

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Doe 114,

Court File No.:

Plaintiff,

v.

COMPLAINT

Jason McLean,

Defendant.

Plaintiff, for her cause of action against Defendant, alleges that:

PARTIES

1. Plaintiff Doe 114 is an adult female resident of the State of Minnesota. In the interest of privacy, the identity of Plaintiff Doe 114 has been disclosed under separate cover to Defendant.

2. At all times material, Jason McLean (hereinafter "McLean") was an adult male resident of the State of Minnesota.

FACTS

3. In 1975, The Children's Theatre Company, Minneapolis, Minnesota, (hereinafter "Children's Theatre") incorporated as an independent non-profit corporation in the State of Minnesota with its principal place of business at 2400 Third Avenue South, Minneapolis, Minnesota 55404.

4. From 1975 to 1984, Children's Theatre operated a theatre school, which in various forms offered educational opportunities, programs, trainings, and courses in the theatre arts to students. In 1975, students attended classes at their school in the morning and then attended

afternoon educational programming and classes at Children's Theatre's school.

5. In the late 1970s, McLean became employed as a company actor with Children's Theatre.

6. In September 1981, Children's Theatre opened the Children's Theatre Conservatory School. Students enrolled in the school attended all classes at the school including academic and arts related classes and participated in the Children's Theatre's theatrical productions.

7. In September 1981, Plaintiff began attending Children's Theatre school. She was 13 years old and in the ninth grade.

8. Plaintiff came to know McLean when she was a student at Children's Theatre.

9. In approximately 1981, McLean began sexually abusing Victim M5, , also known as Doe 116 in a separately filed lawsuit against McLean, a 14- to 15-year old girl who was a student at Children's Theatre school. McLean continued to abuse Victim M5 for approximately three to four years.

10. In the fall of 1982, McLean began sexually abusing Victim M1, who was a 14- or 15-year-old girl and student at Children's Theatre school. McLean's abuse of Victim M1 continued for approximately a year and a half.

11. In May or June of 1983, McLean sexually abused Laura Adams. She was a 15-year-old student at Children's Theatre school.

12. In September 1983, in addition to his continued employment as a company actor at Children's Theatre, McLean began teaching acting classes to students at the Children's Theatre school.

13. From approximately August to November 1983, when Plaintiff was approximately

15 to 16 years old, in multiple instances McLean inflicted harmful, offensive and unpermitted sexual contact upon Plaintiff.

14. In September 1984, McLean began his sexual abuse of Victim M3, also known as Doe 76 in a separately filed lawsuit against McLean, a 15- to 16-year-old female student at Children's Theatre. McLean's sexual abuse of Victim M3 continued for nine months.

15. McLean continued to be employed by Children's Theatre until 1986.

16. Upon information and belief, there are other minors who McLean sexually abused when he was an employee, agent, actor, and teacher at Children's Theatre.

17. At all times material, McLean's employment duties included but were not limited to acting in Children's Theatre productions and coaching and teaching students and child actors at Children's Theatre. While she was a student at Children's Theatre, Plaintiff participated as a student and an actor in performances at Children's Theatre in which McLean acted. McLean, therefore, was in a position of power and authority over Plaintiff.

18. As a direct result of the conduct of Defendant McLean described herein, Plaintiff has 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. Plaintiff was prevented, and will continue to be prevented, from performing her normal daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling, and on information and belief has and/or will incur loss of income and/or loss of earning capacity.

COUNT I: SEXUAL BATTERY

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this count and further alleges the following:

19. From approximately August to November 1983, Defendant McLean inflicted multiple instances of unpermitted, harmful, and offensive sexual contact upon the person of Plaintiff Doe 114.

20. As a direct result of Defendant McLean's wrongful conduct, Plaintiff has suffered the injuries alleged herein.

PRAYER FOR RELIEF

21. Plaintiff demands judgment against Defendant McLean in an amount in excess of \$50,000.00, plus costs, disbursements, reasonable attorney fees, interest and such other and further relief as the court deems just and equitable.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated: 2/8/16

JEFF ANDERSON & ASSOCIATES, P.A.



By: Jeffrey R. Anderson, #2057

Molly K. Burke, #0391477

Attorneys for Plaintiff

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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.



Molly Burke