

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**OLIVER ORTOLANI,**

Plaintiff,

v.

**COMMUNITY OF JESUS, INC., ARTS  
EMPOWERING LIFE, INC.,  
PERFORMING ARTS BUILDING  
FOUNDATION, INC.,**

Defendants.

Civil Case No.: 1:25-cv-12005-LTS

**DEFENDANT COMMUNITY OF JESUS, INC.’S  
MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant, the Community of Jesus, Inc. (“the Church”), by and through its attorneys, Saul Ewing LLP, moves to dismiss the Complaint filed by Plaintiff Oliver Ortolani (“Plaintiff”) in its entirety with prejudice for failure to state a claim on the following grounds, which are set forth in the accompanying Consolidated Memorandum of Law:<sup>1</sup>

1. Plaintiff’s Complaint, on its face, is an improper shotgun pleading that violates Fed. R. Civ. P. 8(a) because it pervasively and conclusorily lumps the three named Defendants together (a) without making specific factual allegations as to what each Defendant’s actual conduct was or setting forth facts demonstrating how and why the Defendants are liable to Plaintiff; (b) conclusorily treating all three Defendants as the same entity without alleging that they are “alter egos,” much less setting forth any facts that could establish that they are alter egos; and (c) failing to identify any individual who engaged in wrongful conduct against him, what that individual’s

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<sup>1</sup> There are three Defendants in this case, namely, the Community of Jesus, Inc. (the “Church”), Arts Empowering Life, Inc. (“AEL”), and Performing Arts Building Foundation, Inc. (“PABF”) (collectively, the “Defendants”). Each Defendant has filed its own Motion to Dismiss; however, with the Court’s permission, the Defendants have jointly submitted a Consolidated Memorandum of Law in support of each of their Motions to Dismiss. See ECF No. 12.

relationship with any of the Defendants was, and how any such relationship rendered each Defendant liable. In this regard, the Church respectfully requests that the Court pay particular attention to the absence of the requisite allegations of actual facts capable of establishing that the Church is liable to Plaintiff.

2. Counts I through VI, which are all claims brought under the federal Trafficking Victims Protection Reauthorization Act (“TVPRA”), all fail as a matter of law because the Plaintiff has not pleaded and cannot plausibly plead the required elements of each claim.

3. Count VII, which is a claim for a violation of the Massachusetts Labor Trafficking Statute (Mass. Gen. Laws c. 265, § 51), fails as a matter of law because the Plaintiff has not pleaded and cannot plausibly plead the required elements of this claim.

4. Count VIII, which is a claim asserted under the federal Racketeer Influenced and Corrupt Organizations Act (“RICO”), is time-barred under the four-year statute of limitations. In addition, Count VIII fails as a matter of law because the Plaintiff has not plausibly pled the required elements of this claim.

5. Count IX, which is a claim for unjust enrichment, fails as a matter of law because the Plaintiff has not pleaded and cannot plausibly plead the required elements of this claim.

In support hereof, the Church submits an accompanying Consolidated Memorandum of Law, the Declaration of Jeffrey S. Robbins, and Exhibits 1–5.

**WHEREFORE**, the Defendant, the Community of Jesus, Inc., respectfully requests that this Court enter an order dismissing this case with prejudice pursuant to Fed. R. Civ. P. 12(b)(6).

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendant requests oral argument on this Motion.

Respectfully submitted,

**THE COMMUNITY OF JESUS, INC.,**

By its attorneys,

/s/ Jeffrey S. Robbins

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Dated: December 1, 2025

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I hereby certify that counsel for the Defendants have conferred with counsel for the Plaintiff and have attempted in good faith to resolve or narrow the issue presented in this Motion.

/s/ Bridgitte E. Mott

Bridgitte E. Mott

**CERTIFICATE OF SERVICE**

I, Bridgitte E. Mott, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 1, 2025.

/s/ Bridgitte E. Mott

Bridgitte E. Mott