

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND**

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**INDEX NO.  
SUMMONS**

**AARON KIN,  
IZCHAK KIN, and  
DOV KIN**

**Plaintiff,**

**Plaintiff designates ROCKLAND  
COUNTY as the place of trial—  
DEFENDANT'S LOCATION.**

**-against-**

**LONNA RALBAG  
10 Jay Court  
Monsey NY 10952**

**Defendant.**

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**To the above named Defendants:**

**You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons to serve a notice of appearance on the plaintiff's attorneys within twenty days after the services of this summons exclusive of the day of service,**

where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

**Dated:** New York , New York  
December 20, 2022.



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**LAW OFFICES OF BRUCE EGERT**

**BRUCE EGERT**  
**Attorney for Plaintiff**  
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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ROCKLAND

-----X INDEX NO.

AARON KIN, IZCHAK KIN and DOV KIN,

Plaintiff(s),

**C O M P L A I N T**

-against-

LONNA RALBAG,

Defendant.

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AARON KIN, IZCHAK KIN and DOV KIN, plaintiffs herein, allege the following as and for their complaint:

1. At all times herein mentioned the defendant is a resident of Rockland County, State of New York and as such the court has jurisdiction over her as well as proper venue.
2. The plaintiffs are members of the same extended family and all are related to Israel Kin, who currently resides in the State of Nevada. Specifically, all

plaintiffs reside in Los Angeles California. Plaintiff Izchak Kin is the father of plaintiffs Aaron Kin and Dov Kin, as well as Israel Kin.

3. Israel Kin was married to defendant Lonna Ralbag Kin in 2000. The marriage yielded one son; Ms. Ralbag had four children of her prior marriage; Israel Kin has four daughters from his prior marriage. The marriage between Israel Kin and Lonna Ralbag was formally dissolved in the civil courts of California in 2008.
4. Prior to this, there was a divorce proceeding pending in Rockland County Supreme Court under Index No. 8351/2004 in which Lonna Ralbag was the plaintiff. The court instructed Lonna Ralbag to produce her computer which allegedly had pornographic material thereon, but upon such production it was shown that the computer had been illicitly erased. As such, Lonna Ralbag discontinued the divorce case because of her misconduct relating to said erasure of pornographic content that was contained on a computer that she owned and controlled and which she had produced to the court. As a result of this finding, Ralbag voluntarily discontinued her action for a divorce in Rockland County despite her desire to have one.
5. The marriage of Israel Kin and Lonna Ralbag unraveled when it was discovered by Israel Kin that pornographic materials were being viewed by Lonna Ralbag's children along with the belief that there may have been inter-sibling intimacy among Lonna Ralbag's children. Fearing for his then 2-year old son's safety, Israel Kin sought a remedy and, as a result, Lonna Kin commenced a divorce proceeding in Rockland County Supreme Court.

6. Subsequently, Israel Kin attended a Jewish religious court called a 'bet din' to have a bill of divorce prepared, called a 'get', by a qualified rabbi. Said 'get' was prepared in 2008 and is, to this day, ready to be collected by defendant Lonna Ralbag. She has been notified of this on numerous occasions.
  
7. Lonna Ralbag, subsequently and nevertheless, made complaints about her ex-husband Israel Kin claiming that he was a 'get-refuser' despite the fact that he had previously issued the 'get' and told her numerous times that she could attend the religious court and pick up the document.
  
8. She made this accusation against him despite his having taken all necessary steps to remove all barriers to her re-marriage, by attending to the religious court and having a get written out.
  
9. Jewish law requires that once the actual 'get' is written out and handed to the ex-wife she is given a receipt for that 'get' stating, the names, dates, witnesses thereon and that she is free to remarry any man she chooses. But, the actual 'get' is torn apart or destroyed. The reason for this curious procedure is so that no one, in the future, can get a hold of that 'get' and appeal it's efficacy. If ex-husbands or their agents were allowed to make such appeals or collateral attacks, and if they were to be sustained, then any subsequent marriage of the wife would be considered adulterous (a very serious religious violation) and any children born of that marriage would be considered bastards ('mamzerim'). Each year thousands of such 'gets' are written and put into effective use without much legal controversy.

10. This action is commenced on behalf Aaron Kin and his immediate family, all of whom have been targeted by defendant Lonna Ralbag in a campaign of harassment and deliberately malicious action which has caused them great harm, dread and damage.

11. These actions by Lonna Ralbag have constituted libel, slander, defamation of character, negligent infliction of emotional distress by her taking direct actions against them which included:

- a. Contacting a rabbi in Brooklyn NY, Rabbi Aryeh Ralbag, who is a first cousin to Lonna Ralbag who prepared an edict or ruling that the plaintiff's mother, Yedda Kin, should not be buried in Israel due to the belief that she, Yedda Kin, supported her son, Israel Kin, and transmitted it to the chief rabbi of Israel, named Rabbi David Baruch Lau, who is also a cousin to Lonna Ralbag. This edict was prepared on the same day that Yedda Kin died. Said rabbi, at the behest of Lonna Ralbag, saw to it that there was an intent to create a legal impediment to said burial. Upon the death of Yedda Kin her body was transported to Israel for burial, as had been previously arranged by plaintiff and family. A burial in Israel is considered an extremely distinguished and momentous occasion. Jewish law requires burial as soon as possible without the decedent's remains being left unattended or unburied for any unnecessary period of time. Upon arriving in Israel with his mother's casket, he learned of the prior order that Lonna Ralbag had secretly arranged, not having told the family of the decedent. Her motivation was to infer that Israel Kin was a 'get-denier' and that somehow, the mother was supportive of this, which was palpably untrue.

Upon learning this, plaintiffs became extremely agitated and upset and needed to scramble and seek a judicial order on an emergent basis to direct that the mother be able to be buried as soon as possible. At this time, plaintiff called the aforesaid Rabbi Lau in Israel and who stated to him that he (Rabbi Lau) had a rabbinic edict from Rabbi Ralbag. He further stated that if you get another ruling from a different rabbinic court in Israel he would reverse the edict, which was a misdirection and deceitful. Then, one hour later Rabbi Lau asked for \$100,000.00 from plaintiff in order to conduct the burial; the answer given was, from plaintiff, that 'he would have nothing to do with an attempt at extortion'; one more hour elapsed and then Rabbi Lau asked for \$50,000.00 which was steadfastly refused; then, another hour elapsed and Rabbi Lau asked for \$20,000 and then finally agreed to bury her, after receiving stern warnings from the rabbinic court in Jerusalem which determined that Yedda Kin should be buried. This episode has continued to cause great anguish and fear in the plaintiff due to the violation of his religious convictions, specifically, the inability to bury his mother in a timely manner as prescribed by religious law on account of the illicit and inappropriate actions taken by defendant Lonna Ralbag as directed by her to a party having no connection to her complaint of her ex-husband being a get-denier. Thus the damages sustained by the plaintiff are ongoing as was created by the defendant.

- b. Contacting the Rabbinical Council of California to further attempt to obtain rabbinical decrees against the plaintiffs herein. At present, ongoing and continuing, Lonna Ralbag has, upon information and belief, petitioned the Israel Supreme Court to compel the rabbinical courts of Israel to prevent the burial of any of the plaintiffs or family members from being buried in Israel.

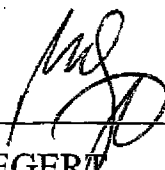
- c. Visiting Israel, by defendant Lonna Ralbag, during 2022, to appear at a hearing and file a petition at the Israel Supreme Court to influence the said court to issue a ruling to compel the religious courts to deny burial rights for the plaintiffs and their family in the State of Israel. Said case has not yet been finalized.
  - d. Organizing pickets and vocal protests in front of plaintiff's house during the 7-day mourning period ('shivah') of said mother; during this time, defendant helped to organize, encourage and arrange for loud amplified speeches to be made in front of their home during the introspective time of mourning and also while guests arrived at the home to pay their respects.
  - e. Organizing pickets and vocal protests in front of the weddings of the niece of the plaintiff Aaron Kin in Monsey NY at the Atrium catering hall on Route 59; and a similar protest was organized and took place at the wedding of plaintiff's nephew at Teferet Rivka in Borough Park Brooklyn New York. These protests were designed to annoy, harass and disturb all of the participants and guests so as to unlawfully interfere in a religious service commonly known as a 'chuppah', as well as the ensuing joyous celebration.
  - f. Posting numerous videos on social media sites such as 'You Tube' which show the aforesaid picket lines and loud, amplified speeches in front of homes in residential neighborhoods at inappropriate hours of the evening. This, as set forth herein, caused significant and ongoing damages to the reputation of the plaintiff and family on account of actions that were not their doing.
12. All of these actions are part of one long pre-conceived and concerted action by the defendant against the plaintiffs in an effort to defame them and cause emotional harm both by her deliberate actions and negligence.



13. In each of these actions, the motivations were to accuse Israel Kin of being a get-denier and of wrongfully contending that the plaintiffs were somehow connected to and a part of the effort to deny her a 'get'.
14. However, neither plaintiff Aaron Kin nor any of his family members are connected with nor have any responsibility toward the granting of a 'get' by Israel Kin to Lonna Ralbag. None of the plaintiffs were ever involved with the business or personal affairs of Lonna Ralbag's ex-husband Israel.
15. The actions by Lonna Ralbag are outrageous and reckless conduct motivated by her loathing of her ex-husband Israel Kin with no fault on the part of the plaintiffs contributing in any way or manner. This included her attempt to influence the legal system in a foreign nation, i.e.: Israel, to pressure the plaintiffs.
16. The conduct attributed by defendant Lonna Ralbag continues to occur and is constant and ongoing.
17. The damages sustained by the plaintiff include but are not limited to
- a. mental trauma,
  - b. loss of sleep,
  - c. fear of physical assault,
  - d. threats to personal safety,
  - e. slander,
  - f. libel,

- g. defamation of character,
- h. being cast into a false light in public opinion, having their person, image and profile displayed on videos that are widely available to any member of the public without charge, without their approval or consent in order for defendant to gain both a financial interest and further her career as a Rockland County realtor as well as physical injuries,
- i. legal fees expended in both Israel and the United States;
- j. security costs during family gatherings or weddings;
  
- k. As a result, the injuries sustained by the plaintiffs are damages that are both special-damages and per-se damages giving rise to a claim for significant financial award by this court and jury.
  
- l. The amount of damages sought by the plaintiff greatly exceeds the jurisdiction of all lower courts.
  
- m. The terms and provisions of Article 16 of the CPLR do not apply to this matter.

WHEREFORE, plaintiff demands judgment in a sum of money to be awarded by court and jury, punitive damages, interest, together with such other and further relief that to this court may be deemed just, proper and equitable.



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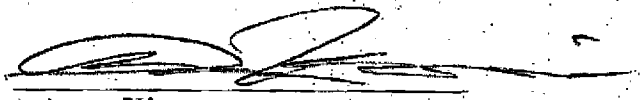
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VERIFICATION

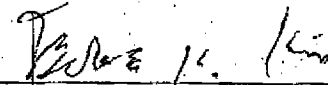
STATE OF CALIFORNIA  
COUNTY OF Los Angeles ) s.s.:

I, the undersigned, being duly sworn does hereby depose and say under my oath that

We have read over the annexed complaint and the contents are true to my our knowledge, except as to those matters therein which are stated to be alleged upon information and belief and as to those matters we believe them to be true.



Aaron Kin

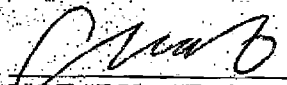


Izchak Kin



Dov Kin

Severally sworn to before me this  
14 day of December, 2022.

 Ji Young Lee  
NOTARY PUBLIC

