on healing herself, and was committed to being with him in person in a normal relationship.

2013

256) Over the next 8 months, Louise staged another fake trip to Israel and Anjali staged three fake trips to Florida during Jeffrey's return to Florida to interview with several synagogues and immediately after he began his tenure a Rabbi of Bircat Shalom Synagogue. On one fake trip Anjali was allegedly trapped at Laguardia Airport in a blizzard for over 15 hours after her flight was cancelled (New York really was experiencing a blizzard). These trips were gut-wrenching for Jeffrey. He truly believed the woman he loved was going through hell trying to see him.

257) In March or April 2013, Jeffrey traveled to meet Anjali in New York. Over the course of three days, Anjali led him on a wild goose chase around Manhattan, allegedly trying to meet him. Jeffrey eventually went home disappointed, exhausted, and beside himself at Anjali's mental state. The idea that Anjali — a woman who had given up her religion, social group, and lifestyle to convert to Orthodox Judaism, who spent three or four hours a day with Jeffrey on the phone in the most engaging conversations Plaintiff had ever had, consistently express her love for him, her desire to be with him, spent hours joyfully engaging his children, her mother constantly reinforce everything she was saying — the idea that everything Anjali was telling him was a grand fiction seemed too outlandish to even enter Jeffrey's mind. Even now, as of this filing, after the reality of his relationship was fully revealed, Jeffrey experiences the truth as far more bizarre than the whole-cloth lies Anjali devoted many thousands of hours to creating.

258) While Jeffrey was in Israel, Anjali remained in touch with Judah and Alexandra, receiving regular photos, videos, and joining in on 3-way conference calls. She was incredibly engaging with them and engaged by them. She was truly part of their lives. They never wanted to end their calls with Anjali. This was profoundly endearing to Jeffrey, who would only discover in June 2017 that this engagement had only been for the purpose of emotionally accessing both Jeffrey and his children in order to cause them to lower their guards to her causing them as much harm as possible.

259) Anjali continued her therapy sessions with Navah Verhoeven through spring 2013. Navah confirmed to Jeffrey that Anjali was meeting her with some regularity for therapy, in addition to her alleged therapy in New York, that her mother was paying for it, that Anjali was sincerely not able to physically meet Jeffrey because of her childhood rape trauma, and

that she indeed suffered from serious psychological trauma due to having been repeatedly raped as a 5-year-old child. Anjali faked having been raped to her therapist, Navah, in order to reinforce her fictitious story to Jeffrey. The reality that Anjali was consulting a therapist and paying her to go through therapy sessions where Anjali faked PTSD she didn't have from a series of childhood rapes that never happened, only to reinforce and lend credibility to the lies she was telling Plaintiff, was beyond the scope of what Jeffrey considered.

260) Anjali and Louise were utterly believable. They never once slipped up on any details in the fictions they created for Jeffrey. The combination of Anjali's verifiable backstory as a convert to Orthodox Judaism attending Stern College, the photos and videos she sent Jeffrey several times a week of her with her Orthodox Jewish friends at Stern College events or in Manhattan, her mother Louise's constant reinforcement of Anjali's stories, and Anjali's seeming inexhaustible ability and desire to want to talk, text, and communicate with Jeffrey misled him to believing their lies. Anjali's ongoing therapy with Navah reinforced those lies. The possibility that someone would convert to Orthodox Judaism, spend a year at an Orthodox Seminary in Israel and then attend Orthodox women's college in New York, invest incredible time, massive amounts of thought, mental energy, send gifts, keep her stories consistent day after day, week after week, year after year, photoshop fake airline tickets, spend thousands of hours on the phone with Plaintiff in engaging conversation, pretend to be in love, consistently, day after day be awake at odd hours in order to pretend to be in a far-away times zone, while actually conspiring with her mother to scam and cause serious psychological and emotional injury to a man training to be an Orthodox rabbi, simply didn't compute in Jeffrey's head. Both Anjali and her mother Louise were utterly believable. Even now, it is almost easier for Jeffrey to believe the five-and-a-half-year story he knows

was invented than the reality that Anjali invested the time and energy she did in creating fictions for him.

261) Jeffrey took the love he felt for Anjali, combined with her inability to see him, very personally. He felt emotionally crushed every time she tried to see him and failed, disappointed for the relationship, and beside himself at what Anjali led him to believe she was going through. The reality was that getting as deep as possible inside Jeffrey's head in order to cause as much damage as possible was Anjali's entire point.

262) Dr. Martha Stout, Ph.D explains:

Being devoid of conscience is impossible for most human beings to fantasize about. In fact, it is difficult to think of another experience that quite so eludes empathy. Total blindness, clinical depression, profound cognitive deficit, winning the lottery, and a thousand other extremes of human experience, even psychosis, are accessible to our imaginations. We have all been lost in the dark. We have all been somewhat depressed. We have all felt stupid, at least once or twice... ..But not to care at all about the effects of our actions on society, on friends, on family, on our children? What on earth would that be like? What would we do with ourselves? Nothing in our lives, waking or sleeping, in forms us... ..Absolute guiltlessness defies the imagination. (The Sociopath Next Door, page 11)

263) In April 2013, Jeffrey was nearing the end of his rabbinic ordination program. He had returned to Florida over Passover to interview with several synagogues, and was hired by Bircat Shalom Synagogue in Boca Raton. Anjali pulled another fake trip in the midst Jeffrey's interview week. On April 12, 2013 Louise texted Plaintiff on Facebook:

Hi.

Anjali called last night, she sounded better than she had in days. She says you've been talking to each. Jeff, I think every interaction you have with someone can change them. You truly can build them up -or knock them down. After last weekend, you were very angry. Understandable. Any other person would have torn Anjali apart with words. But you conveyed controlled disappointment, important lessons and wisdom to her. You were able to crystallize your own wisdom and give it to her. She was able to turn her depression/disappointment into a meaningful leaning lesson about herself. Just want to thank you for being a positive influence.

We should treating people with great importance, because each person is a spark of the divine. And if you can influence them positively then you have given to the emotional and spiritual well being of that person.

Have a wonderful Shabbat.

*Love,
Louise*

264) Instead of getting angry with Anjali, who Jeffrey had been misled to believe was truly a victim and deserved nothing but care, sensitivity, kindness, and understanding, Plaintiff protected Anjali from the emotions her non-appearance was causing in him and instead internalized them. He was committed to not causing her any further sorrow.

265) Jeffrey returned to the United States and began his tenure as Rabbi of Bircat Shalom Synagogue in early May 2013. Later that month, Anjali finished school for the year, and Louise was serious about helping her daughter meet Jeffrey. They booked a flight together to come visit Plaintiffs June 30-July 7, 2013.

266) On June 21, 2013, Jeffrey was admitted to Jupiter Medical Center with severe chest pain and an extremely slow heart beat. He felt like there was an enormous weight on his chest. Plaintiff believed he was having a heart attack. No physical abnormality was found with Plaintiff. The examining doctor asked Plaintiff if he was under stress, and Plaintiff admitted to the doctor that he was under a lot of stress because of Anjali.

267) Anjali's ongoing assault on Plaintiff's psyche caused him to check in to the hospital with symptoms analogous to a heart attack.

268) Louise had been complaining for several months about a pinched nerve in her arm. Not to be outdone by the actual harm they were causing Jeffrey, Defendants explained their failed trip two weeks later by pretending Louise had a heart attack on the way to the airport.

Louise wrote:

Louise Moya Stokes
1:22pm Jul 3

Hi. I guess you heard about my heart problem. It was a shock and real wake up call. I'm thankful it was diagnosed early on, otherwise I would have completely ignored the signs. I am on track with medication, weight control and exercise. And dealing with stress. The family has been wonderful, especially Anjali. My little nurse-nutritionist-chef-daughter.

Anjali said you are without a phone. Welcome to my world, not so bad, eh?

Jeffrey Waintroub-Roberts

10:36pm Jul 3

I was pretty shocked. I am very glad Anjali went home with you, but I'm still pretty shocked that this happened at all. I've been hearing all about the meal planning, pills, walks etc. I'm sure you'll be fine once you recover mentally and emotionally, but wow what a kick in the rear. I'm truly sorry you had to go through this.

What are you doing for the 4th? Please let me know if you are able to talk, even on Anjali's cell phone if necessary. I'd like to catch up a little.

How are you feeling?

*Love & Healing,
Jeff*

269) Jeffrey spoke with friends and seriously considered ending the relationship. Anjali, however, was so sincere, so determined, and so forthright with Plaintiff that he just couldn't. The many hours he spent on the phone with Anjali daily were so easy, engaging, and meaningful, Jeffrey simply didn't know what to make of Anjali's non-appearance.

270) On July 5, 2013, Anjali emailed Jeffrey:

Life is an incredible journey. Often when we were little kids, we would envision our life to be a straight path. "I'd go to high school, then college, choose a profession and get married, etc." We probably did not think of the many challenges and tribulations to get to those certain points. In parshat Masei, the Torah summarizes the entire journey followed by Israel from the Exodus and through the 40 years in the desert. GD is not trying to emphasize the struggles, but moreover emphasize the journey, 'Look how far you have come'. From a scared nation clinging to Hashem for all their physical needs and now preparing to go forth. This is what life is really about: going forth. We all face challenges in good measure, and when we are experiencing these challenges it is hard for us to zoom out and appreciate the importance of the struggle. We are engulfed by the frustration of the moment and cannot see beyond that. In life things do not come easy, our grades, our relationships, our jobs anything in life will not come easy. Just like with Torah study we must toil, and put forth effort. Our challenges are preparing us for the ups, they are teaching us an invaluable lesson. If we look back at our own life journey so far, we see things much differently. We don't remember the sheer frustration but rather we understand how everything has led us to where we needed to go. And most of the time, we look back and think of how amazing it felt

to overcome those struggles and reach the other side. G-d is always with us, we must always have an unshakable faith and recognize everything is good.

Jeff, you are such a kind, wonderful man with a big heart. You also have an unshakeable faith in GD. When times are hard or frustrating, people just throw up their hands in the air and give up. They think why should I do this when GD doesn't seem to hear my prayers. But you are different. You are so dedicated to Torah study and creating a Torah environment in your home and teaching to others in your shul. Your efforts may often go unappreciated by some, but not by me or Gd. You keep me strong, keep me going when I just want to throw my hands in the air. You are my HOLY MAN and I love you.

Have an amazing Shabbat, grow stronger, let that light within you shine and inspire those around you.

*Love you,
Anjali Shoshana*

271) Martha Stout, Ph.D explains:

Imagine—if you can—not having a conscience, none at all, no feelings of guilt or remorse no matter what you do, no limiting sense of concern for the well-being of strangers, friends, or even family members. Imagine no struggles with shame, not a singled one in your whole life, no matter what kind of selfish, lazy, harmful, or immoral action you have taken. And pretend that the concept of responsibility is unknown to you, except as a border others seem to accept without question, like gullible fools. Now add to this strange fantasy the ability to conceal from other people that your psychological makeup is radically different from theirs. Since everyone simply assumes that conscience is universal among human beings, hiding the fact that you are conscience-free is nearly effortless. You are not held back from any of your desires by guilt or shame, and you are never confronted by others for your cold-bloodedness. The ice water in your veins is so bizarre, so completely outside of their personal experience, that they seldom even guess at your condition. (The Sociopath Next Door, Page 1)

272) Back at Stern, Anjali informed Plaintiff that she was coming South Florida with her friends

Sarah Alt, Julie Wittert, Ray Nov, Meredith Lane, Amanda Esraeilian, and two others over Yom Kippur and part of Succot. She emailed Jeffrey her travel dates: September 13-22, 2013.

273) On September 13, 2013 Anjali called Jeffrey and informed him that she landed and had arrived at her friend's house in Fort Lauderdale. This was a Friday, the day before Yom Kippur. She arranged to meet Jeffrey at a Starbucks on Sunday. She didn't show up.

Instead, she later described having crept through the parking lot, seen Jeffrey enter and exit the coffee house, seen him through the window, and spied on him without having the nerve to approach. Jeffrey thought he was dealing with a total nut, but a nut he truly loved and who loved him in return.

274) Anjali spent the week essentially terrorizing Jeffrey with detailed descriptions of watching him walk to synagogue in the morning while hiding behind trees, scheduling daily meetings at restaurants, coffee houses, and synagogues she kept 'trying' to appear to but failing, even telling him in a 3:00 am phone call about having stood at his front door a few hours earlier that night and then calling after she left, simply unable to bring herself to knock. This went on via calls and texts every few hours, essentially 24-hours a day. Louise called Jeffrey several times daily, utterly worried about Anjali, claiming Anjali refused to respond to her calls, and demanding that Jeffrey tell her what he knew about Anjali and her mental state.

275) We tend to think of stalking as an implied threat of violence by an acknowledged aggressor. However unnerving, this form of aggression is something our society has tools to confront and handle. Far more insidious and psychologically destructive is the stalker who convinces her target that he is the lover of her life, and she is the love of his, but that she is a victim, spends extended periods 24-hour-a-day making him believe that she is nearby, and that her attempted interaction with him is causing her own psychological destruction. It is the perfect formula for outrageously antagonizing the target while simultaneously demanding a calm, sympathetic, emotionless response in order to care for her, the victim.... who is actually the perpetrator.

276) By September 21, Jeffrey was seriously ill and was diagnosed with pneumonia. as a result of Anjali's stalking. Jeffrey was delirious and essentially bedridden for the coming four weeks and would be noticeably sick through the beginning of November.

277) Jeffrey contracted pneumonia because of the stress Anjali deliberately subjected him to.

278) When Anjali found out that Jeffrey was sick as a result of the mind games she was playing, she told him she extended her ticket through the 29th and continued "trying to see" Jeffrey, calling him five or six times daily and texting him through the night, and spent many hours with him on the phone every day, often in tears — that she couldn't bring herself to see him in order to care for him. Throughout the whole ordeal, Anjali kept the focus on herself and her deteriorating mental state and mental health, methodically growing more and more broken, hysterical, and emotionally crushed in spurts and fits incrementally, day by day.

279) Martha Stout, Ph.d explains:

Since this clandestine power game is priority number one, all of the covetous sociopath's deceitfulness and tolerance for risk are devoted to it. For the sake of the game, she may devise schemes and perform acts that most of us would consider outrageous and potentially self-destructive, in addition to cruel. And yet when such a person is around us in our lives, even on a daily basis, we are often oblivious to her activities. We do not expect to see a person direct a dangerous, vicious vendetta against someone who in most cases has done nothing to hurt or to offend her. We do not expect it, and so we do not see it, even when it happens to someone we know—or to us personally. The actions taken by a covetous sociopath are often so outlandish, and so gratuitously mean, that we refuse to believe they were intentional, or even that they happened at all. In this way, her true nature is usually invisible to the group. She can easily hide in plain sight...

280) On September 22, 2013, Louise emailed Plaintiff:

Hi,

I finally spoke to Anjali. She called and was very brief. All she would tell me is that she's okay, but tired. She said she's been in contact with you, but it's tense. Apparently she's with her friends from Stern. They are visiting one of the girl's family near Fort Lauderdale.

She said you're seriously sick with pneumonia. Please take care of yourself Jeff.

I told Anjali to see you tomorrow. Bring you some chicken soup.

Best,
Louise

281) Anjali's level of hysteria, paranoia about Jeffrey 'finding her', and general mental state slowly, progressively deteriorated over the 16 days she was allegedly in Florida. Jeffrey, sick with pneumonia, was beside himself with worry and concern that Anjali was in such a terrible mental state and spent essentially all his free time awake trying to help, console, and "be there" for her when she stood him up at various meeting spots and suffered a breakdown. She was a 24-hour-a-day project.

282) September 30, 2013, the day after Anjali returned to New York, Anjali emailed Jeffrey:

I just spent the last 2 hours with a mental health counselor regarding my problems. Notice I say problem(s) because I'm dealing with many issues. I'm going to take a break from school. I can't seem to focus on anything anymore.

I am sorry for everything. You don't deserve a broken girl. I don't deserve either. Please be in touch.

Love,
Anjali Shoshana

283) Later that day, a devastated Louise called Jeffrey. Louise had spoken with Anjali and her mental health counselor at Stern, and was making arrangements to check her back into the mental health treatment center in Palo Alto, California, associated with Stanford University where she had spent three weeks the summer of 2012. Jeffrey, in bed with pneumonia, spent hours reassuring a crying, heartbroken Louise that her daughter Anjali would heal, that she was strong, and that he would be there for her.

284) Dr. Martha Stout, Ph.D explains:

Sexual seduction is only one aspect of the game. We are seduced as well by the acting skills of the sociopath. Since the scaffolding of the life without conscience is deception and illusion, intelligent sociopaths often become proficient at acting, and even at some of the particular techniques employed by professional actors. Paradoxically, the visible signs of emotion at will can become second nature to the cold-blooded—the appearance of intense interest in another

person's problems or enthusiasms, chest-thumping patriotism righteous indignation, blushing modesty, weepy sadness. Crocodile tears at will are a sociopathic trademark.

285) In June 2017, Jeffrey discovered photos of Anjali on her authentic Facebook page in group photos at a September 15, 2013 Orthodox Jewish wedding in New York, the day after Yom Kippur.

286) Plaintiff goes through the psychological experience of a head-on car crash seeing Anjali looking happy, dressed up, and smiling with her friends in photos at Orthodox Jewish events in New York on the exact days she was spending upwards of 8 hours on the phone with Jeffrey, allegedly in Florida, creeping around his neighborhood and office, checking out his synagogue when he wasn't there, observing him while standing him up for various meetings, and throwing serious, convincing mental breakdowns, panic attacks, and vomiting on the phone. Forget why — *how* on earth did she pull this off without raising red flags with everyone around her? Is it even possible to spend the amount of time texting and on the phone for the amount of time she was spending, without causing people to ask questions? Plaintiff is psychologically re-traumatized simply trying to come to grips with Anjali's lifestyle while pulling off her scam.

287) Martha Stout, Ph.d. explains:

The covetous sociopath is the ultimate wolf in sheep's clothing... ..the disguise is especially elaborate... ..an extravagant charade... ..what does she do the remainder of her day [when not living out a sociopathic vendetta]? We would probably not see anything out of the ordinary. Most of her behavior would look normal to us, or close enough to pass...

288) Anjali's purpose in this and her other fake trips was to stalk and harass Jeffrey to the point of actually redefining his perceived reality for the purpose of inflicting psychological torment and trauma on Jeffrey, far worse than that of a traditional stalker constantly hovering around a target. Worse, Anjali and Louise had spent the previous two years

systematically, methodically, deliberately conditioning Jeffrey to the point that he never questioned Anjali's and her mother Louise's claims regarding her purported mental state or whether she was in Florida at all. Defendants had worked on Jeffrey to the point that he perceive Anjali as the victim of her own stalking and harassment of him.

289) More than simply manipulating and controlling Jeffrey, psychologists have identified actually *redefining their victim's perceived reality* as the covetous sociopath's true goal.

290) Jeffrey was still in bed with pneumonia when Anjali described reentering the mental treatment facility in Palo Alto. The relationship quickly shifted to Jeffrey supporting Anjali through this incredibly difficult, psychologically invasive, full-time process that was intended to dig up and heal the deepest traumas in her that were preventing her from having a normal relationship.

291) On October 21, 2013 Louise emailed Jeffrey:

Online with you, talking to her. She is not doing well mentally and physically. I think being away from family, school and REALLY working on her past abuse, ptsd, is wearing on her. She is mostly hurt by you she said. Nothing you have done, you are a good man, just the situation is hard for her to handle. She wants to leave, but she knows that would be a bad idea. I'm just letting her vent. I guess she threw up several times tonight. Stomach in knots.

Jeff, I think she is just down. She's sad. I'm going to be on the phone with her for a while. She'll be okay.

I just came back from Alb today. I'll go visit her tomorrow.

*Love,
Louise*

292) Louise emailed Jeffrey again the next day:

Hi,

I spent most of the afternoon and evening with Anjali and she is doing better. Her therapist said she would have high and low days. Sunday was a low day for her. I get the sense she is very determined like never before to get better and more on with her life. She's tired of having her life interrupted over and over again because of the trauma. Her therapist are working on a systematic and comprehensive approach with her, and including EMDS (eye movement

desensitization reprocessing) . group therapy. She is working hard and responding well to treatment.

I'll be seeing her Thursday and maybe stay with her for Shabbat.

Hope you are doing well.

*Love,
Louise*

293)Over the coming months, Louise kept in regular touch with Jeffrey, reporting on how Anjali was doing in Palo Alto, her visits with Anjali, and on her own ventures into therapy regarding her own guilt for having compelled her five-year-old daughter to keep going to swim camp where she was allegedly being subjected to daily rape and sexual abuse by “Andy”.

294)Jeffrey spent several hours daily on the phone with Anjali through October, November, and December 2013, just as before. He counseled and consoled her daily as she described psychologically invasive therapy in graphic detail, slowly peeling away the layers of fear, trauma, and anxiety surrounding those memories and images. Anjali told Jeffrey how lonely she was, how isolated she felt, about struggling what to tell her friends back at Stern where she was and why she had dropped out of school.

295)Anjali was at actually at Stern College in New York the fall semester of 2013, pretending to be a pious convert to Orthodox Judaism. Anjali and Louise induced Jeffrey into providing Anjali with hundreds of hours of counseling on the phone over a ten weeks period for a trauma she didn't have by telling him that he was the “love of her life”. and that she could not meet him because she was at a mental health facility in Palo Alto addressing Post-Traumatic-Stress-Disorder for a childhood rape she invented.

296) At every turn, Anjali methodically wove highly-detailed, intricate stories designed to draw Jeffrey's sympathy. These stories took months or sometimes years to unfold and play out. For example, when Anjali first described checking into the mental health facility, she explained that she was going to the Stanford Hillel (college synagogue organization) for Shabbats. Her descriptions of services, the rabbi, the physical environment, and the people there was detailed and consistent. She constantly complained about how socially isolated she was, and how none of her friends back at Stern even bothered calling even though they knew she was out of school on medical leave. Early on, she began telling Jeffrey about a new friend she was making at Stanford. Over the coming ten weeks, the relationship with this friend would go through various ups and downs. They spent the day in San Francisco. They would have a fight, stop talking for a few days, Anjali called her and they made up, and finally, in early December 2013, she described drinking too much at a Chanukah party and ending up in a full-on lesbian encounter that this "friend" coerced her into. She was emotionally vulnerable, socially isolated, beside herself at her inability to see Jeffrey, and so worn out from therapy that she questioned her own sexual orientation when prompted and seduced by this "friend". After going through the encounter in graphic detail, Anjali reluctantly agreed with Jeffrey that she didn't think she actually was a lesbian, she just had to conquer her fears and trauma relating to men. This particular vignette took 10 weeks to create and unfold, casually mentioned here and there in her several hours of daily conversations and ongoing texting with Jeffrey, building up to the final encounter. It is just one of many dozens of examples of bizarre, whole-cloth lies Anjali and her mother Louise created for Plaintiffs, just for the thrill of deception and soliciting more sympathy from Jeffrey — all to have him lower his guard to even more manipulation and abuse.

297) In another fictitious storyline, Louise and Anjali began reporting mid-2012 that Anil had been diagnosed with Parkinson's disease. Over the coming years, the idea of leaving Anil with this horrible degenerative disease in order to follow her spiritual longings to convert to Judaism would slowly begin eating at Louise's conscience, to the point that eventually she simply couldn't bring herself to do it. For Anjali, this fictitious storyline allowed her yet another mechanism through which to present herself to Jeffrey as if she were a good person and illicit even more misguided sympathy from him. For example, she regularly described helping her father up and down the stairs, serving him tea, cleaning him, and lovingly taking care of other basic tasks, claiming to have moved back to her parents' house in Sacramento, January through mid-April 2015 while actually living in New York. On November 13, 2013, Louise emailed Plaintiff:

Hi Jeff,

True, it has been a long time. I'm doing okay considering everything that has gone on for the last several months. I've lost almost 30 lbs and that's been a huge personal accomplishment I'm very proud of. I guess it took a major health scare to get me moving. I feel the best in years. I've had to put the Jewish conversion/divorce on hold until I worked on other issues. Anil is retiring at the end of the year and we have been talking about the next chapter in our lives. It's not been an easy conversation to have. His Parkinson's has gotten progressively worse, to the point he can't hold his cup of tea without spilling it.

The one bright spot has been the weekly therapy. It has helped me face truths that I was not able to earlier, and accept/deal with in a constructive manner. But it's not been a picnic and there have been many, many tears. I always had the most love for Anjali, but now I have also so much respect and admiration for her.

I don't know if she told you, but she might be released in 2 weeks. She has made so much progress. And her team is very happy with her. She will be allowed to stay on longer since the insurance coverage allows for more time. And she was asked to help lead the group therapy. GoAnjali!!

298) Appeals to their victims' conscience, sympathy, and senses of virtue and decency have been identified as trademark sociopathic behavior. Because sociopaths have no conscience, they observe conscience in their victims and wield it against them as a tool for manipulation.

299) These and other lies and fictitious (many other) storylines Defendants told Jeffrey were intricate, took months or often years to develop, and were universally malicious.

300) Louise constantly reminded Jeffrey how expensive Anjali's therapy was, saying that she was going broke and that Jeffrey really should contribute. In early December 2013, Louise began working on Jeffrey financially from a new angle, explaining that Anjali had lost her financial aid award to Stern because she forgot to reapply on time while in the mental health facility at Stanford. She would have to move back home and go to UC Davis or Sac State.

301) Anjali was really down about what her treatment was costing her mother, and Louise made it clear she thought Jeffrey should help — all this was about her seeing him, after all. Louise got into great detail regarding the cost of the mental health facility, insurance co-pays, and the cost of Anjali's tuition at Stern versus a local California school.

302) The reality was, Jeffrey lived on almost nothing, receiving housing and an \$800/month stipend from the synagogue he officiated. Jeffrey spent essentially every cent he could on Jewelry and other gifts for Anjali. He sent these gifts to her because she told him she loved him, was sincerely trying to see him, and he believed her.

303) Anjali finally emerged from the mental health facility. Despite Jeffrey begging her not to, she insisted on buying another flight and coming to Florida. Anjali emailed her flight itinerary to Jeffrey: Monday, Dec 23, US Airways from SFO to CLT change planes, FLT 749 CLT to FLL land 4:22 pm.

304) Jeffrey went to the airport with his Judah and Alexandra, confident that 10 weeks of intensive, full-time therapy would enable Anjali to appear. The plan was for everyone to go out to dinner that night. Jeffrey made reservations. Jeffrey's children were extremely excited to finally meet Anjali, who they had been talking to several times a week for over

two years. Jeffrey ended up spending three hours circling with Anjali allegedly having a panic attack on the phone from inside Fort Lauderdale International Airport. Jeffrey put his Judah and Alexandra on the phone and they tried talking with her to get her to come out. Jeffrey thought having his children there would calm Anjali down because she was always so relaxed and upbeat with them. She told the kids she was doing her hair and just needed more time, but would be out “really soon”. After three hours of going back and forth with Anjali, circling at the airport, the Judah and Alexandra started crying and Jeffrey, despite Anjali’s insistence that she was coming out really, really soon, finally drove home.

305) Louise stayed in touch and told Jeffrey she was “beside herself with worry” and “praying and reading Tehillim (Psalms)” in hopes that Anjali would be OK. Louise was focused on her own conversion to Judaism and spent hours seeking counseling from Plaintiff and explaining how much Anjali was costing her. For example, on Christmas Eve, December 24, 2013, while Anjali was allegedly in Florida, Louise and Plaintiff texted:

Rabbi

Anjali tells me you're really going through the Torah Anthology 6:44 PM

Louise Stokes

listening to shiurim on va'era 6:44 PM

Rabbi

it's a great set 6:44 PM

Louise Stokes

i love it 6:44 PM

Rabbi

very well done 6:44 PM

Louise Stokes

reading abt the patriachs 6:45 PM

so much to learn, so little time 6:45 PM

this is a hard night 6:45 PM

best to keep my mind on learning 6:45 PM

Rabbi

I'm really sorry Mrs. Stokes 6:45 PM

I really wish there were something I could do 6:46 PM

I'm still at the office 6:46 PM

Louise Stokes

the hardest part is being lonely. 6:46 PM

Rabbi

i don't really have anyone or anything to go home to 6:46 PM

Louise Stokes

married, but lonely 6:46 PM

Rabbi

I can't imagine 6:46 PM

Louise Stokes

jeff...the only thing abt xmas that i like...the eggnog 6:47 PM

Rabbi

It almost sound like Anil never expected romantic love or true companionship... he thought of the whole thing more like a business deal 6:47 PM

Louise Stokes

eh, screw anil 6:48 PM

Rabbi

*I was just about to say that! Eggnog is THE BEST6:48 PM
especial with a shot of RUM!!6:48 PM*

Louise Stokes

rum, whiskey, brandy6:48 PM

im not messing around6:48 PM

Rabbi

all at once? Hey why not....6:48 PM

Louise Stokes

:)6:48 PM

Rabbi

are you sure you can't just sneak out for a few days? 6:49 PM

why not leave for FL tomorrow afternoon or evening when things are winding down?6:49 PM

you could use a weekend in the sun6:49 PM

Louise Stokes

lets see if my darling daughter has bankrupt my cc 6:49 PM

Rabbi

OK please let me know 6:50 PM

Louise Stokes

i will 6:50 PM

jeff 6:50 PM

you made my happy. 6:50 PM

Rabbi

I'm really sorry if I haven't always treated you with the respect I should have. 6:50 PM

please forgive me. 6:50 PM

Louise Stokes

no. i am sorry too 6:50 PM

i get hot under the collar. the latin in me 6:51 PM

florida is sounding very nice.... 6:51 PM

Rabbi

I don't know what to do with a girl who literally tells me she loves me so deeply that she can't meet me in person because she is afraid of losing her own free will 6:52 PM

it is! 78 degrees today 6:52 PM

crystal blue skies 6:52 PM

Louise Stokes

heaven 6:53 PM

Rabbi

<http://www.weather.com/weather/tenday/USFL0040> 6:53 PM

looks like rain is coming 6:53 PM

but that means off-and-on rain 6:53 PM

not solid 6:53 PM

Louise Stokes

okay 6:53 PM

Rabbi

is there any chance you can actually come? 6:54 PM

Louise Stokes

idk 6:54 PM

lets see 6:55 PM

amil's fami is here 6:55 PM

Rabbi

I just saw a flight for \$657 from SFO to FLL leaving tomorrow and returning next Tuesday.... 6:55 PM

maybe you have points? 6:55 PM

Louise Stokes

no. no point 6:56 PM

Rabbi

last minute deals aren't great.... 6:56 PM

I just can't imagine Anjali flying back to SFO without seeing me AGAIN 6:57 PM

Louise Stokes

whats wrong with that girl? 6:57 PM

Rabbi

I don't know 6:57 PM

Louise Stokes

someone told me that there is always one child that needs extra love and attention 6:58 PM

Rabbi

But it is pretty obvious that she WANTS to meet me 6:58 PM

she didn't fly here at 3 AM etc just to sit in the airport and go home again 6:59 PM

Louise Stokes

i have no idea 6:59 PM

jeff 6:59 PM

i need to go now. 6:59 PM

Rabbi

ok 6:59 PM

Louise Stokes

lets talk later 6:59 PM

Rabbi

thanks for being in touch 7:00 PM

Louise Stokes

im here for you

306) After another run-around of promising to meet Plaintiffs at restaurants, bars, and

synagogues, similar to the previous trip, Anjali informed Jeffrey that she simply couldn't do this anymore and was flying home. She gave Jeffrey her flight details. He returned to the airport again the evening of December 25, 2013, worried about her and hoping to meet if only briefly. Jeffrey didn't meet her and Anjali allegedly got on the red-eye and flew home.

307) On arrival the morning of December 26, 2013, Louise emailed Jeffrey:

I'm relieved, but happy, no. I'm just picking her up from the airport Jeff. I'm not enabling, but when she has no one else except her mom then why slam the door on her face. She is not a cruel person, not mean, vindictive, hateful, or lying. That's what sets a parents love apart from the rest. I won't give up on her.

Talk later.

308) Later that night, Louise emailed again:

Hi,

We just got home now. A very long day. I had my scheduled appt with my therapist and he was able to see Anjali privately for an hour. There's no point going into everything now, I'm extremely tire. Bottom line, he is putting her on Zoloft for the short term.

I read your email. I am sorry for everything. And so is Anjali. Let's talk soon.

Louise

309) Anjali put Jeffrey on an absolute head trip. December 26, 2013 Plaintiff responded later that evening and emailed Louise:

I have been on the phone with her 3 hours almost every single day for the past 2.5 years. That includes all this past fall. Really think about that. Anjali began her relationship with me right around her first day at Fulsome Lake. I have been with her through the worst ups and downs of her life. I have stayed with her through all the ups and down because she promised me that she WOULD meet me. She literally swore to do so.

As of today, Anjali has never once met me in person.

As of the day before she flew to see me, Anjali was telling me in intimate detail how profoundly she loved me and wanted to make love to me. I am not going to go into detail, and I don't mean to cheapen our relationship. My point is, for the 2.5 years we have known each other, our relationship has been profoundly deep, profoundly intimate, and quite frankly closer on every level EXCEPT the physical than I had ever hoped to be with a woman. She is my true soulmate and dream girl. I can not imagine loving someone more deeply.

The last trip to Florida was a complete failure. Anjali literally SWORE that she would never do that again to herself or to me. I believed her. I spend 3 weeks believing she was staying 2 miles from my apartment and every single day of her entire trip, including Shabbats, told me she was planning on walking over and meeting me. I literally got pneumonia from the head trip she put me on. After she left, she revealed that the whole thing had been a lie. She had spent the majority of the time an hour drive away in Fort Lauderdale and had never really been in a position to walk over to see me. I had been sitting on the edge of my chair for 3 weeks for nothing. The closest she ever got was hiding behind parked cars and trees spying on me in my succah and watching me from a distance sitting in a Starbucks where she stood me up - just so she could look at me from 100 feet away without my knowledge.