

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ALEX GOLDMAN, :  
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 Plaintiff, :  
 :  
 -against- :  
 :  
 CATHERINE REDDINGTON, :  
 :  
 Defendant. :  
 :  
 :  
----- X

Case No. \_\_\_\_\_

**AFFIDAVIT OF ALEX GOLDMAN  
IN SUPPORT OF ORDER TO SHOW CAUSE**

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

I, ALEX GOLDMAN, being duly sworn, swear that the following is true and correct under penalties of perjury:

- 1. I am the plaintiff in the above-referenced action and, as such, am fully familiar with the facts and circumstances herein.
- 2. I respectfully submit this Affidavit in support of my application by Order to Show Cause, for an order pursuant to Fed. R. Civ. P. 65 granting a temporary restraining order and preliminary injunction against Defendant Catherine Reddington (“Defendant”).

**Basis of Relief Requested**

3. The basis for my application, as described in the supporting papers and my Complaint against Defendant, is that Defendant is engaged in a campaign of aggressive public harassment and making knowingly false and defamatory statements against me, in an attempt to devastate my educational and career prospects and tarnish my reputation.

4. As described in further length below, in the past few weeks, in particular, Defendant has made numerous posts on social media platforms Facebook and LinkedIn falsely accusing me of sexual assault and falsely stating that I am a “rapist.” These social media posts have been viewed and “liked” by thousands of people. These vicious accusations are false, as Ms. Reddington knows, yet Ms. Reddington continues to make them with specific intent of causing harm to me. If Ms. Reddington is not restrained from doing so, she will cause additional harm to me.

5. I did not rape Catherine Reddington.

6. I do not have a complete recollection of the night in question; however I do not recall ever having even consensual sex with Catherine Reddington, ever. There is nothing that causes me to doubt this belief.

#### **Relevant Facts**

7. I am born and raised in West Orange, New Jersey and I graduated from West Orange High School in 2014. Following high school graduation, I enrolled at Syracuse University, where I studied civil engineering and was enrolled in an accelerated program for my Master’s in Business Administration (“MBA”)—an extremely selective program in which only six students in my class were admitted. I maintained a 3.1 GPA and was on track to graduate with my bachelor’s degree in 2018 and an MBA in 2019.

8. I have never been arrested and never accused of any crime anywhere, prior to this false accusation.

9. During my time at Syracuse, I became a member of the Syracuse University chapter of the Delta Kappa Epsilon (“DKE) fraternity. From Fall 2015 to Fall 2017, I resided in

the DKE fraternity house located at 703 Walnut Avenue, Syracuse, New York 13210. In Spring 2016, I was elected president of the Syracuse University chapter of the DKE fraternity.

10. On April 22, 2017, Catherine Reddington—a fellow student and member of the Kappa Kappa Gamma (“KKG”) sorority—attended a joint DKE-KKG party at the DKE fraternity house. The event was scheduled to begin at approximately 11:00 p.m. Ms. Reddington and other women from the KKG sorority arrived a few hours early to “pregame” in a room on the second floor of the DKE fraternity house. We both consumed alcohol during the pregame.

11. After participating at the “pregame” for approximately two hours on the second floor, we both went downstairs to the party where alcohol was also being served. I have since watched surveillance video from the DKE house which shows that at approximately 12:30 a.m. on April 23, 2017, Ms. Reddington followed me back to my room. The surveillance video further shows Ms. Reddington a few feet behind me and entering my room.

12. Ms. Reddington spent the night in my room. I awakened in my room on the morning of April 23, 2017 fully clothed. Ms. Reddington was present on my bed and she was fully clothed too. I did not rape Catherine Reddington and I do not recall even having consensual sex with Catherine Reddington. I believe this to be true based upon the lack of evidence in my room that we had sex: there was no condom or condom wrapper in my room; there were no fluids of any kind on my bed or on my sheets; and there was no vaginal fluid on my penis.

13. The surveillance video shows Ms. Reddington leaving my room at approximately 10:30 a.m. in no apparent distress.

14. I later learned from Detective Michael Bates (“Detective Bates”) from the Syracuse Police Department (“SPD”) and Assistant District Attorney Maureen Barry (“ADA Barry”) of the Onondaga County District Attorney (“OCDA”) that on April 24, 2017—approximately 26 hours after leaving my fraternity house—Ms. Reddington went to Crouse Hospital to complain of a possible sexual assault. Detective Bates and ADA Barry later informed me that during the course of the Sexual Assault Nurse Examination (“SANE”) Ms. Reddington stated: “I think I might have been drugged because I don’t remember much.”

15. I was also informed that the SANE produced no evidence to corroborate a sexual assault; no evidence of any intoxicants in her bloodstream other than caffeine and marijuana; and DNA analysis of Ms. Reddington’s vagina was negative for male DNA.

16. Also, earlier on April 24, 2017, Ms. Reddington texted me and asked if she could come to my room to look for a pair of lost earrings. I was in the library studying and not available for her to come to my room. She provided no indication that anything had occurred.

17. A few days later, on the afternoon of April 27, 2017, upon returning from the library, Ms. Reddington and a friend of hers were present at the DKE house drinking alcohol. We both went to my room looked for the pair of earrings she claimed to have lost, but they were not found. Again, she did not indicate that anything occurred on April 22-23, 2017.

18. On May 10, 2017, I first learned of Ms. Reddington’s false allegations when the Syracuse Police Department arrived at the DKE house to speak with me.

19. Following Defendant’s complaint that she may have been sexually assaulted, Detective Bates from the SPD and ADA Barry from the OCDA conducted a detailed and thorough investigation. Following the SPD and OCDA investigation, I learned that Detective Bates first interviewed Ms. Reddington on May 1, 2017 at which time she stated “halfway

through the night, she ‘blacked out’ and doesn’t remember anything after 12:30 a.m. on April 23, 2017.” I also learned that again on May 4, 2017, Detective Bates interviewed Ms. Reddington to see if she could recall any other events on the evening in question and she stated that she could not. I also learned that on May 10, 2017, she was again interviewed by Detective Bates and shown the surveillance video from the hallway of the fraternity house and stated that she “did not recall going to Mr. Goldman’s room” and did not know what happened after midnight of the night in question.

20. I am informed that Detective Bates later received the forensic toxicology report from Crouse Hospital taken from Ms. Reddington’s urine sample on April 24, 2017. That report indicated that the only items present in her bloodstream at the time of the analysis were caffeine and marijuana and no other drugs or intoxicants were detected. I received Detective Bates’ notes at the conclusion of the Syracuse University Title IX Investigation. According to Detective Bates’ notes, based on: the lab results showing no indication of any incapacitating drugs in her system; the fact she had no recollection of the events of the night in question; no physical evidence of sexual assault; and no medical evidence of sexual assault SPD closed this case as Detective Bates believed there was no evidence that a sexual assault occurred. Detective Bates forwarded his report to ADA Barry.

21. ADA Barry subsequently issued her own report following the conclusion of the investigation by OCDA and SPD and sent a copy of the report to me through my counsel. A copy of the OCDA report issued by ADA Barry is annexed hereto as *Exhibit A*. The OCDA investigation included interviewing Ms. Reddington, reviewing all police reports and medical records of Ms. Reddington, and reviewing results of the SANE. The report by ADA Barry definitively stated: “there is no corroborating evidence to support allegations of a sexual

assault....there is also no physical evidence from the SANE to corroborate a sexual assault.”

*Exhibit A.* ADA Barry also stated that DNA analysis following the SANE resulted in negative results for male DNA. *Exhibit A.* Furthermore, ADA Barry wrote that “Ms. Reddington has stated repeatedly that she has no direct knowledge of any sexual acts that she may have engaged in with Mr. Goldman.” *Exhibit A.*

22. On July 10, 2017, I received a letter from Syracuse University Title IX Investigator Bernerd Jacobson (“Investigator Jacobson”) informing me that Syracuse University was conducting its own Title IX investigation pursuant to Syracuse University’s Code of Student Conduct. I later learned this complaint was filed in or about June 2017.

23. I later learned that Ms. Reddington initially informed Investigator Jacobson that she had no memory of entering my room that night and anything that followed until she awakened several hours later. However, weeks later Ms. Reddington asserted that she began to experience sudden flashes of memories following a visit to a therapist and miraculously was able to describe fragmented memories of having sexual intercourse with me and being sodomized by me without her consent. This is unequivocally false.

24. Despite any supporting medical or physical evidence, Investigator Jacobson credited Ms. Reddington’s contrived recollection. Syracuse University expelled me in November 2017. I was only seven credits shy of graduation at the time of my expulsion.

25. I later learned that following my expulsion, Ms. Reddington celebrated by going to the DKE fraternity house bragging to my friends and fraternity brothers that her “rapist” was expelled. In fact, she texted at least two of my friends following my expulsion calling me a “violent rapist” and “monster.” Upon information and belief, she has told this to many others as well, including fraternity brothers of mine and other Syracuse University students.

26. Following my expulsion from Syracuse University, I moved back to West Orange, New Jersey and enrolled at New Jersey Institute of Technology (“NJIT”) for the Spring 2018 semester. After enrolling at New Jersey Institute of Technology, I obtained an internship at Bohler Engineering in New York City for the summer of 2018.

27. Ms. Reddington has made knowingly false and defamatory statements about me to other Syracuse University students who are friends of mine. On November 17, 2017, Ms. Reddington contacted Thomas Aiello, a friend of mine, via text message, following Syracuse University’s decision to expel me. During this text message conversation, Ms. Reddington repeatedly referred to me as “violent” and branded me a “violent rapist.” A copy of this text message conversation is annexed hereto as *Exhibit B*.

28. Furthermore, in May 2018, Ms. Reddington contacted Dennis Kadric, another friend of mine, via text message. During this text message conversation, Ms. Reddington repeatedly referred to me as a “monster” based on her false claims of sexual assault.

29. These text messages are rife with outright lies and extremely disparaging accusations of criminality and damaging to my reputation.

30. In **June 2018**, in an effort to further destroy my reputation, as well as educational and career prospects, Ms. Reddington began a series of social media posts continuing to falsely brand me as a “rapist” and falsely claimed that she was the not the first person I had sexually assaulted.

31. On June 4, 2018 at 7:44 p.m., Ms. Reddington posted on Facebook with her location at NJIT—my new college—a three page post which is annexed hereto as *Exhibit C*. In pertinent part, Ms. Reddington wrote:

During the early hours of April 23, 2017 I was raped and sodomized. I woke up in Delta Kappa Epsilon Fraternity in Alex

Goldman's bed confused, bloody, bruised, with ripped clothing and splinter. I went to the police only to be asked if I had ever engaged in rough sex prior to my rape, and my friend to be asked if I slept around. I never slept around, in fact, I have never had a once night stand in my life. Not that that should matter as rape is an act of violence, not sex.

*Exhibit C.* In the same post Ms. Reddington also wrote:

My motive is to try to stop him from ruining another person's life, as this will not be the last time. He is a predator. He didn't have to rape and sodomize me. He didn't have to do any of this. This more than just seeking justice; this is seeking prevention. I completed an entire two semesters at the school where my rapist was expelled from, one of which he was there for, but to this day he continues to walk free. My rapist has an internship with Bohler Engineering and will be graduating from a different college, New Jersey Institute of Technology. I have had multiple individuals that have approached me, expressed their knowledge of Alex Goldman's track record. Alex Goldman is a rapist. I write this post because this is not the first time Alex Goldman has raped someone and I want to make sure that it is the last.

*Exhibit C.* She concluded the post with “#MeToo #NewJerseyInstituteofTechnology #NJIT #Bohler Engineering” with a link to my Facebook profile, my LinkedIn profile, and a picture of me. *Exhibit C.* Thousands of people viewed this Facebook post, as evidenced by the more than eleven hundred “likes”, two hundred and ninety three “shares,” and more than one hundred “comments.” *Id.*

32. The Facebook post received comments such as: “[h]opefully they'll catch this animal. I will share this posting in hopes that someone out there who knows him sees it...” and “...Everyone within the Bohler ecosystem should know that their future leadership consists of a current rapist. They should read this and know that they are empowering a monster...” *Id.*

33. On the same date, June 4, 2018, Ms. Reddington posted an almost identical post on social media platform LinkedIn, in which she once again referred to me numerous times as a



“rapist.” A copy of Ms. Reddington’s post on LinkedIn is annexed hereto as *Exhibit D*. In a portion of the post after stating “Alex Goldman is a rapist” she wrote:

While I am proud to say I got my rapist expelled from Syracuse University, on November 15, 2017, he now attends New Jersey Institute of Technology where he is on track for graduation. Clearly my school officials saw something wrong enough with him to remove him permanently from my university, however, our law enforcement continues to allow him to walk the streets. While I tried doing this “the systematic way”, this monster is free and should be behind bars.

*Exhibit D*. She concluded the post by tagging “New Jersey Institute of Technology; Bohler Engineering; #MeToo.” *Exhibit D*.

34. On the night of June 4, 2018, only a few hours after the posts, I was informed by friends of mine regarding Ms. Reddington’s social media posts on Facebook and LinkedIn. Over the course of the subsequent hours, days, and weeks, I followed the posts myself and observed people “liked,” commented, or shared the posts. I immediately observed other people post false statements about me, in sum and substance, propagating the falsehood that I am a rapist and criminal, as a result of Ms. Reddington’s false and defamatory posts.

35. On June 5, 2018, Ms. Reddington directly contacted Bohler Engineering, where I had just begun a summer internship. Ms. Reddington contacted Bohler via the direct message feature on Facebook, a copy of which she posted on Facebook. A copy of Ms. Reddington’s communications with Bohler and Facebook post is annexed hereto as *Exhibit E*. While she only published a portion of what she stated to Bohler, it is clear she contacted Bohler with a specific purpose—to harm my career prospects and position with Bohler. The portion of her message to Bohler reads: “...syracuse did when they deemed him dangerous and expelled him. Thank you for your time.” *Id.* Although her full statement to Bohler is not publicly available, upon

information and belief, she clearly reiterated her false statements labelling me a “rapist” and recounted that Syracuse University expelled me and urged Bohler to fire me.

36. On June 5, 2018, I received a call from Karen Maier, the Chief People Officer at Bohler Engineering. Ms. Maier informed me I was being terminated effective immediately due to “potential misconduct outside of work.” Ms. Maier informed me there was no need to respond as Bohler had already made its decision.

37. Ms. Reddington then posted on Facebook the entirety of Bohler’s response: “Thanks for messaging us. We try to be as responsive as possible. We’ll get back to you soon.” *Id.* Bohler subsequently followed-up at 4:38 p.m. on that same date and stated: “Thanks for the message. Due to the severity of the allegations and our zero tolerance policy, we have elected to immediately terminate the employment relationship.” *Id.*

38. On June 5, 2018 at 4:48 p.m., Ms. Reddington reposted Bohler’s message in celebration and stated: “Thank you to everyone for reposting and spreading the word on the monster that Alex Goldman is. Thank you to Bohler Engineering for taking a stand against this disgusting excuse of a man. Alex Goldman has now lost his position at Bohler Engineering. --☺ feeling happy.” *Exhibit E.* Hundreds of people viewed this Facebook post, as evidenced by the more than three hundred and sixty “likes” and thirteen “comments.” *Id.*

39. This Facebook post received comments such as: “This person needs to be off the streets” and “...he will get his, it’s only the beginning!!!!” *Id.*


40. More recently, on June 6, 2018 at 1:48 a.m., Ms. Reddington posted on the Facebook page for NJIT—my new college—the following under the reviews section: “A school that accepts recently expelled rapists, despite it being marked on their transcript.” A copy of Ms. Reddington’s post on NJIT’s Facebook page is annexed hereto as *Exhibit F.*

41. Ms. Reddington's text messages and social media posts have endeavored to inflict maximum harm on me. Ms. Reddington's knowingly false statements have affected my educational prospects, career prospects, and reputation. I was not only expelled from Syracuse University, but now I am nervous about my situation at NJIT as they are evaluating my standing at the university.


42. Additionally, following Ms. Reddington's very public social media posts, I had no choice but to delete my Facebook and LinkedIn profiles as I was being harassed and tagged in false posts which were further damaging my reputation.

43. The foregoing wrongful conduct by Ms. Reddington has had and continues to have a detrimental impact on my life. I am extremely concerned that Ms. Reddington intends to make further attempts to have me expelled from NJIT and will contact any future employer and continue to make false accusations.

Respectfully submitted,

 6/25/18  
\_\_\_\_\_  
Alex Goldman

Sworn to before me this 25<sup>TH</sup> day of  
June 2018

  
\_\_\_\_\_  
Notary Public

SETH JASON ZUCKERMAN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02ZU6363360  
Qualified in New York County  
My Commission Expires 08-21-2021