

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ANN ALTMAN,)	
)	
Plaintiff,)	
)	
v.)	No. 4:25-cv-00017
)	
SAMUEL ALTMAN,)	JURY TRIAL DEMANDED
)	
Defendant.)	

COMPLAINT

COMES NOW Plaintiff, Ann Altman, by and through her attorneys, Mahoney Law Firm, LLC, and for her Complaint against Defendant, Samuel Altman, states as follows:

GENERAL ALLEGATIONS

1. Plaintiff, Ann Altman, is a resident and citizen of the State of Hawaii.
2. Defendant, Samuel Altman (“Sam Altman”), is a resident and citizen of the State of California.
3. Plaintiff, Ann Altman, and Defendant, Sam Altman, are biological siblings.
4. All of the events and wrongful acts giving rise to Plaintiff’s claims herein occurred at the parties’ family home located at 22 Arundel Place, Clayton, Missouri 63105 (the “Family Home”) between the approximate years of 1997 through 2006.
5. In approximately 1997, Plaintiff, Ann Altman, was three years old and residing in the Family Home with Defendant, Sam Altman.
6. Beginning at or about that time, Defendant, Sam Altman, forced Plaintiff to touch his penis and perform oral penetration on him. Sam Altman was twelve years old at the time.

7. From approximately 1997 to 1999, when Plaintiff, Ann Altman, was between the ages of three to five years old, the foregoing conduct occurred several times per week where Defendant, Sam Altman, forced Plaintiff to touch his penis and perform oral penetration on him.

8. During the aforementioned period of time, Defendant Sam Altman's acts of sexual abuse progressed to digital penetration of Plaintiff's vagina and anus, and at times he would also forcibly perform oral sex on Plaintiff.

9. At all times relevant herein, Defendant, Sam Altman, groomed and manipulated Plaintiff, Ann Altman, into believing the aforementioned sexual acts were her idea, despite the fact she was under the age of five years old when the sexual abuse began and Defendant was nearly a teenager.

10. Beginning in approximately 1999 or 2000, Defendant, Sam Altman, began to penetrate Plaintiff, Ann Altman, with his penis both vaginally and anally.

11. The foregoing level of childhood sexual abuse continued for a period of approximately eight or nine years until Plaintiff was eleven or twelve years old wherein Defendant, Sam Altman, regularly continued to commit numerous acts of rape, sexual assault, sexual abuse, molestation, sodomy, and battery upon Plaintiff, Ann Altman.

12. The last acts of rape committed by Defendant, Sam Altman, against Plaintiff, Ann Altman, occurred when Defendant, Sam Altman, was an adult and Plaintiff, Ann Altman, was a minor.

13. At all times relevant herein, there was in effect a Childhood Sexual Abuse statute in the State of Missouri that governed acts of "childhood sexual abuse" that occurred when the person abused was under the age of 18. R.S.Mo. § 537.046 (West 2025).

14. Pursuant to the Missouri Childhood Sexual Abuse statute, “[a]ny action to recover damages from injury or illness caused by childhood sexual abuse in an action brought pursuant to this section shall be commenced within ten years of the plaintiff attaining the age of twenty-one or within three years of the date the plaintiff discovers, or reasonably should have discovered, that the injury or illness was caused by childhood sexual abuse, whichever later occurs.” R.S.Mo. § 537.046(2) (West 2025).

15. At the time of filing this action, Plaintiff, Ann Altman, is thirty (30) years of age.

JURISDICTION & VENUE

16. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1332.

17. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2) in that the events, acts, and omissions giving rise to the claims herein all occurred in the Eastern District of Missouri.

COUNT I ***Sexual Assault***

COMES NOW Plaintiff, Ann Altman, by and through her attorneys, Mahoney Law Firm, LLC, and for Count I of her Complaint against Defendant, Samuel Altman (“Sam Altman”), states as follows:

18. Plaintiff hereby incorporates Paragraphs 1 through 17 herein as though fully set forth hereunder.

19. At no time did Plaintiff, Ann Altman, consent to the aforementioned sexual assault, sexual abuse, sexual penetration, sodomy, and/or sexual contact by Defendant, Sam Altman, nor did Plaintiff maintain the capacity to consent due to her minor status.

20. As a direct and proximate result of the aforementioned acts, Defendant, Sam Altman, created in Plaintiff’s mind, a well-founded fear of imminent peril, caused by Defendant Sam Altman’s ability to commit an unwanted and forceful sexual assault and battery, and

Defendant, Sam Altman, by committing the aforementioned acts, thereby committed a sexual assault upon Plaintiff, Ann Altman.

21. For the approximate years of 1997 through 2006, at the times that Defendant, Sam Altman, sexually assaulted Plaintiff, Defendant, Sam Altman, intended to commit an unlawful and outrageous touching upon the person of Plaintiff, Ann Altman, without any lawful justification.

22. Defendant Sam Altman's actions amounted to willful and wanton misconduct and/or a reckless disregard for the health and safety of Plaintiff, Ann Altman.

23. As a direct and proximate result of the foregoing acts of sexual assault upon Plaintiff, Ann Altman, by Defendant, Sam Altman, Plaintiff has suffered great bodily injury, including but not limited to, physical injuries associated with the harms committed; she has also experienced PTSD, severe emotional distress, mental anguish, and depression, which is expected to continue into the future; she has experienced embarrassment and humiliation; Plaintiff has incurred numerous medical bills and other health-related bills as a result of medical and mental health treatment for her injuries, and is expected to incur the same in the future; she has lost wages and benefits she would have otherwise received, but for the sexual assault by Defendant; and may suffer such loss of wages and benefits in the future; she has suffered a loss of enjoyment of a normal life as a consequence of her emotional injuries and she has lost her ability to engage in the same kinds of normal activities, all to her damage.

WHEREFORE, Plaintiff, Ann Altman, requests that judgment be entered on her behalf against Defendant, Samuel Altman, for actual damages in a sum in excess of Seventy-Five Thousand Dollars (\$75,000.00), for punitive damages, and for costs of suit.

COUNT II
Sexual Battery

COMES NOW Plaintiff, Ann Altman, by and through her attorneys, Mahoney Law Firm, LLC, and for Count II of her Complaint against Defendant, Samuel Altman (“Sam Altman”), states as follows:

18. Plaintiff hereby incorporates Paragraphs 1 through 17 herein as though fully set forth hereunder.

19. For the approximate years of 1997 through 2006, Defendant, Sam Altman, repeatedly and continually sexually assaulted, sexually penetrated, sexually abused, raped, sodomized, and battered Plaintiff, Ann Altman.

20. At no time did Plaintiff, Ann Altman, consent to the aforementioned sexual assault, sexual abuse, sexual penetration, sodomy, sexual contact, and/or battery by Defendant, Sam Altman, nor did Plaintiff maintain the capacity to consent due to her minor status.

21. At the time Defendant, Sam Altman, committed the aforementioned acts, he intended to commit an unlawful and outrageous touching upon the person of Plaintiff, Ann Altman, without any lawful justification.

22. As a direct and proximate result of the aforementioned acts, Defendant, Sam Altman, committed an unlawful and outrageous touching upon the person of Plaintiff, Ann Altman, without any lawful justification or consent, thereby committing a battery upon her.

23. Defendant Sam Altman’s actions amounted to willful and wanton misconduct and/or a reckless disregard for the health and safety of Plaintiff, Ann Altman.

24. As a direct and proximate result of the foregoing acts of sexual battery upon Plaintiff, Ann Altman, by Defendant, Sam Altman, Plaintiff has suffered great bodily injury, including but not limited to, physical injuries associated with the harms committed; she has also

experienced PTSD, severe emotional distress, mental anguish, and depression, which is expected to continue into the future; she has experienced embarrassment and humiliation; Plaintiff has incurred numerous medical bills and other health-related bills as a result of medical and mental health treatment for her injuries, and is expected to incur the same in the future; she has lost wages and benefits she would have otherwise received, but for the sexual assault by Defendant; and may suffer such loss of wages and benefits in the future; she has suffered a loss of enjoyment of a normal life as a consequence of her emotional injuries and she has lost her ability to engage in the same kinds of normal activities, all to her damage.

WHEREFORE, Plaintiff, Ann Altman, requests that judgment be entered on her behalf against Defendant, Samuel Altman, for actual damages in a sum in excess of Seventy-Five Thousand Dollars (\$75,000.00), for punitive damages, and for costs of suit.

Respectfully submitted,

By: /s/ Ryan J. Mahoney

Ryan J. Mahoney, #61489 (MO)
Leigh M. Perica, #68780 (MO)
MAHONEY LAW FIRM, LLC
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ryan@themahoneylawfirm.com
leigh@themahoneylawfirm.com

Attorneys for Plaintiff

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

ANN ALTMAN

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Mahoney Law Firm, LLC 2220 S. State Route 157, Suite 250 Glen Carbon, IL 62034

DEFENDANTS

SAMUEL ALTMAN

County of Residence of First Listed Defendant San Francisco, CA (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 X 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, INTELLECTUAL PROPERTY RIGHTS, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332. Brief description of cause: Childhood Sexual Abuse

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ excess of \$75,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE Jan 6, 2025 SIGNATURE OF ATTORNEY OF RECORD Mahoney

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

ANN ALTMAN	,)	
)	
	Plaintiff,)	
)	
v.)	Case No. 4:25-cv-00017
SAMUEL ALTMAN	,)	
)	
	Defendant,)	
)	

ORIGINAL FILING FORM

THIS FORM MUST BE COMPLETED AND VERIFIED BY THE FILING PARTY WHEN INITIATING A NEW CASE.

THIS SAME CAUSE, OR A SUBSTANTIALLY EQUIVALENT COMPLAINT, WAS PREVIOUSLY FILED IN THIS COURT AS CASE NUMBER _____ AND ASSIGNED TO THE HONORABLE JUDGE _____.

THIS CAUSE IS RELATED, BUT IS NOT SUBSTANTIALLY EQUIVALENT TO ANY PREVIOUSLY FILED COMPLAINT. THE RELATED CASE NUMBER IS _____ AND THAT CASE WAS ASSIGNED TO THE HONORABLE _____. THIS CASE MAY, THEREFORE, BE OPENED AS AN ORIGINAL PROCEEDING.

NEITHER THIS SAME CAUSE, NOR A SUBSTANTIALLY EQUIVALENT COMPLAINT, HAS BEEN PREVIOUSLY FILED IN THIS COURT, AND THEREFORE MAY BE OPENED AS AN ORIGINAL PROCEEDING.

The undersigned affirms that the information provided above is true and correct.

Date: 01/06/2025



Signature of Filing Party

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

ANN ALTMAN

Plaintiff

v.

SAMUEL ALTMAN

Defendant

Civil Action No. 4:25-cv-00017

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SAMUEL ALTMAN
3180 18TH STREET
SAN FRANCISCO, CA 94110

A lawsuit has been filed against you.

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

Ryan J. Mahoney
Mahoney Law Firm, LLC
2220 S. State Route 157, Suite 250
Glen Carbon, IL 62034

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

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 4:25-cv-00017

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify):* _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: