

STATE OF MINNESOTA
COUNTY OF STEARNS

DISTRICT COURT
SEVENTH JUDICIAL DISTRICT

Case Type: Personal Injury

John Vogel and Allen Vogel,
Plaintiffs,

Court File No.:

v.

SUMMONS

Diocese of St. Cloud, St. Augustine's Parish,
and The Order of St. Benedict a/k/a and
d/b/a St. John's Abbey,

Defendants.

THIS SUMMONS IS DIRECTED TO DEFENDANTS ABOVE NAMED.

STEARNS COUNTY DISTRICT COURT
2011 SEP 18 4:11 PM
BY: DEPUTY CLERK

1. YOU ARE BEING SUED. The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

2. YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS. You must give or mail to the person who signed this Summons a **written response** called an Answer within 20 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at Jeff Anderson & Associates, P.A., 366 Jackson Street, Suite 100, St. Paul, MN 55101.

3. YOU MUST RESPOND TO EACH CLAIM. The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.

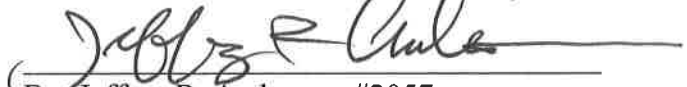
If you do not Answer within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

5. LEGAL ASSISTANCE. You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

6. ALTERNATIVE DISPUTE RESOLUTION. The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: September 17, 2014

JEFF ANDERSON & ASSOCIATES, P.A.



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STATE OF MINNESOTA
COUNTY OF STEARNS

DISTRICT COURT
SEVENTH JUDICIAL DISTRICT

Case Type: Personal Injury

John Vogel and Allen Vogel,

Court File No.:

Plaintiffs,

v.

COMPLAINT

Diocese of St. Cloud, St. Augustine's Parish,
and The Order of St. Benedict a/k/a and
d/b/a St. John's Abbey,

Defendants.

Plaintiffs, for their causes of action against Defendants, allege that:

PARTIES

1. Plaintiff John Vogel is an adult male resident of the State of Texas.
2. Plaintiff Allen Vogel is an adult male resident of the State of Minnesota.
3. At all times material, Defendant Diocese of St. Cloud was and continues to be an organization or entity, which includes, but is not limited to, civil corporations, decision making entities, officials, and employees, authorized to conduct business and conducting business in the State of Minnesota with its principal place of business at 214 Third Avenue South, St. Cloud, Minnesota. The Bishop is the top official of the Diocese and is given authority over all matters within the Diocese as a result of his position. The Diocese functions as a business by engaging in numerous revenue producing activities and soliciting money from its members in exchange for its services. The Diocese has several programs which seek out the participation of children in the Diocese's activities. The Diocese, through its officials, has control over those activities involving children. The Diocese has the power to appoint, supervise, monitor, and fire each person working

with children within the Diocese.

4. At all times material, Defendant Order of St. Benedict a/k/a and d/b/a St. John's Abbey (hereinafter "Defendant Order" or "Order") was and continues to be an organization or entity which includes, but is not limited to, civil corporations, decision making entities, officials, and employees, authorized to conduct business and conducting business in the State of Minnesota with its principal place of business located in Collegeville, Minnesota. The Abbot is the top official of the Order and is given authority over all matters dealing with the Order as a result of his position. The Order functions as a business by engaging in numerous revenue producing activities and soliciting money in exchange for its services. The Order has several programs which seek out the participation of children in the Order's activities. The Order, through its officials, has control over those activities involving children. The Order has the power to appoint, supervise, monitor, and fire each person working with children within the Order.

5. Defendant Order is also known as, does business as and owns and operates St. John's Abbey which is a Benedictine religious community located in Collegeville, Minnesota.

6. At all times material, Defendant St. Augustine's Parish (hereinafter "Parish") was and continues to be a non-profit religious corporation, authorized to conduct business and conducting business under the laws of the State of Minnesota, with its principal place of business located at 442 Second Street, SE, St. Cloud, Minnesota 56304.

FACTS

7. At all times material, Father Cosmas Dahlheimer (hereinafter "Dahlheimer") was a Roman Catholic priest employed by Defendant Order, Defendant Diocese and/or Defendant Parish. At all times material, Dahlheimer remained under the direct supervision, employ and control of Defendant Order, Defendant Diocese and/or Defendant Parish. Defendants placed

Dahlheimer in positions at Defendant Order and in Defendant Diocese where he had access to and worked with children as an integral part of his work.

8. At all times material, Father Richard William Eckroth (hereinafter “Eckroth”) was a Catholic priest and member of Defendant Order. Eckroth was educated and trained by Defendant Order. On information and belief, Eckroth pledged obedience to the Order. Eckroth was placed at St. John’s University and St. Benedict College by and under the authority of Defendant Order and therefore was under the direct supervision, employ and control of Defendant Order. At all times material, Eckroth was employed by the Order of St. Benedict.

9. At all times material, Plaintiffs reasonably believed both Eckroth and Dahlheimer were agents of Defendant Diocese and Defendant Parish. Both were Roman Catholic Priests who Plaintiffs came to know and trust through their association with St. Augustine’s Parish, a church within the Diocese of St. Cloud.

10. Eckroth became a monk with Defendant Order on July 11, 1946.

11. Eckroth was ordained as a priest on June 7, 1952.

12. From 1952 through 1973, Eckroth was employed as a Philosophy Professor at St. John’s University and Seminary.

13. During that time, Eckroth was also employed by Defendant Order as a Brother Master, a St. John’s University Dorm Prefect, and at St. Benedict’s College in St. Joseph, Minnesota.

14. Upon information and belief, during that time, Eckroth also spent time assisting priests at Defendant St. Augustine’s Parish in St. Cloud, Minnesota.

15. Upon information and belief, during that time, Eckroth sexually abused a number of children at a cabin owned by Defendant Order.

16. Upon information and belief, Defendant Order knew or should have known Eckroth sexually abused minor children when he took them on trips to the cabin.

17. By and through his association and/or employment with Defendant Order, Eckroth was provided with a classroom, administrative support, a telephone, supplies and other related services necessary to permit him to teach at Defendant Order's schools. Defendant Order at times also assigned Eckroth to work with the public at various parishes in Central Minnesota. Defendant Order, by associating with and holding out Eckroth to the public as safe to work with children, provided Eckroth with the means and opportunity to access Plaintiffs and other members of the public and in so doing represented that Eckroth was safe to work with children.

18. Dahlheimer became a monk of Defendant Order on July 11, 1930.

19. Dahlheimer was ordained as a priest on June 6, 1936.

20. In approximately 1963, Defendant Order sent Dahlheimer to St. Maur's Priory in the State of Kentucky where he underwent psychological counseling and received electric shock therapy at least four times.

21. From approximately 1969 to 1973, Dahlheimer was assigned to serve as Associate Pastor at St. Augustine's through an agreement between Defendant Order, Defendant Diocese of St. Cloud, and Defendant St. Augustine's Parish.

22. In approximately 1973, Defendant Order transferred Dahlheimer from St. Augustine's to St. Bernard's Parish in St. Paul, Minnesota.

23. Plaintiffs came in contact with Eckroth and Dahlheimer at St. Augustine's.

24. Plaintiffs John Vogel and Allen Vogel were raised in a devout Roman Catholic family, served as altar boys, and participated in church activities at St. Augustine's in St. Cloud.

Plaintiffs, therefore, developed great admiration, trust, reverence and respect for the Roman Catholic Church, including Defendant and its agents.

25. In approximately 1971 or 1972, when Plaintiff John Vogel was about 7 or 8 years old, Eckroth engaged in unpermitted sexual contact with Plaintiff John Vogel.

26. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that Eckroth was a danger to children before Eckroth molested Plaintiff John Vogel.

27. From approximately 1971 to 1974, when Plaintiff Allen Vogel was about 5 to 8 years old, Dahlheimer engaged in unpermitted sexual contact with Plaintiff Allen Vogel.

28. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that Dahlheimer was a danger to children before Dahlheimer molested Plaintiff Allen Vogel.

29. Defendants Diocese of St. Cloud and/or St. Augustine's Parish negligently or recklessly believed that both Eckroth and Dahlheimer were fit to work with children and/or that any previous problems they had were fixed and cured; that Eckroth and Dahlheimer would not sexually molest children and that Eckroth and Dahlheimer would not injure children; and/or that Eckroth and Dahlheimer would not hurt children.

30. By holding Eckroth and Dahlheimer out as safe to work with children, and by undertaking the custody, supervision of, and/or care of the minor Plaintiffs, Defendants Diocese of St. Cloud and/or St. Augustine's Parish entered into a fiduciary relationship with the minor Plaintiffs. As a result of Plaintiffs being minors, and by Defendants undertaking the care and guidance of the then vulnerable minor Plaintiffs, Defendants held a position of empowerment over Plaintiffs.

31. Further, Defendants Diocese of St. Cloud and/or St. Augustine's Parish, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted this position of empowerment. This empowerment prevented the then minor Plaintiffs from effectively protecting themselves and Defendants thus entered into a fiduciary relationship with Plaintiffs.

32. Defendants Diocese of St. Cloud and/or St. Augustine's Parish had a special relationship with Plaintiffs.

33. Defendants Diocese of St. Cloud and/or St. Augustine's Parish owed Plaintiffs a duty of reasonable care because they had superior knowledge about the risk that Eckroth and Dahlheimer posed to Plaintiffs, the risk of abuse in general in its programs and/or the risks that its facilities posed to minor children.

34. Defendants Diocese of St. Cloud and/or St. Augustine's Parish owed Plaintiffs a duty of reasonable care because it solicited youth and parents for participation in its youth programs; encouraged youth and parents to have the youth participate in its programs; undertook custody of minor children, including Plaintiffs; promoted its facilities and programs as being safe for children; held its agents, including Eckroth and Dahlheimer, out as safe to work with children; encouraged parents and children to spend time with its agents; and/or encouraged its agents, including Eckroth and Dahlheimer, to spend time with, interact with, and recruit children.

35. Defendants Diocese of St. Cloud and/or St. Augustine's Parish had a duty to Plaintiffs to protect them from harm because Defendants' actions created a foreseeable risk of harm to Plaintiffs.

36. Defendants Diocese of St. Cloud and/or St. Augustine Parish's breach of duties include, but are not limited to: failure to have sufficient policies and procedures to prevent child

sex abuse, failure to properly implement the policies and procedures to prevent child sex abuse, failure to take reasonable measures to make sure that the policies and procedures to prevent child sex abuse were working, failure to adequately inform families and children of the risks of child sex abuse, failure to investigate risks of child molestation, failure to properly train the workers at institutions and programs within each of Defendants' geographical confines, failure to have any outside agency test their safety procedures, failure to protect the children in their programs from child sex abuse, failure to adhere to the applicable standard of care for child safety, failure to investigate the amount and type of information necessary to represent the institutions, programs, leaders and people as safe, failure to train employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and/or failure by relying on people who claimed that they could treat child molesters.

37. Defendants Diocese of St. Cloud and/or St. Augustine's Parish failed to use ordinary care in determining whether their facilities were safe and/or to determine whether it had sufficient information to represent its facilities as safe. Defendants' failures include, but are not limited to: failure to have sufficient policies and procedures to prevent abuse at their facilities, failure to investigate risks at their facilities, failure to properly train the workers at their facilities, failure to have any outside agency test their safety procedures, failure to investigate the amount and type of information necessary to represent their facilities as safe, failure to train their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and/or failure by relying upon people who claimed that they could treat child molesters.

38. Defendants Diocese of St. Cloud and/or St. Augustine's Parish also breached their duties to Plaintiffs by failing to warn them and their family of the risk that Eckroth and Dahlheimer

posed and the risks of child sexual abuse by clerics. They also failed to warn them about any of the knowledge that Defendants had about child sex abuse.

39. Defendants Diocese of St. Cloud and/or St. Augustine's Parish also violated a legal duty by failing to report known and/or suspected abuse of children by Eckroth, Dahlheimer and/or its other agents to the police and law enforcement.

40. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that some of the leaders and people working at Catholic institutions within the Diocese were not safe.

41. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions within the Diocese were safe.

42. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese.

43. Defendants Diocese of St. Cloud and/or St. Augustine's Parish knew or should have known that they did not have sufficient information about whether or not there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese.

44. Defendant Diocese of St. Cloud knew or should have known that it had numerous agents who had sexually molested children. It knew or should have known that child molesters have a high rate of recidivism. It knew or should have known that there was a specific danger of child sex abuse for children participating in its youth programs.

45. Defendant St. Augustine's Parish knew or should have known that numerous agents of Defendant Diocese of St. Cloud had sexually molested children. It knew or should have known

that child molesters have a high rate of recidivism. It knew or should have known that there was a specific danger of child sex abuse for children participating in its own youth programs as a result.

46. Defendants Diocese of St. Cloud and/or St. Augustine's Parish held their leaders and agents out as people of high morals, as possessing immense power, teaching families and children to obey these leaders and agents, teaching families and children to respect and revere these leaders and agents, soliciting youth and families to its programs, marketing to youth and families, recruiting youth and families, and holding out the people that worked in the programs as safe.

47. Defendants Diocese of St. Cloud and/or St. Augustine's Parish were negligent and/or made representations to Plaintiffs and their family during each and every year of their minority.

48. In 2003, Defendant Diocese of St. Cloud publicly admitted that it knew there were 26 priests who worked in the Diocese who had been accused of sexually molesting minors. The Diocese of St. Cloud has released those names to the public but continues to conceal important information about the priests on that list. Information has not been disclosed about the priests' patterns of grooming and sexual abuse. As a result, children are at risk of being sexually molested.

49. Upon information and belief, prior to and since 2003, Defendant Diocese of St. Cloud failed to report multiple allegations of sexual abuse of children by its agents to the proper civil authorities. As a result, children are at risk of being sexually molested.

50. In 2011, Defendant Order released the names of 17 clerics who worked at the Order who had been credibly accused of sexual molestation in a letter and through a statement on its website. Then in 2012, the list was removed from the website and not publicly available. As a result, children were at risk of being sexually molested.

51. On December 9, 2013, under intense public pressure, Defendant Order posted the names of 18 clerics who worked at the Order who had been credibly accused of sexual molestation. The list included only 14 of the names from the 2011 list and contained 4 new names that had not been on the 2011 list. As a result of the confusion the two lists create, children are still at risk of being sexually molested.

52. The Order refuses to disclose to the public the files and documents on the perpetrators. As a result, the histories of the abusive clerics are still concealed and children are at risk of being sexually molested.

53. As a direct result of Defendants' conduct described herein, Plaintiffs have suffered, and will continue to suffer, great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, physical, personal and psychological injuries. Each Plaintiff was prevented, and will continue to be prevented, from performing his normal daily activities and obtaining the full enjoyment of life; has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; on information and belief, and has and/or will incur loss of income and/or loss of earning capacity.

COUNT I: JOHN VOGEL - NUISANCE (COMMON LAW AND MINN. STAT. § 561.01) AGAINST THE ORDER OF ST. BENEDICT

54. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

55. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of, Eckroth, Dahlheimer and Defendant's other agents on its list of credibly accused priests and those not on that list; 2) attack the credibility of the

victims of Defendant's agents; and/or 3) protect Defendant's agents from criminal prosecution for their sexual assaults against children.

56. The negligence and/or deception and concealment by Defendant was and is injurious to the health and/or indecent or offensive to the senses and/or an obstruction to the free use of property by the general public, including, but not limited to, residents in the St. Joseph area and all other members of the general public who live in communities where Defendant's accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that the general public cannot trust Defendant to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment histories, nor to disclose their patterns of conduct in grooming and sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in Minnesota and throughout the Midwest United States where Defendant conducted, and continues to conduct, its business.

57. The negligence and/or deception and concealment by Defendant was specially injurious to Plaintiff John Vogel's health as he was sexually assaulted by Defendant's agent, Eckroth.

58. The negligence and/or deception and concealment by Defendant also was specially injurious to Plaintiff John Vogel's health in that when Plaintiff finally discovered the negligence and/or deception and concealment of Defendant, Plaintiff John Vogel experienced mental and emotional distress that he had been the victim of the Defendant's negligence and/or deception and concealment; that Plaintiff John Vogel had not been able to help other minors being molested because of the negligence and/or deception and concealment; and that Plaintiff John Vogel had

not been able to because of the negligence and/or deception and concealment to receive timely medical treatment needed to deal with the problems Plaintiff John Vogel had suffered and continue to suffer as a result of the molestation.

59. Plaintiff John Vogel also suffered special, particular and peculiar harm after he learned of the Order's concealment of its list of priests credibly accused of sexually molesting minors. As a result of the concealment, Plaintiff John Vogel has suffered and continues to suffer lessened enjoyment of his life, impaired health, emotional distress, and/or physical symptoms of emotional distress. He has also experienced depression, anxiety, and/or anger.

60. Plaintiff John Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and wage loss as a result of impaired health, emotional distress, discomfort, and/or physical symptoms of emotional distress.

61. The continuing nuisance created by Defendant was, and continues to be, the proximate cause of the injuries and damages to the general public and of Plaintiff John Vogel's special injuries and damages as alleged.

62. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff John Vogel's rights.

63. As a result of the above-described conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT II: JOHN VOGEL - NUISANCE (MINN. STAT. § 609.74) AGAINST
THE ORDER OF ST. BENEDICT**

64. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth

under this count.

65. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the proper civil authorities sexual assaults and abuse committed by Eckroth, Dahlheimer and Defendant's other agents against minor children; and/or 2) protect Defendant's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 3) allow known child molesters to live freely in the community unknown to the public.

66. The deception and concealment by Defendant has maintained or permitted a condition which unreasonably endangers the safety and health of a considerable number of members of the public, including, but not limited to, children and residents in the St. Joseph area and other members of the general public who live in communities where Defendant's agents who molested children live. Defendant's failure to report multiple allegations of sexual assault and abuse of children to proper authorities has endangered the safety and health of a considerable number of the members of the public by allowing child molesters' to avoid prosecution and remain living freely in unsuspecting communities. These child molesters, known to Defendant but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

67. The deception and concealment by Defendant was specially injurious to Plaintiff John Vogel's health as he was sexually assaulted by Defendant's agent, Eckroth.

68. The condition permitted or maintained by Defendant was also specially injurious to Plaintiff John Vogel in that he experienced mental and emotional distress because he had been the victim of the Defendant's deception and concealment; Plaintiff John Vogel had not been able to help other minors being molested because of the deception and concealment; and because Plaintiff John Vogel had not been able to receive timely medical treatment needed to deal with the problems he had suffered and continues to suffer as a result of the molestation. Plaintiff John Vogel

has also experienced depression, anxiety, and/or anger.

69. Plaintiff John Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and/or wage loss as a result of the nuisance.

70. The continuing public nuisance created by Defendant was, and continues to be, the proximate cause of the unreasonably dangerous condition to the public and of Plaintiff John Vogel's special injuries and damages as alleged.

71. In doing the aforementioned acts, Defendant acted intentionally, maliciously and with conscious disregard for Plaintiff's rights.

72. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

COUNT III: JOHN VOGEL - NUISANCE (COMMON LAW AND MINN. STAT. § 561.01) AGAINST THE DIOCESE OF ST. CLOUD

73. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

74. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of, Eckroth, Dahlheimer and Defendant's other agents on its list of credibly accused priests and those not on that list; 2) attack the credibility of the victims of Defendant's agents; and/or 3) protect Defendant's agents from criminal prosecution for their sexual assaults against children.

75. The negligence and/or deception and concealment by Defendant was and is

injurious to the health and/or indecent or offensive to the senses and/or an obstruction to the free use of property by the general public, including, but not limited to, residents in the Diocese of St. Cloud and all other members of the general public who live in communities where Defendant's accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that the general public cannot trust Defendant to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment histories, nor to disclose their patterns of conduct in grooming and sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in Minnesota and throughout the Midwest United States where Defendant conducted, and continues to conduct, its business.

76. The negligence and/or deception and concealment by Defendant was specially injurious to Plaintiff's health as he was sexually assaulted by Defendant's agent, Eckroth.

77. The negligence and/or deception and concealment by Defendant also was specially injurious to Plaintiff John Vogel's health in that when Plaintiff finally discovered the negligence and/or deception and concealment of Defendant, Plaintiff John Vogel experienced mental and emotional distress that he had been the victim of the Defendant's negligence and/or deception and concealment; that Plaintiff John Vogel had not been able to help other minors being molested because of the negligence and/or deception and concealment; and that Plaintiff John Vogel had not been able to because of the negligence and/or deception and concealment to receive timely medical treatment needed to deal with the problems Plaintiff John Vogel had suffered and continues to suffer as a result of the molestation.

78. Plaintiff John Vogel also suffered special, particular and peculiar harm after he

learned of the Diocese's concealment of its list of priests credibly accused of sexually molesting minors. As a result of the concealment, Plaintiff John Vogel has suffered and continues to suffer lessened enjoyment of his life, impaired health, emotional distress, and/or physical symptoms of emotional distress. He has also experienced depression, anxiety, and/or anger.

79. Plaintiff John Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and wage loss as a result of impaired health, emotional distress, discomfort, and/or physical symptoms of emotional distress.

80. The continuing nuisance created by Defendant was, and continues to be, the proximate cause of the injuries and damages to the general public and of Plaintiff John Vogel's special injuries and damages as alleged.

81. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff John Vogel's rights.

82. As a result of the above-described conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT IV: JOHN VOGEL - NUISANCE (MINN. STAT. § 609.74) AGAINST
THE DIOCESE OF ST. CLOUD**

83. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

84. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the proper civil authorities sexual assaults and abuse committed by Eckroth, Dahlheimer and Defendant's other agents against minor children; and/or 2) protect

Defendant's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 3) allow known child molesters to live freely in the community unknown to the public.

85. The deception and concealment by Defendant has maintained or permitted a condition which unreasonably endangers the safety and health of a considerable number of members of the public, including, but not limited to, children and residents in the Diocese of St. Cloud and other members of the general public who live in communities where Defendant's agents who molested children live. Defendant's failure to report multiple allegations of sexual assault and abuse of children to proper authorities has endangered the safety and health of a considerable number of the members of the public by allowing child molesters' to avoid prosecution and remain living freely in unsuspecting communities. These child molesters, known to the Diocese but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

86. The deception and concealment by Defendant was specially injurious to Plaintiff John Vogel's health as he was sexually assaulted by Defendant's agent, Eckroth.

87. The condition permitted or maintained by Defendant was also specially injurious to Plaintiff John Vogel in that he experienced mental and emotional distress because he had been the victim of the Defendant's deception and concealment; Plaintiff John Vogel had not been able to help other minors being molested because of the deception and concealment; and because Plaintiff John Vogel had not been able to receive timely medical treatment needed to deal with the problems he had suffered and continues to suffer as a result of the molestation. Plaintiff John Vogel has also experienced depression, anxiety, and/or anger.

88. Plaintiff John Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers

the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and/or wage loss as a result of the nuisance.

89. The continuing public nuisance created by Defendant was, and continues to be, the proximate cause of the unreasonably dangerous condition to the public and of Plaintiff John Vogel's special injuries and damages as alleged.

90. In doing the aforementioned acts, Defendant acted intentionally, maliciously and with conscious disregard for Plaintiff's rights.

91. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

**COUNT V: JOHN VOGEL – NEGLIGENCE
AGAINST THE DIOCESE OF ST. CLOUD**

92. Plaintiff John Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

93. Defendant Diocese owed Plaintiff John Vogel a duty of reasonable care.

94. Defendant Diocese breached the duty of reasonable care it owed Plaintiff John Vogel.

95. Defendant's breach of its duty was the proximate cause of Plaintiff John Vogel's injuries.

96. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT VI: JOHN VOGEL - NEGLIGENT SUPERVISION AGAINST
THE DIOCESE OF ST. CLOUD**

97. Plaintiff John Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

98. At all times material, Eckroth was under Defendant's direct supervision, employ and control when he committed the wrongful acts alleged herein. Eckroth engaged in the wrongful conduct while acting in the course and scope of his employment with Defendant Diocese and/or accomplished the sexual abuse by virtue of his job-created authority. Defendant Diocese failed to exercise ordinary care in supervising Eckroth while he served at a parish within the Diocese and failed to prevent the foreseeable misconduct of Eckroth from causing harm to others, including the Plaintiff John Vogel herein.

99. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT VII: JOHN VOGEL - NEGLIGENT RETENTION AGAINST
THE DIOCESE OF ST. CLOUD**

100. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

101. Defendant, by and through its agents, servants and employees, became aware, or should have become aware, of problems indicating that Eckroth was an unfit agent with dangerous and exploitive propensities, yet Defendant failed to take any further action to remedy the problem and failed to investigate or remove Eckroth from working with children.

102. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT VIII: JOHN VOGEL – NEGLIGENCE
AGAINST ST. AUGUSTINE'S PARISH**

103. Plaintiff John Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

104. Defendant St. Augustine's owed Plaintiff John Vogel a duty of reasonable care.

105. Defendant St. Augustine's breached the duty of reasonable care it owed Plaintiff John Vogel.

106. Defendant's breach of its duty was the proximate cause of Plaintiff John Vogel's injuries.

107. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT IX: JOHN VOGEL - NEGLIGENT SUPERVISION AGAINST
ST. AUGUSTINE'S PARISH**

108. Plaintiff John Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

109. At all times material, Eckroth was under Defendant's direct supervision, employ and control when he committed the wrongful acts alleged herein. Eckroth engaged in the wrongful conduct while acting in the course and scope of his employment with Defendant St. Augustine's and/or accomplished the sexual abuse by virtue of his job-created authority. Defendant St. Augustine's failed to exercise ordinary care in supervising Eckroth while he served at the parish and failed to prevent the foreseeable misconduct of Eckroth from causing harm to others, including the Plaintiff John Vogel herein.

110. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

**COUNT X: JOHN VOGEL - NEGLIGENT RETENTION AGAINST
ST. AUGUSTINE'S PARISH**

111. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

112. Defendant, by and through its agents, servants and employees, became aware, or

should have become aware, of problems indicating that Eckroth was an unfit agent with dangerous and exploitive propensities, yet Defendant failed to take any further action to remedy the problem and failed to investigate or remove Eckroth from working with children.

113. As a direct result of Defendant's negligent conduct, Plaintiff John Vogel has suffered the injuries and damages described herein.

COUNT XI: ALLEN VOGEL - NUISANCE (COMMON LAW AND MINN. STAT. § 561.01) AGAINST THE ORDER OF ST. BENEDICT

114. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

115. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of, Eckroth, Dahlheimer and Defendant's other agents on its list of credibly accused priests and those not on that list; 2) attack the credibility of the victims of Defendant's agents; and/or 3) protect Defendant's agents from criminal prosecution for their sexual assaults against children.

116. The negligence and/or deception and concealment by Defendant was and is injurious to the health and/or indecent or offensive to the senses and/or an obstruction to the free use of property by the general public, including, but not limited to, residents in the St. Joseph area and all other members of the general public who live in communities where Defendant's accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that the general public cannot trust Defendant to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment histories, nor to disclose their patterns of conduct in grooming and

sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in Minnesota and throughout the Midwest United States where Defendant conducted, and continues to conduct, its business.

117. The negligence and/or deception and concealment by Defendant was specially injurious to Plaintiff Allen Vogel's health as he was sexually assaulted by Defendant's agent, Dahlheimer.

118. The negligence and/or deception and concealment by Defendant also was specially injurious to Plaintiff Allen Vogel's health in that when Plaintiff finally discovered the negligence and/or deception and concealment of Defendant, Plaintiff Allen Vogel experienced mental and emotional distress that he had been the victim of the Defendant's negligence and/or deception and concealment; that Plaintiff Allen Vogel had not been able to help other minors being molested because of the negligence and/or deception and concealment; and that Plaintiff Allen Vogel had not been able to because of the negligence and/or deception and concealment to receive timely medical treatment needed to deal with the problems Plaintiff Allen Vogel had suffered and continue to suffer as a result of the molestation.

119. Plaintiff Allen Vogel also suffered special, particular and peculiar harm after he learned of the Order's concealment of its list of priests credibly accused of sexually molesting minors. As a result of the concealment, Plaintiff Allen Vogel has suffered and continues to suffer lessened enjoyment of his life, impaired health, emotional distress, and/or physical symptoms of emotional distress. He has also experienced depression, anxiety, and/or anger.

120. Plaintiff Allen Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers

the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and wage loss as a result of impaired health, emotional distress, discomfort, and/or physical symptoms of emotional distress.

121. The continuing nuisance created by Defendant was, and continues to be, the proximate cause of the injuries and damages to the general public and of Plaintiff Allen Vogel's special injuries and damages as alleged.

122. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff Allen Vogel's rights.

123. As a result of the above-described conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XII: ALLEN VOGEL - NUISANCE (MINN. STAT. § 609.74) AGAINST
THE ORDER OF ST. BENEDICT**

124. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

125. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the proper civil authorities sexual assaults and abuse committed by Eckroth, Dahlheimer and Defendant's other agents against minor children; and/or 2) protect Defendant's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 3) allow known child molesters to live freely in the community unknown to the public.

126. The deception and concealment by Defendant has maintained or permitted a condition which unreasonably endangers the safety and health of a considerable number of members of the public, including, but not limited to, children and residents in the St. Joseph area and other members of the general public who live in communities where Defendant's agents who molested children live. Defendant's failure to report multiple allegations of sexual assault and

abuse of children to proper authorities has endangered the safety and health of a considerable number of the members of the public by allowing child molesters' to avoid prosecution and remain living freely in unsuspecting communities. These child molesters, known to Defendant but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

127. The deception and concealment by Defendant was specially injurious to Plaintiff Allen Vogel's health as he was sexually assaulted by Defendant's agent, Dahlheimer.

128. The condition permitted or maintained by Defendant was also specially injurious to Plaintiff Allen Vogel in that he experienced mental and emotional distress because he had been the victim of the Defendant's deception and concealment; Plaintiff Allen Vogel had not been able to help other minors being molested because of the deception and concealment; and because Plaintiff Allen Vogel had not been able to receive timely medical treatment needed to deal with the problems he had suffered and continues to suffer as a result of the molestation. Plaintiff Allen Vogel has also experienced depression, anxiety, and/or anger.

129. Plaintiff Allen Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and/or wage loss as a result of the nuisance.

130. The continuing public nuisance created by Defendant was, and continues to be, the proximate cause of the unreasonably dangerous condition to the public and of Plaintiff Allen Vogel's special injuries and damages as alleged.

131. In doing the aforementioned acts, Defendant acted intentionally, maliciously and with conscious disregard for Plaintiff's rights.

132. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

COUNT XIII: ALLEN VOGEL - NUISANCE (COMMON LAW AND MINN. STAT. § 561.01) AGAINST THE DIOCESE OF ST. CLOUD

133. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

134. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of, Eckroth, Dahlheimer and Defendant's other agents on its list of credibly accused priests and those not on that list; 2) attack the credibility of the victims of Defendant's agents; and/or 3) protect Defendant's agents from criminal prosecution for their sexual assaults against children.

135. The negligence and/or deception and concealment by Defendant was and is injurious to the health and/or indecent or offensive to the senses and/or an obstruction to the free use of property by the general public, including, but not limited to, residents in the Diocese of St. Cloud and all other members of the general public who live in communities where Defendant's accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that the general public cannot trust Defendant to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment histories, nor to disclose their patterns of conduct in grooming and sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in Minnesota and throughout the Midwest United States where Defendant conducted, and continues to conduct, its business.

136. The negligence and/or deception and concealment by Defendant was specially injurious to Plaintiff's health as he was sexually assaulted by Defendant's agent, Dahlheimer.

137. The negligence and/or deception and concealment by Defendant also was specially injurious to Plaintiff Allen Vogel's health in that when Plaintiff finally discovered the negligence and/or deception and concealment of Defendant, Plaintiff Allen Vogel experienced mental and emotional distress that he had been the victim of the Defendant's negligence and/or deception and concealment; that Plaintiff Allen Vogel had not been able to help other minors being molested because of the negligence and/or deception and concealment; and that Plaintiff Allen Vogel had not been able to because of the negligence and/or deception and concealment to receive timely medical treatment needed to deal with the problems Plaintiff Allen Vogel had suffered and continues to suffer as a result of the molestation.

138. Plaintiff Allen Vogel also suffered special, particular and peculiar harm after he learned of the Diocese's concealment of its list of priests credibly accused of sexually molesting minors. As a result of the concealment, Plaintiff Allen Vogel has suffered and continues to suffer lessened enjoyment of his life, impaired health, emotional distress, and/or physical symptoms of emotional distress. He has also experienced depression, anxiety, and/or anger.

139. Plaintiff Allen Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and wage loss as a result of impaired health, emotional distress, discomfort, and/or physical symptoms of emotional distress.

140. The continuing nuisance created by Defendant was, and continues to be, the

proximate cause of the injuries and damages to the general public and of Plaintiff Allen Vogel's special injuries and damages as alleged.

141. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff Allen Vogel's rights.

142. As a result of the above-described conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XIV: ALLEN VOGEL - NUISANCE (MINN. STAT. § 609.74) AGAINST
THE DIOCESE OF ST. CLOUD**

143. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

144. Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the proper civil authorities sexual assaults and abuse committed by Eckroth, Dahlheimer and Defendant's other agents against minor children; and/or 2) protect Defendant's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 3) allow known child molesters to live freely in the community unknown to the public.

145. The deception and concealment by Defendant has maintained or permitted a condition which unreasonably endangers the safety and health of a considerable number of members of the public, including, but not limited to, children and residents in the Diocese of St. Cloud and other members of the general public who live in communities where Defendant's agents who molested children live. Defendant's failure to report multiple allegations of sexual assault and abuse of children to proper authorities has endangered the safety and health of a considerable number of the members of the public by allowing child molesters' to avoid prosecution and remain living freely in unsuspecting communities. These child molesters, known to the Diocese but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

146. The deception and concealment by Defendant was specially injurious to Plaintiff Allen Vogel's health as he was sexually assaulted by Defendant's agent, Dahlheimer.

147. The condition permitted or maintained by Defendant was also specially injurious to Plaintiff Allen Vogel in that he experienced mental and emotional distress because he had been the victim of the Defendant's deception and concealment; Plaintiff Allen Vogel had not been able to help other minors being molested because of the deception and concealment; and because Plaintiff Allen Vogel had not been able to receive timely medical treatment needed to deal with the problems he had suffered and continues to suffer as a result of the molestation. Plaintiff Allen Vogel has also experienced depression, anxiety, and/or anger.

148. Plaintiff Allen Vogel has also suffered and continues to suffer special and peculiar pecuniary harm as a result of the dangerous condition maintained or permitted by Defendant. As a result of the same condition maintained or permitted by Defendant that unreasonably endangers the safety and health of the public, Plaintiff has suffered and continues to suffer pecuniary loss including medical expenses and/or wage loss as a result of the nuisance.

149. The continuing public nuisance created by Defendant was, and continues to be, the proximate cause of the unreasonably dangerous condition to the public and of Plaintiff Allen Vogel's special injuries and damages as alleged.

150. In doing the aforementioned acts, Defendant acted intentionally, maliciously and with conscious disregard for Plaintiff's rights.

151. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

COUNT XV: ALLEN VOGEL – NEGLIGENCE
AGAINST THE DIOCESE OF ST. CLOUD

152. Plaintiff Allen Vogel incorporates all consistent paragraphs of this Complaint as if

fully set forth under this count.

153. Defendant Diocese owed Plaintiff Allen Vogel a duty of reasonable care.

154. Defendant Diocese breached the duty of reasonable care it owed Plaintiff Allen Vogel.

155. Defendant's breach of its duty was the proximate cause of Plaintiff Allen Vogel's injuries.

156. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XVI: ALLEN VOGEL - NEGLIGENT SUPERVISION AGAINST
THE DIOCESE OF ST. CLOUD**

157. Plaintiff Allen Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

158. At all times material, Dahlheimer was under Defendant's direct supervision, employ and control when he committed the wrongful acts alleged herein. Dahlheimer engaged in the wrongful conduct while acting in the course and scope of his employment with Defendant Diocese and/or accomplished the sexual abuse by virtue of his job-created authority. Defendant Diocese failed to exercise ordinary care in supervising Dahlheimer while he served at a parish within the Diocese and failed to prevent the foreseeable misconduct of Dahlheimer from causing harm to others, including the Plaintiff Allen Vogel herein.

159. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XVII: ALLEN VOGEL - NEGLIGENT RETENTION AGAINST
THE DIOCESE OF ST. CLOUD**

160. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth

under this count.

161. Defendant, by and through its agents, servants and employees, became aware, or should have become aware, of problems indicating that Dahlheimer was an unfit agent with dangerous and exploitive propensities, yet Defendant failed to take any further action to remedy the problem and failed to investigate or remove Dahlheimer from working with children.

162. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XVIII: ALLEN VOGEL – NEGLIGENCE
AGAINST ST. AUGUSTINE'S PARISH**

163. Plaintiff Allen Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

164. Defendant St. Augustine's owed Plaintiff Allen Vogel a duty of reasonable care.

165. Defendant St. Augustine's breached the duty of reasonable care it owed Plaintiff Allen Vogel.

166. Defendant's breach of its duty was the proximate cause of Plaintiff Allen Vogel's injuries.

167. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XIX: ALLEN VOGEL - NEGLIGENT SUPERVISION AGAINST
ST. AUGUSTINE'S PARISH**

168. Plaintiff Allen Vogel incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

169. At all times material, Dahlheimer was under Defendant's direct supervision, employ and control when he committed the wrongful acts alleged herein. Dahlheimer engaged in

the wrongful conduct while acting in the course and scope of his employment with Defendant St. Augustine's and/or accomplished the sexual abuse by virtue of his job-created authority. Defendant St. Augustine's failed to exercise ordinary care in supervising Dahlheimer while he served at the parish and failed to prevent the foreseeable misconduct of Dahlheimer from causing harm to others, including the Plaintiff Allen Vogel herein.

170. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

**COUNT XX: ALLEN VOGEL - NEGLIGENT RETENTION AGAINST
ST. AUGUSTINE'S PARISH**

171. Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count.

172. Defendant, by and through its agents, servants and employees, became aware, or should have become aware, of problems indicating that Dahlheimer was an unfit agent with dangerous and exploitive propensities, yet Defendant failed to take any further action to remedy the problem and failed to investigate or remove Dahlheimer from working with children.

173. As a direct result of Defendant's negligent conduct, Plaintiff Allen Vogel has suffered the injuries and damages described herein.

PRAYER FOR RELIEF

Plaintiffs demand judgment against Defendants individually, jointly and severally in an amount in excess of \$50,000.00, plus costs, disbursements, reasonable attorney's fees, interest, and such other and further relief as the court deems just and equitable.

Plaintiffs request an order requiring that the Defendants publicly release the names and documents on all clerics credibly accused of child molestation, which includes each such cleric's

history of abuse, each such cleric's pattern of grooming and sexual behavior, and his last known address.

Plaintiffs request an order requiring that Defendants discontinue their current practice of dealing with allegations of child sexual abuse by their agents secretly, and that they work with civil authorities to create, implement and follow a policy for dealing with such molesters that will better protect children and the general public from further harm.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated: September 17, 2014

JEFF ANDERSON & ASSOCIATES, P.A.



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ACKNOWLEDGMENT

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorney fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in this pleading are asserted.

