

NEW YORK STATE SUPREME COURT
KINGS COUNTY

JANE DOE 1, JANE DOE 2, and JANE DOE 3,

Plaintiffs,

-against-

MAIMONIDES MEDICAL CENTER, GENESIS
FERTILITY & REPRODUCTIVE MEDICINE, P.C., and
RICHARD V. GRAZI, M.D.

Defendants.

Index No.: _____

Date Filed: _____

SUMMONS

Plaintiffs designate Kings
County as the place of trial.

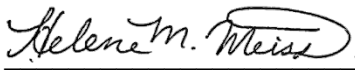
Victims of Gender-
Motivated Violence
Protection Law N.Y.C.
Admin Code § 10-1101

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to Answer the Verified Complaint in this action and to serve a copy of your Answer or, if the Verified Complaint is not served with this Summons, to serve a Notice of Appearance on Plaintiffs' attorneys within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York); and, in case of your failure to appear or Answer, judgement will be taken for the relief demanded herein.

Dated: September 28, 2026

MARSH LAW FIRM PLLC

By: 
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Cori J. Iacopelli, Esq.
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(212) 372-3030

TO:

MAIMONIDES MEDICAL CENTER

Attn: General Counsel

4802 Tenth Ave.

Brooklyn, NY 11219

GENESIS FERTILITY & REPRODUCTIVE MEDICINE, P.C.

6010 Bay Parkway, 5th Floor

Brooklyn, NY 11204

RICHARD V. GRAZI, M.D.

6010 Bay Parkway, 5th Floor

Brooklyn, NY 11204

NEW YORK STATE SUPREME COURT
KINGS COUNTY

Index No.: _____

JANE DOE 1, JANE DOE 2, JANE DOE 3,

Plaintiffs,

VERIFIED COMPLAINT

-against-

MAIMONIDES MEDICAL CENTER, GENESIS
FERTILITY & REPRODUCTIVE MEDICINE, P.C., and
RICHARD V. GRAZI, M.D.

**Victims of Gender-
Motivated Violence
Protection Law N.Y.C.
Admin Code § 10-1101**

Defendants.

Plaintiffs JANE DOE 1, JANE DOE 2, and JANE DOE 3 (collectively “Plaintiffs”), by and through their attorneys at MARSH LAW FIRM PLLC, respectfully allege for their Verified Complaint the following:

I. INTRODUCTION

1. This is an action brought by Plaintiffs against Maimonides Medical Center (“MMC”); MMC’s Division of Reproductive Endocrinology and Infertility, Genesis Fertility & Reproductive Medicine, P.C. (“Genesis”), and Richard V. Grazi, M.D. (“Grazi” or “Defendant Grazi”), the Director of the Division, based on Defendant Grazi’s sexual abuse and exploitation of Plaintiffs. Defendants MMC, Genesis, and Grazi are hereinafter referred to collectively as “Defendants.”

2. Defendant Richard V. Grazi is a physician who exploited his position of trust and medical authority to commit acts of gender-motivated violence against female patients, including the Plaintiffs herein. Defendant Grazi used the doctor-patient relationship, his professional standing in the Orthodox Jewish community of Brooklyn, and the implicit authority of medical

examinations to perpetrate sexual abuse against each of the Plaintiffs when they were young adults. His conduct was motivated by gender, as all known victims of his sexual abuse are female.

3. Defendants MMC and Genesis directed, enabled, participated in, and/or conspired in the commission of Defendant Grazi's gender-motivated violence against Plaintiffs by providing him with the institutional platform, facilities, staff, tasks, premises, instrumentalities, and professional authority through which he accessed, groomed, and abused Plaintiffs, and likely many other female patients.

4. Upon information and belief, Defendants MMC and Genesis knew or should have known of Defendant Grazi's pattern of inappropriate conduct toward female patients and staff well before his abuse of Plaintiffs.

5. In a verified pleading filed in 2005, Dr. Susan M. Lobel ("Dr. Lobel"), a former MMC employee, medical staff member, and partner with Defendant Grazi of the Division of Reproductive Endocrinology Faculty Practice Plan at Genesis, alleged that Defendant Grazi engaged in "inappropriate behavior with female patients and staff."

6. Attached hereto as **Exhibit 1** is a true and accurate copy of the 2005 Dr. Lobel Verified Amended Complaint.

7. Defendants also knew or should have known that Defendant Grazi was conducting intimate breast and pelvic examinations of young female patients without appropriate safeguards, including without gloves, without a chaperone or female staff member present, behind closed or locked doors, and, in certain instances, before ordinary office hours when no other staff were present.

8. These circumstances were not isolated or hidden from the practice environment; they occurred repeatedly in Defendants' facilities, using Defendants' examination rooms, scheduling systems, staff, and institutional authority.

9. Defendants nevertheless continued to employ, credential, retain, promote, and hold out Defendant Grazi as a trusted fertility specialist, while permitting him continued access to vulnerable female patients in private examination settings. Defendant Grazi's conduct went completely unchecked, and he continued to have unfettered access to sexually abuse his female patients for decades. Defendants failed to take adequate action to prevent harm to patients, including Plaintiffs herein.

10. As further alleged below, on at least one occasion, after Jane Doe 2's husband questioned why no nurse or female staff member was present during Defendant Grazi's examinations, a nurse appeared for the next two appointments only. Thereafter, Defendants again permitted Defendant Grazi to examine Jane Doe 2 without any additional medical staff present. This temporary change in practice demonstrates that Defendants and/or their agents were aware of the lack of appropriate safeguards and had the ability to require chaperones, but failed to implement or enforce such protections consistently.

11. The gender-motivated misconduct alleged herein did not occur in a vacuum. Before and during the abuse alleged herein, Defendant Grazi's inappropriate conduct toward female patients and staff was known or should have been known to Defendants' medical personnel, administrative staff, supervisors, credentialing personnel, and/or risk-management personnel. Defendants had notice of red flags including, but not limited to, Defendant Grazi's inappropriate conduct with female patients and staff, his practice of conducting intimate examinations without

chaperones or female staff present, his use of private and closed examination settings, and complaints or concerns raised regarding the absence of nurses during such examinations.

12. Despite actual and constructive notice of Defendant Grazi's inappropriate conduct with female patients and staff, Defendants failed to investigate, restrict, supervise, discipline, or remove him; failed to implement and enforce reasonable chaperone and supervision policies for intimate examinations; failed to warn patients; and failed to prevent Defendant Grazi from continuing to use Defendants' offices, reputation, and authority to access and commit gender-motivated violence by sexually abusing female patients, including Plaintiffs.

II. PROCEEDING IN ACCORDANCE WITH N.Y.C. Admin. Code § 10-1101

13. This action is brought under the Gender-Motivated Violence Protection Act (hereinafter, "GMVA") (New York City Administrative Code § 10-1101 et seq.). On January 29, 2026, an amendment to the GMVA, Introduction 1297-A (hereinafter, "Intro 1297") was enacted by the New York City Council. This amendment (d)(ii) allows survivors of gender-motivated violence who were harmed prior to January 9, 2022, to file suit against their abuser and/or any individual or entity who enabled the conduct of said abuser, within eighteen months of Intro 1297's enactment on January 29, 2026. As such, this action is timely under Intro 1297.

14. In line with the above, Plaintiffs were victims of one or more crimes of violence motivated by gender in the City of New York, including conduct that would constitute a sexual offense.

III. JURISDICTION AND VENUE

15. This Court has personal jurisdiction over all Defendants pursuant to New York CPLR §§ 301 and 302 because the alleged sexual abuse occurred within the state of New York

and each Defendant transacts business in New York, and owns, uses, and possesses real property within New York.

16. The amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

17. Venue is proper because Kings County is the county (1) where each Plaintiff resides, (2) where Defendant Grazi resides and conducted his medical practice at the time of the alleged abuse, (3) where MMC and Genesis defendants maintain their principal offices, and (4) in which a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred.

IV. PARTIES

18. Plaintiff JANE DOE 1 is over 18 years old, a resident of Kings County in the State of New York, and she brings this action for the gender-motivated sexual violence perpetrated against her by Defendant Grazi, an agent, employee, and/or doctor of MMC and Genesis.

19. Plaintiff JANE DOE 2 is over 18 years old, a resident of Kings County in the State of New York, and she brings this action for the gender-motivated sexual violence perpetrated against her by Defendant Grazi, an agent, employee, and/or doctor of MMC and Genesis.

20. Plaintiff JANE DOE 3 is over 18 years old, a resident of Kings County in the State of New York, and she brings this action for the gender-motivated sexual violence perpetrated against her by Defendant Grazi, an agent, employee, and/or doctor of MMC and Genesis.

21. Defendant Grazi is a resident of the State of New York and a board-certified physician licensed in the State of New York to practice medicine, specializing in Obstetrics & Gynecology and Reproductive Endocrinology and/or Infertility.

22. At all relevant times, Defendant Grazi practiced medicine and saw patients in Kings County, New York. Defendant Grazi is the founder and Chief Executive Officer of Defendant

Genesis and the Director of the Division of Reproductive Endocrinology and Infertility at Defendant MMC.

23. Defendant MMC is a domestic not-for-profit corporation duly organized and existing under the laws of the State of New York, with its principal office and registered address in Brooklyn, New York, located at 4802 Tenth Avenue, Brooklyn, New York 11219. At all relevant times, Defendant MMC conducted business as Maimonides Medical Center.

24. At all relevant times, MMC employed and/or relied on doctors, nurses, medical staff, administrators, employees, volunteers, and others who provided medical services to various women seeking care in the field of Obstetrics & Gynecology and Reproductive Endocrinology and/or Infertility, including Plaintiffs.

25. At all relevant times, Defendant Grazi was a doctor at MMC who provided medical services to women on behalf of MMC, including Plaintiffs.

26. At all relevant times, MMC employed and/or relied on doctors, nurses, scientists, administrators, employees, volunteers, and other professionals who provided medical services to various women seeking care in the field of Obstetrics & Gynecology and Reproductive Endocrinology and/or Infertility, including Plaintiffs.

27. During the time Defendant Grazi was a doctor at MMC, he used his position of power and authority as a doctor of MMC to commit acts of gender-motivated sexual violence against Plaintiffs.

28. To the extent that MMC was a different entity, corporation, or organization during the period of time during which Defendant Grazi used his position as a doctor to commit acts of gender-motivated violence against Plaintiffs, such entity, corporation, or organization is hereby on

notice that it is intended to be a defendant in this lawsuit and is named in this lawsuit as Maimonides Medical Center.

29. To the extent that MMC is a successor to a different entity, corporation, or organization which existed during the period of time during which Defendant Grazi used his position as a doctor to commit acts of gender-motivated violence against Plaintiffs, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in this lawsuit as Maimonides Medical Center.

30. All such Maimonides-related entities, corporations, or organizations are collectively referred to herein as “MMC.”

31. Defendant Genesis is a domestic professional service corporation duly organized and existing under the laws of the State of New York, with its principal office and registered address in Brooklyn, New York, located at 6010 Bay Parkway, 5th Floor, Brooklyn, New York 11204. At all relevant times, Defendant Genesis conducted business as “Genesis Fertility & Reproductive Medicine” and/or “Brooklyn I.V.F.”

32. At all relevant times, Genesis employed and/or relied on doctors, nurses, scientists, administrators, employees, volunteers, and other professionals who provided medical services to various women seeking care in the field of Obstetrics & Gynecology and Reproductive Endocrinology and/or Infertility, including Plaintiffs.

33. At all relevant times, Defendant Grazi was the founder and Chief Executive Officer of Genesis, as well as a doctor at Genesis who provided medical services to women on behalf of Genesis, including Plaintiffs.

34. At all relevant times, Genesis employed Defendant Grazi, including as its Chief Executive Officer, provided him with facilities and institutional authority, and held him out to the public as a trusted physician within its organization and as a reputable fertility specialist.

35. At all relevant times, Genesis was the Division of Reproductive Endocrinology and Infertility (REI) at MMC.

36. During the time Defendant Grazi was a doctor at Genesis, he used his position of power and authority as a doctor of Genesis to commit acts of gender-motivated sexual violence against Plaintiffs.

37. To the extent that Genesis was a different entity, corporation, or organization during the period of time during which Defendant Grazi used his position as a doctor to commit acts of gender-motivated violence against Plaintiffs, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in this lawsuit as Genesis Fertility & Reproductive Medicine, P.C.

38. To the extent that Genesis is a successor to a different entity, corporation, or organization which existed during the period of time during which Defendant Grazi used his position as a doctor to commit acts of gender-motivated violence against Plaintiffs, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is named in this lawsuit as Genesis Fertility & Reproductive Medicine, P.C.

39. All such Genesis-related entities, corporations, or organizations are collectively referred to herein as “Genesis Fertility & Reproductive Medicine, P.C.”.

V. FACTUAL HISTORY

40. Plaintiffs re-allege and incorporate by reference paragraphs 1 to 12 as though fully set forth herein.

41. Each Defendant's conduct, or lack thereof, violated New York's GMVA, which exists to protect and provide legal recourse to persons, including the Plaintiffs herein, from acts of gender-motivated violence as perpetrated by Defendant Grazi and enabled by the institutional Defendants, MMC and Genesis, in Brooklyn, New York.

42. Upon information and belief, many of Defendant Grazi's patients come from the Orthodox Jewish community in Gravesend and the surrounding Brooklyn neighborhoods.

43. At all relevant times, MMC, through its agents, servants, and employees, managed, maintained, operated, and controlled Maimonides, and held out to the public its agents, servants, and employees as those who managed, maintained, operated, and controlled MMC.

44. At all relevant times, Genesis, through its agents, servants, and employees, managed, maintained, operated, and controlled Genesis, and held out to the public its agents, servants, and employees as those who managed, maintained, operated, and controlled Genesis.

45. At all relevant times, Defendant Grazi was an agent and/or employee of MMC, acted as an agent of MMC, and MMC allowed Defendant Grazi to provide medical services at MMC and/or on its behalf.

46. At all relevant times, Defendant Grazi had an office on the premises of MMC.

47. At all relevant times, Defendant Grazi was an agent and/or employee of Genesis, acted as an agent of Genesis, and Genesis allowed Defendant Grazi to provide medical services at Genesis and/or on its behalf.

48. At all relevant times, Defendant Grazi had an office on the premises of Genesis.

49. MMC and Genesis, through their agents, servants, and employees, held Defendant Grazi out to the public, to Plaintiffs, and to their families, as their agent and/or employee.

50. MMC and Genesis, through their agents, servants, and employees, held Defendant Grazi out to the public, to Plaintiffs, and to their families, as having been vetted, screened, and approved by those defendants.

51. MMC and Genesis, through their agents, servants, and employees, held Defendant Grazi out to the public, to Plaintiffs, and to their families, as a reputable doctor and/or specialist in the field of Obstetrics & Gynecology and Reproductive Endocrinology and/or Infertility.

52. Plaintiffs and their families reasonably relied upon the acts and representations of MMC and Genesis, through their agents, servants, and employees, and reasonably believed that Defendant Grazi was an agent and/or employee of those defendants who was vetted, screened, and approved by those defendants.

DEFENDANT GRAZI'S SEXUAL ABUSE OF JANE DOE 1

53. In or about approximately 2005 or 2006, Defendants allowed Defendant Grazi to use his position as an agent of Defendants, including its facilities, location and/or equipment, to sexually abuse JANE DOE 1, beginning when she was approximately 19 years old.

54. When Plaintiff JANE DOE 1 was a young adult of approximately 19 years old, Defendant Grazi committed acts of gender-motivated violence against her as described below in Brooklyn, New York.

55. At all relevant times, JANE DOE 1 was a member of the Orthodox Jewish community in Gravesend, Brooklyn.

56. In or about approximately 2002 or 2003, when Plaintiff JANE DOE 1 was approximately sixteen years old, she sought medical treatment from Defendant Grazi. At the time,

Defendant Grazi had a preexisting social relationship with JANE DOE 1's mother through their shared Orthodox Jewish community in Brooklyn, where he was widely known and respected within the community as a fertility specialist.

57. Due to Defendant Grazi's reputation within the community, he was viewed as a trusted doctor for sensitive women's issues.

58. As a minor, JANE DOE 1's mother initially accompanied her to her appointments with Defendant Grazi beginning at approximately age sixteen.

59. However, during one appointment, Defendant Grazi had JANE DOE 1's mother step out of the room so he could speak to JANE DOE 1 privately. After speaking, but before dismissing JANE DOE 1, Defendant Grazi abused his authority by asked JANE DOE 1 to pay him with a kiss on his cheek, pointing his finger to where he wanted the kiss placed. Scared, uncomfortable, and unsure what to do, JANE DOE 1 hesitated and kissed Defendant Grazi's cheek before leaving.

60. Thereafter, in or around 2005 or 2006, when Plaintiff JANE DOE 1 was approximately nineteen years old, she had additional appointments with Defendant Grazi.

61. During one appointment, Defendant Grazi met JANE DOE 1 in his private office at Genesis, with the door closed, and made vulgar, inappropriate, and demeaning sexual remarks to JANE DOE 1.

62. During another appointment, in or about approximately 2006, Defendant Grazi similarly met JANE DOE 1 in his private office at Genesis, with the door closed. Shortly thereafter, Defendant Grazi brought JANE DOE 1 to a room she had never entered before.

63. The "examination room" was located adjacent to Defendant Grazi's private office at Genesis, which was different from the prior examination room she'd been in.

64. Defendant Grazi closed the door and locked it.

65. Throughout the appointment, Defendant Grazi committed acts of gender-motivated sexual violence against Plaintiff JANE DOE 1. Under the guise of teaching JANE DOE 1 to do a “self-breast exam,” Defendant Grazi directed JANE DOE 1 to remove her top and bra, while he was present in the room, and, when she complied, he proceeded to massage, grope, and fondle her breasts without her consent.

66. JANE DOE 1 felt confused and ashamed.

67. Immediately thereafter, Defendant Grazi directed JANE DOE 1 to remove the rest of her clothing, including her underwear, while he was present in the room, and led her to an examination table for a further “examination.”

68. No ultrasound equipment, no medical instruments, and no gloves were present or used during the “examination.” No additional medical staff, specifically female staff, were present in the room.

69. Once JANE DOE 1 laid down on the table, Defendant Grazi inserted his bare fingers inside JANE DOE 1’s vagina, without her consent and while she lay paralyzed with fear.

70. In the days and weeks following, Defendant Grazi personally called JANE DOE 1 on her cell phone multiple times, urging her to return for another “examination.” JANE DOE 1 declined and stopped answering calls from his office and unknown numbers.

71. The calls eventually slowed down, but resumed in frequency approximately one year later, when Defendant Grazi learned that JANE DOE 1 was not yet pregnant. Upon learning this news, Defendant Grazi called JANE DOE 1 again and urged her to return to his office so that he could help her conceive. JANE DOE 1 declined.

72. Defendant Grazi's "examinations" served no legitimate medical purpose and were for the furtherance of his own sexual gratification.

73. Defendant Grazi used these "examinations" as an opportunity to sexually abuse JANE DOE 1.

74. It was and is reasonably foreseeable that the gender-motivated violence committed and/or enabled by Defendants would inflict severe emotional and psychological distress on patients, including JANE DOE 1, and she did in fact suffer severe emotional and psychological distress and personal physical injury as a result of Defendants' wrongful conduct.

75. By reason of the wrongful acts and omissions of Defendants as detailed herein, Plaintiff JANE DOE 1 has suffered, and continues to suffer, severe and grievous psychological harm, including but not limited to, severe emotional and psychological distress, humiliation, fright, dissociation, anger, shame, insomnia, anxiety, depression, a severe shock to her nervous system, mental anguish, flashbacks and/or ruminations about the gender-motivated violence, severe obsessive-compulsive disorder, guilt, hypervigilance, intimacy issues, and an inability to trust others. Upon information and belief, some or all of these injuries are of a permanent and lasting nature, and JANE DOE 1 has and/or will become obligated to expend sums of money for treatment.

DEFENDANT GRAZI'S SEXUAL ABUSE OF JANE DOE 2

76. In approximately 2001, Defendants allowed Defendant Grazi to use his position as an agent of Defendants, including its facilities, location and/or equipment, to sexually abuse JANE DOE 2 when she was approximately 18 years old.

77. When Plaintiff JANE DOE 2 was a young adult of approximately 18 years old, Defendant Grazi committed acts of gender-motivated violence against her as described below in Brooklyn, New York.

78. At all relevant times, JANE DOE 2 was and is a member of the Orthodox Jewish community in Gravesend, Brooklyn.

79. In approximately 1998, when JANE DOE 2 was approximately 16 years old, she sought medical treatment from Defendant Grazi at Genesis. At the time, given that she was a minor and not yet married, her mother and father accompanied her to the appointment.

80. In approximately 2001, when JANE DOE 2 was approximately 18 years old, she again sought treatment from Defendant Grazi at Genesis.

81. This time, JANE DOE 2 sought medical advice from Defendant Grazi for fertility treatment.

82. JANE DOE 2 relied on Defendant Grazi's representations and reputation of trustworthiness in the community.

83. On numerous occasions, the night before JANE DOE 2's appointments (which occurred approximately every two weeks) Defendant Grazi would call her and direct her to arrive at her appointment at 7 o'clock a.m., before the office opened. When JANE DOE 2 arrived, there were no other staff in the office besides Defendant Grazi.

84. During these appointments, Defendant Grazi would perform a breast "examination" on JANE DOE 2, after he removed her bra, in a way that made JANE DOE 2 extremely uncomfortable. During these breast "examinations," Defendant Grazi never wore gloves.

85. Defendant Grazi's "examinations" served no legitimate medical purpose and were for the furtherance of his own sexual gratification.

86. Defendant Grazi used these "examinations" as an opportunity to sexually abuse JANE DOE 2.

87. Further, under the guise of teaching JANE DOE 2 to do “self-breast exams,” Defendant Grazi would remove the medical robe and sheet covering JANE DOE 2’s body, direct her to stand fully naked in front of a mirror, and proceed to massage, grope, and fondle her breasts without her consent.

88. Additionally, on numerous occasions, Defendant Grazi would perform internal vaginal “examinations” on JANE DOE 2 by digitally penetrating JANE DOE 2’s vagina with his fingers without gloves on.

89. During these vaginal “examinations,” JANE DOE 2 verbally told Defendant Grazi that he was hurting her. Defendant Grazi would respond, frustrated, and say something to the effect of “Oh, come on now [JANE DOE 2], how are you not comfortable with me yet” which made JANE DOE 2 very uncomfortable, insecure, and unsafe.

90. On one occasion, after the “examinations,” Defendant Grazi brought JANE DOE 2 to his private office, also located at Genesis. While in his office, Defendant Grazi inappropriately questioned JANE DOE 2 about intercourse and whether it “felt good” for her. Defendant Grazi then directed JANE DOE 2 to take off her underwear.

91. When JANE DOE 2 questioned him, Defendant Grazi got frustrated and responded with something to the effect of, “when will you just understand and trust me?”

92. After JANE DOE 2 complied, Defendant Grazi directed her to sit on a chair and open her legs. Defendant Grazi then “examined” JANE DOE 2 by sitting her down on a chair, spreading her legs, and inserting his bare fingers into her vagina.

93. No additional medical staff, specifically female staff, were ever present in the room during these “examinations.”

94. It wasn't until JANE DOE 2's husband eventually called Defendant Grazi to question why there was not another nurse present in the room with JANE DOE 2 during these "examinations" that a nurse appeared for the next two appointments only. Other than these two appointments, no additional medical staff, specifically female staff, were ever present in the room during Defendant Grazi's "examinations" of JANE DOE 2.

95. It was and is reasonably foreseeable that the gender-motivated violence committed and/or enabled by Defendants would inflict severe emotional and psychological distress on patients, including JANE DOE 2, and she did in fact suffer severe emotional and psychological distress and personal physical injury as a result of Defendants' wrongful conduct.

96. By reason of the wrongful acts and omissions of Defendants as detailed herein, Plaintiff JANE DOE 2 has suffered, and continues to suffer, severe and grievous psychological harm, including but not limited to, severe emotional and psychological distress, humiliation, fright, dissociation, anger, shame, insomnia, anxiety, depression, a severe shock to her nervous system, mental anguish, flashbacks and/or ruminations about the gender-motivated violence, low self-esteem, guilt, hypervigilance, intimacy issues, and an inability to trust others. Upon information and belief, some or all of these injuries are of a permanent and lasting nature, and JANE DOE 2 has and/or will become obligated to expend sums of money for treatment.

DEFENDANT GRAZI'S ABUSE OF JANE DOE 3

97. In approximately 2010 to 2012, Defendants allowed Defendant Grazi to use his position as an agent of Defendants, including its facilities, location and/or equipment, to sexually abuse JANE DOE 3 when she was approximately 21 to 23 years old.

98. In or around 2010 to 2012, when Plaintiff JANE DOE 3 was a young adult, approximately 21 to 23 years old, and seeking infertility treatment, Defendant Grazi committed acts of gender-motivated violence against her as described below in Brooklyn, New York.

99. At all relevant times, JANE DOE 3 was and is a member of the Orthodox Jewish community in Gravesend, Brooklyn.

100. During the appointments at Genesis, Defendant Grazi committed acts of gender-motivated sexual violence against Plaintiff JANE DOE 3. Defendant Grazi sexually abused JANE DOE 3 in many ways, including performing “examinations” of her breasts and genitals without gloves on.

101. When performing breast “examinations,” Defendant Grazi directed JANE DOE 3 to remove her clothing and, when she complied, he proceeded to massage, grope, and fondle her breasts in a way that made JANE DOE 3 extremely uncomfortable.

102. On multiple occasions, when performing genital “examinations” of JANE DOE 3, Defendant Grazi would touch her clitoral area, making JANE DOE 3 feel extremely uncomfortable, and would also digitally penetrate her with his fingers without gloves on.

103. No additional medical staff, specifically female staff, were ever present in the room during these “examinations.”

104. Despite JANE DOE 3’s request to have her husband present in the room, Defendant Grazi would not allow it, telling him to wait in the waiting room and that he would “take good care” of JANE DOE 3.

105. JANE DOE 3 left Defendant Grazi’s office each time feeling dirty for the experience he subjected her to.

106. It was and is reasonably foreseeable that the gender-motivated violence committed and/or enabled by Defendants would inflict severe emotional and psychological distress on patients, including JANE DOE 3, and she did in fact suffer severe emotional and psychological distress and personal physical injury as a result of Defendants' wrongful conduct.

107. By reason of the wrongful acts and omissions of Defendants as detailed herein, Plaintiff JANE DOE 3 has suffered, and continues to suffer, severe and grievous psychological harm, including but not limited to, severe emotional and psychological distress, humiliation, fright, dissociation, anger, shame, insomnia, anxiety, depression, a severe shock to her nervous system, mental anguish, flashbacks and/or ruminations about the gender-motivated violence, low self-esteem, isolation, guilt, hypervigilance, intimacy issues, and an inability to trust others. Upon information and belief, some or all of these injuries are of a permanent and lasting nature, and JANE DOE 3 has and/or will become obligated to expend sums of money for treatment.

VI. CAUSES OF ACTION AS TO ALL PLAINTIFFS

COUNT I:

**VIOLATION OF GENDER-MOTIVATED VIOLENCE ACT
Committing Gender-Motivated Violence
(NYC Admin. Code § 10-1101 *et. seq.*)**

As Against Defendant RICHARD V. GRAZI, M.D.

108. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in the preceding paragraphs of this complaint as if fully set forth herein, with the same force and effect as if hereinafter set forth at length.

109. Defendant Grazi's acts of gender-motivated violence against Plaintiffs included but were not limited to unwanted physical contact, forcibly grabbing, groping, and molesting each Plaintiff, digitally penetrating each Plaintiff's vagina, and/or other sexual acts.

110. The sexual acts committed by Defendant Grazi against Plaintiffs were not consensual and constitute a violation of Plaintiffs' bodily autonomy and an expression of Defendant Grazi's contempt thereof. Defendant Grazi's malice toward and the gender-motivated nature of his conduct against Plaintiffs are apparent from the nature of the sexual abuse itself and the fact that all of his other victims were female, many of whom sought medical treatment for infertility issues.

111. Therefore, as a result of the conduct complained of herein, Defendant Grazi has violated the GMVA and is liable to Plaintiff for: (1) compensatory and punitive damages; (2) injunctive and declaratory relief; (3) attorneys' fees and costs; and (4) such other relief as a court may deem appropriate.

112. As a direct and proximate result of Defendant Grazi's violations of the GMVA, Plaintiffs have sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

113. As a direct and proximate result of Defendant Grazi's violations of the GMVA, Plaintiffs have incurred medical expenses and other economic damages, and continues to suffer, and will now be obligated to expend sums of money for medical care and attention in an effort to cure themselves of their psychological injuries and to alleviate their pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

114. By reason of the foregoing, Plaintiffs were caused to sustain grievous psychological injuries and mental anguish as a result thereof. Upon information and belief these injuries are of a permanent and lasting nature.

115. By reason of the foregoing, Plaintiffs are entitled to compensatory damages from Defendant Grazi in such sums as a jury would find fair, just, and adequate, and Plaintiffs are further entitled to punitive and exemplary damages from Defendant Grazi in such sums as a jury would find fair, just, and appropriate to deter Defendant Grazi and others from future similar misconduct.

116. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

117. This action falls within exceptions to Article 16 of the C.P.L.R.

COUNT II:

VIOLATION OF GENDER-MOTIVATED VIOLENCE ACT

Enabling Gender-Motivated Violence

(NYC Admin. Code § 10-1101 et. seq.)

**As Against Defendants MAIMONIDES MEDICAL CENTER and GENESIS FERTILITY
& REPRODUCTIVE MEDICINE, P.C.**

118. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in the preceding paragraphs of this complaint as if fully set forth herein, with the same force and effect as if hereinafter set forth at length.

119. In violation of the GMVA, Defendants MMC and Genesis directed, enabled, participated in, and/or conspired with Defendant Grazi in the commission of gender-motivated violence against Plaintiffs by, among other things: employing, credentialing, retaining, and promoting Defendant Grazi despite actual and constructive notice of his inappropriate conduct toward female patients and staff; providing him with examination rooms, offices, equipment, staff, scheduling systems, premises, institutional authority, and access to vulnerable female patients; holding him out as a trusted and reputable physician; failing to institute adequate safeguards and supervision to protect female patients from abuse, including failing to require or enforce chaperones during intimate examinations and permitting him to conduct private examinations

behind closed doors and outside ordinary office safeguards; failing to investigate complaints, concerns, or red flags; and failing to take corrective action despite learning, or having reason to know, of Defendant Grazi's pattern of misconduct.

120. Therefore, as a result of the conduct complained of herein, MMC and Genesis have violated the GMVA and are liable to Plaintiffs for: (1) compensatory and punitive damages; (2) injunctive and declaratory relief; (3) attorneys' fees and costs; and (4) such other relief as a court may deem appropriate.

121. As a direct and proximate result of MMC's and Genesis' violations of the GMVA, Plaintiffs have sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

122. As a direct and proximate result of MMC's and Genesis' violations of the GMVA, Plaintiffs have incurred medical expenses and other economic damages, and continue to suffer, and will now be obligated to expend sums of money for medical care and attention in an effort to cure themselves of their psychological injuries and to alleviate their pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

123. By reason of the foregoing, Plaintiffs were caused to sustain grievous psychological injuries and mental anguish as a result thereof. Upon information and belief, these injuries are of a permanent and lasting nature.

124. By reason of the foregoing, Plaintiffs are entitled to compensatory damages from Defendants MMC and Genesis in such sums as a jury would find fair, just, and adequate, and Plaintiffs are further entitled to punitive and exemplary damages from Defendants MMC and

Gensis in such sums as a jury would find fair, just, and appropriate to deter said Defendants and others from future similar misconduct.

125. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

126. This action falls within exceptions to Article 16 of the C.P.L.R.

VII. CPLR 1603 – NO APPORTIONMENT OF LIABILITY

127. Pursuant to CPLR 1603, the foregoing causes of action are exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(2), CPLR 1602(5), 1602(7) and 1602(11), thus precluding the Defendants from limiting their liability by apportioning some portion of liability to any joint tortfeasor.

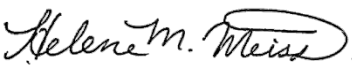
VIII. PRAYER FOR RELIEF

128. Plaintiffs demand judgment against Defendants in such sum as a jury would find fair, adequate and just, together with compensatory and punitive damages, interest, attorneys' fees and costs, injunctive and declaratory relief, and such other and further relief as this Court may deem just and proper.

129. Plaintiffs specifically reserve the right to pursue additional causes of action, other than those outlined above, that are supported by the facts pleaded, or that may be supported by other facts learned in discovery.

Dated: New York, New York
September 28, 2026

MARSH LAW FIRM PLLC

By: 

Helene M. Weiss, Esq.

Cori J. Iacopelli, Esq.

Gianna N. Elliot, Esq.

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(212) 372-3030

ATTORNEY'S VERIFICATION

I, HELENE M. WEISS, Esq., an attorney duly admitted to practice in the Courts of New York State, and a member of the firm MARSH LAW FIRM PLLC, attorneys for the plaintiffs in the within action, hereby affirms under penalty of perjury:

I am the attorney for the Plaintiffs.

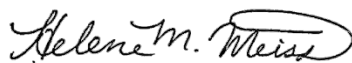
I have read the within Complaint and I know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief and as to those matters, I believe them to be true.

My belief, as to those matters therein not stated upon knowledge, is based upon the following:

Investigations, records/documents in the file, and interviews and/or discussions with Plaintiffs.

The reason I make this affirmation instead of Plaintiffs is because each Plaintiff resides outside the county from where your affirmant maintains her office for the practice of law.

Dated: New York, New York
September 28, 2026



Helene M. Weiss, Esq.