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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE, WASHINGTON**

**JOHN DOE, as father and natural guardian of,
JANIE DOE, a minor,**

AT LAW AND IN ADMIRALTY

Plaintiff,

NO: 17-cv-

v.

**HOLLAND AMERICA LINE N.V. d/b/a
HOLLAND AMERICA LINE N.V. LLC,
HAL ANTILLEN N.V. LLC, HOLLAND
AMERICA LINE INC., and HOLLAND
AMERICA LINE-USA INC., owners/operators
of the M/S VEENDAM,**

**PLAINTIFF’S COMPLAINT
FOR PERSONAL INJURIES**

JURY TRIAL DEMANDED

Defendants.

COMES NOW the Plaintiff, JOHN DOE, as natural father and legal guardian of JANIE DOE, a minor (hereinafter, “Plaintiff”), by and through undersigned counsel, hereby sues Defendants, HOLLAND AMERICA LINE N.V. d/b/a HOLLAND AMERICA LINE N.V. LLC, HAL ANTILLEN N.V. LLC, HOLLAND AMERICA LINE INC., and HOLLAND AMERICA LINE-USA INC., (hereinafter collectively referred to as, “HOLLAND AMERICA” or “Defendants”), and alleges:

THE PARTIES

1. The Plaintiff JOHN DOE is the father and natural guardian of the minor child named herein as JANIE DOE. The Plaintiff is, and at all times material hereto, was a resident and citizen of the

1 State of California. At the time of the subject incident, JANIE DOE was 15 years and 2 months old
2 and at all times material hereto, was and is a resident and citizen of the State of California. JANIE
3 DOE was a passenger on the cruise ship *MS VEENDAM* (hereinafter “The Vessel”) owned and
4 operated by the Defendants. The names “JOHN DOE and JANIE DOE” are a generic reference to
5 the Plaintiff and the minor on whose behalf this lawsuit is brought and their identity should not be
6 public record due to the nature of the events in this matter. The Defendants are aware of the identity
7 of the Plaintiff and of JANIE DOE.
8

9 2. The Defendant HOLLAND AMERICA LINE N.V. d/b/a HOLLAND AMERICA LINE N.V.
10 LLC is and at all times material hereto was a foreign corporation with its principal place of business
11 in Seattle, Washington, doing business in King County Washington, and which lists its registered
12 agent with the Washington Secretary of State as Holland America Line Inc., a corporation authorized
13 and existing under the laws of the state of Washington. At all times material hereto, Defendant
14 operated The Vessel and/or was responsible for the acts that caused the subject incident and injuries
15 and for the hiring, screening, training, monitoring, and/or supervising of GEDE SUKRANTARA
16 (hereinafter, “SUKRANTARA”), the crewmember who perpetrated the subject sexual assault, rape,
17 and false imprisonment on JANIE DOE on The Vessel.
18

19 3. The Defendant HAL ANTILLEN N.V. LLC is and at all times material hereto was a foreign
20 corporation doing business in King County, Washington, was and is a subsidiary of Carnival
21 Corporation & PLC, which held title to, owned, and/or operated The Vessel on which this incident
22 occurred, and which was responsible for the negligence that caused the subject incident and injuries
23 and employed and/or was responsible for the hiring, screening, training, monitoring, and/or
24 supervising of SUKRANTARA.
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1 4. The Defendant HOLLAND AMERICA LINE INC. is and at all times material hereto was
2 a corporation authorized and existing under the laws of the state of Washington, has its principal
3 place of business in Seattle, Washington, does business in King County, Washington, operated The
4 Vessel on which the subject incident occurred, was responsible for the negligence that caused the
5 subject incident and injuries, and employed and/or was responsible for the hiring, screening, training,
6 monitoring, and/or supervising of SUKRANTARA.
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8 5. The Defendant HOLLAND AMERICA LINE-USA INC. is and at all times material hereto
9 was a corporation authorized and existing under the laws of the state of Delaware, has its principal
10 place of business in Seattle, Washington, does business in King County, Washington, operated The
11 Vessel on which the subject incident occurred, was responsible for the negligence which caused the
12 subject incident and injuries, and employed and/or was responsible for the hiring, screening, training,
13 monitoring, and/or supervising of SUKRANTARA.
14

15 **JURISDICTION**

16 6. This Court has diversity subject matter jurisdiction under 28 U.S.C. § 1332 as the Plaintiff is
17 completely diverse from the Defendants and the amount in controversy far exceeds the minimum
18 jurisdictional amount of \$75,000.00, exclusive of interest, costs and attorneys' fees. This Court also
19 has federal question subject matter jurisdiction under 28 U.S.C. § 1331 as to the civil remedy claim
20 brought under 18 U.S.C. § 2255.
21

22 7. This Court has personal jurisdiction over the Defendants and venue is proper as:

- 23 a. Defendants have their principal place of business and/or have
24 offices located in Seattle, Washington;
25
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1 b. Defendants conduct substantial business within the State of
2 Washington, including, but not limited to, operating cruises from
3 Seattle;

4 c. Defendants committed one or more acts as set forth in the Revised
5 Code of Washington Section 4.28.185, which submits the
6 Defendants to jurisdiction and venue of this Court; and,
7

8 d. Defendants submitted to the jurisdiction of this Court via the
9 subject cruise ticket contract.

10 8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 and personal jurisdiction lies as to
11 all Defendants because at all times material hereto one or more of the Defendants have their
12 principal place of business in this District, have an office and agents in this District to conduct
13 business here, actually conduct and engage in substantial business activity in this District, engaged in
14 the acts of negligence more fully described herein in this District, and have designated this Court as
15 the proper venue in the venue selection clause in the terms and conditions of the passenger ticket
16 contract.
17

18 9. All conditions precedent for filing and maintaining this action have been fulfilled, have been
19 waived, or do not apply.
20

21 **GENERAL ALLEGATIONS**

22 10. The incident which is the subject of this civil action occurred on or about January 15, 2017
23 while The Vessel was in navigable waters and within the “special maritime and territorial
24 jurisdiction of the United States” as defined by 18 U.S.C. § 7.
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1 11. At all times material hereto, JANIE DOE was a fare paying customer on The Vessel owned
2 and/or operated by the Defendants and occupied the status of passenger on the subject cruise ship.

3 12. JANIE DOE boarded The Vessel on or about January 4, 2017 for a two-week cruise.

4 13. Defendants advertise the CLUB HAL® YOUTH PROGRAM as Holland America Line's
5 youth activities program, which "offers an array of entertaining events for kids and teens ages 3-17,
6 **supervised by a full-time, professionally trained staff.**"
7

8 14. Defendants advertise safety as a priority of the CLUB HAL program. "Safety is our primary
9 concern and strict policies are in place for effective supervision."

10 15. Throughout the duration of the cruise, JANIE DOE participated in the CLUB HAL youth
11 program on multiple occasions, often under the supervision of LILY WHITEHOUSE, a youth staff
12 member employed by Defendants.
13

14 16. At all times material hereto, SUKRANTARA was employed as a waiter by Defendants.

15 17. On the date alleged in Paragraph 10 above, SUKRANTARA was twenty-six years old.

16 18. Throughout the duration of the cruise, SUKRANTARA repeatedly attempted to fraternize
17 with JANIE DOE in violation of Defendants' shipboard policies and procedures designed to protect
18 passengers.
19

20 19. Upon information and belief, several crew members of various positions and rankings
21 witnessed and were aware of improper fraternization attempts by SUKRANTARA directed at JANIE
22 DOE yet did nothing to reprimand or relieve SUKRANTARA of his duties and/or protect JANIE
23 DOE.
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1 20. On or about January 14, 2017, JANIE DOE informed WHITEHOUSE, while in the presence
2 of ERIKA FORTIN, another crew member employed by Defendants, that a Lido crew member was
3 being flirtatious with her and inquiring about her age.

4 21. Rather, than reporting the crewmember to supervisors or acting to protect the minor child
5 who was obviously uncomfortable with the crew member's behavior, WHITEHOUSE told the child
6 to tell the "flirtatious" crewmember that she was 13 years-old so that he would leave her alone.
7

8 22. On the date alleged in Paragraph 10 above, JANIE DOE attended a cruise sponsored youth
9 event aboard The Vessel with WHITEHOUSE present as the youth staff member. After the event,
10 JANIE DOE walked to the ship's Lido deck (Deck 11) for a snack. While at the Lido deck,
11 SUKRANTARA made small talk with JANIE DOE. After some time, JANIE DOE left the Lido
12 Deck and headed to the Sky Deck (Deck 12) and on her way stopped at a restroom designated for
13 women located near the CLUB HAL area. Unbeknownst to JANIE DOE, SUKRANTARA followed
14 her to the women's restroom. SUKRANTARA proceeded to push on the restroom door preventing
15 the door from closing and then forced his way into the restroom, locking the door after him. In the
16 restroom, SUKRANTARA pushed JANIE DOE against the wall. JANIE DOE yelled at him to get
17 off her, get out of the restroom and to leave her alone. SUKRANTARA refused and continued his
18 assault. SUKRANTARA then threatened JANIE DOE to tell everyone that it was her idea and that
19 she was "easy to get" if she did not stop yelling. SUKRANTARA then started to forcefully kiss
20 JANIE DOE and touch her body under her clothing.
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23 23. JANIE DOE locked up her body, refusing to allow SUKRANTARA to touch her private
24 parts. SUKRANTARA removed his shirt as he pinned JANIE DOE against the wall. He then
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1 continued with his attempts to kiss her and rubbed his hands over her body. JANIE DOE repeatedly
2 told him to get off her, to stop and that she did not want to engage in any sexual activity with him.

3 24. SUKRANTARA asked JANIE DOE to take him to her stateroom and she refused asking if
4 she could leave. SUKRANTARA then tried to push JANIE DOE over the toilet and attempted to
5 vaginally penetrate her with his penis. JANIE DOE again yelled “no” and tried to escape the
6 restroom. SUKRANTARA once again pushed her against the wall. SUKRANTARA tried to push
7 JANIE DOE to the ground; JANIE DOE resisted. In the ensuing struggle, SUKRANTARA
8 succeeded in positioning JANIE DOE in the corner of the restroom. While in the corner,
9 SUKRANTARA pushed JANIE DOE down while he tried to force her mouth open.
10 SUKRANTARA succeeded in opening JANIE DOE’s mouth and then inserted his penis inside her
11 mouth. JANIE DOE again attempted to get up but SUKRANTARA kept pushing her down.
12 SUKRANTARA eventually ejaculated onto her mouth, face, and clothing.
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15 25. SUKRANTARA then told JANIE DOE to take a picture of him “so she could always
16 remember” and that he would give her his email so she could send it to him and they could talk.
17 JANIE DOE refused and SUKRANTARA again pressed her to take a picture. Wanting to end the
18 horrific sexual assault and fearing that the assault would otherwise continue, JANIE DOE took the
19 picture.
20

21 26. As a result of the acts perpetrated by SUKRANTARA, JANIE DOE suffered physical,
22 emotional, and psychological injuries requiring medical and psychological treatment.

23 27. Defendants employees’ failure to take appropriate action while being aware that
24 SUKRANTARA was violating shipboard policies and procedures prohibiting fraternization with
25 minor passengers allowed SUKRANTARA to perpetrate his assault and rape upon JANIE DOE and
26

1 showed reckless disregard for the safety of JANIE DOE, a minor passenger trusted to the care and
2 supervision of Defendants' employees, in particular those employees in charge of the CLUB HAL®
3 YOUTH PROGRAM.

4
5 **COUNT I**
6 **NEGLIGENCE**

7 28. Plaintiff re-alleges all allegations pled in paragraphs 1 through 27 above as if alleged fully
8 herein.

9 29. Defendants owed JANIE DOE the legal duty to exercise reasonable care under the
10 circumstances for her safety.

11 30. Defendants had a duty to live up to the representations made to the public, which were made
12 to induce the public, including families, to choose this cruise line and this vacation and to purchase
13 tickets for this cruise.
14

15 31. Defendants breached their duty to provide JANIE DOE with reasonable care under the
16 circumstances by their failures and by their choices of rules, regulations, policies, and procedures and
17 by their other actions and conduct including but not limited to the following:

- 18 a. Failing to warn passengers that the ship is not a safe place for minor females, that
19 there are predators among the crew, and that the security systems and personnel
20 onboard ship were not adequate to protect passengers from crewmembers attacking
21 passengers in common and/or public restrooms;
22
23 b. Failing to make, create, and maintain a safe environment for minor passengers as
24 advertised;
25
26 c. Failing to fulfill their representations made in their literature, website, and

1 otherwise about the safety and security of minor passengers onboard;

2 d. Failing to fulfill their representations made in their literature, website, and otherwise
3 about the strict policies in place for effective supervision of minors participating in
4 the CLUB HAL YOUTH PROGRAM;

5 e. Failing to implement reasonable and adequate security policies, security measures,
6 and security procedures necessary to protect minor passengers participating in the
7 CLUB HAL YOUTH PROGRAM;

8 f. Failing to implement and/or enforce reasonable and proper procedures for the safety
9 and security of the passengers onboard the ship including the safety of minor female
10 passengers;

11 g. Failing to promulgate and/or enforce reasonable and proper rules, regulations,
12 policies, and/or procedures for their crewmembers regarding interaction with minor
13 passengers;

14 h. Failing to implement and/or enforce procedures designed to address improper
15 fraternization attempts by crewmembers with minor passengers;

16 i. Failing to promulgate and/or enforce policies and/or procedures designed to prevent
17 crewmembers from sexually assaulting and/or raping minor passengers aboard the
18 ship;

19 j. Failing to reasonably and properly screen, hire, train, monitor, and retain employees;

20 k. Failing to provide adequate training for their crewmembers/employees in regard to
21 interactions with passengers, including minor passengers;

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- 1 l. Failing to recruit crew from countries where proper and reliable background checks
2 into criminal, vocational, and mental health histories can be obtained;
- 3 m. Failing to perform a thorough and complete background check of SUKRANTARA or
4 hiring him from a location which does not have sufficient record keeping to expose
5 incidents which would alert Defendants of criminal activities of its crewmembers
6 including SUKRANTARA;
- 7
- 8 n. Failing to adequately supervise SUKRANTARA thereby enabling him to follow
9 JANIE DOE into a women's restroom wherein he carried out his sexual assault on
10 her;
- 11
- 12 o. Continuing to employ and retain as a crewmember a person who Defendants knew or
13 should have known was a danger to female passengers;
- 14
- 15 p. Failing to have video surveillance in common area hallways, balconies, outside and in
16 the immediate area of public restrooms and other areas to allow the vessel to monitor
17 the activities of its passengers and crew and to deter crew from committing crimes
18 and violent acts onboard;
- 19
- 20 q. Creating workplace conditions such that sexual crimes are foreseeable;
- 21
- 22 r. Failing to develop, implement, and/or enforce reasonable and proper workplace
23 criteria to reduce and/or eliminate: excessive work hours, excessive work demands
24 and/or excessively long contracts of employment at sea and away from friends and
25 family sufficient to reduce the likelihood of violent acts and/or sexual assaults by
26 employees/crew members upon passengers;

- 1 s. Failing to develop, implement, and/or enforce workplace environment improvements
2 to reduce the likelihood of violent acts and/or sexual assaults by employees/crew
3 members upon passengers;
- 4 t. Failing to implement reasonable and proper methods to prevent crime by their
5 crewmembers against passengers;
- 6 u. Failing to comply with applicable industry and other standards, statutes, and/or
7 regulations, the violation of which is negligence per se and/or evidence of negligence;
- 8 v. Failing to take additional security measures after being put on notice that the security
9 measures in force are inadequate;
- 10 w. Failing to implement a method of operation which was reasonable and safe and would
11 prevent dangerous conditions such as the one in this case;
- 12 x. Failing sufficiently to monitor and supervise the conduct, activities, and whereabouts
13 of its crew onboard its own cruise ship;
- 14 y. Failing to provide sufficient security personnel to be able to adequately monitor the
15 activities of people and the physical plant of the ship and to respond to emergencies
16 timely and adequately so as to prevent injuries to personnel onboard including
17 passengers such as JANIE DOE;
- 18 z. Failing to make, create, and maintain a safe environment for passengers in restrooms
19 and common areas; and/or
- 20 aa. Violating the International Safety Management Code by failing to have an adequate
21 Safety Management System Manual and/or failing to adequately implement and
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1 follow the Safety Management System Manual they have, as it related to protecting
2 passengers from sexual assault and/or rape aboard Defendants' vessels.

3 32. As a result of Defendants' negligence alleged in the preceding paragraph, JANIE DOE
4 suffered physical and psychological injuries, pain and suffering, mental anguish, loss of capacity for
5 the enjoyment of life, as well as incurred expenses of medical care and treatment. These damages
6 are continuing and/or permanent.
7

8 WHEREFORE, the Plaintiff demands judgment against HOLLAND AMERICA for all
9 damages to which he is entitled under the General Maritime Law and otherwise including but not
10 limited to all compensable damages suffered by JANIE DOE in the past and in the future including
11 but not limited to: expenses for medical and psychological care and treatment; bodily and
12 psychological injury, pain, suffering, mental anguish, loss of the enjoyment of life; punitive damages,
13 all taxable court costs and prejudgment interest accruing from the date of the incident and all other
14 damages which the Court deems just and proper.
15

16 **COUNT II**
17 **STRICT LIABILITY**
18 **PHYSICAL ASSAULT, BATTERY, SEXUAL ASSAULT**
19 **SEXUAL BATTERY AND RAPE OF PASSENGER BY CREWMEMBER**

20 33. The Plaintiff, hereby adopts and re-alleges each and every allegation in paragraphs 1 through
21 27 above.

22 34. As a common carrier, HOLLAND AMERICA is strictly liable and responsible for the
23 intentional torts committed by its crewmembers and/or employees including that of SUKRANTARA
24 against its passengers including JANIE DOE.
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1 35. As more fully alleged in Paragraphs 22 – 24 above, SUKRANTARA committed the
2 intentional torts of assault, battery, sexual assault, sexual battery, and rape against JANIE DOE as he
3 knowingly physically and sexually assaulted and battered as well as raped JANIE DOE against her
4 will in the women’s restroom aboard the subject cruise ship.

5 36. As a result of SUKRANTARA’s physical and sexual assault and battery as well as rape
6 against her, JANIE DOE suffered physical and psychological injuries, pain and suffering, mental
7 anguish, loss of capacity for the enjoyment of life as well as incurred expenses of medical care and
8 treatment. These damages are continuing and/or permanent.

9
10 WHEREFORE, the Plaintiff demands judgment against HOLLAND AMERICA for all
11 damages to which he is entitled under the General Maritime Law and otherwise including but not
12 limited to all compensable damages suffered by JANIE DOE in the past and in the future including
13 but not limited to: expenses for medical and psychological care and treatment; bodily and
14 psychological injury, pain, suffering, mental anguish, loss of the enjoyment of life; punitive damages,
15 all taxable court costs and prejudgment interest accruing from the date of the incident and all other
16 damages which the Court deems just and proper.
17

18 **COUNT III**
19 **STRICT LIABILITY FOR**
20 **FALSE IMPRISONMENT OF PASSENGER BY CREWMEMBER**

21 37. The Plaintiff, hereby adopts and re-alleges each and every allegation in paragraphs 1 through
22 27 above.

23 38. As a common carrier, HOLLAND AMERICA is strictly liable and responsible for the
24 intentional torts committed by its crewmember and/or employee including that of SUKRANTARA
25 against its passengers including JANIE DOE.
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1 39. SUKRANTARA falsely imprisoned JANIE DOE by intentionally restricting her movement
2 and confining her to the subject women's restroom over JANIE DOE's pleas to leave. Such
3 imprisonment was unlawful as there was no legal or contractual justification for SUKRANTARA to
4 confine JANIE DOE in the women's restroom as he was carrying out his attack.

5 40. As a direct and proximate result of SUKRANTARA's false imprisonment of her, JANIE
6 DOE suffered physical and psychological injuries, pain and suffering, mental anguish, loss of
7 capacity for the enjoyment of life as well as incurred expenses of medical care and treatment. These
8 damages are continuing and/or permanent.

9
10 WHEREFORE, the Plaintiff demands judgment against HOLLAND AMERICA for all damages
11 to which he is entitled under the General Maritime Law and otherwise including but not limited to all
12 compensable damages suffered by JANIE DOE in the past and in the future including but not limited
13 to: expenses for medical and psychological care and treatment; bodily and psychological injury, pain,
14 suffering, mental anguish, loss of the enjoyment of life; punitive damages, all taxable court costs and
15 prejudgment interest accruing from the date of the incident and all other damages which the Court
16 deems just and proper.
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19 **COUNT IV**
20 **STRICT LIABILITY**
21 **FOR CIVIL REMEDIES PURSUANT TO 18 U.S.C. § 2255**

22 41. The Plaintiff, hereby adopts and re-alleges each and every allegation in paragraphs 1 through
23 27 above.

24 42. As a common carrier, HOLLAND AMERICA is strictly liable for the actions of
25 SUKRANTARA including the civil penalties provided under 18 U.S.C. § 2255(a).

26 43. 18 U.S.C. § 2255(a) provides:

1 Any person who, while a minor, was a victim of a violation of section
2 1589, 1590, 1591, 2241(c), 2242, 2243, 2251, 2251A, 2252, 2252A,
3 2260, 2421, 2422, or 2423 of this title and who suffers personal injury
4 as a result of such violation, regardless of whether the injury occurred
5 while such person was a minor, may sue in any appropriate United
6 States District Court and shall recover the actual damages such person
7 sustains and the cost of the suit, including a reasonable attorney's fee.
8 Any person as described in the preceding sentence shall be deemed to
9 have sustained damages of no less than \$150,000 in value.

10 44. 18 U.S.C. § 2242 provides:

11 Whoever, in the special maritime and territorial jurisdiction of the
12 United States... knowingly—

13 (1) causes another person to engage in a sexual act by threatening or
14 placing that other person in fear (other than by threatening or placing
15 that other person in fear that any person will be subjected to death,
16 serious bodily injury, or kidnapping); or

17 (2) engages in a sexual act with another person if that other person
18 is—

19 (A) incapable of appraising the nature of the conduct; or

20 (B) physically incapable of declining participation in, or
21 communicating unwillingness to engage in, that sexual act; or
22 attempts to do so, shall be fined under this title and imprisoned for
23 any term of years or for life.

24 45. SUKRANTARA violated 18 U.S.C. §§ 2242(1) by: (1) knowingly causing JANIE DOE to
25 engage in a sexual act or acts by using force against her by threatening her and/or placing her in fear
26 as more fully alleged in paragraphs 22 through 24 above; and/or, (2) engaging in a sexual act with
JANIE DOE who was (A) incapable of appraising the nature of his conduct and/or (B) physically
incapable of declining participating in the sexual act as more fully alleged in paragraphs 22 through
24 above.

46. 18 U.S.C. § 2243 provides:

(a) **OF A MINOR.**—Whoever, in the special maritime and territorial
jurisdiction of the United States ... knowingly engages in a sexual
act with another person who—

1 (1) has attained the age of 12 years but has not attained the age of
2 16 years; and
3 (2) is at least four years younger than the person so engaging;
4 or attempts to do so, shall be fined under this title, imprisoned not
5 more than 15 years, or both.

6 47. SUKRANTARA, who was twenty-six years of age, violated 2243(a)(1) by knowingly
7 engaged in a sexual act with JANIE DOE, a minor who was fifteen years of age, as more fully
8 alleged in paragraphs 22 through 24 above.

9 48. As a direct result of the foregoing, JANIE DOE has suffered actual damages, including
10 psychological, emotional, and physical injuries; mental anguish; and the loss of enjoyment of life.
11 These injuries are continuing and/or permanent in nature.

12 WHEREFORE, Plaintiff on behalf of JANIE DOE demands judgment against HOLLAND
13 AMERICA for all actual compensatory damages provided under 18 U.S.C. § 2255(a) including
14 attorneys' fees and taxable costs and further relief the Court may deem appropriate.

15 **JURY DEMAND**

16 Plaintiff demands trial by jury on all **issues so triable**.

17 **Dated: December 13, 2017**

18 **Respectfully submitted,**

19 **BRAIS & ASSOCIATES, P.A.**
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