

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Darin Buckman, John Doe 595, Joshua Bollman,)
and Cynthia Yesko,)

Plaintiffs,)

v.)

Illinois Catholic Conference a/k/a Catholic)
Conference of Illinois; Diocese of Belleville;)
The Catholic Bishop of Chicago, a Corporation)
Sole a/k/a Archdiocese of Chicago; Diocese of)
Joliet in Illinois a/k/a Diocese of Joliet; Diocese of)
Peoria; Diocese of Rockford; Diocese of)
Springfield in Illinois a/k/a Diocese of Springfield;)
and the Missionaries of Our Lady of La Salette,)
Generalate a/k/a The Missionaries of Our Lady of)
La Salette, Province of Mary Queen a/k/a La Salette)
Missionaries a/k/a Missionaries of La Salette)
Corporation of Missouri a/k/a the Missionaries of)
Our Lady of La Salette Province of Mary,)
Mother of the Americas,)

Defendants.)

No.

2018L011293

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DOROTHY BROWN
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COOK COUNTY, IL

COMPLAINT

Plaintiffs, by and through their attorneys, Frost Pearlman, LLC, and Jeff Anderson & Associates, P.A., for their Complaint against Defendants, hereby state as follows:

PARTIES

1. Plaintiff Darin Buckman is an adult male resident of the State of Illinois.
2. Plaintiff John Doe 595 is an adult male resident of the State of Illinois.
3. Plaintiff Joshua Bollman is an adult male resident of the State of Wisconsin.
4. Plaintiff Cynthia Yesko is an adult female resident of the State of Illinois.

5. At all times material, Defendant Illinois Catholic Conference a/k/a Catholic Conference of Illinois (hereinafter “Catholic Conference”) 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 Illinois with its principal places of business at 65 East Wacker Place, Suite 1620, Chicago, Illinois and 108 East Cook Street, Springfield, Illinois. The Catholic Conference was created in approximately 1969. Later, Defendant Catholic Conference created a corporation called the Catholic Conference of Illinois to conduct some of its affairs. The Catholic Conference represents Illinois bishops and archbishops and their dioceses. The Catholic Conference functions as a business by engaging in activities promoting, advancing and furthering the policies, practices and interests of Catholic institutions in Illinois. Archbishop Blaise J. Cupich, S.T.D., the Archbishop of Defendant Archdiocese of Chicago, is the Chairman of Defendant Illinois Catholic Conference. Defendant Illinois Catholic Conference coordinates its efforts in conjunction with each Diocese in Illinois.

6. Defendant Diocese of Belleville (hereinafter “Belleville Diocese”) 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 Illinois with its principal place of business at 222 South Third Street, Belleville, Illinois. The Belleville Diocese was created in approximately 1887. Later, the Diocese created a corporation called the Belleville Diocese to conduct some of its affairs. The Belleville Diocese operates its affairs as both a corporate entity and as an organization named the Belleville Diocese, with the Bishop as the top official. Both of these entities and all other corporations and entities controlled by the Bishop are included in this Complaint as being the

Belleville Diocese. 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 Belleville Diocese has several programs which seek out the participation of children in the diocese's activities. The Belleville Diocese has the power to appoint, supervise, monitor and fire each person working with children in the Belleville Diocese.

7. Defendant The Catholic Bishop of Chicago, a Corporation Sole a/k/a Archdiocese of Chicago (hereinafter "Chicago Archdiocese") 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 Illinois with its principal place of business at 835 North Rush Street, Chicago, Illinois. The Chicago Archdiocese was created in approximately 1880. Later, the Archdiocese created a corporation called the Chicago Archdiocese to conduct some of its affairs. The Chicago Archdiocese operates its affairs as both a corporate entity and as an organization named the Chicago Archdiocese, with the Archbishop as the top official. Both of these entities and all other corporations and entities controlled by the Archbishop are included in this Complaint as being the Chicago Archdiocese. The Archbishop 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 Chicago Archdiocese has several programs which seek out the participation of children in the diocese's activities. The Chicago Archdiocese has the power to appoint, supervise, monitor and fire each person working with children in the Chicago Archdiocese.

8. Defendant Diocese of Joliet in Illinois a/k/a Diocese of Joliet (hereinafter “Joliet Diocese”) 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 Illinois with its principal place of business at 16555 Weber Road, Crest Hill, Illinois. The Joliet Diocese was created in approximately 1948. Later, the Diocese created a corporation called the Joliet Diocese to conduct some of its affairs. The Joliet Diocese operates its affairs as both a corporate entity and as an organization named the Joliet Diocese, with the Bishop as the top official. Both of these entities and all other corporations and entities controlled by the Bishop are included in this Complaint as being the Joliet Diocese. 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 Joliet Diocese has several programs which seek out the participation of children in the diocese’s activities. The Joliet Diocese has the power to appoint, supervise, monitor and fire each person working with children in the Joliet Diocese.

9. Defendant Diocese of Peoria (hereinafter “Peoria Diocese”) 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 Illinois which its principal place of business at 419 Northeast Madison Avenue, Peoria, Illinois. The Peoria Diocese was created in approximately 1877. Later, the Diocese created a corporation called the Peoria Diocese to conduct some of its affairs. The Peoria Diocese operates its affairs as both a corporate entity and as an organization named the Peoria Diocese, with the Bishop as the top official. Both of these entities and all other

corporations and entities controlled by the Bishop are included in this Complaint as being the Peoria Diocese. 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 Peoria Diocese has several programs which seek out the participation of children in the diocese's activities. The Peoria Diocese has the power to appoint, supervise, monitor and fire each person working with children in the Peoria Diocese.

10. Defendant Diocese of Rockford (hereinafter "Rockford Diocese") 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 Illinois with its principal place of business at 555 Colman Center Drive, Rockford, Illinois. The Rockford Diocese was created in approximately 1908. Later, the Diocese created a corporation called the Rockford Diocese to conduct some of its affairs. The Rockford Diocese operates its affairs as both a corporate entity and as an organization named the Rockford Diocese, with the Bishop as the top official. Both of these entities and all other corporations and entities controlled by the Bishop are included in this Complaint as being the Rockford Diocese. 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 Rockford Diocese has several programs which seek out the participation of children in the diocese's activities. The Rockford Diocese has the power to appoint, supervise, monitor and fire each person working with children in the Rockford Diocese.

11. Defendant Diocese of Springfield in Illinois a/k/a Diocese of Springfield (hereinafter “Springfield Diocese”) 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 Illinois with its principal place of business at 1615 West Washington Street, Springfield, Illinois. The Springfield Diocese was created in approximately 1853. Later, the Diocese created a corporation called the Springfield Diocese to conduct some of its affairs. The Springfield Diocese operates its affairs as both a corporate entity and as an organization named the Springfield Diocese, with the Bishop as the top official. Both of these entities and all other corporations and entities controlled by the Bishop are included in this Complaint as being the Springfield Diocese. 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 Springfield Diocese has several programs which seek out the participation of children in the diocese’s activities. The Springfield Diocese has the power to appoint, supervise, monitor and fire each person working with children in the Springfield Diocese.

12. At all times material, Defendants Catholic Conference, Belleville Diocese, Chicago Archdiocese, Joliet Diocese, Peoria Diocese, Springfield Diocese and Rockford Diocese (hereinafter “Diocesan Defendants”) were co-conspirators, employees, agents, ostensible agents, managing agents, servants, owners, joint venturers, managers, directors, officers, representatives, alter egos, partners, general partners, trustees, co-trustees, co-venturers, and/or employees of Diocesan Defendants, and in doing the things herein alleged were acting within the course and scope of their co-conspiracy, employment, agency, ownership, joint venture, management or

their status as an officer, director or managing agent of Diocesan Defendants. Each of the Diocesan Defendants' actions, omissions, and conduct were known to, authorized and ratified by Diocesan Defendants. The acts, omissions, and/or conduct by Diocesan Defendants, which was outside the scope of their authority, was known to, authorized and ratified by Diocesan Defendants.

13. At all times material, Defendant the Missionaries of Our Lady of La Salette, Generalate a/k/a The Missionaries of Our Lady of La Salette, Province of Mary Queen a/k/a La Salette Missionaries a/k/a Missionaries of La Salette Corporation of Missouri a/k/a the Missionaries of Our Lady of La Salette Province of Mary, Mother of the Americas (hereinafter "La Salette Missionaries") was and continues to be a Roman Catholic religious order of priests and brothers affiliated with the Roman Catholic Church, doing business in the State of Illinois. Defendant La Salette Missionaries has its principal place of business at 915 Maple Avenue, Hartford, Connecticut. The provincial superior is the top official of the La Salette Missionaries and is given authority over all matters dealing with La Salette Missionaries as a result of his position. The La Salette Missionaries function as a business by engaging in numerous revenue producing activities and soliciting money in exchange for its services. The La Salette Missionaries have programs which seek out the participation of children. The La Salette Missionaries, through its officials, have control over these programs involving children and the authority to appoint, supervise, monitor and fire each person working with children in these programs.

FACTS

14. From approximately 1979 to 1984, when Plaintiff Darin Buckman was approximately 8 to 14 years old, Father John Anderson (hereinafter “Fr. Anderson”) engaged in unpermitted sexual contact with Plaintiff Darin Buckman.

15. Fr. Anderson was ordained a priest of the Peoria Diocese in approximately 1959.

16. At all times material, Fr. Anderson was a Roman Catholic priest under the supervision, employ, agency and control of Defendant Peoria Diocese.

17. Defendant Peoria Diocese placed Fr. Anderson in positions where he had access to and worked with children as an integral part of his work.

18. Plaintiff Darin Buckman was raised in a devout Roman Catholic family and attended St. Edward’s Parish in Chillicothe, Illinois. Plaintiff and his family came into contact with Fr. Anderson as an agent and representative of Defendant Peoria Diocese and Diocesan Defendants.

19. Incidents of sexual assault alleged in this Complaint occurred on property owned by, operated by, or under the control of Defendant Peoria Diocese.

20. In approximately 1981, when Plaintiff John Doe 595 was approximately 15 years old, Monsignor Charles Beebe (hereinafter “Msgr. Beebe”) engaged in unpermitted sexual contact with Plaintiff John Doe 595.

21. Msgr. Beebe was ordained a priest of the Peoria Diocese in approximately 1970.

22. At all times material, Msgr. Beebe was a Roman Catholic priest under the supervision, employ, agency and control of Defendant Peoria Diocese.

23. Defendant Peoria Diocese placed Msgr. Beebe in positions where he had access to and worked with children as an integral part of his work.

24. Plaintiff John Doe 595 was raised in a devout Roman Catholic family and attended Academy of Our Lady – Spalding Institute in Peoria, Illinois. Plaintiff and his family came into contact with Msgr. Beebe as an agent and representative of Defendant Peoria Diocese and Diocesan Defendants.

25. In approximately 1999, when Plaintiff Joshua Bollman was approximately 12 years old, Father Peter Kohler, M.S. (hereinafter “Fr. Kohler”) engaged in unpermitted sexual contact with Plaintiff.

26. At the time of the sexual assault of Plaintiff, Fr. Kohler was the Provincial Vicar of the La Salette Missionaries.

27. Fr. Kohler was ordained a Roman Catholic priest of the La Salette Missionaries in approximately 1968.

28. At all times material, Fr. Kohler was a Roman Catholic priest under the supervision, employ, agency and control of Defendants Rockford Diocese and La Salette Missionaries.

29. Defendants Rockford Diocese and La Salette Missionaries placed Fr. Kohler in positions where he had access to and worked with children as an integral part of his work.

30. Plaintiff Joshua Bollman was raised in a devout Roman Catholic family and attended St. Joseph Parish in Lena, Illinois. Plaintiff and his family came into contact with Fr. Kohler as an agent and representative of Defendant Rockford Diocese, La Salette Missionaries and Diocesan Defendants.

31. From approximately 1972 to 1975, when Plaintiff Cynthia Yesko was approximately 4 to 7 years old, Father Stanislaus Yunker (hereinafter “Fr. Yunker”) engaged in unpermitted sexual contact with Plaintiff.

32. Fr. Yunker was ordained a priest of Defendant Springfield Diocese in approximately 1923.

33. At all times material, Fr. Yunker was a Roman Catholic priest under the supervision, employ, agency and control of Defendant Springfield Diocese.

34. Defendant Springfield Diocese placed Fr. Yunker in positions where he had access to and worked with children as an integral part of his work.

35. Plaintiff Cynthia Yesko was raised in a devout Roman Catholic family and attended St. Vincent de Paul in Springfield, Illinois. Plaintiff and her family came into contact with Fr. Yunker as an agent and representative of Defendant Springfield Diocese and Diocesan Defendants.

36. From approximately 1973 to 1975, when Plaintiff Cynthia Yesko was approximately 5 to 7 years old, Father Louis Schlangen (hereinafter "Fr. Schlagen") engaged in unpermitted sexual contact with Plaintiff.

37. Fr. Schlagen was ordained a priest of Defendant Springfield Diocese in approximately 1957.

38. At all times material, Fr. Schlagen was a Roman Catholic priest under the supervision, employ, agency and control of Defendant Springfield Diocese.

39. Defendant Springfield Diocese placed Fr. Schlagen in positions where he had access to and worked with children as an integral part of his work.

40. Plaintiff Cynthia Yesko was raised in a devout Roman Catholic family and attended Sts. Peter and Paul in Springfield, Illinois. Plaintiff and her family came into contact with Fr. Schlagen as an agent and representative of Defendant Springfield Diocese and Diocesan Defendants.

41. Bishop William O'Connor, then Bishop of Defendant Springfield Diocese was complicit and had knowledge of the sexual abuse of Plaintiff Cynthia Yesko.

42. Individuals working within each Defendant are mandatory reporters under Illinois Mandatory Reporting laws.

43. Defendants have failed and continue to fail to report known and/or suspected sexual abuse of children by their agents to the police and law enforcement.

44. Defendants have maintained and continue to maintain sexually abusive priests in employment despite knowledge or suspicions of child sex abuse.

45. Defendants hold 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 their programs, marketing to youth and families, recruiting youth and families, and holding out the people that work in their programs as safe.

46. As a result, Defendants' leaders and agents have occupied positions of great trust, respect and allegiance among members of the general public, including Plaintiff.

47. Plaintiffs developed great admiration, trust, reverence and respect for Defendants and their agents.

48. Defendants affirmatively or implicitly represent to minor children, their families and members of the general public that clerics working in the State of Illinois are safe to work with children and/or do not have a history of sexually assaulting children.

49. Since approximately 1969, Defendant Catholic Conference has assembled the Bishops of each Diocese in Illinois to discuss and respond collectively as a governing body over Catholic institutions and issues in the State of Illinois.

50. Since 1969, each Illinois Diocese has been a member of the Catholic Conference which provides a unified front for the six Dioceses in Illinois to address the handling of sexual abuse allegations involving Catholic priests working in the State of Illinois.

51. Defendant Catholic Conference, on behalf of each Illinois Diocese, has made representations about the safety of programs in Catholic institutions in Illinois.

52. Defendant Catholic Conference has repeatedly pledged to restore trust for victims of sexual abuse through accountability and justice. These pledges are inconsistent with Illinois Defendants' policies, practices and actions demonstrating secrecy and concealment of information about clerics who have sexually assaulted children in Illinois.

53. Defendants have misleadingly represented and continue to misleadingly represent to the public, including Plaintiffs, that 1) there is no danger of child sex abuse at its facilities and in its programs; 2) they respond to allegations of sexual abuse promptly and effectively; 3) they cooperate with civil authorities; 4) they discipline offenders; and/or 5) they provide a means of accountability to ensure the problem of clerical sex abuse is dealt with effectively.

54. Defendants have also misleadingly represented and continue to misleadingly represent to the public that any sexual misconduct by its agents is a problem of the past and that its programs and schools do not currently pose any risk to children.

55. In a September 24, 2009 Statement, Defendant Catholic Conference, representing each of the six Dioceses in Illinois, stated that each diocese has a practice of seeking reconciliation with survivors and urging them to come forward to report their stories as a way to promote healing.

56. In practice, Diocesan Defendants have ignored reports of sexual abuse received and minimized the harm caused to survivors of child sex abuse by clerics.

57. Each Defendant has repeatedly and misleadingly represented that it will take action to prevent sexual abuse while simultaneously concealing information about its knowledge of sexual abuse of minors from law enforcement and the general public.

58. Defendants have, for decades, and continue to adopt policies and practices of covering up criminal activity committed by its agents. These practices continue to the present day.

59. Defendants' practices have endangered numerous children in the past and these practices will continue to put children at risk in the future.

60. In approximately 2004, Defendant Belleville Diocese publicly admitted that there were 25 priests of the Belleville Diocese who had been accused of sexually molesting minors since 1950. Defendant Belleville Diocese has never publicly released those names. Defendant Belleville Diocese continues to conceal the identities and information about priests accused of sexual abuse of minors. As a result, children are at risk of being sexually abused.

61. In approximately 2004, Defendant Chicago Archdiocese publicly admitted that there were 55 clerics of the Archdiocese who had allegations of sexually molesting minors substantiated against them since 1950. In 2014, Defendant Chicago Archdiocese added 10 more clerics to its list. Defendant Chicago Archdiocese has released some of the documents pertaining to the clerics that expose the histories, patterns and practices used to molest minors, and the Chicago Archdiocese's knowledge of the clerics' dangerous tendencies. Defendant Chicago Archdiocese continues to conceal important information about the priests on its list and the names and information about accused priests not on its list. Defendant Chicago Archdiocese has not released names and information about accused priests who belong to Roman Catholic religious orders or deceased priests. Additional information has also not been disclosed about

the accused priests' pattern of grooming and sexual abuse. As a result, children are at risk of being sexually assaulted.

62. On approximately August 27, 2018, Archbishop Cupich of Defendant Chicago Archdiocese made public statements that were dismissive of the sexual abuse of children by priests, demonstrating indifference to the current peril of sexual abuse of children.

63. On approximately September 26, 2018, Archbishop Cupich of Defendant Chicago Archdiocese published an op-ed in the Chicago Tribune newspaper about Defendant Chicago Archdiocese's response to sexual abuse in the Catholic Church. Archbishop Cupich apologized for his earlier comments on August 27, 2018 and represented that Defendant Chicago Archdiocese would continue the practices it has in the past. Defendant Chicago Archdiocese's practices continue to put children at risk of being sexually assaulted.

64. In approximately 2004, Defendant Joliet Diocese publicly admitted that there were 27 priests who had allegations of sexually molesting minors since 1950. Since then, Defendant Joliet Diocese has released the identities of 35 priests credibly accused of sexual abuse of minors and some of the documents pertaining to the clerics that expose the histories, patterns and practices used to molest minors, and the Joliet Diocese's knowledge of the clerics' dangerous tendencies. Defendant Joliet Diocese continues to conceal important information about the priests on its list and the names and information about accused priests not on its list. Defendant Joliet Diocese has not released names and information about accused priests who belong to Roman Catholic religious orders who worked in Defendant Joliet Diocese. Additional information has also not been disclosed about the accused priests' pattern of grooming and sexual abuse. As a result, children are at risk of being sexually assaulted.

65. In approximately 2012, Bishop Conlon of Defendant Joliet Diocese permitted one of its priests, Fr. Lee Ryan, who has been credibly accused of sexual abuse of a minor to continue in his employment despite knowledge that the priest sexually abused a teenager. Bishop Conlon's actions demonstrate disregard for the current peril of sexual abuse of children.

66. In approximately 2004, Defendant Peoria Diocese publicly admitted that there were 14 priests of the Peoria Diocese who had been accused of sexually molesting minors since 1950. Defendant Peoria Diocese has released the identities of 16 priests who have been removed from ministry due to abuse of a minor. Defendant Peoria Diocese continues to conceal important information about the priests on its list and the names and information about accused priests not on its list. Defendant Peoria Diocese has not released names and information about accused priests who belong to Roman Catholic religious orders or deceased priests. Additional information has also not been disclosed about the accused priests' pattern of grooming and sexual abuse. As a result, children are at risk of being sexually abused.

67. On August 22, 2018, Bishop Jenky of Defendant Peoria Diocese made statements which trivialized the problem of sexual abuse of children by priests, demonstrating indifference to the current peril of sexual abuse of children.

68. Despite representations to the contrary, Defendant Peoria Diocese has failed to respond to victims' reports of sexual abuse, including Plaintiff Darin Buckman's, demonstrating indifference to the current peril of sexual abuse of children.

69. In approximately 2004, Defendant Rockford Diocese publicly admitted that there were 28 priests of the Rockford Diocese who had been accused of sexually molesting minors since 1950. Defendant Rockford Diocese has never publicly released those names. Defendant

Rockford Diocese continues to conceal the identities and information about priests accused of sexual abuse of minors. As a result, children are at risk of being sexually abused.

70. In approximately 2004, Defendant Springfield Diocese publicly admitted that there were 14 priests of the Springfield Diocese who had been accused of sexually molesting minors since 1950. Defendant Springfield Diocese has never publicly released those names. Defendant Springfield Diocese continues to conceal the identities and information about priests accused of sexual abuse of minors. As a result, children are at risk of being sexually abused.

71. In approximately 2007, Bishop Thomas Paprocki of Defendant Springfield Diocese made public statements that were dismissive of the harm that victims of sexual abuse suffer, demonstrating a lack of compassion and concern for the healing of sexual abuse victims.

72. Bishop Paprocki has made statements as recently as September 7, 2018, contrary to the Catholic Conference's pledge to restore trust for victims through accountability and justice.

73. Prior to and since Defendants' disclosures, Defendants 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 assaulted.

**Special Relationship between Defendant Peoria Diocese and the then-minor
Plaintiff Darin Buckman**

74. Fr. John Anderson sexually abused Plaintiff Darin Buckman from approximately 1979 to 1983, when Plaintiff was approximately 8 to 14 years old.

75. Fr. Anderson used his position as a priest of the Diocese of Peoria to isolate and manipulate children, including Plaintiff.

76. As a parishioner, altar boy and student, Plaintiff had regular interaction with clergy, including Fr. Anderson.

77. Fr. Anderson gained access to Plaintiff solely by virtue of his employment with Defendant Peoria Diocese.

78. On information and belief, Fr. Anderson's inappropriate conduct with children was known to Defendant Peoria Diocese.

79. While Plaintiff was a parishioner, altar boy and student, Defendant Peoria Diocese had exclusive custody and control of Plaintiff under such circumstances as to deprive his parents of their normal opportunities for protection of their minor son. This includes, without limitation, the deprivation of a parent of their normal opportunity to protect their child from the sexual abuse of a predator or pedophile.

80. By accepting custody of Plaintiff, Defendant Peoria Diocese had a special relationship with Plaintiff.

81. While Defendant had exclusive custody of Plaintiff, Defendant Peoria Diocese had a fiduciary duty to Plaintiff.

82. Defendant Peoria Diocese owed Plaintiff a duty of reasonable care because it had superior knowledge about the risk that Fr. Anderson posed to Plaintiff, the risk of abuse in general in its programs and the risks that its facilities posed to minor children.

83. Defendant Peoria Diocese owed Plaintiff a duty of reasonable care because it solicited youth and parents for participation in their youth programs; encouraged youth and parents to have the youth participate in their programs; undertook custody of minor children, including Plaintiff; promoted their facilities, schools and programs as being safe for children; held its agents, including Fr. Anderson, out as safe to work with children; encouraged parents and children to spend time with their agents; and encouraged their agents, including Fr. Anderson, to spend time with, interact with, and recruit children.

84. Defendant Peoria Diocese owed Plaintiff a duty to protect him from harm because Defendant's actions created a foreseeable risk of harm to Plaintiff. As a vulnerable child participating in the programs and activities Defendant Peoria Diocese offered to minors, Plaintiff was a foreseeable victim. As a vulnerable child who Fr. Anderson had access to through Defendant's facilities and programs, Plaintiff was a foreseeable victim.

85. Defendant Peoria Diocese knew or should have known that some of the leaders and people working at Catholic institutions were not safe.

86. Defendant Peoria Diocese knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions were safe.

87. Defendant knew or should have known that there was a risk of child sex abuse to children participating in Catholic programs and activities.

88. Defendant knew or should have known that it 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.

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

90. On information and belief, Fr. Anderson sexually abused other children before, during, and after he sexually abused Plaintiff.

91. Before Plaintiff was sexually abused by Fr. Anderson, Defendant Peoria Diocese had actual and/or constructive knowledge of material facts regarding Fr. Anderson's

inappropriate and sexually abusive behaviors, but failed to act on that knowledge to protect children including Plaintiff.

92. Defendant Peoria Diocese were under an affirmative duty to interfere and intervene when it knew or reasonably should have known of sexually abusive conduct.

93. Defendant Peoria Diocese held its 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, and holding out the people that worked in its programs as safe.

94. Plaintiff and his family reasonably relied on these representations and Defendant's omissions.

95. Defendant Peoria Diocese was in a specialized or superior position to receive and did receive specific information regarding misconduct by its priests that was of critical importance to the well-being, protection, care and treatment of innocent victims, including Plaintiff. This knowledge was not otherwise readily available to Plaintiff. Defendant Peoria Diocese exercised its special and superior position to assume control of said knowledge and any response thereto.

96. Defendant created the misperception in the mind of Plaintiff and his family that he and other children were safe with priests in general and with Fr. Anderson in particular.

97. To the contrary, Plaintiff was a victim of a known and preventable hazard that Defendant Peoria Diocese created and allowed to continue.

98. Further, as a result of the indoctrination, reverence and trust Plaintiff and his family placed in Defendant Peoria Diocese, and as a result of Defendant's silence regarding sexual abuse by its priests including Fr. Anderson, Plaintiff and his family had no reason to

believe that Defendant Peoria Diocese was aware or involved in facilitating the criminal sexual behavior and the wide-ranging efforts to conceal that criminal conduct from them or others.

Special Relationship between Defendant Peoria Diocese and the then-minor Plaintiff John Doe 595

99. Msgr. Beebe sexually abused Plaintiff John Doe 595 in approximately 1981, when Plaintiff was approximately 15 years old.

100. Msgr. Beebe used his position as a priest of the Diocese of Peoria to isolate and manipulate children, including Plaintiff.

101. As a student, Plaintiff had regular interaction with clergy, including Msgr. Beebe.

102. Msgr. Beebe gained access to Plaintiff solely by virtue of his employment with Defendant Peoria Diocese.

103. On information and belief, Msgr. Beebe's inappropriate conduct with children was known to Defendant Peoria Diocese.

104. While Plaintiff John Doe 595 was a student, Defendant Peoria Diocese had exclusive custody and control of Plaintiff under such circumstances as to deprive his parents of their normal opportunities for protection of their minor son. This includes, without limitation, the deprivation of a parent of their normal opportunity to protect their child from the sexual abuse of a predator or pedophile.

105. By accepting custody of Plaintiff, Defendant Peoria Diocese had a special relationship with Plaintiff.

106. While Defendant had exclusive custody of Plaintiff, Defendant Peoria Diocese had a fiduciary duty to Plaintiff.

107. Defendant Peoria Diocese owed Plaintiff a duty of reasonable care because it had superior knowledge about the risk that Msgr. Beebe posed to Plaintiff, the risk of abuse in general in its programs and the risks that its facilities posed to minor children.

108. Defendant Peoria Diocese owed Plaintiff a duty of reasonable care because it solicited youth and parents for participation in their youth programs; encouraged youth and parents to have the youth participate in their programs; undertook custody of minor children, including Plaintiff; promoted their facilities, schools and programs as being safe for children; held its agents, including Msgr. Beebe, out as safe to work with children; encouraged parents and children to spend time with their agents; and encouraged their agents, including Msgr. Beebe, to spend time with, interact with, and recruit children.

109. Defendant Peoria Diocese owed Plaintiff a duty to protect him from harm because Defendant's actions created a foreseeable risk of harm to Plaintiff. As a vulnerable child participating in the programs and activities Defendant Peoria Diocese offered to minors, Plaintiff was a foreseeable victim. As a vulnerable child who Msgr. Beebe had access to through Defendant's facilities and programs, Plaintiff was a foreseeable victim.

110. Defendant Peoria Diocese knew or should have known that some of the leaders and people working at Catholic institutions were not safe.

111. Defendant Peoria Diocese knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions were safe.

112. Defendant knew or should have known that there was a risk of child sex abuse to children participating in Catholic programs and activities.

113. Defendant knew or should have known that it 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.

114. Defendant knew or should have known that they had numerous agents who had sexually molested children. Defendant knew or should have known that child molesters have a high rate of recidivism. They knew or should have known that there was a specific danger of child sex abuse to children participating in their youth programs.

115. On information and belief, Msgr. Beebe sexually abused other children before, during, and after he sexually abused Plaintiff.

116. Before Plaintiff was sexually abused by Msgr. Beebe, Defendant Peoria Diocese had actual and/or constructive knowledge of material facts regarding Msgr. Beebe's inappropriate and sexually abusive behaviors, but failed to act on that knowledge to protect children including Plaintiff.

117. Defendant Peoria Diocese were under an affirmative duty to interfere and intervene when they knew or reasonably should have known of sexually abusive conduct.

118. Defendant Peoria Diocese held its 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, and holding out the people that worked in their programs as safe.

119. Plaintiff and his family reasonably relied on these representations and Defendant's omissions.

120. Defendant Peoria Diocese were in a specialized or superior position to receive and did receive specific information regarding misconduct by their priests that was of critical

importance to the well-being, protection, care and treatment of innocent victims, including Plaintiff. This knowledge was not otherwise readily available to Plaintiff. Defendant Peoria Diocese exercised their special and superior position to assume control of said knowledge and any response thereto.

121. Defendant created the misperception in the mind of Plaintiff and his family that he and other children were safe with priests in general and with Msgr. Beebe in particular.

122. To the contrary, Plaintiff was a victim of a known and preventable hazard that Defendant Peoria Diocese created and allowed to continue.

123. Further, as a result of the indoctrination, reverence and trust Plaintiff and his family placed in Defendant Peoria Diocese, and as a result of Defendant's silence regarding sexual abuse by its priests including Msgr. Beebe, Plaintiff and his family had no reason to believe that Defendant Peoria Diocese were aware or involved in facilitating the criminal sexual behavior and the wide-ranging efforts to conceal that criminal conduct from them or others.

Defendant Peoria Diocese's Knowledge of Sexual Abuse

124. At the time of the formation of Defendant Peoria Diocese in the United States, the hierarchy of the Roman Catholic Church, including the officials of Defendant, had actual knowledge that priests sexually abused children.

125. Armed with this actual knowledge, Defendant Peoria Diocese hid the information from its parishioners and students, including Plaintiff Darin Buckman, Plaintiff John Doe 595 and their families.

126. The top officials of Defendant Peoria Diocese had a pattern and practice of hiding and not disclosing facts that sexually abusive priests served in active ministry. Defendant Peoria

Diocese has misrepresented and underreported the true nature and number of sexually abusive priests that have served in active ministry for Defendant Peoria Diocese.

**Fraudulent Misrepresentation and Non-Disclosure of Knowledge of
Defendant Peoria Diocese**

127. On information and belief, Defendant Peoria Diocese, through their leaders, provincials, agents and officials, had actual knowledge of sexual abuse by their priests at all relevant times prior to the abuse of Plaintiffs Darin Buckman and John Doe 595.

128. Armed with actual knowledge, Defendant Peoria Diocese hid this information from students, including Plaintiffs and their families.

129. In each of the years until the date of the filing of this Complaint in 2018, Defendant Peoria Diocese has misrepresented and underreported the true nature of the problem of sexual abuse of children by their clerics.

130. Defendant Peoria Diocese has had and presently has a financial incentive to misrepresent and withhold the true nature of the scope of this problem, and its contribution to and responsibility for the problem and the resulting harm to children like Plaintiffs.

131. Because of Defendant Peoria Diocese's special relationship and assumed duty described above, Defendant Peoria Diocese had a duty to disclose all that they knew, or reasonably should have known, about sexual abuse by their priests.

132. Defendant Peoria Diocese had a duty to each Plaintiff and each Plaintiff's family to warn them about the problem of sexual abuse by their priests, and had a similar duty not to downplay, underreport, or otherwise misinform or withhold facts regarding those issues to each Plaintiff or his family.

133. On information and belief, the failure of Defendant Peoria Diocese to take action regarding Fr. Anderson's sexual abuse of Plaintiff Darin Buckman and Msgr. Beebe's sexual

abuse of Plaintiff John Doe 595 is consistent with its practice of failing to respond to reports of sexual misconduct and abuse.

134. Had Defendant Peoria Diocese and their agents not misrepresented and concealed their knowledge of the dangers posed to Plaintiff by child molesting priests such as Fr. Anderson and Msgr. Beebe and thus Defendant Peoria Diocese's role in causing the abuse and later-resulting injuries, each Plaintiff would have discovered this information earlier, and within the limitations period; and therefore would have filed his cause of action against Defendant Peoria Diocese earlier than each Plaintiff did without the aid of any applicable discovery rule.

135. Because of Defendant Peoria Diocese's misrepresentations and concealment, each Plaintiff: (a) was unaware of his claim against Defendant Peoria Diocese when he turned 18; (b) did not know or suspect that Defendant Peoria Diocese had done something wrong until 2018; and (c) because of the misrepresentations and concealment of Defendants, was otherwise not aware that the acts of Defendant Peoria Diocese caused him to suffer injury.

Detrimental Reliance

136. Before, during and after approximately 1979 to 1983, Plaintiff Darin Buckman and his family detrimentally relied on the false statements and non-disclosure of Defendant Peoria Diocese about priests who had sexually abused children.

137. Before, during and after approximately 1981, Plaintiff John Doe 595 and his family detrimentally relied on the false statements and non-disclosure of Defendant Peoria Diocese about priests who had sexually abused children.

138. If each Plaintiff's parents were told at any time prior to or during Plaintiff's attendance in Diocesan programs what Defendant Peoria Diocese knew or reasonably should have known at the time about child sexual abuse by their priests or about child sexual abuse by

Fr. Anderson and Msgr. Beebe, more particularly described above, they would not have permitted each Plaintiff to be alone with any priest, including Fr. Anderson or Msgr. Beebe.

139. Plaintiff Darin Buckman did not learn of Defendant Peoria Diocese's involvement in his sexual abuse until 2018, when he learned of information regarding Defendant's noncompliance with policies and procedures to protect children from sexual abuse.

140. Plaintiff John Doe 595 did not learn of Defendant Peoria Diocese's involvement in his sexual abuse until 2018, when he learned of information regarding Defendant's noncompliance with policies and procedures to protect children from sexual abuse.

Equitable Estoppel

141. As more particularly described above, on information and belief, Defendant Peoria Diocese concealed material facts about the true nature of sexual abuse by their priests, including Fr. Anderson and Msgr. Beebe.

142. Defendant Peoria Diocese knew that by concealing their knowledge of sexually abusive priests, including Fr. Anderson and Msgr. Beebe, that it was misrepresenting facts to the public regarding the existence and extent of sexual abuse by their priests and the safety and protection of children.

143. At no time before 2018, did Plaintiffs Darin Buckman and John Doe 595 know that the representations made by Defendant Peoria Diocese were untrue.

144. Defendant Peoria Diocese intended or reasonably expected the representations to be acted upon by each Plaintiff, abused persons, their parents, or other victims of clergy sexual abuse.

145. Each Plaintiff and his family reasonably relied upon the representations of Defendant Peoria Diocese in good faith and to their detriment; and

146. Each Plaintiff has been prejudiced by his reliance on the representations of Defendant Peoria Diocese and fraudulent misrepresentations of Defendant Peoria Diocese described above when he was sexually abused and thereafter prevented from discovering the causes of the abuse he suffered, including Defendant's wrongful conduct, and from bringing this lawsuit prior to 2018.

147. Defendant Peoria Diocese has denied knowledge of Msgr. Beebe's inappropriate behavior with children and made no efforts to notify parents, parishioners, students, or the public when it learned that Msgr. Beebe had engaged in inappropriate sexual conduct with children.

148. As a result, Defendant Peoria Diocese should be equitably estopped from asserting a statute of limitations defense.

149. Based on the foregoing allegations, any statute of limitations defenses are also precluded by application of 735 ILCS 5/13-215 which tolled Plaintiffs Darin Buckman's and John Doe 595's cause of action against Defendant Peoria Diocese.

Special Relationship between Defendants Rockford Diocese, La Salette Missionaries and the then-minor Plaintiff Joshua Bollman

150. Fr. Kohler sexually abused Plaintiff Joshua Bollman in approximately 1999, when Plaintiff was approximately 12 years old.

151. Fr. Kohler used his position as a priest to isolate and manipulate children, including Plaintiff Joshua Bollman.

152. As a parishioner and student, Plaintiff had regular interaction with clergy, including Fr. Kohler.

153. Fr. Kohler gained access to Plaintiff solely by virtue of his employment with Defendants Rockford Diocese and Defendant La Salette Missionaries.

154. On information and belief, Fr. Kohler's inappropriate conduct with children was known to Defendants.

155. While Plaintiff was a student, Defendants had exclusive custody and control of Plaintiff under such circumstances as to deprive his parents of their normal opportunities for protection of their minor son. This includes, without limitation, the deprivation of a parent of their normal opportunity to protect their child from the sexual abuse of a predator or pedophile.

156. By accepting custody of Plaintiff, Defendants had a special relationship with Plaintiff.

157. While Defendants had exclusive custody of Plaintiff, Defendants had a fiduciary duty to Plaintiff.

158. Defendants owed Plaintiff a duty of reasonable care because it had superior knowledge about the risk that Fr. Kohler posed to Plaintiff, the risk of abuse in general in its programs and the risks that its facilities posed to minor children.

159. Defendants owed Plaintiff a duty of reasonable care because they solicited youth and parents for participation in their youth programs; encouraged youth and parents to have the youth participate in their programs; undertook custody of minor children, including Plaintiff; promoted their facilities, schools and programs as being safe for children; held their agents, including Fr. Kohler, out as safe to work with children; encouraged parents and children to spend time with their agents; and encouraged their agents, including Fr. Kohler, to spend time with, interact with, and recruit children.

160. Defendants owed Plaintiff a duty to protect him from harm because Defendants' actions created a foreseeable risk of harm to Plaintiff. As a vulnerable child participating in the programs and activities Defendants offered to minors, Plaintiff was a foreseeable victim. As a

vulnerable child who Fr. Kohler had access to through Defendants' facilities and programs, Plaintiff was a foreseeable victim.

161. Defendants knew or should have known that some of the leaders and people working at Catholic institutions were not safe.

162. Defendants knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions were safe.

163. Defendants knew or should have known that there was a risk of child sex abuse to children participating in Catholic programs and activities.

164. Defendants 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.

165. Defendants knew or should have known that they had numerous agents who had sexually molested children. Defendants knew or should have known that child molesters have a high rate of recidivism. They knew or should have known that there was a specific danger of child sex abuse to children participating in their youth programs.

166. On information and belief, Fr. Kohler sexually abused other children before, during, and after he sexually abused Plaintiff.

167. Before Plaintiff was sexually abused by Fr. Kohler, Defendants had actual and/or constructive knowledge of material facts regarding Fr. Kohler's inappropriate and sexually abusive behaviors, but failed to act on that knowledge to protect children including Plaintiff.

168. Defendants were under an affirmative duty to interfere and intervene when they knew or reasonably should have known of sexually abusive conduct.

169. Defendants 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, and holding out the people that worked in their programs as safe.

170. Plaintiff and his family reasonably relied on these representations and Defendants' omissions.

171. Defendants were in a specialized or superior position to receive and did receive specific information regarding misconduct by their priests that was of critical importance to the well-being, protection, care and treatment of innocent victims, including Plaintiff. This knowledge was not otherwise readily available to Plaintiff. Defendants exercised their special and superior position to assume control of said knowledge and any response thereto.

172. Defendants created the misperception in the mind of Plaintiff and his family that he and other children were safe with priests in general and with Fr. Kohler in particular.

173. To the contrary, Plaintiff was a victim of a known and preventable hazard that Defendants created and allowed to continue.

174. Further, as a result of the indoctrination, reverence and trust Plaintiff and his family placed in Defendants, and as a result of Defendants' silence regarding sexual abuse by its priests including Fr. Kohler, Plaintiff and his family had no reason to believe that Defendants were aware or involved in facilitating the criminal sexual behavior and the wide-ranging efforts to conceal that criminal conduct from them or others.

Knowledge of Sexual Abuse of Defendants Rockford Diocese and La Salette Missionaries

175. At the time of the formation of Defendants Rockford Diocese and La Salette Missionaries in the United States, the hierarchy of the Roman Catholic Church, including the officials of Defendants, had actual knowledge that priests sexually abused children.

176. Armed with this actual knowledge, Defendants hid the information from its parishioners and students, including Plaintiff and his family.

177. The top officials of Defendants had a pattern and practice of hiding and not disclosing facts that sexually abusive priests served in active ministry. Defendants have misrepresented and underreported the true nature and number of sexually abusive priests that have served in active ministry for Defendants.

Damages

178. As a direct result of Defendants' conduct described herein, each Plaintiff has suffered and continues 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 normal daily activities and obtaining the full enjoyment of life, and/or has incurred and will continue to incur expenses for 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: CIVIL CONSPIRACY ALL PLAINTIFFS AGAINST DIOCESAN DEFENDANTS

Plaintiffs incorporate all preceding paragraphs of this Complaint as if fully set forth under this Count.

179. Each and every Defendant participated in the acts and omissions complained of and entered into a common scheme to conceal the true nature of sexual abuse of minors in the Dioceses across the State of Illinois.

180. Each Defendant contributed to conceal the improper and illegal activities taking place within the Dioceses in Illinois.

181. Each Defendant entered into an agreement and concerted action to pursue the common purpose of: 1) concealing the sexual assaults of and the identities and patterns of its sexually abusive agents; 2) concealing sexual assaults and abuse committed by its agents from proper civil authorities; 3) attaching credibility of victims of Defendants' agents; 4) protecting Defendants' agents from criminal prosecution for sexual assaults and abuse against children; 5) allowing known child molesters to live freely in the community without informing the public; 6) after receiving reports or notice of sexual misconduct by clerics, transferring them to new locations without warning parishioners or the public of the threat posed by such sexual abusers; 7) making affirmative representations regarding Defendants' agents' fitness for employment in positions that include working with children, while failing to disclose negative information regarding sexual misconduct by clerics; and 8) concealing Defendants' actions and their agents' actions from survivors of past abuse causing separate current harm.

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

**COUNT II: PUBLIC NUISANCE (COMMON LAW)
ALL PLAINTIFFS AGAINST ALL DEFENDANTS**

Plaintiffs incorporate all preceding paragraphs of this Complaint as if fully set forth under this Count.

183. Residents of Illinois, and the greater Midwest have a common right to be free from conduct that unreasonably interferes with the general public's right to public health, public safety, and conduct that disrupts the peace and comfort of members of the general public.

184. Each Defendant continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual misconduct committed by, the identities of, and the pedophilic/ephebophilic tendencies of Defendants' agents against minor children; and/or 2) conceal from proper civil authorities sexual assaults and abuse committed by Defendants' agents against minor children; and/or 3) attack the credibility of victims of the Defendants' agents; and/or 4) protect Defendants' agents from criminal prosecution for their sexual assaults and abuse against children; and/or 5) allow known child molesters to live freely in the community unknown to the public; and/or 6) after receiving reports or notice of misconduct by clerics, transfer them to new parishes without any warning to parishioners of the threat posed by such clerics, in violation of law; and/or 7) make affirmative representations regarding Defendants' pedophilic and/or ephebophilic agents' fitness for employment, in positions that include working with children; and/or 8) concealing Defendants' actions and their agents' actions from survivors of past abuse causing separate current harm.

185. The negligence and/or deception and concealment by each Defendant was and is a significant and unreasonable interference with the health, safety, peace, and comfort of the general public, including, but not limited to, residents of Illinois and all other members of the general public who live in communities where the Defendants' accused molesters live. Defendants' failure to report multiple allegations of sexual assault and abuse of children to proper authorities as well as its failure to inform the public about sexual abuse, or clerics accused of sexual abuse of minors has prevented the public from knowing of a real danger, and has

thereby significantly endangered the safety and health of the general public by allowing child molesters to avoid prosecution and remain living freely in unsuspecting communities. These child molesters, known to Defendants but not to the public, pose a threat of abuse to the general public.

186. The negligence and/or deception and concealment by the Defendants was and is specially injurious to each Plaintiff's health because each Plaintiff was sexually assaulted by the Defendants' agents.

187. Defendants' significant and unreasonable interference with the health, safety, peace and comfort of the general public was also specially injurious to each Plaintiff's health in that when each Plaintiff finally discovered the negligence and/or deception and concealment, each Plaintiff experienced mental, emotional and/or physical distress that he had been the victim of the Defendants' negligence and/or deception and concealment.

188. Each Plaintiff has also suffered and continues to suffer special, particular and peculiar psychological, emotional and pecuniary harm different in kind from the general public, after learning of Defendants' concealment of names and information about clerics accused of sexually molesting minors and as a result of Defendants' significant and unreasonable interference with each Plaintiff's and the general public's rights, which continues as long as decisions are made and actions are taken to keep the information about the abuse and the accused priests and brothers concealed. As a result of the negligence and/or deception and concealment, each Plaintiff has suffered and continues to suffer lessened enjoyment of life, and/or impaired health, and/or emotional distress, and/or physical symptoms of emotional distress, and/or pecuniary loss including medical expenses and/or wage loss.

189. Each Plaintiff's injuries are also particular to them and different from certain members of the public who have not been harmed by the nuisance. People who have not been harmed by the nuisance include those who have not suffered any injury at all, those who are unaware of the nuisance, those who do not believe that Defendants ever concealed anything about child sex abuse, and those who think that any concealment only occurred decades ago.

190. The continuing public nuisance created by Defendants was, and continues to be, the proximate cause of the significant and unreasonable interference with the health, safety, peace and comfort of the general public and of each Plaintiff's special injuries and damages as alleged.

191. In doing the aforementioned acts, Defendants acted negligently and/or intentionally, maliciously and with conscious disregard for each Plaintiff's rights.

192. As a result of the above-described conduct, each Plaintiff has suffered injuries and damages more particularly described above and such other damages to which experts in this case may testify.

COUNT III: NEGLIGENCE
PLAINTIFF DARIN BUCKMAN AGAINST DIOCESE OF PEORIA

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

193. Defendant Peoria Diocese accepted minor parishioners and held St. Edward's Parish in Chillicothe, Illinois out as a safe place for children and held Fr. Anderson out as a fit priest.

194. Defendant Peoria Diocese agreed to and did undertake to provide for the supervision, care and physical safety of children at and upon the premises of St. Edward's Parish, including Plaintiff.

195. Defendant Peoria Diocese, by and through its agents, servants and employees, knew or should reasonably have known of Fr. Anderson's dangerous and exploitative propensities as a child molester.

196. At all relevant times, Defendant Peoria Diocese owed a duty of reasonable care to Plaintiff to protect Plaintiff from harm, including inappropriate sexual contact and abuse by Fr. Anderson.

197. Defendant Peoria Diocese's breach of its 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 Defendant's geographical confines, failure to have any outside agency test their safety procedures, failure to protect children in their programs from sexual 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 their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

198. Defendant Peoria Diocese failed to use ordinary care in determining whether their facilities were safe and/or whether they had sufficient information to represent their facilities as safe. Defendant's 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 they could treat child molesters.

199. Defendant Peoria Diocese also breached their duties to Plaintiff by failing to warn him and his family of the risk that Fr. Anderson posed and the risks of child sexual abuse by clerics. They also failed to warn them about any of the knowledge that Defendant had about child sex abuse.

200. Defendant Peoria Diocese also breached its duties to Plaintiff by actively maintaining and employing Fr. Anderson in a position of power and authority through which Fr. Anderson had access to children, including Plaintiff, and power and control over children, including Plaintiff.

201. The employment of Fr. Anderson in Defendant's programs created a dangerous condition to which Plaintiff was exposed.

202. Fr. Anderson obtained access to Plaintiff and was able to seclude and sexually abuse him as a direct result of his position as a priest and authority figure of Defendant Diocese of Peoria.

203. As a direct and proximate result of Defendant's conduct, Plaintiff has sustained and continues to sustain the injuries and damages alleged herein and such other damages to which experts in this case may testify.

**COUNT IV: NEGLIGENCE REGARDING ACTIONS
OUTSIDE THE SCOPE OF EMPLOYMENT
RESTATEMENT OF TORTS (SECOND) §317
PLAINTIFF DARIN BUCKMAN AGAINST DIOCESE OF PEORIA**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

204. It was the duty of Defendant Peoria Diocese, through the acts of its employees and agents, to exercise reasonable care for the protection and benefit of minor children, including Plaintiff.

205. In the alternative, the actions of Fr. Anderson described above were outside the scope of Fr. Anderson's employment with Defendant Peoria Diocese, but were such acts for which Defendant Peoria Diocese has legal responsibility.

206. Defendant Peoria Diocese, as the master, also had a duty to use reasonable care to supervise and control Fr. Anderson, its servant, so as not to create an unreasonable risk of bodily harm to others, including specifically minor children such as Plaintiff.

207. Defendant Peoria Diocese knew or had reason to know that they had the ability to control Fr. Anderson, and knew or should have known of the necessity and opportunity for exercising such control.

208. Fr. Anderson used premises owned by, operated by, and under the control of Defendant Peoria Diocese, and the instruments of his employment as a priest granted to him by Defendant Peoria Diocese, including his status, authority, and influence as a priest, to access and abuse Plaintiff.

209. Fr. Anderson was on the premises of St. Edward's Parish by his appointment by Defendant Peoria Diocese, and Defendant Peoria Diocese knew that it had the ability to control Fr. Anderson, and that he was or was likely to have access to minors to which he had and was given access by Defendant Peoria Diocese.

210. Defendant Peoria Diocese knew or reasonably should have known that allowing sexually abusive priests to be in remote or private locations outside the presence of other adults, and allowing sexually abusive priests unfettered access to children created a risk of harm to those children.

211. Such harm occurred in the form of sexual abuse of Plaintiff by a priest of Defendant Peoria Diocese that was neither supervised nor controlled for such wrongful conduct.

212. Defendant Peoria Diocese's breach of its 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 Defendant's geographical confines, failure to have any outside agency test its safety procedures, failure to protect children in its programs from sexual 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 its employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

213. Defendant Peoria Diocese failed to use ordinary care in determining whether its facilities were safe and/or whether they had sufficient information to represent its facilities as safe. Defendant Peoria Diocese's failures include, but are not limited to: failure to have sufficient policies and procedures to prevent abuse at its facilities, failure to investigate risks at

its facilities, failure to properly train the workers at its facilities, failure to have any outside agency test its safety procedures, failure to investigate the amount and type of information necessary to represent its facilities as safe, failure to train its 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 they could treat child molesters.

214. As a direct and proximate result of one or more of the foregoing wrongful acts and omissions, Plaintiff suffered injuries and damages more particularly described above; and other damages to which experts in this case may testify.

**COUNT V: FRAUDULENT MISREPRESENTATION OR
NON-DISCLOSURE OF FACTS
RESTATEMENT OF TORTS (SECOND) §557A and §310
PLAINTIFF DARIN BUCKMAN AGAINST DIOCESE OF PEORIA**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

215. It was Defendant Peoria Diocese's duty to refrain from making fraudulent misrepresentations to Plaintiff and his family before 1983; and between 1983 and 2018.

216. Because of the special relationship that Defendant Peoria Diocese had with Plaintiff, as more particularly described above, Defendant had a duty to Plaintiff and his parents to disclose all it knew or reasonably should have known about sexual abuse by its priests.

217. Defendant Peoria Diocese breached the duty of care owed to Plaintiff, a minor, and his parents, and was guilty of one or more of the foregoing acts or omissions and/or was guilty of fraudulent misrepresentations and nondisclosure that will come out during the course of discover in this case.

218. Plaintiff and his parents, during the time he was a minor, detrimentally relied upon the fraudulent misrepresentation and non-disclosure of Defendant Peoria Diocese as more particularly described above.

219. As a direct and proximate result of the foregoing wrongful acts and omissions, Plaintiff suffered injuries and damages more particularly described above, and such other damages to which experts in this case may testify.

**COUNT VI: NEGLIGENCE
PLAINTIFF JOHN DOE 595 AGAINST DIOCESE OF PEORIA**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

220. Defendant Peoria Diocese accepted minor parishioners and held Academy of Our Lady - Spalding Institute in Peoria, Illinois out as a safe place for children and held Msgr. Beebe out as a fit priest.

221. Defendant Peoria Diocese agreed to and did undertake to provide for the supervision, care and physical safety of children at and upon the premises of Academy of Our Lady - Spalding Institute, including Plaintiff.

222. Defendant Peoria Diocese, by and through its agents, servants and employees, knew or should reasonably have known of Msgr. Beebe's dangerous and exploitative propensities as a child molester.

223. At all relevant times, Defendant Peoria Diocese owed a duty of reasonable care to Plaintiff to protect Plaintiff from harm, including inappropriate sexual contact and abuse by Msgr. Beebe.

224. Defendant Peoria Diocese's breach of its 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 Defendant's geographical confines, failure to have any outside agency test their safety procedures, failure to protect children in their programs from sexual 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 their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

225. Defendant Peoria Diocese failed to use ordinary care in determining whether their facilities were safe and/or whether they had sufficient information to represent their facilities as safe. Defendant's 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 they could treat child molesters.

226. Defendant Peoria Diocese also breached its duties to Plaintiff by failing to warn him and his family of the risk that Msgr. Beebe posed and the risks of child sexual abuse by

clerics. They also failed to warn them about any of the knowledge that Defendant had about child sex abuse.

227. Defendant Peoria Diocese also breached its duties to Plaintiff by actively maintaining and employing Msgr. Beebe in a position of power and authority through which Msgr. Beebe had access to children, including Plaintiff, and power and control over children, including Plaintiff.

228. The employment of Msgr. Beebe in Defendant's programs created a dangerous condition to which Plaintiff was exposed.

229. Msgr. Beebe obtained access to Plaintiff and was able to seclude and sexually abuse him as a direct result of his position as a priest and authority figure of Defendant Diocese of Peoria.

230. As a direct and proximate result of Defendant's conduct, Plaintiff has sustained and continues to sustain the injuries and damages alleged herein and such other damages to which experts in this case may testify.

**COUNT VII: NEGLIGENCE REGARDING ACTIONS
OUTSIDE THE SCOPE OF EMPLOYMENT
RESTATEMENT OF TORTS (SECOND) §317
PLAINTIFF JOHN DOE 595 AGAINST DIOCESE OF PEORIA**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

231. It was the duty of Defendant Peoria Diocese, through the acts of its employees and agents, to exercise reasonable care for the protection and benefit of minor children, including Plaintiff.

232. In the alternative, the actions of Msgr. Beebe described above were outside the scope of Msgr. Beebe's employment with Defendant Peoria Diocese, but were such acts for which Defendant Peoria Diocese has legal responsibility.

233. Defendant Peoria Diocese, as the master, also had a duty to use reasonable care to supervise and control Msgr. Beebe, its servant, so as not to create an unreasonable risk of bodily harm to others, including specifically minor children such as Plaintiff.

234. Defendant Peoria Diocese knew or had reason to know that they had the ability to control Msgr. Beebe, and knew or should have known of the necessity and opportunity for exercising such control.

235. Msgr. Beebe used premises owned by, operated by, and under the control of Defendant Peoria Diocese, and the instruments of his employment as a priest granted to him by Defendant Peoria Diocese, including his status, authority, and influence as a priest, to access and abuse Plaintiff.

236. Msgr. Beebe was on the premises of Academy of Our Lady – Spalding Institute by his appointment by Defendant Peoria Diocese, and Defendant Peoria Diocese knew that it had the ability to control Msgr. Beebe, and that he was or was likely to have access to minors to which he had and was given access by Defendant Peoria Diocese.

237. Defendant Peoria Diocese knew or reasonably should have known that allowing sexually abusive priests to be in remote or private locations outside the presence of other adults, and allowing sexually abusive priests unfettered access to children created a risk of harm to those children.

238. Such harm occurred in the form of sexual abuse of Plaintiff by a priest of Defendant Peoria Diocese that was neither supervised nor controlled for such wrongful conduct.

239. Defendant Peoria Diocese's breach of its 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 Defendant's geographical confines, failure to have any outside agency test its safety procedures, failure to protect children in its programs from sexual 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 its employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

240. Defendant Peoria Diocese failed to use ordinary care in determining whether its facilities were safe and/or whether they had sufficient information to represent its facilities as safe. Defendant Peoria Diocese's failures include, but are not limited to: failure to have sufficient policies and procedures to prevent abuse at its facilities, failure to investigate risks at its facilities, failure to properly train the workers at its facilities, failure to have any outside agency test its safety procedures, failure to investigate the amount and type of information necessary to represent its facilities as safe, failure to train its 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 they could treat child molesters.

241. As a direct and proximate result of one or more of the foregoing wrongful acts and omissions, Plaintiff suffered injuries and damages more particularly described above; and other damages to which experts in this case may testify.

**COUNT VIII: FRAUDULENT MISREPRESENTATION OR
NON-DISCLOSURE OF FACTS
RESTATEMENT OF TORTS (SECOND) §557A and §310
PLAINTIFF JOHN DOE 595 AGAINST DIOCESE OF PEORIA**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

242. It was Defendant Peoria Diocese's duty to refrain from making fraudulent misrepresentations to Plaintiff and his family before 1981; and between 1981 and 2018.

243. Because of the special relationship that Defendant Peoria Diocese had with Plaintiff, as more particularly described above, Defendant had a duty to Plaintiff and his parents to disclose all it knew or reasonably should have known about sexual abuse by its priests.

244. Defendant Peoria Diocese breached the duty of care owed to Plaintiff, a minor, and his parents, and was guilty of one or more of the foregoing acts or omissions and/or was guilty of fraudulent misrepresentations and nondisclosure that will come out during the course of discover in this case.

245. Plaintiff and his parents, during the time he was a minor, detrimentally relied upon the fraudulent misrepresentation and non-disclosure of Defendant Peoria Diocese as more particularly described above.

246. As a direct and proximate result of the foregoing wrongful acts and omissions, Plaintiff suffered injuries and damages more particularly described above, and such other damages to which experts in this case may testify.

COUNT IX: NEGLIGENCE

**PLAINTIFF JOSHUA BOLLMAN AGAINST ROCKFORD DIOCESE
AND LA SALETTE MISSIONARIES**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

247. Defendant Rockford Diocese and La Salette Missionaries (hereinafter referred to under this count as “Defendants”) accepted minor parishioners and held St. Joseph’s Parish in Lena, Illinois out as a safe place for children and held Fr. Kohler out as a fit priest.

248. Defendants agreed to and did undertake to provide for the supervision, care and physical safety of children at and upon the premises of St. Joseph’s Parish, including Plaintiff.

249. Defendants, by and through their agents, servants and employees, knew or should reasonably have known of Fr. Kohler’s dangerous and exploitative propensities as a child molester.

250. At all relevant times, Defendants owed a duty of reasonable care to Plaintiff to protect Plaintiff from harm, including inappropriate sexual contact and abuse by Fr. Kohler.

251. Defendants’ breach of their 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 Defendants’ geographical confines, failure to have any outside agency test their safety procedures, failure to protect children in their programs from sexual 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 their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

252. Defendants failed to use ordinary care in determining whether their facilities were safe and/or whether they had sufficient information to represent their 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 they could treat child molesters.

253. Defendants also breached their duties to Plaintiff by failing to warn him and his family of the risk that Fr. Kohler 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.

254. Defendants also breached their duties to Plaintiff by actively maintaining and employing Fr. Kohler in a position of power and authority through which Fr. Kohler had access to children, including Plaintiff, and power and control over children, including Plaintiff.

255. The employment of Fr. Kohler in Defendants' programs created a dangerous condition to which Plaintiff was exposed.

256. Fr. Kohler obtained access to Plaintiff and was able to seclude and sexually abuse him as a direct result of his position as a priest and authority figure of Defendants.

257. As a direct and proximate result of Defendants' conduct, Plaintiff has sustained and continues to sustain the injuries and damages alleged herein and such other damages to which experts in this case may testify.

**COUNT XI: NEGLIGENCE REGARDING ACTIONS
OUTSIDE THE SCOPE OF EMPLOYMENT
RESTATEMENT OF TORTS (SECOND) §317
PLAINTIFF JOSHUA BOLLMAN AGAINST ROCKFORD DIOCESE AND LA
SALETTE MISSIONARIES**

Plaintiff incorporates all preceding paragraphs of this Complaint as if fully set forth under this Count.

258. It was the duty of Defendant Rockford Diocese and Defendant La Salette Missionaries (hereinafter referred to under this count as "Defendants"), through the acts of their employees and agents, to exercise reasonable care for the protection and benefit of minor children, including Plaintiff.

259. In the alternative, the actions of Fr. Kohler described above were outside the scope of Fr. Kohler's employment with Defendants, but were such acts for which Defendants have legal responsibility.

260. Defendants, as the masters, also had a duty to use reasonable care to supervise and control Fr. Kohler, their servant, so as not to create an unreasonable risk of bodily harm to others, including specifically minor children such as Plaintiff.

261. Defendants knew or had reason to know that they had the ability to control Fr. Kohler, and knew or should have known of the necessity and opportunity for exercising such control.

262. Fr. Kohler used premises owned by, operated by, and under the control of Defendants, and the instruments of his employment as a priest granted to him by Defendants,

including his status, authority, and influence as a priest, to access and abuse Plaintiff.

263. Fr. Kohler was on the premises of St. Joseph's in Lena by his appointment by Defendants, and Defendants knew that they had the ability to control Fr. Kohler, and that he was or was likely to have access to minors to which he had and was given access by Defendants.

264. Defendants knew or reasonably should have known that allowing sexually abusive priests to be in remote or private locations outside the presence of other adults, and allowing sexually abusive priests unfettered access to children created a risk of harm to those children.

265. Such harm occurred in the form of sexual abuse of Plaintiff by a priest of Defendants that was neither supervised nor controlled for such wrongful conduct.

266. Defendants' breach of their 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 Defendants' geographical confines, failure to have any outside agency test their safety procedures, failure to protect children in their programs from sexual 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 their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and failure by relying on people who claimed that they could treat child molesters.

267. Defendants failed to use ordinary care in determining whether their facilities were safe and/or whether they had sufficient information to represent their 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 they could treat child molesters.

268. As a direct and proximate result of one or more of the foregoing wrongful acts and omissions, Plaintiff suffered injuries and damages more particularly described above; and other damages to which experts in this case may testify.

WHEREFORE, Plaintiffs demand judgment against Defendants jointly and severally in an amount in excess of the jurisdictional limits of this Court, and any other such relief as the Court deems just and equitable.

To abate the continuing nuisance, Plaintiffs further request an order requiring that each Defendant publicly release the names of all agents, including priests, accused of child molestation, each agent's history of abuse, each such agent's pattern of grooming and sexual behavior, and his or her last known address. This includes the release of each Defendant's documents on the agents.

Plaintiffs further request an order requiring Defendants to discontinue their current practice and policy of dealing with allegations of child sexual abuse by their agents, and requiring that Defendants work with civil authorities to create, implement and follow a policy to

deal with sexually abusive clergy that will better protect children and the general public from further harm.

JURY DEMAND

Plaintiffs hereby demand a jury trial.

Respectfully Submitted,

/s/ Marc J. Pearlman
One of Plaintiffs' Attorneys

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Darin Buckman, John Doe 595, Joshua Bollman,)
and Cynthia Yesko,)

Plaintiffs,)

v.)

No.)

Illinois Catholic Conference a/k/a Catholic)
Conference of Illinois; Diocese of Belleville;)
The Catholic Bishop of Chicago, a Corporation)
Sole a/k/a Archdiocese of Chicago; Diocese of)
Joliet in Illinois a/k/a Diocese of Joliet; Diocese of)
Peoria; Diocese of Rockford; Diocese of)
Springfield in Illinois a/k/a Diocese of Springfield;)
and the Missionaries of Our Lady of La Salette,)
Generalate a/k/a The Missionaries of Our Lady of)
La Salette, Province of Mary Queen a/k/a La Salette)
Missionaries a/k/a Missionaries of La Salette)
Corporation of Missouri a/k/a the Missionaries of)
Our Lady of La Salette Province of Mary,)
Mother of the Americas,)

Defendants.)

JURY DEMAND

NOW COMES the Plaintiffs, by and through their attorneys, Frost Pearlman, LLC, and
Jeff Anderson & Associates, P.A., and hereby demands that this matter be tried before a jury of
twelve persons.

Respectfully Submitted,

/s/ Marc J. Pearlman
One of Plaintiffs' Attorneys

FILED DATE: 10/17/2018 5:21 PM 2018L011293

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