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Superior Court of California  
County of Los Angeles

OCT 16 2017

Sherril R. Carter, Executive Officer/Clerk  
By: M. Soto, Deputy  
Moses Soto

6 Attorney for Plaintiffs, JOHN CC DOE, JOHN  
7 CB DOE, and JOHN BC DOE

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9  
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES- CENTRAL DISTRICT

12 JOHN CC DOE, an Individual, JOHN CB  
DOE, an Individual, and JOHN BC DOE,  
13 individual

Case No.: BC 679843

14 Plaintiffs,

**COMPLAINT FOR DAMAGES**

15 v.

- 1. CHILD SEXUAL ABUSE
- 2. NEGLIGENCE

16 DEFENDANT DOE 1; DEFENDANT DOE  
2; DEFENDANT DOE 3; DEFENDANT  
17 DOE 4 AND DOES 1 through 100, inclusive,

18 Defendants.

19 DEMAND FOR JURY TRIAL

1 Based upon information and belief available to Plaintiffs at the time of the filing of this  
2 Complaint, Plaintiffs makes the following allegations:

3 **BACKGROUND FACTS**

4 1. Plaintiffs JOHN CC DOE, JOHN CB DOE, and JOHN BC DOE were sexually  
5 molested as children by DEFENDANT DOE 4, (hereinafter "DEFENDANT DOE 4") who was their  
6 parish priest. Plaintiffs JOHN CC DOE and JOHN CB DOE were sexually molested in the mid to late  
7 1990's by DEFENDANT DOE 4 at DEFENDANT DOE 2 in Palmdale, California. They were  
8 between 12-15 years old when DEFENDANT DOE 4 abused their trust and sexually molested them.  
9 Plaintiff JOHN BC DOE was sexually molested by DEFENDANT DOE 4 at DEFENDANT DOE 3 in  
10 Redondo Beach California, in the late 1990's to early 2000's.

11 2. Five victims of DEFENDANT DOE 4 's child sexual abuse have filed lawsuits against  
12 DEFENDANT DOE 1. Since at least the mid 1990's, officials with the DEFENDANT DOE 1  
13 (hereinafter "DEFENDANT DOE 1" and "DEFENDANT DOE 1" or "DEFENDANT DOE 1") have  
14 known of complaints that DEFENDANT DOE 4 had sexually molested children and was engaging in  
15 conduct with adolescent aged boys that was suspicious of his sexually abusing others. The  
16 DEFENDANT DOE 1 did not investigate the complaints of abuse or suspicions of abuse, but instead  
17 transferred DEFENDANT DOE 4 to different assignments and destroyed records pertaining to these  
18 complaints. DEFENDANT DOE 4 was ordained a Catholic priest of the DEFENDANT DOE 1 on  
19 June 9, 1990. His first parish assignment as a priest was St. Christopher's in West Covina, California.

20 3. Starting at St. Christopher's DEFENDANT DOE 4 developed a penchant for spending  
21 extraordinary amounts of time with teenage boys. DEFENDANT DOE 4 was assigned as an associate  
22 pastor at St. Christopher's from 1990 to 1994. At St. Christopher's the first complaint regarding  
23 DEFENDANT DOE 4 's conduct with youth was made in writing to the pastor, Monsignor Helmut  
24 Hefner, who was also a longtime DEFENDANT DOE 1 official. That letter of complaint as well as  
25 all other records from DEFENDANT DOE 4 's time at St. Christopher's have been destroyed by the  
26 DEFENDANT DOE 1.

27 4. From 1994 to 1998 DEFENDANT DOE 4 was assigned as an associate pastor at  
28 DEFENDANT DOE 2 in Palmdale, California. At DEFENDANT DOE 2, DEFENDANT DOE 4

1 continued his practice of spending extraordinary amounts of time alone with teen boys. Taking them  
2 to the movies often one-on-one, taking them to ice cream often one-on-one. Having them in his  
3 rectory bedroom, often one-on-one. Wrestling with them and hugging them. DEFENDANT DOE 4  
4 would further regularly discuss sex with teens in religious education classes held at DEFENDANT  
5 DOE 2. All of this conduct was observed by parish staff at DEFENDANT DOE 2. The Pastor of  
6 DEFENDANT DOE 2, who was aware of DEFENDANT DOE 4 having boys one-on-one alone with  
7 him in his rectory bedroom, counseled parish staff that DEFENDANT DOE 4 was not allowed to have  
8 minors alone with him in Cunningham's rectory bedroom. The DEFENDANT DOE 1 had long had a  
9 policy that such conduct was forbidden, because it was suspicious for child sexual abuse occurring.  
10 Based on Cunningham's conduct with minors, some parish staff suspected he might be sexually  
11 molesting boys. The DEFENDANT DOE 1 has long had a policy of expecting parish staff to report  
12 their suspicions that a priest might be sexually abusing minors up the chain of command of the  
13 DEFENDANT DOE 1. The DEFENDANT DOE 1, however, negligently failed to communicate this  
14 policy or expectation to parish staff at DEFENDANT DOE 2 and throughout the DEFENDANT DOE  
15 1 in the 1990's and 2000's.

16 5. DEFENDANT DOE 4 was witnessed by parish staff wrestling with one boy, whom he  
17 routinely had alone with in CUNNINGHAM's bedroom. On one occasion DEFENDANT DOE 4 was  
18 seen to pin the boy belly down on the ground, with the boy's legs spread, and DEFENDANT DOE 4  
19 kneeling, between the boy's legs and holding the boy down. The parish staff member witnessing this  
20 conduct believed DEFENDANT DOE 4's conduct to be improper.

21 6. One Pastor at DEFENDANT DOE 2 wrote an evaluation of DEFENDANT DOE 4 in  
22 which he says that DEFENDANT DOE 4 is too "immature." "Immature" has been a code word used  
23 by Catholic Clergy for many years to describe a priest who spends too much time with minors and  
24 who is possibly sexually abusing them. In the same document, the Pastor writes that DEFENDANT  
25 DOE 4 is popular with young people, especially in a one-on-one situation.

26 7. The successor pastor of DEFENDANT DOE 2 in Palmdale, also was aware of  
27 DEFENDANT DOE 4 having boys in his rectory bedroom. As a result, the pastor counseled  
28 DEFENDANT DOE 4 he is not to have boys in his rectory bedroom, that doing so raises the

1 appearance of impropriety with youth and could result in a complaint of child sexual abuse.

2 8. In 1998, after a complaint that DEFENDANT DOE 4 was sexually abusing a child  
3 reached the highest levels of the DEFENDANT DOE 1 administration, DEFENDANT DOE 4 was  
4 moved to DEFENDANT DOE 3 in Redondo Beach, California.

5 9. On May 24, 1999, the Vicar for Clergy for the DEFENDANT DOE 1, Richard Loomis,  
6 confirmed in a letter to DEFENDANT DOE 4 that it was closing its case on the complaint that  
7 DEFENDANT DOE 4 had sexually molested a child. Monsignor Loomis's letter indicates that the  
8 child was never interviewed, and gives no indication that any parish staff were ever interviewed  
9 regarding DEFENDANT DOE 4's conduct with the child or any other youth. The letter from Loomis  
10 indicates records of the complaint, the investigation, and the findings would be retained permanently  
11 in the Confidential file of the DEFENDANT DOE 1 pertaining to DEFENDANT DOE 4. Despite  
12 this, record of the complaint, the investigation and findings have been destroyed. The DEFENDANT  
13 DOE 1 has maintained no record of the identity of the victim, who complained of the abuse, when  
14 they complained, to whom they complained, and what specifically they complained about. The  
15 DEFENDANT DOE 1 has maintained no record of who, if anyone, was interviewed regarding the  
16 complaint. The complaint was not presented to the DEFENDANT DOE 1 Sexual Abuse Advisory  
17 board, despite the fact the DEFENDANT DOE 1 had publicly touted that such complaints were  
18 presented to that board for its determinations.

19 10. Monsignor Loomis, who was Vicar for Clergy, himself has been accused of sexually  
20 molesting at least two minors, one of whom the DEFENDANT DOE 1 has paid a significant  
21 settlement to. Monsignor Loomis has also been allowed to continue in ministry, to the present, as an  
22 active parish priest of the DEFENDANT DOE 1 despite the abuse complaints against him.

23 11. In a deposition taken in 2016, Monsignor Loomis, when asked about the May 24, 1999  
24 letter, could not remember a single detail about the complaint. Not who it was made by, not when it  
25 was made, not who it was made to, not anything regarding what the complaint was about.

26 12. In 2001, DEFENDANT DOE 4 was assigned by the DEFENDANT DOE 1 as Pastor at  
27 St. Louise De Marillac Catholic church in Covina, California. Within a few months of his arrival, an  
28 associate pastor at the parish complained in writing to the DEFENDANT DOE 1 Vicar for Clergy

1 Craig Cox and the regional Bishop, Gabino Zavala that DEFENDANT DOE 4 is having teen boys in  
2 the rectory as well as having a youth or young man staying in DEFENDANT DOE 4 's rectory  
3 bedroom late into the night. The associate pastor complained about these contacts with teen boys  
4 because he believed them to be "imprudent." The associate pastor identified some of the boys in his  
5 letters of complaint that are sent to Monsignor Cox and Bishop Zavala. There is no record of the  
6 DEFENDANT DOE 1 conducting any interviews of any of the young boys or the young man.

7 13. The young man seen in DEFENDANT DOE 4 's bedroom admits in a letter written at  
8 DEFENDANT DOE 4's urging that he has known DEFENDANT DOE 4 since meeting  
9 DEFENDANT DOE 4 as his parish priest at St. Christopher's in West Covina when the boy was 13 or  
10 14 years old. The young man admits that he and DEFENDANT DOE 4 have had a close relationship  
11 since that time. The DEFENDANT DOE 1 never reached out to the boy to ask him any details  
12 regarding the history of his contacts with DEFENDANT DOE 4. The boy as a minor had also been an  
13 overnight guest of DEFENDANT DOE 4 in the rectory at DEFENDANT DOE 2 in Palmdale.

14 14. At St. Louise, DEFENDANT DOE 4 continued his practices of regularly giving hugs  
15 to teens, wrestling with teen boys, grabbing their breasts and twisting, openly discussing with them  
16 masturbation and other sexual topics in meetings on Church grounds. While at St. Louise parish staff  
17 complained to the DEFENDANT DOE 1 regarding this conduct, as well as of finding used condoms  
18 on church grounds, the morning after DEFENDANT DOE 4 's youth groups would meet in such  
19 areas.

20 15. While at St. Louise, DEFENDANT DOE 4 was observed by parish staff kissing two  
21 late teen boys at a local Denny's. The staff member complained to Archdiocesan officials.  
22 DEFENDANT DOE 4 discouraged the boys from being interviewed by the DEFENDANT DOE 1  
23 following the complaint. Eventually, DEFENDANT DOE 4 identified one of the two boys to the  
24 DEFENDANT DOE 1. That boy confirmed DEFENDANT DOE 4 had kissed him, and that it was  
25 routine. The boy also admitted to knowing DEFENDANT DOE 4 for some time before. There was  
26 never any attempt by the DEFENDANT DOE 1 to determine how old the teen was when  
27 DEFENDANT DOE 4 first came to know him and began kissing him. There was no attempt by the  
28 DEFENDANT DOE 1 to determine who the other boy DEFENDANT DOE 4 was seen kissing.

1           16.     In 2003 DEFENDANT DOE 4 was removed from his position as Pastor at St. Louise  
2 De Marillac by Cardinal Roger Mahony. DEFENDANT DOE 4 resisted this removal and worked to  
3 gain the support of parishioners to have him stay. Such conduct has over the years routinely been  
4 engaged in by priests who are being moved from a parish after complaints or concerns of sexual abuse  
5 have become known to Archdiocesan leadership. This conduct of inflaming support by parishioner  
6 acts discourage the child sexual abuse victims in the parish from reporting the abuse to their parents or  
7 other adults for fear of being exposed or condemned by the parish community.

8           17.     The sad truth however, is that children who have been molested by Catholic priests, are  
9 often the children of the families most involved with the parish and with the priest. This is how the  
10 priest gains the access and trust that are then manipulated to the pedophile priests perverted desires.  
11 Counseling the teens regarding normal issues can turn to counseling regarding their changing bodies  
12 and about sex. A reassuring touch or kindness by the perpetrator, moves to more touching, hugs, long  
13 looks, soft words, and caresses. As the victim's inhibitions are lowered, the trusted moral and  
14 religious authority leads the teen further to touches that are more intimate and pleasurable. Confused  
15 by conflicting emotions, the victims often reach a point where they do not believe they can tell anyone  
16 of the conduct because the youths fear be branded, fear the loss of privacy, fear they will be blamed  
17 for allowing the conduct, fear being condemned or labeled, fear they or their family will be cast out of  
18 the religious community and religion they are so intimately involved in, fear the loss of faith their  
19 parents will feel, or the loss of trust parents will feel in them. The child is further paralyzed and  
20 imprisoned when the perpetrator, a respected revered and loved Catholic priest, the center of the  
21 community, utilizes his position to rally the adults and children of the parish to support him.

22           18.     By the mid 1990's, the DEFENDANT DOE 1 was well aware of the epidemic of its  
23 priests sexually molesting minors, and of the activities by those priests which served to silence  
24 victims. Because of this knowledge, the DEFENDANT DOE 1 publicly purported to implement a  
25 policy of informing parish communities whenever a priest had been accused of molesting minors.  
26 Despite this policy the DEFENDANT DOE 1, never informed any of the parish communities  
27 DEFENDANT DOE 4 served, that he had been accused multiple times of sexually abusing minors.

28           19.     In 2004 DEFENDANT DOE 4 was assigned to Our Lady of Assumption parish in

1 Ventura, California. He again immediately took to the youth of the parish. Within months of his  
2 arrival, he took a group of children and adults on a trip to Europe for World Youth Day. On that trip,  
3 he was accused of conduct that was suspicious for sexual abuse. The DEFENDANT DOE 1 has kept  
4 no records of the complaint, of who made it, of what was complained of, of when such conduct  
5 occurred. DEFENDANT DOE 4 confided in a long-time parishioner and friend from DEFENDANT  
6 DOE 2 in Palmdale, that DEFENDANT DOE 4 had been discovered in a hotel room, alone with a  
7 minor, with the minor's belt in his hands.

8         20. DEFENDANT DOE 4 was informed by his pastor at Our Lady of Assumption in  
9 Ventura that some sort of complaint had been made relating to his conduct at World Youth Day.  
10 Shortly after DEFENDANT DOE 4 was told this, DEFENDANT DOE 4 took a leave of absence from  
11 his position. There is no record of the DEFENDANT DOE 1 taking any action to either investigate  
12 the complaint or impose any discipline upon DEFENDANT DOE 4. Instead the DEFENDANT DOE  
13 1 has to the present elected to financially support DEFENDANT DOE 4, including paying for his  
14 separate legal defense in actions involving his sexual abuse of minors.

15         21. In 2013, the DEFENDANT DOE 1 was forced to make public tens of thousands of  
16 pages of personnel files regarding its priests accused of molesting children. On the same day, the  
17 DEFENDANT DOE 1 made these documents public on its website in 2013, the DEFENDANT DOE  
18 1 buried in that production a document titled *Final Addendum to the Report to the People of God*. The  
19 document however was dated October 2008. In that document, the DEFENDANT DOE 1 lists  
20 DEFENDANT DOE 4 as having a credible allegation of child sexual abuse having been made against  
21 him. Again, the DEFENDANT DOE 1 has not retained any records pertaining to this complaint.  
22 There is no reference as to the timing of the complaint, or when the abuse was alleged to occur.

23         22. In 1989, the DEFENDANT DOE 1 formalized its policies regarding the prevention,  
24 detection and reporting of child sexual abuse by priests. This was done because the DEFENDANT  
25 DOE 1 had become well aware of the epidemic of abuse by its priests, and by priests generally. Those  
26 policies were added to periodically over the course of the 1990's and early 2000's. Those policies at  
27 all times prohibited priests from having minors in their rectory living quarters. From priests wrestling  
28 with, tickling or hugging minors, or spending too much time in the company of minors, or taking

1 minors on any outings without adults' present. By 1994, those policies expressly stated that if a  
2 fellow priest observes any of such conduct they are required to report it to the Vicar for Clergy of the  
3 DEFENDANT DOE 1. These policies starting in 1989 were given to every priest working in the  
4 DEFENDANT DOE 1. The DEFENDANT DOE 1 however, took no action in 1989 or throughout the  
5 1990's or early 2000's to communicate to parish or school staff these same policies. While the  
6 DEFENDANT DOE 1 throughout this time and before, expected parish staff to communicate any  
7 suspicions of abuse by priests up the chain of command, nothing was done by the DEFENDANT DOE  
8 1 to communicate this expectation to those staff members, or to provide those staff members with  
9 guidance regarding what sort of conduct should be avoided and should create suspicions of abuse.  
10 Therefore, while the priests of a parish were told what conduct with minors should be avoided, like  
11 having kids in the rectory, or taking them on trips without another adult present, or wrestling with  
12 them, or hugging them, youth group leaders and catechism teachers who would be in the best position  
13 to observe this conduct were not informed of this.

14         23. The DEFENDANT DOE 1 by failing to communicate these policies to parish staff  
15 purposefully sought to keep secret abuse by priests, and in this way facilitated priests like  
16 DEFENDANT DOE 4, molestation of minors. Parish staff not knowing of these policies, feared they  
17 would lose their positions if they reported their concerns. Many dismissed their observations and  
18 concerns because they didn't actually see or know of sexual molestation, though they observed  
19 conduct by priests such as DEFENDANT DOE 4 which caused them to suspect abuse was occurring.

20         24. Defendants DEFENDANT DOE 1, DEFENDANT DOE 2 AND DEFENDANT DOE 3  
21 through their agents and managing agents knew of prior complaints that DEFENDANT DOE 4 had  
22 sexually molested a minor, prior to the end of his abuse of Plaintiffs. Defendants DEFENDANT DOE  
23 1 DEFENDANT DOE 2 AND DEFENDANT DOE 3 through their agents and managing agents knew  
24 or had reason to know that DEFENDANT DOE 4 routinely violated rules of Defendants that were  
25 designed to prevent child molestation by clergy. Such rules violations included but were not limited  
26 to DEFENDANT DOE 4 regularly having underage boys alone with him in his church living quarters;  
27 regularly wrestling with under age boys on church grounds; regularly meeting underage boys without  
28 chaperones for outings to movies, Starbucks and other locations.



1 PARTIES

2 25. Plaintiff JOHN CC DOE was approximately 12-13 years old when he was sexually  
3 molested by Father CHRISTOPHER CUNNINGHAM, his parish priest, at DEFENDANT DOE 2 in  
4 Palmdale, California. Plaintiff was under 26 years of age on January 1, 2003. Plaintiff is now 34  
5 years old. Plaintiff is a resident of the Clark County, Nevada.

6 26. In June of 2017, as a result of being interviewed by investigators as part of existing  
7 litigation involving DEFENDANT DOE 4 's abuse of minors, and finding out that he was not alone  
8 and not the only victim of DEFENDANT DOE 4, Plaintiff JOHN CC DOE for the first time in his life  
9 began acknowledging to himself that the sexual abuse he had suffered as a young child occurred,  
10 began for the first time since he was a young child actively thinking of the abuse, and the extent of it.  
11 As a result, Plaintiff JOHN CC DOE for the first time in his life began to understand that  
12 psychological problems he had as an adult were related to or caused by the child sexual abuse inflicted  
13 upon him by DEFENDANT DOE 4. In June of 2017, PLAINTIFF for the first time attempted to  
14 actively think of the abuse and its effects upon his life, for the first time, PLAINTIFF began reliving  
15 the abuse. This reliving of the abuse was debilitating to PLAINTIFF. Through actively thinking  
16 about the abuse starting in June of 2017, PLAINTIFF JOHN CC DOE has begun to remember more of  
17 the abuse, and had re-experienced the abuse causing him further and significant trauma. Throughout  
18 PLAINTIFF'S life, both as a minor after the abuse and as an adult, he has experienced alcohol and  
19 drug dependency and addiction. This alcohol and drug dependency throughout his childhood after the  
20 abuse as well as in adulthood rendered Plaintiff JOHN CC DOE unable to coherently think of either  
21 the abuse he had suffered, or to form any coherent thoughts regarding any injuries in adulthood that  
22 might be caused by the abuse.

23 27. Prior to June of 2017, Plaintiff JOHN CC DOE did not know or understand his own  
24 feelings regarding the abuse, or acknowledge to himself the extent of the abuse he suffered. As a 12  
25 and 13-year-old child, during the abuse and after, Plaintiff JOHN CC DOE subconsciously engaged in  
26 the psychological coping mechanisms of disassociation, denial and minimization as a means of coping  
27 with the sexual abuse. Consciously and subconsciously, as a minor, Plaintiff JOHN CC DOE  
28 suppressed the memories and experiences of the abuse, out of fear, guilt, shame, and deep confusion.

1 To survive the abuse, Plaintiff JOHN CC DOE as a young boy and thereafter did everything he could  
2 to not think about the abuse, and therefore did not think about the effects the abuse was having on his  
3 life. Plaintiff JOHN CC DOE's dissociation, from the abuse, was made more pronounced because of  
4 his drug addiction. These reactions to the child sexual abuse by Plaintiff JOHN CC DOE, are all too  
5 common reactions by child sexual abuse victims.

6 28. Prior to June of 2017, Plaintiff JOHN CC DOE did not know, and reasonably did not  
7 discover that the abuse he suffered from as a child at the hands of Defendant DOE 4 had caused him  
8 injuries as an adult. Those injuries include, but are not limited to, problems including, starting in June  
9 of 2017 reliving and re-experiencing the trauma of the abuse, trust, and control issues, depression,  
10 anxiety, anger, nervousness, fear, alienation from family and friends, loss of intimacy, identity issues,  
11 and issues with authority. DEFENDANT DOE 4 accomplished the sexual abuse of Plaintiff JOHN  
12 CC DOE by taking advantage of and manipulating Plaintiff JOHN CC DOE's youth, inexperience,  
13 trust and reverence. This same manipulation also resulted in Plaintiff JOHN CC DOE not  
14 understanding the effects the abuse was having on him as a minor and as an adult, and in Plaintiff  
15 JOHN CC DOE suppressing memories of the abuse.

16 29. Plaintiff JOHN CB DOE was approximately 13-15 years old when he was sexually  
17 molested by DEFENDANT DOE 4, his parish priest, at DEFENDANT DOE 2 IN Palmdale,  
18 California. Plaintiff was under 26 years of age on January 1, 2003. Plaintiff is now 35 years old.  
19 Plaintiff is a resident of Pennsylvania.

20 30. In November of 2016, as a result of being interviewed by investigators as part of  
21 existing litigation involving DEFENDANT DOE 4'S abuse of minors, and finding out that he was not  
22 alone and not the only victim of DEFENDANT DOE 4, Plaintiff JOHN CB DOE for the first time in  
23 his life began actively thinking of the abuse, and the extent of it. As a result, Plaintiff JOHN CB DOE  
24 for the first time in his life began to understand that psychological problems he had as an adult were  
25 related to or caused by the child sexual abuse inflicted upon him by DEFENDANT DOE 4 . In  
26 November of 2016, Plaintiff JOHN CB DOE for the first time attempted to actively think of the abuse  
27 and its effects upon his life, for the first time, Plaintiff JOHN CB DOE began reliving the abuse. This  
28 reliving of the abuse was debilitating to Plaintiff JOHN CB DOE. Through actively thinking about

1 the abuse starting in November of 2016, Plaintiff JOHN CB DOE has begun to remember more of the  
2 abuse, and has re-experienced the abuse causing him further and significant trauma. Throughout  
3 Plaintiff JOHN CB DOE's life, both as a minor after the abuse and as an adult, he has experienced  
4 alcohol dependency and addiction. This alcohol dependency throughout his childhood after the abuse  
5 as well as in adulthood rendered Plaintiff JOHN CB DOE is unable to coherently think of either the  
6 abuse he had suffered, or to form any coherent thoughts regarding any injuries in adulthood that might  
7 be caused by the abuse.

8 31. Prior to November of 2016, Plaintiff JOHN CB DOE did not know or understand his  
9 own feelings regarding the abuse, or acknowledge to himself the extent of the abuse he suffered. As a  
10 13 to 15- year-old child, during the abuse and after, Plaintiff JOHN CB DOE subconsciously engaged  
11 in the psychological coping mechanisms of disassociation, denial and minimization as a means of  
12 coping with the sexual abuse. These processes prevented Plaintiff JOHN CB DOE from consciously  
13 understanding or appreciating the abuse he was suffering or the effects it had or was having on him.  
14 Consciously and subconsciously, as a minor, Plaintiff JOHN CB DOE suppressed the memories and  
15 experiences of the abuse, out of fear, guilt, shame, and deep confusion. To survive the abuse, Plaintiff  
16 JOHN CB DOE as a young boy, and thereafter did everything he could not to think about the abuse,  
17 and therefore did not think about the effects the abuse was having on his life. Plaintiff JOHN CB  
18 DOE's dissociation, from the abuse, was made more pronounced because of his alcohol addiction.  
19 These reactions to the child sexual abuse by Plaintiff JOHN CB DOE, are all too common reactions  
20 by child sexual abuse victims.

21 32. Prior to November of 2016, Plaintiff JOHN CB DOE did not know, and reasonably did  
22 not discover that the abuse he suffered from as a child at the hands of DEFENDANT DOE 4 had  
23 caused him injuries as an adult. Those injuries include, but are not limited to, problems starting in  
24 November of 2016 reliving and re-experiencing the trauma of the abuse, trust, and control issues,  
25 depression, anxiety, anger, nervousness, fear, alienation from family and friends, loss of intimacy,  
26 identity issues, and issues with authority. DEFENDANT DOE 4 accomplished the sexual abuse of  
27 Plaintiff JOHN CB DOE by taking advantage of and manipulating Plaintiff JOHN CB DOE's youth,  
28 inexperience, trust and reverence. This same manipulation also resulted in Plaintiff JOHN CB DOE

1 not understanding the effects the abuse was having on him as a minor and as an adult, and in Plaintiff  
2 JOHN CB DOE suppressing memories of the abuse.

3 33. Plaintiff JOHN BC DOE was approximately 12-13 years old when he was sexually  
4 molested by DEFENDANT DOE 4, his parish priest, at ST. LAWRENCE MARTYR in Redondo  
5 Beach, California. Plaintiff was under 26 years of age on January 1, 2003. Plaintiff is now 31 years  
6 old. Plaintiff is a resident of County, California.

7 34. In July of 2017, as a result of being interviewed by investigators as part of existing  
8 litigation involving DEFENDANT DOE 4 's abuse of minors, and finding out that he was not alone  
9 and not the only victim of DEFENDANT DOE 4, Plaintiff JOHN BC DOE for the first time in his life  
10 began acknowledging to himself that the sexual abuse he had suffered as a young child occurred,  
11 began for the first time since he was a young child actively thinking of the abuse, and the extent of it.  
12 As a result, Plaintiff JOHN BC DOE for the first time in his life began to understand that  
13 psychological problems he had as an adult were related to or caused by the child sexual abuse inflicted  
14 upon him by DEFENDANT DOE 4. In July of 2017, Plaintiff JOHN BC DOE for the first time  
15 attempted to actively think of the abuse and its effects upon his life, for the first time, Plaintiff JOHN  
16 BC DOE began reliving the abuse. This reliving of the abuse was debilitating to Plaintiff JOHN BC  
17 DOE. Through actively thinking about the abuse starting in July of 2017, Plaintiff JOHN BC DOE  
18 has begun to remember more of the abuse, and had re-experienced the abuse causing him further and  
19 significant trauma. Throughout PLAINTIFF JOHN BC DOE's life, both as a minor after the abuse  
20 and as an adult, he has experienced alcohol and drug dependency and addiction. This alcohol and  
21 drug dependency throughout his childhood after the abuse as well as in adulthood rendered Plaintiff  
22 JOHN BC DOE unable to coherently think of either the abuse he had suffered, or to form any coherent  
23 thoughts regarding any injuries in adulthood that might be caused by the abuse.

24 35. Prior to July of 2017, Plaintiff JOHN BC DOE did not know or understand his own  
25 feelings regarding the abuse, or acknowledge to himself the extent of the abuse he suffered. As a 12  
26 and 13-year-old child, during the abuse and after, Plaintiff JOHN BC DOE subconsciously engaged in  
27 the psychological coping mechanisms of disassociation, denial and minimization as a means of coping  
28 with the sexual abuse. Consciously and subconsciously, as a minor, Plaintiff JOHN BC DOE

1 suppressed the memories and experiences of the abuse, out of fear, guilt, shame, and deep confusion.  
2 To survive the abuse, Plaintiff JOHN BC DOE as a young boy, and thereafter did everything he could  
3 not to think about the abuse, and therefore did not think about the effects the abuse was having on his  
4 life. Plaintiff JOHN BC DOE's disassociation, from the abuse, was made more pronounced because  
5 of his drug addiction. These reactions to the child sexual abuse by Plaintiff JOHN BC DOE, are all too  
6 common reactions by child sexual abuse victims.

7 36. Prior to July of 2017, Plaintiff JOHN BC DOE did not know, and reasonably did not  
8 discover that the abuse he suffered from as a child at the hands of DEFENDANT DOE 4 had caused  
9 him injuries as an adult. Those injuries include, but are not limited to, problems including, starting in  
10 July of 2017 reliving and re-experiencing the trauma of the abuse, trust, and control issues, depression,  
11 anxiety, anger, nervousness, fear, alienation from family and friends, loss of intimacy, identity issues,  
12 and issues with authority. DEFENDANT DOE 4 accomplished the sexual abuse of Plaintiff JOHN  
13 BC DOE by taking advantage of and manipulating Plaintiff JOHN BC DOE's youth, inexperience,  
14 trust and reverence. This same manipulation also resulted in Plaintiff JOHN BC DOE not  
15 understanding the effects the abuse was having on him as a minor and as an adult, and in Plaintiff  
16 JOHN BC DOE suppressing memories of the abuse.

17 37. THE DEFENDANT DOE 1 ("DEFENDANT DOE 1") is authorized to conduct  
18 business and conducts business in the State of California, with its principal place of business in  
19 County, California. DEFENDANT DOE 1 has responsibility for Roman Catholic Church operations  
20 in Ventura County, Santa Barbara County and County, California. Defendant, DEFENDANT DOE 1  
21 is the DEFENDANT DOE 1 in which the sexual abuse occurred. Plaintiffs were parishioner and  
22 students at DEFENDANT DOE 1 parishes and schools. DEFENDANT DOE 4 was a priest, employee  
23 and an agent of DEFENDANT DOE 1 at all times relevant when he met Plaintiffs and Plaintiffs'  
24 families and while the sexual abuse of Plaintiffs was occurring. The DEFENDANT DOE 1 at all  
25 times relevant employed, supervised and controlled the employment as a priest of DEFENDANT  
26 DOE 4, as well as all other employees and agents of St. Christopher's Catholic Church in West  
27 Covina, DEFENDANT DOE 2 in Palmdale, DEFENDANT DOE 3, St. Louise De Marilac Catholic  
28 Church in Covina, and OUR LADY OF THE ASSUMPTION CATHOLIC CHURCH in Ventura.

1           38.     DEFENDANT DOE 2 in Palmdale is the Catholic Church at which Plaintiffs JOHN  
2 CC DOE and JOHN CB DOE and their family were parishioners. Plaintiffs' were both students at  
3 DEFENDANT DOE 2 classes and/or Elementary school, and were both sexually abused on church  
4 grounds. DEFENDANT DOE 2 is also the Catholic Church at which DEFENDANT DOE 4 was  
5 assigned and worked as associate Pastor at the time he met and came to sexually abuse Plaintiff. As  
6 part of his duties with DEFENDANT DOE 2 and the DEFENDANT DOE 1, DEFENDANT DOE 4  
7 visited parishioners in their homes, including Plaintiff JOHN CC DOE's family's home.  
8 DEFENDANT DOE 2 is not separately incorporated from the DEFENDANT DOE 1. DEFENDANT  
9 DOE 2 is wholly owned, operated and controlled by the DEFENDANT DOE 1, and has been since its  
10 creation.

11           39.     DEFENDANT DOE 3 in Redondo Beach is the Catholic Church at which Plaintiff  
12 JOHN BC DOE and his family were parishioners. Plaintiff JOHNBC DOE was also a student at  
13 DEFENDANT DOE 3 elementary school, and was sexually abused by DEFENDANT DOE 4 during  
14 school hours, on school and/or parish property, while DEFENDANTS had custody of Plaintiff JOHN  
15 BC DOE and while his parents were not present. DEFENDANT DOE 3 is also the Catholic Church at  
16 which DEFENDANT DOE 4 was assigned and worked as associate Pastor at the time he met and  
17 came to sexually abuse Plaintiff. DEFENDANT DOE 3 is not separately incorporated from the  
18 DEFENDANT DOE 1. DEFENDANT DOE 2 is wholly owned, operated and controlled by the  
19 DEFENDANT DOE 1, and has been since its creation.

20           40.     DEFENDANT DOE 4 did commit child sexual abuse upon Plaintiff JOHN CP DOE  
21 within the meaning of *Code of Civil Procedure* §340.1(e) when Plaintiff JOHN CP DOE was  
22 approximately 10-11 years of age. DEFENDANT DOE 4 is a resident of Rhode Island.  
23 DEFENDANT DOE 4 is a licensed clinical psychologist. Prior to Plaintiff JOHN CJ DOE filing of  
24 his lawsuit in 2015, DEFENDANT DOE 4 's psychology practice was geared toward counseling  
25 youth.

26           41.     Defendant Does 5 through 100, inclusive, are individuals and/or business or corporate  
27 private or public entities incorporated in and/or doing business in California, whose true names and  
28 capacities are unknown to Plaintiff who therefore sues such Defendants by such fictitious names, and

1 who will amend the Complaint to show the true names and capacities of each such Doe Defendants  
2 when ascertained. Each such Defendant Doe is legally responsible in some manner for the events,  
3 happenings and/or tortious and unlawful conduct that caused the injuries and damages alleged in this  
4 Complaint.

5 42. Defendants the DEFENDANT DOE 1, DEFENDANT DOE 2, DEFENDANT DOE 3,  
6 DEFENDANT DOE 4, and Does 5 through 100, are hereinafter referred to as the "Defendants."

7 43. Each Defendant is the agent, servant and/or employee of other Defendants, and each  
8 Defendant was acting within the course and scope of his, her or its authority as an agent, servant  
9 and/or employee of the other Defendants. Defendants, and each of them, are individuals,  
10 corporations, alter egos and partnerships of each other and other entities which engaged in, joined in  
11 and conspired with the other wrongdoers in carrying out the tortious and unlawful activities described  
12 in this Complaint, and Defendants, each of them, ratified the acts of the other Defendants as described  
13 in this Complaint.

14 **FIRST CAUSE OF ACTION**

15 **CHILD SEXUAL ABUSE**

16 **(Plaintiff Against All Defendants)**

17 44. Plaintiffs incorporate all paragraphs of this Complaint, as if fully set forth herein.

18 45. Defendants are vicariously liable for the child sexual abuse committed upon Plaintiff  
19 by DEFENDANT DOE 4 : 1) The Defendants authorized the wrongful conduct; 2) The Defendants  
20 ratified the wrongful conduct.

21 46. For the reasons set forth in the incorporated paragraphs of this Complaint, the sexual  
22 abuse of Plaintiff by DEFENDANT DOE 4 arose from, was incidental to, DEFENDANT DOE 4 's  
23 employment with Defendants, and each of these Defendants ratified or approved of DEFENDANT  
24 DOE 4 'S sexual abuse of minors, including Plaintiffs. Plaintiffs allege on information and belief that  
25 Defendants ratified and/or approved of the sexual misconduct by failing to adequately investigate,  
26 discharge, discipline or supervise DEFENDANT DOE 4 or other priests known by Defendants to have  
27 sexually abused children, or to have been accused of sexually abusing children. Defendants and each  
28 of them ratified DEFENDANT DOE 4 's abuse by concealing evidence of prior sexual abuse of other

1 children by Father DEFENDANT DOE 4 and other priests from Plaintiffs, Plaintiffs' parents, other  
2 families with children, law enforcement, and personnel of Defendants who could have been in a  
3 position to prevent the abuse of Plaintiffs and others if they had known of complaints of  
4 DEFENDANT DOE 4 's sexual abuse of children, and prior complaints of other priests of sexual  
5 abuse of children.

6 47. Plaintiffs were also students at DEFENDANT DOE 2 and DEFENDANT DOE 3,  
7 Defendants' therefore and a special relationship with Plaintiffs giving rise to a special duty of care to  
8 Plaintiffs as an underage students. DEFENDANT DOE 4 came into contact with Plaintiffs and  
9 fostered a relationship with Plaintiffs through DEFENDANT DOE 4 's work with, administration of,  
10 and teaching at classes for youth offered DEFENDANT DOE 2 and DEFENDANT DOE 3.

11 48. The risk of abuse of a Catholic priest's authority, the risk of misuse of church, parish  
12 and school resources, facilities, rituals, procedures and responsibilities, and the risk of misuse of  
13 access to young, vulnerable children, and their families all to allow them to commit sexual abuse upon  
14 children, are, and have been for decades, risks known to the officers and directors of Defendants who  
15 have enacted policies and procedures, prior to Plaintiff's molestation by DEFENDANT DOE 4, to  
16 address such conduct and its consequences. The central tenets of the policies and procedures of  
17 Defendants was the avoidance of scandal, secrecy and loyalty to fellow clergy, including child  
18 molesting clergy, rather than the protection of the safety of children.

19 49. Defendants have routinely over the years failed to discipline, investigate or terminate  
20 known child molesting priests. Instead, Defendants condoned the conduct of priests molesting  
21 children by protecting offending clerics from public scorn and civil authorities, often transferring them  
22 from town to town, county to county, state to state, and country to country, all to allow child  
23 molesting priests to escape prosecution and protect their reputations, as well as the reputation of the  
24 Defendants. By doing so, Defendants have systematically encouraged and condoned this conduct by  
25 more priests including, DEFENDANT DOE 4.

26 **SECOND CAUSE OF ACTION**

27 **NEGLIGENCE**

28 **(Plaintiff Against All Defendants)**



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

2           51. Defendants had a duty to protect the minor Plaintiffs when they were entrusted to their  
3 care by Plaintiffs' parents. Plaintiffs' care, welfare, and/or physical custody were temporarily  
4 entrusted to Defendants, and Defendants accepted the entrusted care of Plaintiffs. As such,  
5 Defendants owed Plaintiffs, minor children, a special duty of care, in addition to a duty of ordinary  
6 care, and owed Plaintiffs the higher duty of care that adults dealing with children owe to protect them  
7 from harm.

8           52. DEFENDANT DOE 4 was able, by virtue of his unique authority and position as a  
9 Roman Catholic Priest, to identify vulnerable victims and their families upon which he could perform  
10 such sexual abuse; to manipulate his authority to procure compliance with his sexual demands from  
11 his victims; to induce the victims to continue to allow the abuse; and to coerce them not to report it to  
12 any other persons or authorities. As a Priest, DEFENDANT DOE 4 had unique access to families like  
13 Plaintiffs'. DEFENDANT DOE 4's access, authority and reverence was known to the Defendants and  
14 encouraged by them. DEFENDANT DOE 4 used his authority and position as a Roman Catholic  
15 Priest to sexually abuse Plaintiffs and other minors.

16           53. Defendants, by and through their agents, servants and employees, knew or reasonably  
17 should have known of DEFENDANT DOE 4's dangerous and exploitive propensities and/or that  
18 DEFENDANT DOE 4 was an unfit agent. It was foreseeable that if Defendants did not adequately  
19 exercise or provide the duty of care owed to children in their care, including but not limited to the  
20 Plaintiffs, the children entrusted to Defendants' care would be vulnerable to sexual abuse by  
21 DEFENDANT DOE 4.

22           54. Defendants breached their duty of care to the minor Plaintiff by allowing  
23 DEFENDANT DOE 4 to come into contact with the minor Plaintiffs without supervision; by failing to  
24 adequately supervise, or negligently retaining DEFENDANT DOE 4 who they permitted and enabled  
25 to have access to Plaintiff; by failing to investigate or otherwise confirm or deny such facts about  
26 DEFENDANT DOE 4; by failing to tell or concealing from Plaintiffs, Plaintiffs' parents, guardians, or  
27 law enforcement officials that DEFENDANT DOE 4 was or may have been sexually abusing minors;  
28 and/or by holding out DEFENDANT DOE 4 to the Plaintiffs and his parents or guardians as being in

1 DEFENDANT DOE 2 and DEFENDANT DOE 3 and each of the other parish assignments  
2 DEFENDANT DOE 4 had included, wrestling with teen boys, having them alone with him in his  
3 rectory living quarters, kissing them, taking them out one-on-one to ice cream and the movies, giving  
4 them “titty- twisters”, hugging them, and spending inordinate amounts of time alone with them.

5 44. Many of the parish staff persons who witnessed DEFENDANT DOE 4 'S suspicious  
6 conduct were mandated reporters by virtue of their positions working with children at DEFENDANT  
7 DOE 2 and DEFENDANT DOE 3 each of DEFENDANT DOE 4 'S other parish assignments. Many  
8 of those parish staff who were mandated reporters suspected DEFENDANT DOE 4 was abusing  
9 minors but did not report their suspicions because neither the DEFENDANT DOE 1 nor  
10 DEFENDANT DOE 2 and DEFENDANT DOE 3 informed those persons that they were mandated  
11 reporters as is required by California Penal Code §11165.7. Defendants violation of the requirements  
12 of Penal Code §11165.7 as well as Penal Code §11166 constitutes negligence per se.

13 45. The DEFENDANT DOE 1 since at least the 1970's had a policy and expectation that  
14 all parish workers and staff that had suspicions a priest might be sexually abusing minors should  
15 report those concerns up the chain of command. This policy and expectation however was not  
16 reduced to writing, and was not uniformly communicated to parish and school workers until the  
17 2000's.

18 46. The epidemic of priests sexually molesting minors has long been known to Defendants.  
19 Hundreds of Catholic priests in the DEFENDANT DOE 1 alone have been accused of molesting  
20 children in the years leading up to DEFENDANT DOE 4 's molestation of Plaintiff and other minors.  
21 The DEFENDANT DOE 1 starting in the 1950's, 1960's, 1970's, 1980's and 1990's received a  
22 multitude of complaints that its priests had sexually abused minors. The DEFENDANT DOE 1 like  
23 other Catholic institutions around the country and world adhered to a policy of keeping those  
24 complaints secret, moving priests to other unsuspecting parishes or communities, of not investigating  
25 complaints and of taking steps to silence victims and their families. The DEFENDANT DOE 1 during  
26 this time period routinely developed a practice and policy of sending such accused priests to therapists  
27 loyal to the Defendant or other Catholic Institutions for therapy who would not make mandated  
28 reports of child sexual abuse and therefore allow the priests to be recycled back into further church

1 assignments, endangering countless more children. In 2002 and 2003, more than 700 victims filed  
2 lawsuits against the DEFENDANT DOE 1 alleging child sexual abuse by Catholic clergy serving in .  
3 Settlements in excess of 700 million were reached for those victims between 2004 and 2007.

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

10 **WHEREFORE**, Plaintiffs prays for damages; attorneys' fees; punitive damages as to  
11 DEFENDANT DOE 4 only; and such other relief as the court deems appropriate and just.

12 **JURY TRIAL DEMAND**

13 Plaintiffs demand a jury trial on all issues so triable.

14  
15 DATED: October 16, 2017

LAW OFFICES OF ANTHONY M. DEMARCO

17  
18 By: 

19 ANTHONY M. DEMARCO  
20 Attorney for Plaintiffs, JOHN CC DOE, JOHN  
21 CB DOE and JOHN BC DOE  
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