

RETURN DATE: MARCH 30, 2021

SUPERIOR COURT

DAVID ROOKASIN

J.D. OF NEW HAVEN

VS.

AT NEW HAVEN

CATHERINE ROOKASIN

FEBRUARY 16, 2021

**COMPLAINT**

COUNT ONE: LIBEL PER SE:

1. At all times mentioned herein, the Plaintiff, DAVID ROOKASIN, is a resident of Monroe, Connecticut.

2. At all times mentioned herein, the Defendant, CATHERINE ROOKASIN, is a resident of East Haven Connecticut.

3. At all times mentioned herein, the Plaintiff, DAVID ROOKASIN, was a certified Financial Advisor who, based upon his customer's trust, employ him for advice and counsel regarding their investments.

4. Over the past two years, the Defendant authored and published false, demeaning, and libelous statements to over 200 people on various social media platforms including Facebook which include:

a. "It's difficult for him being a narcissist who's world is crumbling

because he's been caught in another financial services fraud scheme."

- b. "I was sexually assaulted by my own husband then learned that he was attempting to inappropriately touch our 10 year old daughter."
- c. "Thank you for the wonderful compliment. Nooooo. It's love, happiness and healing after a horrible, abusive marriage."
- d. "I'm so grateful that this is no longer my fear or my life! I'm here for any of my friends who need to talk about the damage that narcissistic abuse causes." (Followed by the following quote):

An Abuser may use sex to dominate by:

- Only having sex on their terms
- Demanding sex
- Withholding sex
- No intimacy (eg refusing eye contact)
- Degrading (saying another persons name / treating you like an object)
- Disrespecting boundaries or
- Refusing any form of physical closeness
- Passionalte 'make up' sex (to deflect from abusive behavior
- Rape

- e. She also made over 40 posts on social media referring to her "prior life" or her "ex" which, to the objective observer would be

referencing the Plaintiff where she calls him a narcissistic abuser among other things.

5. As a result of these false, misleading, derogatory, shameful and libelous statements, the Plaintiff, DAVID ROOKASIN, has suffered damage to his business reputation and reputation and standing in the community.

COUNT TWO: LIBEL:

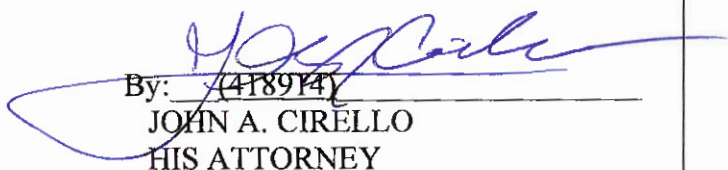
1. Paragraphs 1 through 5 of the First Count are hereinafter incorporated and made part of the Second Count as if fully alleged herein.

6. Said damage to the Plaintiff, DAVID ROOKASIN's reputation has caused him in the past, and will cause him in the future to suffer economic damages.

WHEREFORE, the Plaintiff, DAVID ROOKASIN, claims:

- a. Money Damages;
- b. General Damages;
- c. Any other relief that the Court deems appropriate under the law.

Respectfully Submitted,  
THE PLAINTIFF

  
By: (418914)  
JOHN A. CIRELLO  
HIS ATTORNEY

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**AMOUNT IN DEMAND**

The plaintiff claims money damages in an amount not less than \$2,500 exclusive of interest and costs.

Respectfully Submitted,  
THE PLAINTIFF

By:   
~~(418914)~~  
JOHN A. CIRELLO  
HIS ATTORNEY