

SUPREME COURT FOR THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

ALLAN KASSENOFF,

Plaintiff,

-against-

CATHERINE KASSENOFF,

Defendant.

Index No. 58217/19

AFFIDAVIT OF [REDACTED]

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

[REDACTED], being duly sworn, deposes and says:

1. I was the nanny for the Kassenoffs for 13-months starting in July 2015. After I left their full-time employ, I would periodically be called back to babysit on various occasions through the fall of 2018.
2. I submit this affidavit in full support of the Plaintiff, Allan Kassenoff's motion for full custody of the three children. I agree to make myself available to discuss the contents of this affidavit with the Court, and can be reached through Mr. Dimopoulos' office.
3. Whatever Catherine says about her daughter, A [REDACTED] I beg the court not to believe her. A [REDACTED] is a wonderful child who acts one way when her mother is around, and another way when she's not. She is sweet, smart and caring. She is a beautiful child with a kind heart. My first request is that this Court not allow Catherine to blame everything on the child because I know she will. I agree that A [REDACTED] does have an issue with lying, but she is a good kid that needs help.

4. I am from France, and since 2011 have been a nanny. I have submitted to background checks and have been regularly vetted and received various commendations from my employers. I am currently a legal permanent resident of the United States. I am currently employed full-time by a family in Westchester County.

5. What I witnessed in my 13-months working for the Kassenoffs has troubled me to this day as I believe Catherine is a mentally ill and abusive person. Her abuse of A [REDACTED] led me to make a report to CPS about a year-and-a-half ago, but I refused to give my name for fear of retribution. I do not know if CPS made an investigation. While I remain fearful of Catherine, I cannot allow my fear to get in the way of doing what is right for these children.

6. During my time with the Kassenoffs, Catherine worked full-time for the first 4-months, and I would generally arrive around 8AM and leave at 5PM after Catherine returned from work. I was with "A [REDACTED]" all day and would pick up A [REDACTED] from school every day. Most days, Catherine would pick up [REDACTED] from school.

7. I have personally witnessed the following conduct:

- Catherine would often yell at A [REDACTED] over minor things, and told her things like "this is why you have no friends."
- While I was employed, I witnessed Catherine punish A [REDACTED] by removing toys and books from her room. When the parties moved from New Rochelle to Larchmont, I also witnessed Catherine remove A [REDACTED] fancy bed from her room and in her new room only permit her to sleep on a mattress on the floor. I have included photographs of the mattress on the floor and the empty shelves in her room. I personally took these photos included as **Ex.'s 26 and 27.**
- On one occasion, I witnessed Catherine scream at A [REDACTED] for almost 10 minutes after she misbehaved—she said things such as "you will never have friends," and "you'll never succeed in life or get married and have your own kids." This was an odd event as Catherine insisted that I stay and watch.

- Catherine refused to allow A■■ to have playdates with other kids. Since I picked up A■■ from school, I was often asked by other moms to coordinate a playdate – I would always ask Catherine and she would make up excuses. A■■ would ask for playdates and Catherine would tell her “no one has asked for playdates because you have no friends.”
- Catherine would refuse to allow the children to play with the neighbors, even though they were wonderful people who had kids around A■■ and C■■ ages. When the neighbor’s kids would play outside and invite them, Catherine would refuse because she never wanted the children to interact with other people or kids;
- On most days when Catherine would return from work, regardless of what A■■ and I were doing, she would insist that A■■ go to her room or otherwise do chores. The other children were never asked to do chores.
- When Catherine would return to work, I noticed A■■ become agitated and scared. As an example, when she would see her car pull, up, she would stand up if she was relaxing and say “mommy, do you need me to do anything?”
- Catherine never allowed A■■ to eat the same food as the other kids – A■■ was never allowed to have chocolate or treats, or even milk. The other kids were regularly allowed to eat whatever they wanted.
- Catherine consistently told me that A■■ was a “liar” and a “bad kid.”
- One afternoon when the three kids and I were watching TV when Catherine came home, A■■ sprung up and sat at attention and asked her mother if she could help do something. The other two kids sat and continued to watch TV as A■■ was instructed to do various chores.

8. Allan worked long hours during the week and I would not see him regularly.

When he was home, it was clear he was scared of Catherine and would do as she said.

9. With respect to C■■ and J■■ they were allowed to do whatever they pleased.

However, Catherine would yell at them aggressively at times. For instance, if C■■ did not


complete their twenty minute a day violin practice a day, Catherine would often say “I’m just going to give these violins away...” and “you just won’t play again.”


10. Even though I am now a full-time nanny and no longer an au-pair, I stay involved in the agency to help other young au-pairs. I continue to monitor the Facebook page of the French au-pairs working in the U.S. In March 2018, I took a screen shot of Laura’s (the au-pair after me) post about Catherine. See Ex. 28. While it is in French, the translation is easy:

Careful to all au-pairs who are looking for a family, I won’t advise you to work for the Kassenoff family, the mother is a psychopath would doesn’t treat her well. They have been kicked out of every agency except ours. I don’t know if with my leaving them, whether they were kicked out of Cultural Care as well.

11. I understand that Catherine would behave herself when I was around, so I do not want to imagine how she behaves when she is alone with the children. I am genuinely worried for those wonderful children and hope the Court protects them.

Dated: June 4, 2019





Duly sworn to before me
this 4 day of June 2019



Notary Public



Commission Expires March 17, 2020