

Eric T. Kanefsky, Esq. (Atty. No. 024292002)  
Shawn Barnes, Esq. (Atty. No. 022112010)  
Kevin J. Musiakiewicz, Esq. (Atty. No. 035181997)

**CALCAGNI & KANEFISKY LLP**

One Newark Center  
1085 Raymond Blvd., 18<sup>th</sup> Floor  
Newark, New Jersey 07102  
T: 862.397.1796

E: [eric@ck-litigation.com](mailto:eric@ck-litigation.com)

E: [sbarnes@ck-litigation.com](mailto:sbarnes@ck-litigation.com)

E: [kevin@ck-litigation.com](mailto:kevin@ck-litigation.com)

*Attorneys for Plaintiff*

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MIRYAM MALACHI,

Plaintiff,

v.

AVRAHAM APPEL, ROBERT  
KELETI, and CHAYA  
ROSENZWEIG,

Defendants.

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SUPERIOR COURT OF NEW JERSEY  
OCEAN COUNTY  
LAW DIVISION

Docket No. OCN-L-\_\_\_\_\_-26

**VERIFIED COMPLAINT  
AND JURY DEMAND**

Plaintiff Miryam Malachi (“Mrs. Malachi”), by way of her Verified Complaint against Defendants Avraham Appel (“Appel”), Robert Keleti (“Keleti”), and Chaya Rosenzweig (“Rosenzweig” and, together with “Appel” and “Keleti,” “Defendants”), alleges as follows:

**INTRODUCTION**

1. This civil action arises from Appel’s abuse of his position as a rabbi, mentor, and trusted community leader to sexually assault and exploit Mrs. Malachi, followed by a sustained and coordinated campaign of threats, intimidation, defamation, retaliation, and tortious interference clearly intended to destroy her

personal and professional life.

2. As detailed herein, Appel first leveraged his religious authority, purported charitable organizations, and financial influence to gain access to and exert control over Mrs. Malachi during a period of acute financial and personal vulnerability. After committing sexual assault and egregious acts, Appel attempted to conceal his conduct through threats, manipulation, and an effort to purchase Mrs. Malachi's silence.

3. When those efforts failed, Appel, Keleti, and Rosenzweig jointly launched a smear campaign designed to publicly discredit Mrs. Malachi and torment her and her family. Through a website titled "**Beware of Miri Malachi**" and identifying Mrs. Malachi as a "danger" to all Jews, as well as social media posts and signs and fliers littered throughout Ocean County's closely-knit orthodox community, including on the very grounds of Mrs. Malachi's children's own school, Defendants have falsely accused Mrs. Malachi of being a "thief" and "talented fraudster" who cannot be trusted, extorting Appel and others, and having affairs with married men and a "revolving door of male visitors."

4. Defendants' unlawful conduct has caused Mrs. Malachi devastating and irreparable harm. Mrs. Malachi has suffered from severe emotional distress, physical and psychological trauma, reputational ruin, and catastrophic economic losses, including the destruction of longstanding business relationships and the forced return of substantial investment funds.

5. Through this action, Mrs. Malachi seeks to hold Defendants accountable and obtain the compensatory, punitive, and equitable relief to which she is entitled.

### **PARTIES**

6. Mrs. Malachi is a resident of the State of New Jersey with her principal residence in Toms River, New Jersey.

7. Appel is a resident of the State of New Jersey with his principal residence in Jackson, New Jersey. At all times relevant to this pleading, Appel held himself out to the public as a rabbi, a leader, a mentor, a teacher, and the owner and/or operator of purportedly charitable and, upon information and belief, 501(c)(3), organizations, which he used to gain access to vulnerable women. Appel is also a big player in the Ocean County commercial real estate market.

8. Keleti is a resident of the State of New Jersey with his principal residence in Lakewood, New Jersey. He is the father of Rosenzweig and a close ally of Appel.

9. Rosenzweig is a resident of the State of New Jersey with her principal residence in Jackson, New Jersey. Rosenzweig is the daughter of Keleti. Upon information and belief, Rosenzweig is a licensed real estate professional and the founder and/or owner of Rose Capital Group. In those capacities, Rosenzweig markets and solicits investments—many of which involve investors based in Israel—in commercial real estate development projects.

## JURISDICTION AND VENUE

10. This Court has jurisdiction over this matter because, among other reasons, (i) Plaintiff and Defendants are New Jersey residents, and (ii) most, if not all, of the relevant events and conduct occurred in or arose from New Jersey.

11. Venue is proper in the Superior Court of New Jersey, Ocean County, Chancery Division, General Equity Part, pursuant to R. 4:3-2(a) because, among other reasons, (i) the principal residences of Plaintiff and Defendants are located in Ocean County, and (ii) all events and conduct giving rise to this action occurred in, were directed to, originated from, and/or caused harm to parties domiciled in, Ocean County.

## FACTS COMMON TO ALL COUNTS

### **A. Mrs. Malachi Seeks Assistance from Appel**

12. In 2019, Mrs. Malachi—an Israeli immigrant and then a single mother—was in significant financial distress and struggling to make ends meet for her and her children (L.M., now age 13, and M.M., now age 11).

13. When, in early 2020, Mrs. Malachi shared with M.M.’s former schoolteacher that she was having difficulty paying for daycare for M.M., the teacher suggested that Mrs. Malachi contact Appel.

14. According to M.M.’s former teacher, Appel was a trusted rabbi and pillar of the community who ran several charitable organizations, including Diversified Charities (“Diversified”), often counseled and assisted women in similar circumstances, and was a teacher at a religious private school—Kollel Cheshek

Shlomo, which he owned and operated.

15. In February 2020, Appel arranged to meet with Mrs. Malachi at a local Starbucks.

16. During that meeting, Appel presented himself to Mrs. Malachi as a rabbi, mentor, advisor, and friend, whom Mrs. Malachi could trust, confide in, and depend on.

17. During that meeting, Appel offered Mrs. Malachi—who had significant experience in real estate—the opportunity to solicit investments on behalf of his real estate business and its development projects.

18. Appel structured Mrs. Malachi's compensation as a "draw" or advance against future commissions.

19. For example, between June 16, 2022, and July 17, 2022, Appel issued six separate payments to Mrs. Malachi that were characterized as advances or loans against future commissions and totaled \$20,000. True and accurate screenshots confirming Mrs. Malachi's receipt of payments from Appel/Diversified are attached to the accompanying Certification of Miryam Malachi ("Malachi Cert.") as Exhibit 1.

20. Upon information and belief, those payments were issued by Appel's charitable entity, Diversified. *See id.*

21. Although the payments were characterized as advances or loans against future commissions and Mrs. Malachi is unaware of any deals for which she solicited investment funds that have closed, Appel has never requested that

those funds be returned to him.

22. During the same period, Appel also provided Mrs. Malachi with financial “assistance” to pay for groceries and other necessities, such as medical expenses and water bills. *See id.*

23. Upon information and belief, the financial “assistance” payments and/or donations were also issued by Diversified. *See id.*

24. Regardless of how they were characterized by Appel and his charitable organization, it is now apparent that the payments—the most significant of which were immediately after Appel sexually assaulted Mrs. Malachi on or about June 1, 2022—were part of Appel’s calculated scheme to maintain control over her, keep her quiet, and continue to take advantage of her sexually.

#### **B. Appel Sexually Assaults Mrs. Malachi**

25. On or about June 1, 2022, Appel came to Mrs. Malachi’s home when he knew that Mrs. Malachi was alone and vulnerable because her children had already left for school and her then husband had been hospitalized.

26. During that visit, Appel forced himself upon Mrs. Malachi and sexually penetrated and contacted her, despite Mrs. Malachi’s clear and persistent cries that Appel stop (the “Sexual Assault”).

27. Appel was abusive and unrelenting. The more Mrs. Malachi pled for mercy, the more aggressive Appel became.

28. Before leaving, Appel insisted that Mrs. Malachi delete the Ring camera footage of him entering her home and supervised her undertaking of that task to ensure that it was done to his satisfaction.

29. Unfortunately, the Sexual Assault was not an isolated incident.

30. In the months that followed the Sexual Assault, Appel forced himself upon Mrs. Malachi and took sexual advantage of her on other occasions.

31. Appel also bombarded Mrs. Malachi with demands for sexual acts, along with a steady barrage of text and WhatsApp messages containing incredibly crude and graphic sexual content.

32. For example, Appel sent Mrs. Malachi a picture of himself along with messages saying: “I want to squeeze your breasts.”; “Lick your vagina dry.”; and “That’s the look you get before I flatten you.” A true and accurate copy of the foregoing message is attached to the Malachi Certification as Exhibit 2.

33. Appel likewise sent Mrs. Malachi a picture of his penis along with a comment about “sucking” it. A true and accurate copy of the foregoing message is attached to the Malachi Certification as Exhibit 3.

### **C. Appel Threatens and Intimidates Mrs. Malachi**

28. When Mrs. Malachi refused to be silenced about the Sexual Assault and other incidents, Appel threatened and intimidated her.

34. For example, Appel repeatedly threatened Mrs. Malachi that he knew people, including an inmate that had taken the fall for Appel in connection with another matter, who would “take care of” Mrs. Malachi if she disclosed any details

regarding the Sexual Assault and his other conduct.

35. He also threatened that he would have Mrs. Malachi exiled from the community if she chose to speak to anyone regarding the Sexual Assault and his other conduct.

36. Appel likewise not only insisted that Mrs. Malachi treat with a therapist he recommended but also scripted exactly what Mrs. Malachi was to say to the therapist to get the help she needed to deal with the trauma he had caused her without revealing what had occurred.

**D. Appel Admits to Having Done Terrible Things to Mrs. Malachi**

37. In July 2024, Mrs. Malachi met with Rabbi Joseph Rabinovich and shared with him evidence of the Sexual Assault and other incidents involving Appel.

38. Convinced by that evidence that something must be done to address the situation and the danger that Appel posed to the community, particularly as a rabbi, teacher, and counselor for troubled women, Rabbi Rabinowicz summoned the help of other rabbis and, together, they arranged for an intervention with Appel.

39. At that meeting, Appel admitted that he had done terrible things to Mrs. Malachi and that he had a “problem.”

40. Upon information and belief, Mrs. Malachi is not the only victim of Appel’s sexual acts and misconduct.

41. In response, the rabbis directed, among other things, that Appel step down as a rabbi and from all other positions of trust (including teacher and counselor).

**E. Appel Attempts to Buy Mrs. Malachi's Silence**

42. When the efforts to threaten and intimidate Mrs. Malachi appeared to be failing, Appel attempted to buy Mrs. Malachi's silence.

43. In late 2024, Appel requested that Mrs. Malachi and Mr. Richenberg meet with his attorney, Ian Goldman ("Goldman"), to discuss a "resolution."

44. Goldman advised that Appel was willing to make a lump sum payment of \$50,000 to Mrs. Malachi to cover her future therapy expenses if and only if Mrs. Malachi and Mr. Richenberg agreed to execute what was effectively a full release of any claims related to the Sexual Assault and keep all incidents involving Appel strictly confidential.

45. But Mrs. Malachi and Mr. Richenberg vehemently rejected that proposal.

**F. Appel Threatens and Intimidates Mr. Richenberg**

46. When Mrs. Malachi and Mr. Richenberg learned, in November 2025, that Appel continued to serve as a rabbi and hold his other positions of trust, Mr. Richenberg went to Appel's school on several occasions to confront Appel but Appel was not present.

47. When Mr. Richenberg went to the school on November 11, 2025, he was confronted by Rabbi Rabinovich, who runs the school. Rabbi Rabinovich advised that Appel now had a new rabbi, Rabbi Pearl, and that Rabbi Pearl permitted Appel to start teaching again.

48. In response, Mr. Richenberg told Rabbi Rabinovich that he was going to continue coming to the school until he had an opportunity to speak with Appel and that Mrs. Malachi is going to pursue claims against Appel in secular court.

49. When Mr. Richenberg returned to the school on November 13, 2025, there was security present. Rabbi Rabinovich told Mr. Richenberg to leave the premises, or he was going to call the police.

50. Days later, on November 16, 2025, Goldman sent Mr. Richenberg a letter warning him to stay away from the premises of Appel's home and school and other businesses and organizations.

**G. Defendants Launch a Fierce Campaign to Destroy Mrs. Malachi and Her Lucrative Business Relationships.**

51. Soon after learning that Mrs. Malachi intended to pursue her claims against Appel in secular court, Appel, Keleti, and Rosenzweig launched a fierce and relentless campaign to destroy Mrs. Malachi—personally and professionally—and publicly vindicate Appel.

52. In fact, Mrs. Malachi's former husband acknowledged in a text message to a close friend of Mrs. Malachi, sent before the campaign began, that Appel had reached out to Mrs. Malachi's former husband to enlist his assistance in his plan to "take down" Mrs. Malachi. A true and accurate copy of the text

message is attached to the Malachi Certification as Exhibit 4.

53. In that same text exchange, Mrs. Malachi's former husband acknowledged that Rosenzweig also had contacted him during the same period and similarly asked for his help in "taking down" Mrs. Malachi. *See id.*

54. As Mrs. Malachi first learned on December 15, 2025, Appel, Keleti, and Rosenzweig created a website with the domain address <https://malachichavala.com>, and which is titled "Beware of Miri Malachi/Maolem/Reichenberg" and subtitled "A DANGER TO KLAL YISROEL" (the "Website"). A true and accurate copy of the website is attached to the Malachi Certification as Exhibit 5.

55. "Klal Yisroel" means "Jewish peoplehood." Thus, the subtitle of the Website effectively stated that Mrs. Malachi is a "danger" to all Jews.

56. While the Website purports to "warn the public about this dangerous, individual [*i.e.*, Mrs. Malachi], and to provide a platform for victims," it is based entirely on an array of patently false and defamatory statements, which were curated and manipulated, in many respects, by Rosenzweig. Examples of those patently false and defamatory statements include the following.

57. The Website alleges that Mrs. Malachi stole funds she raised for the benefit of Binyamin Doyev and Tehila Recht<sup>1</sup>—a couple for whom she hosted a wedding celebration at her house—stating: "She pocketed everything. Not one dollar when to them." "She freakin' stole the money. THIEF!"

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<sup>1</sup> The Website incorrectly refers to Binyamin Doyev and Tehila Recht as David and Tehila Rechet.

58. As Mr. Doyev and Ms. Recht explain in their sworn certification, Mrs. Malachi did attempt to raise money to pay for the \$10,000 celebration held in her backyard. But Mrs. Malachi was able to raise only \$2,000 through her campaign. And she and her husband contributed their own money—\$8,000—to cover the balance.

59. The Website alleges that Mrs. Malachi blackmailed and extorted Appel (referred to on the Website as “the rosh kollel”) based on a completely tortured and distorted account of the relevant events between Mrs. Malachi and Appel purportedly provided by a “relative” of Appel, which states, in relevant part, that:

My relative is a respected rosh kollel in Lakewood and a tremendous baa'l chessed. Miri started asking him for money about 4 years ago. She posed a poor single mother who couldn't put food on the table. “I can't pay my water bill, I can't pay tuition, I'm gonna send them to public school . . . I'm going to kill myself” [I saw the e-mails myself]. So he sent her money for utilities, therapy and tuition.

She then waited a few years and instead of saying thank you, tried to extort money from him making up all kinds of crazy allegations with “evidence” . . .

We have evidence that Miri had actually disclosed to someone 2 years prior to making up any allegations that she planned on blackmailing the rosh kollel and extorting money from. We were also made aware that askanim gave her thousands and thousands of dollars to help her deal with the “trauma” she experienced.

60. The Website further alleges that Mr. Richenberg sent Appel a text message threatening that he and his wife were going to “break the silence” if Appel did not pay them \$48,000 and purports to include a screenshot of that text chain.

61. As detailed above and further set forth in Mrs. Malachi’s certification, she did receive funds from Appel (through his charitable organization, Diversified) but those funds were always understood by her to be “draws” in advance of future real estate commissions or gifts/donations to help her and her children with their financial needs.

62. As Mrs. Malachi now knows, however, every dollar that she received from Appel and his charitable organization were solely intended to garner her trust, lull her into a false sense of security, keep her quiet, and continue to take sexual advantage of her.

63. As explained in Mr. Richenberg’s certification, he never sent the text message depicted on the Website or any other message to that or a similar effect. Appel, Keleti, Rosenzweig, and/or someone working on their behalf had to have manufactured them.

64. The statements concerning Rabbi Forscheimer are also blatantly and demonstrably false. While the Website states that Mrs. Malachi told Rabbi Forscheimer that she had “evidence” of Appel’s reprehensible conduct but refused to turn over her phone for a forensic screening, Mrs. Malachi met Rabbi Forscheimer after she learned of the Website and Rabbi Forscheimer confirmed first-hand that he had never even spoken with Mr. Richenberg or Mrs. Malachi

prior to that meeting, much less requested that Mrs. Malachi give him her phone for a forensic screening.

65. The allegation concerning the “blackmail” and “extortion” even goes so far as to attempt to vindicate Appel, knowing that a secular lawsuit concerning the Sexual Assault was forthcoming and trying desperately to get ahead of it:

As for the Rosh Kollole he was back in Bais Medrash the next day, through all the lies and evil. We admire his amazing will-power to move forward even when people whom he thought were close to him, and some who literally owe him their lives, turned against him.

66. The Website accuses Mrs. Malachi of stealing \$25,000 from Appel and states that she did so under the guise of considering suicide.

67. As detailed in Mrs. Malachi’s certification, the monies received from Appel were understood to be “draws” against future commissions or gifts/donations to help Mrs. Malachi and her family pay necessary expenses.

68. The Website falsely states that Mrs. Malachi routinely asks for money under various pretenses, such as needing it for her son’s Bar Mitzva, and then uses that payment as “evidence” that she was paid for “services,” and threatens to publicize that solicitation unless you pay her more.

69. As Mrs. Malachi confirms unequivocally in her certification, she has never engaged in any such conduct.

70. The Website also contains of host of other accusations that could not possibly be more untrue and are solely intended to torment Mrs. Malachi and destroy her reputation, including, but not limited to, that (i) Mrs. Malachi “enjoys

having affairs with married men” and has had “countless married ‘boyfriends’ in numerous places at the same time”; that (ii) Mrs. Malachi hosts parties involving “drugs” and dancing between “married and non-marrieds”; that (iii) Mrs. Malachi married her former husband solely to get her green card; that (iv) Mrs. Malachi failed to keep a kosher household; and that (v) Mrs. Malachi had a “revolving door of male visitors” while at 26 Green Cove in the Westgate apartment complex—a statement specifically attributed to Keleti, who admittedly was Mrs. Malachi’s immediate neighbor when she previously resided at that location.

71. The statement entitled “FAKER” reads:

I’ve never met anyone as slick nor as sick as her. She has hurt so, so many people. Everyone knows and everyone is afraid of her. No morals or dignity whatsoever. She doesn’t pay for anything. She hasn’t paid for tuition ever. Speak to Yeshiva Kol Torah directly they will tell you. She’s a starving, single mom, has no money, but she lives in a mansion, has a live-in, travels the world, and just closed on a new construction custom house in **The Palm Estates** in Toms River. She is a total fake, through and through. Don’t go for her. She is the most convincing person, can cry and scream and make you think you are the crazy one. STAY AWAY!

72. Upon information and belief, Rosenzweig was responsible for preparing that statement, which, as set forth in Mrs. Malachi’s certification, is false.

73. The statement entitled “C. Story” is also directly attributable to Rosenzweig and admittedly nothing more than a summary of the false claims that Rosenzweig previously asserted against Mrs. Malachi before a rabbinical court but could never prove.

74. What is more, the Website discloses Mrs. Malachi's private address, the only conceivable purpose of which is to invite and encourage members of the community to further harass her and her family by visiting and rallying her home.

75. The Website also solicits donations that will purportedly be used to fund Appel and Keleti's campaign.

76. And as if the Website itself were not enough, Keleti has taken upon himself to spread the message in every other possible way.

77. For example, Keleti has posted a link to the Website on his Facebook page accompanied by the following message:

She used threats, false stories, and create[d] social media groups to shame and intimidate people who knew too much about her.

Private investigators were hired by people she threatened, and they found many others who had been harmed.

The community is urged to be very careful and to cut off all contact with this woman, this warning urgently to protect innocent people.

Her name – Miri Malachi Richenberg.

A true and accurate copy of that post is attached to the Malachi Certification as Exhibit 6.

78. Moreover, as evidenced by the screenshots attached to the Malachi Certification as Exhibit 7, Keleti (and possibly others) posted signs smearing Mrs. Malachi at public locations throughout the community, including the school that the Malachi's children attend, and placed pamphlets and fliers of a similarly

tortious message and tone on cars and in mailboxes throughout the area.

#### **H. Rosenzweig's Competitive Animus and Commercial Motives**

79. Upon information and belief, Rosenzweig is a licensed real estate professional and founder/owner of Rose Capital Group, a business that markets commercial real estate investment opportunities in Ocean County and other parts of the region to Israeli investors.

80. Rosenzweig competes directly with Mrs. Malachi in the solicitation of investments from Israeli investors in the very niche and tightly knit local Jewish community in which a person's name and reputation is critical to their success.

81. Upon information and belief, there is material overlap in Rosenzweig's and Mrs. Malachi's respective networks of investors.

82. Upon information and belief, Rosenzweig's animus toward Mrs. Malachi is driven by more than just their direct competition with each other.

83. Because of Mrs. Malachi's experience with commercial real estate investments, members of the community who have invested monies through Rosenzweig and/or Rose Capital Group reached out to Mrs. Malachi and expressed concerns regarding those investments because, among other reasons, there were inconsistencies in the stories the investors were being told and the de minimis distributions that some but not others who invested in the same property had received.

84. Mrs. Malachi researched what information is publicly available regarding those investments and identified what appear to be causes for concern, including that one of the properties that had purportedly been acquired on behalf of the investors has been taken back by the original owner.

85. Upon information and belief, Rosenzweig is concerned that, like Mrs. Malachi, her investors are preparing to pursue claims against her in secular court and, like Appel, is using the Website and other components of the smear campaign to discredit the information that Mrs. Malachi provided them and get ahead of the investors' story.

#### **I. The Catastrophic Impact of Defendants' Actions**

86. As detailed in her certification, the toll that Defendants' conduct has taken on Mrs. Malachi, her family, her reputation, and her business interests has been nothing short of devastating.

87. The emotional trauma that she has suffered since the Sexual Assault and has now been further exacerbated by Defendants' tortious and vindictive campaign is truly crippling.

88. Despite consistent therapy and a steady regimen of prescription medication, Mrs. Malachi cannot control her anxiety and her panic attacks—the most recent of which occurred on Christmas Eve—which have become so intense and severe that they require emergency medical intervention.

89. Most days, Mrs. Malachi finds it difficult to leave her home or accomplish even her basic daily functions and chores. She also finds it difficult—and sometimes impossible—to have sexual relations with her husband.

90. Mrs. Malachi and her husband are no longer comfortable in their own community and do not feel safe or secure in their home. In fact, they recently paid thousands of dollars to contractors to install an advanced security system and remove trees and shrubs that were obstructing their view of the perimeter.

91. Life for Mrs. Malachi's children is no better. They, too, are ashamed to go to school and feel exiled when walking through their own neighborhood.

92. Their teachers have advised Mrs. Malachi that their children appear to be struggling, acting out, and are no longer themselves.

93. Defendants' actions have also ruined Mrs. Malachi's professional reputation and her lucrative business relationships and opportunities.

94. As noted above, Mrs. Malachi has built a network of Israeli-based investors and solicits investment funds on behalf of United States-based real estate developers, including Sapphire Investment Group, LLC ("Sapphire") and 15 Beaver Hill, LLC ("Beaver Hill"), which are both located in Ocean County.

95. Since the Website launched, two investors who invested in projects being developed Beaver Hill have demanded and received a refund of their investments—one for \$94,300 which was returned by wire dated December 18, 2025, and another for \$109,269 which was returned by wire dated December 23, 2025. True and accurate copies of wire confirmations are attached to the Malachi

Certification as Exhibit 8.

96. Similar requests for a return of monies have been made by multiple other clients who have invested approximately \$1 million through Mrs. Malachi.

97. It is only a matter of time before everyone asks for their money back and no one answers her calls.

**FIRST COUNT**  
**Sexual Assault**  
**(Against Appel)**

98. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

99. By virtue of the Sexual Assault and similar subsequent acts, Appel sexually penetrated and contacted Mrs. Malachi without her consent.

100. Appel's acts were intentional and solely designed to cause Mrs. Malachi harm and humiliate her and/or arouse and/or gratify himself.

101. As a direct and proximate result of the Sexual Assault and other sexual acts, Mrs. Malachi has suffered substantial and irreparable harm, including severe emotional distress, anxiety, panic attacks, and physical pain.

**SECOND COUNT**  
**Intrusion upon Seclusion/Invasion of Privacy**  
**(Against Appel)**

102. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

103. Appel intentionally, through the Sexual Assault, coercive demands to delete surveillance footage, and other conduct alleged herein, intruded upon Mrs. Malachi's private space and affairs in a manner that was highly offensive to Mrs. Malachi and would be highly offensive to any reasonable person.

104. As a direct and proximate result of the Sexual Assault and other intentional and highly offensive conduct of Appel, Mrs. Malachi has suffered substantial and irreparable harm, including severe emotional distress, anxiety, panic attacks, and physical pain.

**THIRD COUNT**  
**Intentional/Negligent Infliction of Emotional Distress**  
**(Against All Defendants)**

105. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

106. As detailed above, Defendants have engaged in intentional, reckless, and/or negligent conduct directed at Mrs. Malachi, including committing the Sexual Assault, bombarding Mrs. Malachi with incredibly inappropriate and sexually explicit text messages, threatening to cause Mrs. Malachi significant harm to herself and her reputation if she dared to divulge the details concerning the Sexual Assault or their other egregious conduct to anyone, and launching and proliferating the public smear campaign.

107. Defendants' conduct, as alleged herein, was extreme, outrageous, and beyond all bounds of human decency.

108. As a direct and proximate result of Defendants' conduct, Mrs. Malachi has suffered substantial and irreparable harm, including severe emotional distress, anxiety, panic attacks, and physical pain.

**FOURTH COUNT**  
**Tortious Interference**  
**(Against All Defendants)**

109. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

110. Mrs. Malachi had existing business relationships whereby investors within her network invested substantial funds in various commercial real estate projects that she promoted.

111. Given her experience, reputation, and substantial network of investors, Mrs. Malachi also had a reasonable expectation of future business opportunities through existing and new clients.

112. At all relevant times, Defendants were aware of Mrs. Malachi's existing business relationships and prospective business opportunities.

113. Defendants have tortiously interfered with Mrs. Malachi's existing business relationships and prospective business opportunities by, among other acts, making and widely disseminating false and disparaging statements regarding her, her family, and her business reputation within an extraordinarily small and close-knit community.

114. Defendants' interference with Mrs. Malachi's existing business relationships and prospective business opportunities was wrongful, intentional, malicious, without justification or excuse, and intended to cause harm to Mrs. Malachi while advancing their own economic interests.

115. As a direct and proximate result of Defendants' tortious interference, Mrs. Malachi has suffered significant damages. In fact, as a direct result of the Website, two investors solicited and procured by Mrs. Malachi have demanded and received a return of approximately \$200,000 in investment funds.

116. As a direct and proximate result of Defendants' tortious interference, Mrs. Malachi will continue to suffer significant damages. As a direct result of the Website and other false and disparaging statements, multiple other investors who were solicited by Mrs. Malachi have requested the return of their investments totaling approximately \$1 million.

**FIFTH COUNT**  
**(Defamation/Defamation Per Se)**  
**(Against All Defendants)**

117. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

118. Defendants, directly and through others acting on their behalf, have made false and injurious statements about Mrs. Malachi, which have been published and disseminated via, among other mediums, the Website, posters, signs, fliers, pamphlets, and social media posts and threads.

119. The false and injurious statements include, but are not limited to, accusations that Mrs. Malachi (i) is a threat to all Jews; (ii) is a “dangerous individual”; (iii) stole money that she raised for a couple for whom she hosted a wedding celebration in her backyard; (iv) stole \$25,000 from Appel; (v) blackmailed and extorted Appel; (vi) has affairs with married men; (vii) hosts parties involving “drugs”; and (viii) is a “talented fraudster” who cannot be trusted.

120. These statements, as well as the others identified herein, constitute defamation per se because they pertain to matters concerning Mrs. Malachi’s business and her professional reputation, and effectively accuse her of conduct that is criminal, unlawful, and/or contrary to the standards of her profession.

121. Defendants knew and/or had reason to know that these and similar statements were false and injurious at the time they were made.

122. At the very least, Defendants were negligent in failing to verify the accuracy and truthfulness before the statements were made.

123. The sole purpose of the false and injurious statements was to harm and injure Mrs. Malachi. They served no legitimate purpose.

124. As a direct and proximate result of the false and injurious statements, Mrs. Malachi has suffered, and will continue to suffer, irreparable harm and substantial damages.

**SIXTH COUNT**  
**False Light**  
**(All Defendants)**

125. Mrs. Malachi repeats and realleges the foregoing allegations as if fully set forth herein.

126. As detailed above, Defendants placed Mrs. Malachi before the public in a false light that would be highly offensive to a reasonable person by, among other unlawful acts, creating and launching the Website, publishing fabricated and false stories, manipulating and altering communications, and posting and proliferating false and disparaging statements on the internet and social media and throughout the local community.

127. As a direct and proximate result of the false and injurious statements, Mrs. Malachi has suffered, and will continue to suffer, irreparable harm and substantial damages.

**SEVENTH COUNT**  
**Conspiracy**  
**(Against All Defendants)**

128. Mrs. Malachi repeats and realleges each of the foregoing allegations as if fully set forth herein.

129. Appel, Keleti, and Rosenzweig had an agreement and/or confederation with a common design to harass, tortiously interfere with, defame, and otherwise cause harm to Mrs. Malachi and her existing and prospective business relationships.

130. Defendants undertook many overt acts in furtherance of their agreements and/or confederation, including, but not limited to, creating and launching the Website, publishing fabricated and false stories, manipulating and altering communications, and posting and proliferating false and disparaging statements on the internet and social media and throughout the local community in various forms and mediums.

131. As a direct and proximate result of Defendants' unlawful and conspiratorial acts, Mrs. Malachi has suffered, and will continue to suffer, irreparable harm and substantial damages.

**EIGHTH COUNT**  
**Breach of Fiduciary Duty**  
**(Mrs. Malachi Against Appel)**

132. Mrs. Malachi repeats and realleges each of the foregoing allegations as if fully set forth herein.

133. Mrs. Malachi and Appel were in a special relationship whereby Mrs. Malachi reposed in Appel her trust and confidence in his capacity as a rabbi, mentor, confidant, and advisor.

134. Appel owed Mrs. Malachi fiduciary duties of loyalty and good faith and to otherwise act in her best interests by virtue of the special relationship between Mrs. Malachi and Appel.

135. Appel also owed Mrs. Malachi a fiduciary duty by virtue his promises and assurances that Mrs. Malachi could trust him and that he would undertake to serve her best interests and assist her personally and professionally.

136. Appel breached his fiduciary duties owed to Mrs. Malachi by, among other things, (i) sexually assaulting and harassing her, (ii) threatening and intimidating her, (iii) offering to buy her silence, (iv) tortiously interfering with her existing and prospective business relationships, and (v) launching a crippling and pervasive smear campaign.

137. As a direct and proximate result of these breaches, Mrs. Malachi has suffered, and will continue to suffer, irreparable harm and substantial damages.

**REQUEST FOR RELIEF**

**WHEREFORE**, Mrs. Malachi demands that judgment be entered against Defendants Appel and Keleti, jointly and severally, as follows:

- A. Awarding Mrs. Malachi direct, compensatory, and consequential damages;
- B. Awarding Mrs. Malachi punitive damages;
- C. Awarding Mrs. Malachi reasonable counsel fees and costs; and
- D. Awarding Mrs. Malachi such other and further relief as the Court deems just and equitable.

Respectfully submitted,

Dated: January 5, 2026

By: /s/ Eric T. Kanefsky  
Eric T. Kanefsky  
(Atty. No. 024292002)  
CALCAGNI & KANEFSKY, LLP  
One Newark Center  
1085 Raymond Boulevard, 18<sup>th</sup> Floor  
Newark, New Jersey 07102  
E: eric@ck-litigation.com  
T: (862) 397-1796  
*Counsel for Plaintiff*

**RULE 4:5-1 CERTIFICATION**

I certify, to the best of my information and belief, that the matter in controversy in this action is not the subject of any other action pending in any other court of this State. I further certify that the matter in controversy in this action is not the subject of any pending arbitration proceeding in this State, nor is any other action or arbitration proceeding contemplated. I certify that there is no other party who should be joined in this action at this time.

**CALCAGNI & KANEFSKY LLP**

Dated: January 5, 2026

By: /s/ Eric T. Kanefsky  
Eric T. Kanefsky, Esq.

**RULE 1:38-7(c) CERTIFICATION OF COMPLIANCE**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

**CALCAGNI & KANEFSKY LLP**

Dated: January 5, 2026

By: /s/ Eric T. Kanefsky  
Eric T. Kanefsky, Esq.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, the undersigned, Eric T. Kanefsky of Calcagni & Kanefsky LLP is hereby designated as trial counsel for Plaintiff in this action.

**CALCAGNI & KANEFSKY LLP**

Dated: January 5, 2026

By: /s/ Eric T. Kanefsky  
Eric T. Kanefsky, Esq.

**JURY DEMAND**

Pursuant to Rule 4:35-1, Plaintiff demands a trial by jury as to all issues so triable.

**CALCAGNI & KANEFISKY LLP**

Dated: January 5, 2026

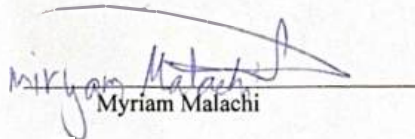
By: /s/ Eric T. Kanefsky  
Eric T. Kanefsky, Esq.

**VERIFICATION**

I, Miryam Malachi, am the plaintiff in this action. I hereby certify and say that the statements contained in Paragraphs 12-36, 42-45, and 51-97 of the Verified Complaint are true the best of my personal knowledge, information, and belief. The statements are based on my personal knowledge and information furnished to me.

I am aware that if any statements made by me are willfully false, I am subject to punishment.

Dated: January 5, 2026

  
Myriam Malachi