

RETURN DATE: FEBRUARY 11, 2025	:	SUPERIOR COURT
	:	
CRAIG MANDERS, EXECUTOR OF THE	:	
ESTATE OF LISA MANDERS AND	:	
CRAIG MANDERS, INDIVIDUALLY	:	J.D. OF STAMFORD/NORWALK
	:	AT STAMFORD
	:	
V.	:	
	:	
AFRICAN PORTFOLIO INC.	:	JANUARY 2, 2025

COMPLAINT

**COUNT ONE: CRAIG MANDERS, EXECUTOR OF THE ESTATE OF
LISA MANDERS, AS TO DEFENDANT AFRICAN
PORTFOLIO, INC.**

1. On November 1, 2024, Craig Manders was appointed Executor of the Estate of Lisa Manders. Craig Manders brings claims in his capacity as Executor, on behalf of the Estate of Lisa Manders, as well as his own individual claims, as outlined below.

2. At all times relevant to the claims in this Complaint, Craig Manders and Lisa Manders were residents of the Township of Cranford, in New Jersey.

3. At all times relevant to the claims in this Complaint, defendant African Portfolio, Inc. (“African Portfolio”), is and was a Connecticut corporation with a principal business address of 146 Sound Beach Avenue, Old Greenwich, Connecticut. African Portfolio is and was a corporation specializing in designing, organizing, planning, and providing African safari tour operations.

4. African safaris are expeditions or trips into areas of the African wilderness to observe and experience African wildlife in its natural habitat. Because of the unpredictability and

sometimes aggressive nature of the wild animals that exist in the African wilderness, coupled with the rural and undeveloped areas where safaris take place, African safaris designed, organized, planned, and provided by African Portfolio, including the African safari attended by Craig and Lisa Manders as outlined in this Complaint, are inherently dangerous activities that require careful planning and execution to be completed safely.

5. As an African safari tour operator, African Portfolio, in exchange for compensation, designed, organized, planned, and/or provided African safari trips for its clients, including Craig and Lisa Manders. African Portfolio advertised and otherwise held itself out as having unique expertise in providing African safari trips, which led Craig and Lisa Manders to select African Portfolio to be their safari tour operator for a 10-day African safari trip they took to Zambia (the “Zambia Safari”).

6. African Portfolio provided services to Craig and Lisa Manders, related to the Zambia Safari, including coordinating and otherwise arranging for their transportation, accommodations, and adventure activities during the Zambia Safari. The adventure activities were to include, but not be limited to, walking, boating, and driving in areas of the African wilderness known to be populated by dangerous wildlife.

7. In planning the Zambia Safari as the tour operator, African Portfolio screened, selected, trained or ensured the training of, and supervised the individuals and groups of individuals who guided and led Craig and Lisa Manders into the wilderness during the Zambia Safari. In doing so, African Portfolio was required to use reasonable care in the selection, training, and supervision of its tour guides and leaders. African Portfolio also held out the guides and leaders on the Zambia Safari as being competent, qualified, and trained to provide Craig and Lisa Manders with a reasonably safe experience during the Zambia Safari.

8. As the tour operator for the Zambia Safari, African Portfolio was responsible for ensuring activities related to the Zambia Safari were conducted in a reasonably safe manner. To this end, African Portfolio was responsible for creating and implementing a reasonably safe trip itinerary and experience for Craig and Lisa Manders, including by setting specific travel destinations and activities, and by providing reasonably competent, experienced, and trained local tour guides and leaders.

9. Craig and Lisa Manders reasonably relied on African Portfolio to ensure the Zambia Safari was planned, executed and operated in a reasonably safe manner.

10. Craig and Lisa Manders also reasonably relied on African Portfolio to select as its actual and/or apparent agents the local tour leaders and guides who could and would provide a reasonably safe experience while planning and leading different aspects of the Zambia Safari.

11. At all times relevant to the claims in this case, the local leaders and guides hired, selected, and/or assigned by African Portfolio to plan and execute aspects of the Zambia Safari were acting as employees and/or actual and/or apparent agents of African Portfolio, acting within the scope of their employment and/or agency and in furtherance of the interests of African Portfolio.

12. On or about May 31, 2024, pursuant to the planning and direction of African Portfolio, Craig and Lisa Manders left the United States and traveled to Africa for the Zambia Safari.

13. As part of the Zambia Safari, in the early morning of June 5, 2024, Craig and Lisa Manders, embarked on a “bush walk” in the Zambian wilderness (the “Bush Walk”) planned and led by employees and/or actual and/or apparent agents of African Portfolio. Specifically, the Bush Walk was led and directed by local tour leaders and/or guides who were employees and/or

actual and/or apparent agents of African Portfolio. The Bush Walk was a special feature of the Zambia Safari offered and highlighted by African Portfolio, which involved a walk into the African wilderness.

14. Employees and/or actual and/or apparent agents of African Portfolio selected an area of the Zambian wilderness for the walk, then encouraged Craig and Lisa Manders to explore the African countryside on foot while being guided by employees and/or actual and/or apparent agents of African Portfolio, with no barriers between them and the wildlife in the area.

15. During the Bush Walk, employees and/or actual and/or apparent agents of African Portfolio identified specific signs of dangerous wildlife and encouraged participants in the Bush Walk to follow those signs, which eventually to the bank of a still body of water in the wilderness.

16. Upon arriving at the bank of the body of water, the same employees and/or actual and/or apparent agents of African Portfolio identified and highlighted for Craig and Lisa Manders a visible, partially submerged, lone hippopotamus resting in the body of water.

17. At the time, the employees and/or actual and/or apparent agents of African Portfolio knew or should have known that the close presence of the wild hippopotamus to participants in the Bush Walk posed an immediate and extreme danger, due to the known tendencies of hippopotami to be highly unpredictable, territorial, and aggressive in such circumstances.

18. The same employees and/or actual and/or apparent agents of African Portfolio also knew or should have known that approaching and/or standing on the bank of the body of water near the wild hippopotamus posed an immediate and grave threat to the safety and well-being of Craig and Lisa Manders.

19. Craig and Lisa Manders, in contrast, were neither fully aware, nor adequately warned by employees and/or actual and/or apparent agents of African Portfolio, that approaching or standing on the bank of the body of water in the presence of the hippopotamus was extremely dangerous and posed a grave and immediate threat to their safety and well-being.

20. After identifying the hippopotamus, the leaders and/or guides of the Bush Walk, all of whom were employees and/or actual and/or apparent agents of African Portfolio, negligently encouraged and permitted participants of the Bush Walk, including Craig and Lisa Manders, to approach the water and stand on the bank to observe, photograph, and record the hippopotamus and its surroundings.

21. Although the leaders and/or guides of the Bush Walk – at least one of whom was armed with a rifle – knew, or should have known, of the immediate and extreme danger the hippopotamus posed to Craig and Lisa Manders while they remained near the body of water, they nonetheless negligently turned and left the area, walking ahead of and away from Craig and Lisa Manders and leaving them behind with no protection from the hippopotamus.

22. As Lisa Manders stood on the water bank, with no barrier between her and the hippopotamus, the hippopotamus suddenly and without warning lifted its head and charged from the water towards Lisa Manders. Although Lisa Manders attempted to flee, she was unable to escape and the hippopotamus violently attacked her, grabbing her by its mouth, lifting her off the ground, shaking her entire body, and crushing her head and body with its bite. Lisa Manders suffered catastrophic injuries in the violent attack and died shortly after.

23. Lisa Manders' husband, Craig Manders, witnessed the violent attack of Lisa Manders by the hippopotamus, and the injuries and ultimate death of Lisa Manders from the hippopotamus attack.

24. African Portfolio, by the acts and omissions of its employees and/or actual and/or apparent agents, for whom African Portfolio is liable, was negligent in failing to provide a reasonably safe environment during the Zambia Safari, including in one or more of the following ways:

- a. In that it encouraged and/or permitted Craig and Lisa Manders to be exposed to an avoidable and highly dangerous encounter with a dangerous hippopotamus in the Zambian wilderness;
- b. In that it failed to provide reasonably safe conditions during the Bush Walk.
- c. In that it failed to take reasonable steps to protect Craig and Lisa Manders from an attack by the hippopotamus;
- d. In that it failed to ensure its agents who were guiding, directing, and leading the Bush Walk were adequately selected, screened, qualified, supervised, and trained in a manner that would ensure Craig and Lisa Manders would have a reasonably safe experience during the Zambia Safari;
- e. In that it failed to create and implement adequate safety policies, procedures, and/or guidelines, to ensure a reasonably safe experience for Craig and Lisa Manders during the Zambia Safari;
- f. In that it failed to provide reasonable precautions, warnings, and/or protection to Craig and Lisa Manders;
- g. In that it knew or should have known that approaching the body of water and remaining on its banks after observing the hippopotamus increased the risk of serious injury or death to Craig and Lisa Manders;

- h. In that it knew, or should have known, that the hippopotamus encountered during the Bush Walk was highly unpredictable, wild, dangerous, territorial and aggressive, and despite this knowledge encouraged and/or permitted Craig and Lisa Manders to approach and stand on the bank of the body of water, knowing that doing so posed a serious and immediate threat to their safety and well-being;
- i. In that it failed to take adequate and reasonable steps to protect Craig and Lisa Manders from the hippopotamus before and during its attack on Lisa Manders, including by leaving them alone on the bank of the water where the hippopotamus was present, leaving no protective barrier between them and the hippopotamus;
- j. In that it failed to adequately train and warn Craig and Lisa Manders about the dangers of a hippopotamus encounter.
- k. In that it otherwise failed to take adequate steps to provide a reasonably safe experience for Craig and Lisa Manders during the Zambia Safari.

25. As a result of African Portfolio's negligence, the Lisa Manders suffered a violent and fatal hippopotamus attack, including but not limited to significant blunt force trauma to her head and body, and physical pain and suffering flowing directly from her significant and fatal physical injuries.

26. As a result of African Portfolio's negligence, Lisa Manders suffered significant premonitory fear and emotional pain, suffering and mental anguish flowing directly from her severe physical injuries prior to her death.

27. As a result of African Portfolio's negligence, Lisa Manders prematurely died.

28. As a result of African Portfolio's negligence, Lisa Manders' ability to enjoy and participate in life's activities was permanently destroyed.

29. As a result of African Portfolio's negligence, the Estate of Lisa T. Manders incurred funeral and burial expenses, resulting in loss and damages to her Estate.

COUNT TWO: CRAIG MANDERS, INDIVIDUALLY, AS TO DEFENDANT AFRICAN PORTFOLIO, INC.

1-29. Paragraphs 1 through 29 of Count One are incorporated as Paragraphs 1 through 29 of this Count Two.

30. At all times mentioned herein, Craig Manders was married to and living with his wife, the decedent Lisa Manders.

31. As a result of the negligence of the employees and/or actual and/or apparent agents of African Portfolio, for which African Portfolio is liable, plaintiff Craig Manders has been and will in the future be deprived of the comfort, association, and consortium of his wife, Lisa Manders.

COUNT THREE: CRAIG MANDERS, AS EXECUTOR OF THE ESTATE OF LISA MANDERS, AS TO DEFENDANT AFRICAN PORTFOLIO, INC.

1-29. Paragraphs 1 through 29 of Count One are incorporated as Paragraphs 1 through 29 of this Count Three.

30. African Portfolio's conduct by and through its employees and/or actual and/or apparent agents as outlined above, in addition to being negligent, was reckless and in willful, wanton disregard of the well-being of Lisa Manders.

31. As a result of the recklessness of African Portfolio as outlined above, African Portfolio is liable to the Estate of Lisa Manders for punitive damages resulting from its reckless conduct.

COUNT FOUR: CRAIG MANDERS, INDIVIDUALLY, AS TO DEFENDANT AFRICAN PORTFOLIO, INC.

1-29. Paragraphs 1 through 29 of Count One are incorporated as Paragraphs 1 through 29 of this Count Four.

30. At all times mentioned herein, Craig Manders was married to Lisa Manders.

31. On June 5, 2024, Craig Manders witnessed all aspects of the charge of the hippopotamus from the water, the violent attack by the hippopotamus of his wife Lisa Manders, the significant pain and suffering suffered by Lisa Manders during and after the violent attack, and the death of Lisa Manders from the hippopotamus attack, as outlined above.

32. As a result of witnessing the violent attack of Lisa Manders by the hippopotamus and its impact on Lisa Manders as outlined above, Craig Manders suffered severe and debilitating emotional and/or psychological injuries, which have impaired his ability to cope with daily routines and for which he has sought treatment.

33. African Portfolio is liable to Craig Manders for the severe and debilitating emotional and/or psychological injuries he sustained by witnessing the hippopotamus attack and its aftermath.

PLAINTIFFS CRAIG MANDERS, EXECUTOR
OF THE ESTATE OF LISA T. MANDERS, AND
CRAIG MANDERS, INDIVIDUALLY

BY: 

PAUL A. SLAGER
NICOLE B. COATES
SLAGER MADRY LLC
750 EAST MAIN STREET
SUITE 810
STAMFORD, CT 06902
(203) 604-2446
JURIS #445999

CLAIM FOR RELIEF

Plaintiffs claim unspecified compensatory monetary damages against the defendant of an amount more than the jurisdictional amount Fifteen Thousand (\$15,000.00) Dollars, together with punitive damages, attorneys' fees, and the costs of this action.

Dated at Stamford, Connecticut this 2nd day of January 2025.

PLAINTIFFS CRAIG MANDERS, EXECUTOR
OF THE ESTATE OF LISA MANDERS, AND
CRAIG MANDERS, INDIVIDUALLY

BY: 

PAUL A. SLAGER
NICOLE B. COATES
SLAGER MADRY LLC
750 EAST MAIN STREET
SUITE 810
STAMFORD, CT 06902
(203) 604-2446
JURIS # 445999

TO THE CLERK:
PLEASE ENTER THE FOLLOWING APPEARANCE FOR THE PLAINTIFFS:

SLAGER MADRY LLC
750 EAST MAIN STREET
STAMFORD, CONNECTICUT 06902
(203) 604-2446 JURIS # 445999