

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CLINTON

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C.B., AN INFANT BY HER MOTHER AND NATURAL
GUARDIAN, ABBY BENNETT, ABBY BENNETT,
INDIVIDUALLY, AND RYAN BENNETT,
INDIVIDUALLY,

Index No.:

Plaintiffs,

SUMMONS

-against-

YOUNG MEN’S CHRISTIAN ASSOCIATION OF
PLATTSBURGH d/b/a BRIGHT BEGINNINGS,

Defendant.

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TO THE ABOVE-NAMED DEFENDANT:

You are hereby summoned and required to serve upon Plaintiffs’ attorney an answer to the complaint in this action within 20 days after the service of this summons, exclusive of the day of service, or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis for venue in Clinton County is CPLR 503(a) because Plaintiffs reside in Clinton County and a substantial part of the events or omissions giving rise to the claims set forth in the Verified Complaint occurred in Clinton County.

Dated: June 22, 2026
New York, New York

The Law Firm of Andrew M. Stengel, P.C.
Attorneys for Plaintiffs



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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CLINTON

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C.B., AN INFANT BY HER MOTHER AND
NATURAL GUARDIAN, ABBY BENNETT, ABBY
BENNETT, INDIVIDUALLY, AND RYAN BENNETT,
INDIVIDUALLY,

Index No.:

Plaintiffs,

VERIFIED COMPLAINT

-against-

Jury Trial Demanded

YOUNG MEN’S CHRISTIAN ASSOCIATION OF
PLATTSBURGH d/b/a BRIGHT BEGINNINGS,

Defendant.

-----X

Plaintiffs C.B., an Infant By Her Mother and Natural Guardian, Abby Bennett, Abby Bennett, Individually, and Ryan Bennett, Individually, by their attorneys, The Law Firm of Andrew M. Stengel, P.C., 11 Broadway, Suite 715, New York, New York 10004, allege upon knowledge with respect to themselves, and upon information and belief as to all other matters, as follows:

NATURE OF ACTION

1. Between January 12, 2026, and March 11, 2026, infant Plaintiff C.B., who was two years old, was subjected to repeated acts of physical abuse and maltreatment by Dillon Bronson, an employee of Defendant Young Men’s Christian Association of Plattsburgh d/b/a Bright Beginnings (“Defendant YMCA” or “Bright Beginnings”), while C.B. was in the care and custody of Bright Beginnings, a licensed childcare center located at 62 Northern Avenue, Plattsburgh, New York 12903.

2. The child abuse and maltreatment were captured on video surveillance on at least three separate occasions.

3. On each occasion, Bronson grabbed infant C.B. and other children by their legs and ankles, violently whipped the children up and then down onto their sleeping cots, and then covered their heads and bodies with blankets.

4. Upon information and belief, other staff members at Bright Beginnings, including Amanda Rizzo and Autumn Stone, were present during these acts of child abuse and maltreatment and failed to report them as required by Social Services Law § 413(1)(a).

5. Defendant YMCA, through its management, had actual and constructive notice of the dangerous propensities of its employees and failed to supervise, discipline or terminate them, allowing the abuse to continue and to be repeated on multiple occasions over a period of months.

6. As a direct result of Defendant's negligence and the failures of its employees, agents and servants, infant Plaintiff C.B. has suffered and continues to suffer severe physical and psychological injuries, including trauma disorder as well as other injuries.

PARTIES, JURISDICTION AND VENUE

7. At all relevant times, Plaintiff C.B., an infant, was one and two years old.

8. Plaintiff Abby Bennett is a natural person and resident of the State of New York, County of Clinton, residing at 90 Beekman Street, Plattsburgh, New York 12901, acting on behalf of her daughter C.B., an infant, and herself individually.

9. Plaintiff Ryan Bennett is a natural person and resident of the State of New York, County of Clinton, residing at 90 Beekman Street, Plattsburgh, New York 12901, acting on behalf of his daughter C.B., an infant, and himself individually.

10. Defendant Young Men's Christian Association of Plattsburgh d/b/a Bright Beginnings ("Defendant YMCA") is a domestic not-for-profit corporation organized and existing

under the laws of the State of New York, with a principal place of business at 62 Northern Avenue, Plattsburgh, New York 12903.

11. At all relevant times, Defendant YMCA owned, operated, managed, maintained, controlled and supervised the licensed childcare facility known as Bright Beginnings, located at 62 Northern Avenue, Plattsburgh, New York 12903.

12. At all relevant times, Defendant YMCA employed Dillon Bronson, Amanda Rizzo, Autumn Stone, Lynne Boyd, Kris Tate and Justin Ihne as employees, agents and servants.

13. This Court has jurisdiction over this action because the amount of damages Plaintiffs seek exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

14. Venue is proper in Clinton County pursuant to CPLR 503(a) because Plaintiffs reside in Clinton County and a substantial part of the events or omissions giving rise to the claims alleged herein arose in Clinton County.

NO APPORTIONMENT OF LIABILITY

15. Pursuant to CPLR 1603, the causes of action herein 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(5), 1602(7) and 1602(11), thus precluding Defendant from limiting its liability by apportioning some portion of liability to any joint tortfeasor.

FACTUAL ALLEGATIONS

16. At all relevant times, infant Plaintiff C.B. was enrolled in the Bright Beginnings childcare program operated by Defendant YMCA at 62 Northern Avenue, Plattsburgh, New York 12903.

17. At all relevant times, infant Plaintiff C.B. was placed in the care and custody of Defendant YMCA's employees, agents and servants at Bright Beginnings.

18. At all relevant times, Defendant YMCA, through its employees, agents and servants, owned, operated, managed, maintained, controlled and supervised the Bright Beginnings childcare facility and the activities thereat, including the care and supervision of infant Plaintiff C.B.

19. At all relevant times, Dillon Bronson was employed by Defendant YMCA as an Assistant Teacher at Bright Beginnings and was responsible for the care and supervision of infant Plaintiff C.B. and other children enrolled at Bright Beginnings.

20. At all relevant times, Amanda Rizzo was employed by Defendant YMCA as a Floater Teacher at Bright Beginnings and was present during acts of child abuse and maltreatment described herein.

21. At all relevant times, Autumn Stone was employed by Defendant YMCA as Lead Teacher at Bright Beginnings and, upon information and belief, she was present during acts of child abuse and maltreatment described herein.

22. At all relevant times, Lynne Boyd was an on-site manager at Bright Beginnings who was responsible for overseeing the operations and staff of the facility. Ms. Boyd was aware of concerns regarding employee conduct at Bright Beginnings and attempted to raise those concerns with YMCA management but was unable to obtain an adequate response from Chief Operating Officer Kris Tate.

23. At all relevant times, Kris Tate was the Chief Operating Officer of Defendant YMCA and was responsible for the management and operations of Bright Beginnings.

24. At all relevant times, Justin Ihne was the Chief Executive Officer of Defendant YMCA. Following disclosure of the abuse, Mr. Ihne informed Plaintiffs of the abuse, failed to notify the YMCA board of directors and departed for New York City.

25. At all relevant times, Dillon Bronson, Amanda Rizzo, Autumn Stone, and Lynne Boyd were childcare workers who were mandated reporters of suspected child abuse or maltreatment pursuant to Social Services Law § 413(1)(a).

26. Infant Plaintiff C.B. began attending the Bright Beginnings childcare program in or about September 2025, at which time she was assigned to a classroom overseen by Dillon Bronson as Assistant Teacher.

27. Beginning in approximately October or November 2025, Plaintiffs Abby Bennett and Ryan Bennett observed changes in infant C.B.'s behavior, including pain when being dressed and a series of incident reports from the school citing C.B. for biting, kicking and fighting with other children.

28. In November and December 2025, infant C.B. developed a habit of rubbing hair under her nose for comfort and self-soothing.

29. During the same period, when Dillon Bronson was present at pick-up, infant C.B. would run and gather all of her belongings in apparent distress.

30. In or about late January 2026, infant C.B. began waking up three to four nights per week, screaming and was unable to sleep through the night.

31. On January 12, 2026, video surveillance at Bright Beginnings captured Dillon Bronson committing acts of child abuse and maltreatment against infant Plaintiff C.B. and other children.

32. Specifically, Bronson grabbed infant C.B. and other children, by their legs and ankles, violently whipped the children up and then down onto their sleeping cots, and then covered their heads and bodies with blankets.

33. Amanda Rizzo and, upon information and belief, Autumn Stone were present during these incidents, but did not make mandated reports of child abuse or maltreatment.

34. On January 20, 2026, video surveillance at Bright Beginnings captured Dillon Bronson committing additional acts of child abuse and maltreatment against infant Plaintiff C.B. and other children.

35. Specifically, Bronson again grabbed infant C.B. and other children, by their legs and ankles, violently whipped the children up and then down onto their sleeping cots, and then covered their heads and bodies with blankets.

36. Amanda Rizzo was present during these incidents, but did not make mandated reports of child abuse or maltreatment.

37. On February 11, 2026, video surveillance at Bright Beginnings captured Dillon Bronson committing further acts of child abuse and maltreatment constituting indicated counts of abuse.

38. During nap time, Bronson stopped sweeping, went to the boy in the cot adjacent to infant C.B.'s cot, grabbed him by his legs and ankles, violently whipped him up and then down onto his sleeping cot, and then covered his head and body with a blanket.

39. Bronson then immediately performed the same actions on infant Plaintiff C.B. and at least two additional children.

40. Amanda Rizzo and Autumn Stone, upon information and belief, were present during these incidents, but did not make mandated reports of child abuse or maltreatment.

41. These three documented incidents of video surveillance are not exhaustive of the abuse suffered by infant C.B.

42. State Police have reported that all 10 children in the classroom experienced similar treatment at various points during the period of abuse.

43. Upon information and belief, some or all of the children, including C.B., witnessed the acts of child abuse or maltreatment of others.

44. In or about late February 2026, infant C.B. would not want to be picked up and would slip through her parents' arms.

45. Infant C.B. said "ow" when being dressed for a period of approximately three weeks; however, no external injuries were observed.

46. On or about March 5, 2026, the New York State Central Register of Child Abuse and Maltreatment was notified of the suspected child abuse at Bright Beginnings.

47. Despite this notification, Dillon Bronson was not dismissed from employment and returned to work at the facility.

48. On March 9, 2026, Bright Beginnings sent a message to parents asking them to keep their children home, without disclosing that the reason was the ongoing investigation into the abuse of children at the facility.

49. On March 11, 2026, Plaintiff Abby Bennett met with Bright Beginnings management and was informed for the first time of the abuse of infant C.B.

50. On March 12, 2026, Bright Beginnings was shut down by authorities.

51. Following the investigation, Dillon Bronson, Amanda Rizzo, Autumn Stone, Lynne Boyd, Kris Tate, and Justin Ihne were terminated from their employment at Bright Beginnings.

52. From January 12, 2026, through March 11, 2026, Amanda Rizzo, Autumn Stone and other employees, agents and servants of Defendant YMCA witnessed dozens of acts of child abuse and maltreatment against infant C.B. and other children but failed to make reports pursuant to Social Services Law § 413(1)(a).

53. Defendant YMCA, through its management, including Kris Tate, Justin Ihne and Lynne Boyd, had actual and constructive knowledge of acts of child abuse and maltreatment committed at Bright Beginnings yet failed to take adequate remedial action to protect infant C.B. and other children from further harm.

54. As a result of the child abuse and maltreatment that infant C.B. suffered as well as witnessing acts of child abuse and maltreatment against other toddlers, she has suffered and continues to suffer severe emotional distress, including trauma disorder as well as other injuries.

CAUSES OF ACTION

COUNT I *Negligence*

55. Plaintiffs repeat and reallege every allegation set forth above as if fully set forth herein.

56. At all relevant times, Defendant YMCA was a licensed operator of a childcare facility and owed a duty of care to infant Plaintiff C.B. and the other children enrolled at Bright Beginnings to maintain the facility in a reasonably safe condition and to provide adequate care, supervision and protection.

57. At all relevant times, infant Plaintiff C.B. was lawfully upon the premises of Bright Beginnings and was in the care and custody of Defendant YMCA's employees, agents and servants.

58. At all relevant times herein, the parents of infant Plaintiff C.B. relinquished control, care and supervision of the infant claimant to Defendant YMCA.

59. At all relevant times herein, Defendant YMCA, its employees, agents and servants had a duty to supervise infant Plaintiff C.B. with the same degree of care as a reasonably prudent parent would exercise under comparable circumstances.

60. Infant Plaintiff C.B. was caused to be injured by reason of the recklessness, negligence and carelessness of Defendant YMCA, by and through its employees, agents and servants.

61. The negligence of Defendant YMCA, by and through its employees, agents and servants, includes but is not limited to:

- a. failing to properly supervise, control, instruct and protect the infant Plaintiff;
- b. failing to properly supervise and control the childcare premises, the activities thereat and the children in the facility, including but not limited to infant Plaintiff C.B.;
- c. being negligent in the custody, care and supervision of infant Plaintiff C.B.;
- d. permitting infant Plaintiff C.B. to be subjected to unsafe and dangerous activities;
- e. creating, causing, permitting and allowing dangerous, hazardous and unsafe conditions to exist and remain;
- f. failing to properly report the abuse of infant Plaintiff C.B.;
- g. failing to warn Plaintiffs and the public of the dangerous conditions and the dangerous propensities of its employees;

- h. failing to remedy, correct and remove said dangerous conditions;
- i. failing to take proper safety measures to prevent injury to infant Plaintiff C.B.;
- j. failing to keep infant Plaintiff C.B. in a safe environment;
- k. failing to avoid the happening of the event and to protect infant Plaintiff C.B. from harm; and
- l. violating the applicable laws and statutes, including Social Services Law §§ 413 and 420; and otherwise, being careless, reckless and negligent.

62. The dangerous, negligent and unsafe conditions described herein were caused and created by Defendant YMCA, by and through its employees, agents and servants.

63. Defendant YMCA, its agents, servants and employees had actual knowledge and constructive notice of the dangerous, negligent and unsafe conditions described herein.

64. The aforesaid dangerous conditions existed for such a long period of time prior to the events described herein that Defendant YMCA, its agents, servants and employees could and should have known of, and should have corrected, those conditions.

65. The negligence of Defendant YMCA, by and through its employees, agents and servants, was the direct and proximate cause of the injuries and damages sustained by infant Plaintiff C.B.

66. By reason of the negligence of Defendant YMCA as aforesaid, and without any negligence attributable to Plaintiffs contributing thereto, infant Plaintiff C.B. has been damaged and is entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

COUNT II***Negligent Hiring, Supervision and Retention***

67. Plaintiffs repeat and reallege every allegation set forth above as if fully set forth herein.

68. At all relevant times, Dillon Bronson, Amanda Rizzo, Autumn Stone and Lynne Boyd were employees, agents and servants of Defendant YMCA acting within the scope of their employment at Bright Beginnings.

69. Defendant YMCA owed a duty to infant Plaintiff C.B. and to the parents and guardians who entrusted their children to Bright Beginnings to exercise reasonable care in the hiring, training, supervision and retention of the employees, agents and servants charged with the care, custody and supervision of children enrolled at Bright Beginnings.

70. Defendant YMCA knew, or in the exercise of reasonable care should have known, that Dillon Bronson and other employees had a propensity to engage in the conduct that caused injury to infant Plaintiff C.B., including acts of child abuse and maltreatment and failures to report such conduct as required by Social Services Law § 413(1)(a).

71. Defendant YMCA was negligent in hiring Dillon Bronson and other employees in that it failed to conduct an adequate investigation of their fitness, qualifications, background and character to work with young children prior to entrusting them with the care and supervision of infant Plaintiff C.B. and other children at Bright Beginnings.

72. Defendant YMCA was negligent in supervising Dillon Bronson, Amanda Rizzo, Autumn Stone and other employees in that it failed to adequately monitor, train, instruct, discipline and oversee their conduct in the care and supervision of children at Bright Beginnings, including but not limited to failing to review video surveillance footage, failing to act on internal reports and

concerns raised by on-site staff and failing to implement and enforce policies and procedures designed to protect the children in its care.

73. Despite actual and constructive knowledge of prior acts of child abuse and maltreatment by Dillon Bronson, and of the failures of Amanda Rizzo, Autumn Stone and other employees to report suspected child abuse or maltreatment as mandated reporters under Social Services Law § 413(1)(a), Defendant YMCA negligently retained Dillon Bronson and other employees in their positions of trust at Bright Beginnings, where they continued to have access to and authority over infant Plaintiff C.B. and other children.

74. The negligent hiring, supervision and retention of Dillon Bronson, Amanda Rizzo, Autumn Stone and other employees by Defendant YMCA was the direct and proximate cause of the injuries and damages sustained by infant Plaintiff C.B.

75. By reason of the negligent hiring, supervision and retention by Defendant YMCA as aforesaid, and without any negligence attributable to Plaintiffs contributing thereto, infant Plaintiff C.B. has been damaged and is entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

COUNT III
Gross Negligence

76. Plaintiffs repeat and reallege every allegation set forth above as if fully set forth herein.

77. Defendant YMCA failed to exercise even slight care for the rights, wellbeing and safety of infant Plaintiff C.B.

78. The conduct of Defendant YMCA, by and through its employees, agents and servants, as described herein, demonstrated a willful and wanton disregard for the rights, wellbeing and safety of infant Plaintiff C.B.

79. The conduct of Defendant YMCA, by and through its employees, agents and servants, as described herein, demonstrated, at best, a reckless disregard for the rights, wellbeing and safety of infant Plaintiff C.B.

80. The conduct of Defendant YMCA, by and through its employees, agents and servants, was tantamount to intentional wrongdoing.

81. Infant Plaintiff C.B. sustained and will continue to sustain damages as a direct and proximate result of the acts and omissions of Defendant YMCA, its employees, agents and servants.

82. By reason of the gross negligence of Defendant YMCA as aforesaid, and without any negligence attributable to Plaintiffs contributing thereto, infant Plaintiff C.B. has been damaged and is entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

COUNT IV
***Failure to Report in Violation of
Social Services Law §§ 413(1)(a) and 420(2)***

83. Plaintiffs repeat and reallege every allegation set forth above as if fully set forth herein.

84. The employees, agents and servants of Bright Beginnings named herein were statutorily obligated to report when they had reasonable cause to suspect that a child coming before them in their official capacity was abused or neglected, pursuant to Social Services Law § 413(1)(a).

85. The employees, agents and servants of Bright Beginnings named herein were required to comply with Social Services Law § 413, including its reporting provisions, and to

provide current and new employees with written instructions explaining the reporting requirements set forth in § 413(1) of that section and in sections 415 through 420 of the Social Services Law.

86. The employees, agents and servants of Bright Beginnings named herein failed to perform their obligations under Social Services Law §§ 413 and 415 to 420 regarding suspected child abuse or maltreatment of infant Plaintiff C.B. and other children in the custody and care of Defendant YMCA, its employees, agents and servants.

87. The employees, agents and servants of Bright Beginnings named herein knowingly and willfully failed to report suspected child abuse and maltreatment against infant Plaintiff C.B. and other children in the custody and care of Defendant YMCA, as required by the New York Social Services Law.

88. Defendant YMCA is liable to infant Plaintiff C.B. under Social Services Law § 420 for damages proximately caused by such failure.

89. The failure to report suspected child abuse and maltreatment against infant Plaintiff C.B. as required by the Social Services Law was a legal cause of infant C.B.'s suffering and her continuing to suffer great pain of mind and body, shock, emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation and loss of enjoyment of life, preventing and continuing to prevent infant C.B. from performing her normal daily activities and obtaining the full enjoyment of life, and causing her to incur in the past and in the future expenses for medical and psychological treatment, therapy and counseling, all of which have had concrete and negative effects on her normal development.

90. By reason of the foregoing, infant Plaintiff C.B. has been damaged and is entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

COUNT V
Loss of Services

91. Plaintiffs repeat and reallege every allegation set forth above as if fully set forth herein.

92. At all relevant times, Plaintiffs Abby Bennett and Ryan Bennett were and still are the parents of infant Plaintiff C.B., with whom at all times herein mentioned she resided and still resides.

93. Plaintiffs Abby Bennett and Ryan Bennett were and are entitled to the services of their child by virtue of the parent-child relationship.

94. As a direct and proximate result of the acts and omissions of Defendant YMCA, its employees, agents and servants, Plaintiffs Abby Bennett and Ryan Bennett are, were and have been deprived of those services.

95. By reason of the foregoing and the injuries sustained by infant Plaintiff C.B., Plaintiffs Abby Bennett and Ryan Bennett have been compelled to, and did, expend sums of money for medical aid, attention and psychological treatment, all in an effort to care for infant C.B. and to address her injuries, and upon information and belief will be compelled to expend further sums in the future for said purposes.

96. By reason of the foregoing and the injuries sustained by infant Plaintiff C.B., Plaintiffs Abby Bennett and Ryan Bennett were and are financially responsible for the hospital, medical and psychological debts of their daughter, infant Plaintiff C.B., and have had to provide additional services on her behalf relating to the trauma suffered by their daughter.

97. Plaintiffs Abby Bennett and Ryan Bennett were and have been deprived of the services of their daughter, infant Plaintiff C.B., and upon information and belief will be deprived thereof for a long period of time to come due to her damages.

98. By reason of the foregoing acts of Defendant YMCA as aforesaid, and without any negligence attributable to Plaintiffs contributing thereto, Plaintiffs Abby Bennett and Ryan Bennett have been damaged and are entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

99. As a result of the acts and omissions of Defendant YMCA, its employees, agents and servants, as described above and herein, infant Plaintiff C.B. has suffered and will continue to suffer personal physical and psychological injuries, including but not limited to: physical pain; severe and permanent emotional distress; physical manifestations of emotional distress; low self-confidence, low self-respect and low self-esteem; feelings of worthlessness, shame, embarrassment and guilt; feelings of loneliness and isolation; loss of faith and trust in authority figures; feelings of helplessness and hopelessness; difficulty trusting others; feelings of anger and difficulty controlling emotions; depression; anxiety; post-traumatic stress disorder; traumatic memories, flashbacks and nightmares; and significant behavioral changes, all of which have had concrete and negative effects on her normal development and quality of life.

100. As a result of the acts and omissions of Defendant YMCA, its employees, agents and servants, as described above and herein, Plaintiffs Abby Bennett and Ryan Bennett have and will be compelled to expend sums of money to care for infant Plaintiff C.B.

101. The above-described damages may be supplemented at a future date as Plaintiffs may not be able to fully describe all of their damages at this time and because additional damages may arise in the future.

102. By reason of the foregoing, Plaintiffs Abby Bennett and Ryan Bennett have been damaged and are entitled to monetary damages in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

JURY DEMAND

103. Plaintiffs demand a trial by jury on all issues so triable.

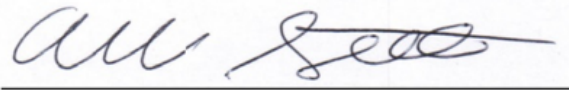
REQUESTED RELIEF

WHEREFORE, Plaintiffs respectfully pray for a Judgment against Defendant as follows:

- i. Awarding Plaintiffs compensatory damages for mental, emotional, psychological, and physical injuries, distress, pain and suffering, and for injury in an amount to be determined at trial but in any case, no less than stated above;
- ii. Awarding Plaintiffs punitive damages to be determined at trial;
- iii. Awarding Plaintiffs reasonable attorneys' fees, litigation expenses and costs incurred in bringing this action;
- iv. Awarding Plaintiffs pre-judgment and post-judgment interest available under law and;
- v. Such other relief that this court deems appropriate and just under the circumstances.

Dated: June 22, 2026
New York, New York

Respectfully submitted,



Andrew M. Stengel
Attorneys for Plaintiffs
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VERIFICATION

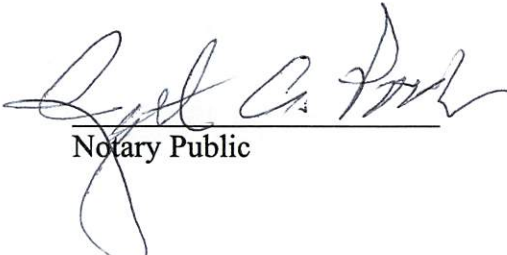
STATE OF NEW YORK)
) ss.:
COUNTY OF CLINTON)

Ryan Bennett, being duly sworn, deposes and says that I am the father of infant Plaintiff C.B. and a Plaintiff herein; that I have read the foregoing complaint and know the contents thereof; that the same is true to the knowledge of deponent, except as to those matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.



Ryan Bennett

Sworn to before me this
12 day of JUNE, 2026



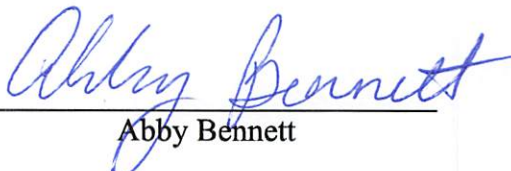
Notary Public

ROBERT A. POOLER
Notary Public, State of New York
No. 01PO5041729
Qualified in Clinton County
Commission Expires April 10, 2027

VERIFICATION

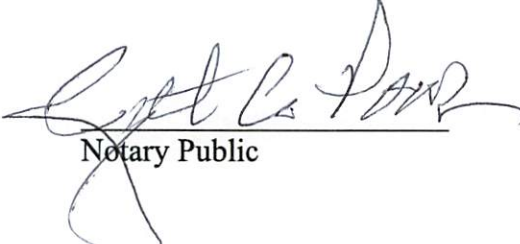
STATE OF NEW YORK)
) ss.:
COUNTY OF CLINTON)

Abby Bennett, being duly sworn, deposes and says that I am the mother of infant Plaintiff C.B. and a Plaintiff herein; that I have read the foregoing complaint and know the contents thereof; that the same is true to the knowledge of deponent, except as to those matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.



Abby Bennett

Sworn to before me this
22 day of JUNE, 2026



Notary Public

ROBERT A. POOLER
Notary Public, State of New York
No. 01PO5041729
Qualified in Clinton County
Commission Expires April 10, 2027

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CLINTON

-----X

C.B., AN INFANT BY HER MOTHER AND NATURAL
GUARDIAN, ABBY BENNETT, ABBY BENNETT,
INDIVIDUALLY, AND RYAN BENNETT,
INDIVIDUALLY,

Index No.:

Plaintiffs,

-against-

YOUNG MEN'S CHRISTIAN ASSOCIATION OF
PLATTSBURGH d/b/a BRIGHT BEGINNINGS,

Defendant.

-----X

SUMMONS AND VERIFIED COMPLAINT

Pursuant to 22 NYCRR 130-1.1, the undersigned, attorney admitted to practice in the Courts of New York State, certifies, upon information and belief and reasonable inquiry, that the contentions contained in the annexed document are not frivolous.

Dated: June 22, 2026



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