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13 *Attorneys for Plaintiff*

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF LOS ANGELES

16 JOHN DOE FD, an individual,  
17 Plaintiff,  
18 v.  
19 DEFENDANT DOE 1, DEFENDANT DOE  
20 2, DEFENDANT DOE 3, and DEFENDANT  
DOES 4-1000, inclusive;  
21 Defendants.

: Case No.  
:  
: **COMPLAINT FOR DAMAGES FOR:**  
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: **1. Negligence;**  
: **2. Sexual Battery;**  
: **3. Negligent failure to warn, train or**  
: **educate**

22 **DEMAND FOR JURY TRIAL**  
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1 Based upon information and belief available to Plaintiff at the time of the filing of this  
2 complaint, Plaintiff makes the following allegations:

3 **SALESIAN SOCIETY’S LONG STANDING FACILITATION AND COVER UP**

- 4 1. The Salesian Society Religious Order for more than 50 years has facilitated the sexual  
5 molestation of vulnerable children entrusted in their care, and covered up for their child  
6 molesters once abuse was known. The Order’s long standing practice of facilitating and  
7 covering up child sexual abuse continued in 1993 during the abuse alleged in this case.  
8 Plaintiff, while a freshman at DOE 2 high school was sexual abused in 1993 by his religion  
9 teacher and counselor, Defendant DOE 3, an employee of Defendant DOE 1 and DOE 2.  
10 All of the abuse occurred on Defendant DOE 2 school grounds.
- 11 2. Defendants DOE 1 and DOE 2 (hereinafter “institutional defendants”) conduct in this case  
12 is consistent with their conduct over many years regarding numerous child molesters  
13 employed by the institutional defendants. In many instances the institutional defendants  
14 promoted employees even after numerous complaints that they had molested children.  
15 The Salesian Society Order is the third largest religious order within the Catholic church  
16 with more than 13,500 priests and brothers in at least 128 countries where it operates  
17 schools, youth center, camps, residences and parishes. The Salesian Society owns or  
18 operates Salesian High School in Richmond, St. Francis Youth Center in Watsonville, DOE  
19 2 High School in Bellflower, California, Don Bosco Tech in Rosemead, California and  
20 numerous other schools and youth facilities in California and the west
- 21 3. For more than 150 years, since shortly after its founding, the institutional Defendants and  
22 the Salesian Society have recognized the heightened danger that its purportedly celibate  
23 priests and brothers would sexually molest poor and disadvantaged children placed in their  
24 care. Instead of alerting parents, the community or law enforcement to this danger, the  
25 defendants created secret rules and codes, known only to fellow priests and brothers to  
26 feebly regulate and alert fellow clergy of abuse. When these measures routinely failed to  
27 prevent abuse, and victims and witnesses made complaints, the defendants utilized their  
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1 statewide, national and international structure to transfer priests to new assignments outside  
2 the reach of law enforcement. At no time through the present have the defendants stopped  
3 placing its loyalty to fellow clergy above its responsibility to protect children. To this day  
4 the defendants continue to employ priests and brothers who have been convicted or accused  
5 of sexually molesting children. Priests and brothers such as Father Larry Lorenzoni, Brother  
6 Ernest Martinez, Father Richard Presenti, Father Benjamin Debenne, Brother Steve Whalen  
7 and others continue to work for Defendants and/or reside at Defendants' facilities with  
8 regular access to children. All the while the Defendants have steadfastly refused to alert  
9 parents or the community of the risks posed to their children by these predators. Defendants'  
10 policies of absolute loyalty to clerics and secrecy regarding their sexual abuse of children,  
11 has long fostered a culture within the Defendants that encouraged the sexual abuse of  
12 children. This culture often condoned the abuse of defenseless and captive children. It also  
13 resulted in numerous pedophile priests and brothers simultaneously working at Defendants'  
14 boarding schools, where they often abused the same children, sometimes passing the  
15 defenseless children from perpetrator to perpetrator. At least 22 Salesian priests or brothers  
16 and teachers of the California branch of the institutional Defendants have been accused of  
17 sexually molesting children. Those include the following: (1) Father Titian "Jim" Miani; (2)  
18 Brother Ernie Martinez; (3) John Verhart; (4) Father Larry Lorenzoni; (5) Brother Anthony  
19 Juarez; (6) Brother Mark Epperson; (7) Brother Ralph Murguia; (8) Brother John Vos; (9)  
20 Father Benjamin Debenne; (10) Brother Jesse Dominguez; (11) Father Richard Presenti;  
21 (12) Brother Steve Whalen; (13) Father Manuel Jimenez; (14) Father John Tkelick; (15)  
22 Brother Roy Vetari; (16) Father Simsich; (17) Brother Harold Danielson; (18) Father Sal  
23 Billante; (19) Brother John; (20) Brother Juan Sanchez; (21) Teacher Marc Dejardins; (22)  
24 Brother Pacheco. Many of these individuals sexually abused the same children.

25 4. This pattern and practice of defendants is by no means limited to the California branch of  
26 the defendants. The following are numerous examples from other branches.

27 **A. Rev. Carlos Peralta:**

- 1 5. As a member of the Salesian order, Rev. Carlos Peralta (hereinafter Peralta) and a school  
2 administrator in Peru, Peralta was responsible for the custody, care, health, welfare, and  
3 safety of the students.
- 4 6. From an early point the Salesian Order had information regarding and was or should have  
5 been on notice of Peralta's dangerous and exploitive propensities.
- 6 7. On information and belief, as a result of Peralta's conduct and behavior, he developed a  
7 reputation in the Salesian order community for acting out with students.
- 8 8. On information and belief, despite his conduct, behavior, and reputation in the Salesian  
9 Order community, the Salesians allowed Peralta to remain as a faculty member and faculty  
10 resident, where he continued to have unsupervised access to students.
- 11 9. On information and belief, the Order did nothing more to investigate or discover the  
12 existence of any other victims of Peralta. Instead, in conformity with its pattern and  
13 practice, it concealed these acts from victims, prospective students, current students, their  
14 families, alumni, parishioners, the public and/or law enforcement authorities.
- 15 10. In 1991, Peralta was caught with a young boy in his bedroom at the school in Peru. The  
16 abuse was reported to the top Order official in Peru.
- 17 11. In 1995, several young students told Order leaders in Peru that Peralta had abused them.  
18 Order's church disciplinary board concluded that "unspeakable things have occurred" and  
19 Peralta was ordered to be kept away from children.
- 20 12. In 1997, Peralta was sent to a clergy abuse treatment center in Argentina.
- 21 13. Despite the report of abuse, in 1998, Peralta was transferred to an Order parish in Chicago  
22 with top Order official in Peru sending Peralta with a permission to work form that stated  
23 Peralta enjoys a good reputation and has no problem working with minors.
- 24 14. In 1999, Peralta was accused of molesting four boys in Chicago, and he was transferred to a  
25 treatment center in Virginia, and then to an Order residence in New Jersey.
- 26 15. In 2001, Peralta was working at an Order parish in Mexico City.
- 27 16. Upon information and belief, Peralta is still working as an Order priest in Mexico.

1 **B. Father William Burke:**

- 2 17. As a member of the religious order of Salesians, Rev. William Burke (hereinafter Burke)  
3 and a school administrator in Florida at Mary Help of Christians School in Tampa, Burke  
4 was responsible for the custody, care, health, welfare, and safety of the students.
- 5 18. From an early point the Order had information regarding and was or should have been on  
6 notice of Burke's dangerous and exploitive propensities.
- 7 19. On information and belief, as a result of Burke's conduct and behavior, he developed a  
8 reputation in the Order community for acting out with students.
- 9 20. In 1985 or 1986, a minor reported being abused by Burke. The abuse was reported to an  
10 official within the Order, a school principal. Despite the report of abuse, Burke was allowed  
11 to remain working at the school.
- 12 21. In 1989, another minor reported to one of Order's agents that he was abused by Burke. Law  
13 enforcement questioned officials in the Order, and were told they did not know the location  
14 of Burke so law enforcement should come back later. When law enforcement returned, they  
15 learned Burke had been moved by officials of the Order out of state to New Jersey, thereby  
16 obstructing law enforcement.
- 17 22. Despite the two reports of abuse, Burke remained a brother of the Order.
- 18 23. On information and belief, despite his conduct, behavior, and reputation in the Order  
19 community, the Order allowed Burke to remain as a faculty member and faculty resident,  
20 where he continued to have unsupervised access to students.
- 21 24. On information and belief, the Order did nothing more to investigate or discover the  
22 existence of any other victims of Burke. Instead, in conformity with its pattern and practice,  
23 it concealed these acts from victims, prospective students, current students, their families,  
24 alumni, parishioners, the public and/or law enforcement authorities.
- 25 25. The following are other examples from California.

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1                   **C.           Brother Bernard Debenne**

2           26. A high school seminary student in Watsonville, CA, at the Salesian Society Junior Seminary  
3           in 1959-60 was sexually abused by one of the teachers Brother Bernard Debenne. The  
4           student who was training to become a priest contemporaneously reported the sexual abuse to  
5           the leader of the west coast Salesians, the Provincial Father Alfred Cogliandro. Father  
6           Coliandro told him that he would handle it. Thereafter, Brother Debenne was promoted to  
7           Principal and then Rector of Salesian High School in Richmond in the 1970's. Despite  
8           continued reports that Debenne was molesting children, the Salesian defendants continued to  
9           employ Debenne. In 2006, Debenne pled guilty to child sex abuse charges. Even then the  
10          Salesian Order continued to employ him.

11                   **D.           Father Richard Presenti**

12          27. In 1973, 1993, and 2003 the Salesians received complaints that Father Richard Presenti had  
13          sexually molested numerous children. Despite these complaints the Salesian Order  
14          continued to employ Presenti as a school principal at various locations.

15                   **E.           Rev. Titian (James) Miani**

16          28. Rev. Titian Miani was accused of assaulting a boy on a church retreat in 1947 and sent to St.  
17          Frances high school run by the Salesian Order in 1955 where there were 65 male students  
18          and transferred to DOE 2 in 1958 - 1959 and was transferred back in 1963-1966 where he  
19          molested more than a dozen children during these two dates at DOE 2.

20   **PARTIES**

21          29. Plaintiff John Doe FD is an adult male who was a minor at the time of the sexual abuse  
22          alleged herein, which occurred over the course of a several years, starting approximately in  
23          1993 and ending approximately 1994.

24          30. Plaintiff is informed and believes and alleges thereon that Defendant DOE 1 is a province of  
25          the Salesian Society Religious Order. DOE 1 has been separately incorporated since 1920,  
26          and is headquartered in San Francisco, California. Defendant DOE 1 owns and operates and  
27          controls numerous schools and youth camps throughout California, including Defendant

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DOE 2 located in Bellflower, California. Defendant DOE 3 was at all times during the abuse of Plaintiff, an agent of Defendant DOE 1. Defendant DOE 1 in collaboration with Defendant DOE 2 transferred Defendant DOE 3 to various assignments throughout California.

31. Plaintiff is informed and believes and alleges thereon that Defendant DOE 2 is a high school, located in Bellflower, California. Plaintiff was a student of DOE 2 during the period when the sexual abuse alleged herein occurred, and Plaintiff was sexually abused on the school grounds by a teacher of the school, defendant DOE 3. Defendant DOE 3 was at all times during the abuse of Plaintiff an agent of Defendant DOE 2.

32. At all times herein defendant DOE 3 (hereinafter "DOE 3") is an adult male residing in California. At all times herein, DOE 3 was an individual serving as employee of defendants DOE 1 and DOE 2. At all times herein defendant DOE 3 was supervised, employed, managed and controlled by defendants DOE 1 and DOE 2.

33. Each Defendant is the agent, servant and/or employee of the other Defendants and each Defendant was acting within the course and scope of his, her or its authority as an agent, servant and/or employee of the other Defendants. Defendants and each of them are individuals, corporations, partnerships and other entities which engaged in, joined in and conspired with the other wrongdoers in carrying out the tortuous and unlawful activities described in his Company and Defendant, each of them ratified the acts of the other Defendants as described in this complaint..

**FACTS**

34. In the course of Plaintiff's interaction with Defendant DOE 3, Plaintiff came to know, admire, trust, revere and respect Defendant DOE 3 as a person of great influence and persuasion, and as an authority figure.

35. Defendant DOE 3 was Plaintiff's religion teacher and could see the relentless teasing he was dealing with from his peers. Additionally Plaintiff had confided in Defendant DOE 3 that his parents were getting a divorce.

- 1 36. In approximately October, 1993 Plaintiff's parents sought out Defendant DOE 3 for  
2 counseling to help Plaintiff deal with the rejection by his peers and the difficulties Plaintiff  
3 was having in relation to the divorce.
- 4 37. Defendant DOE 3 began counseling Plaintiff and those sessions would take place two to  
5 three times per week and continued until the end of the school year. Each session was held  
6 in Defendant DOE 3's office on Defendant DOE 2's premises. The counseling sessions  
7 would last the entire lunch hour.
- 8 38. Defendant DOE 3 began the grooming of Plaintiff by ending each session with a hug. As  
9 Plaintiff would cry during the sessions, Defendant DOE 3 would give Plaintiff a rub on the  
10 shoulders and make him sit on his lap.
- 11 39. Defendant DOE 3 began talking about masturbation and would ask Plaintiff if he  
12 masturbated. After hearing that Plaintiff's mother was raped by his father, Defendant DOE  
13 3 would stutter and sweat and ask Plaintiff if he thought of his mother while he masturbated.
- 14 40. Defendant DOE 3 would have Plaintiff sit on his lap and fondle Plaintiff through his  
15 clothing, holding Plaintiff tight. Eventually, Defendant DOE 3 placed his hand under the  
16 waist band of Plaintiff's pants and fondled him.
- 17 41. Plaintiff finally told a teacher about the abuse who then indicated they should talk with the  
18 dean. The dean indicated they should not tell anyone about it. Plaintiff believes they spoke  
19 to Defendant DOE 3 and he admitted to the abuse. Defendant DOE 2 called law  
20 enforcement and Plaintiff was required to write a statement.

21 **TOLLING OF STATUTE OF LIMITATIONS**

- 22
- 23 42. Starting in 1994, institutional defendants engaged in a pattern of conduct designed to  
24 minimize the liabilities of the institutional defendants because of DOE 3's conduct. This  
25 conduct included attempting to pacify victims and their families by having them visit a  
26 counselor that was sympathetic to the Defendants, without advising the victims or their  
27 families of the statute of limitations for their injuries.



1 43. California Insurance Code Section 11583 provides that whenever a Defendant or its  
2 insurance company makes a partial payment of compensation to an injured person, the  
3 Defendant or the insurance company is obligated to inform the victim in writing of the  
4 statute of limitations on their claims. Insurance Code Section 11583 was enacted to prevent  
5 Defendants and insurance companies from attempting to pacify victims by providing  
6 minimal services or compensation so as to allow those victims statutes of limitations to  
7 expire. Insurance Code Section 11583 required the Defendants to provide to Plaintiff in this  
8 case written notice of his statute of limitations at the time of providing therapy.  
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10 44. Plaintiff was encouraged by institutional defendants to go to their handpicked counselor to  
11 address the sexual abuse Plaintiff had suffered. Plaintiff did attend many sessions with the  
12 counselor. The private counseling sessions were paid for by institutional defendants and  
13 their insurance carrier. That insurance carrier, under the terms of its policy provided  
14 coverage to all of Plaintiff's claims against DEFENDANT DOEs 1 and DOE 2. None of the  
15 DEFENDANT DOES provided any notice to Plaintiff or his parents, via writing or  
16 otherwise of his or their statutes of limitation for filing an action. Plaintiff did not retain an  
17 attorney until 2010.  
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19 45. The DEFENDANT DOE 1 has systematically for many years thwarted investigations of  
20 pedophile priests, while simultaneously attempting to pacify their victims and families  
21 through use of church loyalty. This has routinely included steering victims of abuse and  
22 their families to counselors loyal to the church, while at the same time failing to inform  
23 those victims and their families that they have legal rights and that there are statutes of  
24 limitations that could preclude later bringing an action. When such victims unknowingly  
25 wait until their limitations have expired, the DEFENDANTS and other Roman Catholic  
26 entities have then argued for dismissal of the victims case because statutes of limitation have  
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expired.

46. Plaintiff does not have access to the Defendants' files regarding the perpetrators, or the ability to interview officials with the institutional Defendants, or possession of the institutional Defendants' policies and procedures regarding child abuse prevention and reporting. The institutional Defendants have had a pattern of withholding from the community complaints regarding their clergy sexually abusing minors.

47. Accordingly, Plaintiff alleges the following on information and belief: before the last instance of DOE 3 abusing Plaintiff, institutional Defendants' officials received complaints that the perpetrator DOE 3 had sexually abused minors and failed to take any action to prevent the perpetrator from utilizing his position as a priest to continue molesting Plaintiff; Defendants were also aware prior to the last instance of abuse, that the perpetrator routinely violated policies of the Defendants designed to protect children from being abused; Despite knowledge of these violations, Defendants took no steps to either investigate DOE 3's conduct with children or prevent further conduct with children in violation of Defendants' policies and practices. These policies and practices, while communicated to institutional defendant leaders were either not disseminated to church or educational members including Plaintiff and his parents, or were negligently disseminated such that Plaintiff and his parents were prevented from being able to adequately protect against the abuse.

48. Plaintiff had no reason to discover and did not discover the Defendant DOE 1 and DOE 2's pattern, practice, and conduct in facilitating the cover up of child sexual abuse by its employees and the movement of its predator priests and brothers outside the reach of law enforcement, until the summer of 2010 at the earliest.

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1 **FIRST CAUSE OF ACTION**

2 **NEGLIGENCE**

3 (All Defendants)

4 49. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth herein.

5 50. In 1993-1994, during which time Plaintiff was a minor, Defendant DOE 3 sexually abused  
6 and molested Plaintiff. Plaintiff was introduced to and associated with Defendant DOE 3  
7 through educational programs in and arising out his attendance at Defendant DOE 2 a school  
8 run by Defendant DOE 1. He was placed in the care and custody of Defendant DOE 3, by  
9 employees and agents of said institutional Defendants, for the purpose of education.

10 51. At all times herein, Defendants DOE 1 and DOE 2 were negligent in their supervision,  
11 management, and control of Defendant DOE 1 and had a duty to protect Plaintiff from harm  
12 while Plaintiff was in their care while he was at school.

13 52. Defendant DOE 3 was able, by virtue of his unique authority and position as a teacher, it  
14 identify vulnerable victims and their families upon which he could perform such sexual  
15 abuse.; to manipulate his authority to procure compliance with his sexual demands from his  
16 victims; to induce the victim to continue to allow the abuse; and to coerce him not to report  
17 it to any other persons or authorities. As a school teacher DOE 3 had unique access to the  
18 facilities at DOE 2 and used said facilities to provide resources which allowed him to  
19 commit sexual abuse upon Plaintiff.

20 53. As a direct result of the wrongful conduct alleged herein, Plaintiff has suffered, and  
21 continues to suffer great pain of mind and body, shock, emotional distress, physical  
22 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,  
23 humiliation, and loss of enjoyment of life; was prevented and will continue to be prevented  
24 from performing his daily activities and obtaining the full enjoyment of life; and/or has  
25 incurred and will continue to incur expenses for medical and psychological treatment,  
26 therapy, and counseling.

27 **SECOND CAUSE OF ACTION**

28 **COMPLAINT AND DEMAND FOR JURY TRIAL**

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**INTENTIONAL TORT – SEXUAL BATTERY**

(Against All Defendants)

54. Plaintiff incorporates all paragraphs of this complaint as if fully set forth herein.

55. Prior to the time that Plaintiff became an adult, and during Plaintiff’s childhood, Defendant DOE 3 willfully, intentionally, and maliciously, committed acts of sexual battery, molestation, and abuse upon Plaintiff. Defendant DOE 3 committed the acts of sexual abuse with full knowledge that Plaintiff was a minor.

56. Defendants DOE 1 and DOE 2 are vicariously liable for the sexual battery committed upon Plaintiff by Defendant DOE 3. Institutional defendants authorized the wrongful conduct, institutional defendants ratified the wrongful conduct, and/or public policy dictates that the institutional defendants should be held responsible for the wrongful conduct under the theory commonly referred to as “respondeat superior”.

57. For the reasons set forth in the incorporated paragraphs of this Complaint, the abuse of Plaintiff by Defendant DOE 3 arose from, was incidental to, and was in the course and scope of DOE 3’s employment with institutional defendants, and each of these institutional defendants ratified or approved of that sexual contact.

58. As a direct result of the wrongful conduct alleged herein, Plaintiff has suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; was prevented and will continue to be prevented from performing Plaintiff’s daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

**THIRD CAUSE OF ACTION**

**NEGLIGENT FAILURE TO WARN, TRAIN OR EDUCATE PLAINTIFF**

(Against DOE 1 AND DOE 2)

59. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth herein.

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60. Institutional defendants breached their duty to take reasonable protective measures to protect Plaintiff and other minor students from the risk of childhood sexual abuse by Defendant DOE 3, such as the failure to properly warn, train, or educate Plaintiff and other minor students about how to avoid such a risk, pursuant to Juarez v. Boy Scouts of America, Inc., 97 Cal. Rptr. 2d 12, 81 Cal. App. 4th 377 (2000). Institutional defendants assumed a duty to inform parents and students about the risks of childhood sexual abuse, the warning signs and consequences. Institutional defendants however failed to adequately communicate their policies, and means of enforcement of those policies to Plaintiff and his parents.

61. As a direct result of the wrongful conduct alleged herein, Plaintiff has suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; was prevented and will continue to be prevented from performing Plaintiff's daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

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1 WHEREFORE, Plaintiff prays for relief as follows: damages; injunctive relief; costs;  
2 interest; attorneys' fees; statutory/civil penalties according to law; and such other relief as the  
3 court deems appropriate and just.  
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5 **JURY DEMAND**

6 Plaintiff demands a jury trial on all issues so triable.

7 Dated February 24, 2011

By: \_\_\_\_\_



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