
IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

TRANSYLVANIA COUNTY, NORTH CAROLINA

RABBI DEAN ALTON HOLCOMB, JR.

Plaintiff,

v.

THE HAVEN OF TRANSYLVANIA COUNTY, et al.,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

1. PARTIES

1. Plaintiff is an individual residing in North Carolina.
 2. Defendant The Haven of Transylvania County is a nonprofit operating within Transylvania County, NC.
 3. Defendants include agents, employees, and unknown individuals acting within scope of employment.
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2. JURISDICTION AND VENUE

4. Jurisdiction is proper under North Carolina law.
 5. Venue is proper in Transylvania County where the events occurred.
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3. FACTUAL ALLEGATIONS

6. Plaintiff relied upon Defendant's services and representations.
 7. Defendant represents its mission as:

 "Seen, Heard and Cared For."
 8. Defendant engaged in coercive communications including threats of police involvement.
 9. Statements included:
 - "Bring the car back now"
 - "I will call the police"
 - "I'm reporting the car stolen"
 10. These actions created a coercive and hostile environment.
 11. Plaintiff was effectively forced into displacement.
 12. Defendant failed to provide safe transition or reasonable alternatives.
 13. Plaintiff was exposed to unsafe environmental conditions, including unsheltered living.
 14. Evidence supporting these claims is contained in WP-001:
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4. FIRST CAUSE OF ACTION — CONSTRUCTIVE EVICTION

15. Defendant's conduct made continued stability impossible.

16. Plaintiff was forced out without lawful process.

5. SECOND CAUSE OF ACTION — IIED

17. Defendant's conduct was extreme and outrageous.

18. Defendant acted with reckless disregard.

19. Plaintiff suffered severe distress.

6. THIRD CAUSE OF ACTION — NEGLIGENCE

20. Defendant owed a duty of care.

21. Defendant breached that duty.

22. Harm was foreseeable and occurred.

7. FOURTH CAUSE OF ACTION — UNFAIR PRACTICES

23. Defendant's representations were misleading.

24. Conduct violated N.C. Gen. Stat. §75-1.1.

8. DAMAGES

25. Plaintiff suffered:

- Emotional distress
 - Loss of stability
 - Environmental exposure harm
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9. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests:

- A. Compensatory damages
 - B. Punitive damages
 - C. Injunctive relief
 - D. Costs and any other relief deemed just
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10. JURY DEMAND

Plaintiff demands trial by jury.

SIGNED:



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