

VIRGINIA:

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

JANE DOE¹

Plaintiff,

v.

Case No.: CL12-1467

CATHOLIC DIOCESE OF ARLINGTON
200 N. Glebe Road, Suite 914
Arlington, Virginia 22203
SERVE: Mark E. Hermann, Esq.
Chancellor and General Counsel

And

CATHOLIC DIOCESE OF ARLINGTON,
A CORPORATION SOLE
200 N. Glebe Road, Suite 914
Arlington, Virginia 22203
SERVE: Mark E. Hermann, Esq.
Chancellor and General Counsel

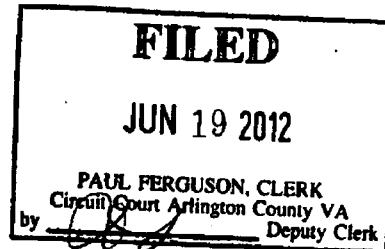
And

Most Rev. PAUL S. LOVERDE
Bishop of the Catholic Diocese
of Arlington
200 N. Glebe Road, Suite 914
Arlington, Virginia 22203

And

HUMAN LIFE INTERNATIONAL, INC.
SERVE: Nancy R. Schlichting, R/A
c/o Lenhart Obenshaim, P.C.
100 10th Street, N.E., Suite 300
Charlottesville, Virginia 22902

And



¹ Attached in a sealed Envelope as Exhibit 1 is an identical complaint in which the Plaintiff is identified by name. Plaintiff has filed simultaneously with the complaint a motion for leave pursuant to Virginia Code Section 8.01-15.1 requesting that she proceed anonymously as "Jane Doe".

HLI ENDOWMENT, INC.)
SERVE: Nancy R. Schlichting, R/A)
c/o Lenhart Obenshaim, P.C.)
100 10th Street, N.E., Suite 300)
Charlottesville, Virginia 22902)
Defendants.)

COMPLAINT

COMES NOW the Plaintiff, Jane Doe, by her counsel, Demetrios C. Pkrallidas and Robert T. Hall, and states the following as the basis for her Complaint against the Defendants herein:

PARTIES

1. At all times relevant herein, the Plaintiff, Jane Doe, was a resident of Warren County in the Commonwealth of Virginia.
2. At all times relevant herein, the Defendant, the Catholic Diocese of Arlington ("Diocese), was an unincorporated organization of the Roman Catholic Church which, among other things, was responsible for the governance of the Roman Catholic priests practicing within its assigned geographical borders.
3. At all times relevant herein, the Defendant, the Catholic Diocese of Arlington, a Corporation Sole ("Diocese), was an unincorporated organization of the Roman Catholic Church which, among other things, was responsible for the governance of the Roman Catholic priests practicing within its assigned geographical borders.
4. At all times relevant herein, the Chancery and administrative offices of the Diocese were located in Arlington County, Virginia.

5. At all relevant times herein, the Defendant, the Most Rev. Paul S. Loverde, was the Bishop for the Diocese.

6. As the Bishop, the Defendant, Most Rev. Paul S. Loverde, was responsible for the governance of all of the churches in the Diocese which included but was not limited to, an obligation of oversight and supervision over all priests practicing in the jurisdictional boundaries of the Diocese.

7. At all times relevant herein, the Defendant, Human Life International, Inc., (hereinafter referred to as "HLI") was a Virginia corporation which had its headquarters and corporate offices located at 4 Family Life Lane, Front Royal, Virginia 22630.

8. At all times relevant herein, the Defendant, HLI Endowment, Inc. (hereinafter referred to as "HLIE"), was a Virginia corporation which had its headquarters and corporate offices located at 4 Family Life Lane, Front Royal, Virginia 22630.

9. Between 2000 and August, 2010, Thomas J. Euteneur (hereinafter referred to as "Euteneur"), served as the President of both HLI and HLIE.

JURISDICTION AND VENUE

10. Jurisdiction is proper in the Commonwealth of Virginia and in the Circuit Court of Arlington County, because the subject matter of this Complaint involves personal injuries that exceed \$25,000.00; the Defendants are residents of or have their offices in the Commonwealth of Virginia; and some of the injuries complained of took place in the Commonwealth of Virginia.

11. Venue is appropriate in Arlington County, because some Defendants reside in or have their offices in Arlington County.

BACKGROUND FACTS

12. In 2000, Euteneur, a duly ordained Roman Catholic priest moved to Warren County, Virginia to begin work as the President of HLI and HLIE and to continue his ministry in "Spiritual Deliverance" and the performance of the rite of exorcism.

13. "Spiritual Deliverance" and the performance of the rite of exorcism are inter-related practices that were performed by Euteneur with the knowledge and consent of the Diocese and Most Rev. Paul S. Loverde (hereinafter referred to as "Bishop Loverde). On at least one previous occasion, the Diocese and Bishop Loverde gave permission to Euteneur to conduct an exorcism within the Diocese.

14. At all times relevant herein, both practices were recognized by the Defendants to be potentially dangerous to the participants. The Defendants knew that a basic principle in the administration of an exorcism is that the priest should never act alone, and that he should always be accompanied by a support team who have been duly prepared to assist him.

15. At all times relevant herein, the Defendants knew that safeguards and monitoring of either or both practices was a necessary obligation for the Defendants' oversight of the performance of these practices by priests in their Diocese.

16. On or about February 28, 2008, the Plaintiff began a relationship with Euteneur by signing a document entitled "Agreement for spiritual help." Among many other things, the document defines "deliverance" as "the application of the spiritual resources of the Church to persons with demonic infestation in order to liberate them from the influence of unclean spirits."

17. The aforementioned document also defined the "deliverance minister" as "a deliverer of evil spirits and a healer. His work is one of authority and faith."

18. The aforementioned document included a requirement of "complete cooperation" and travel to Euteneur's offices at HLI.

19. At all times relevant herein, the Defendants know that Euteneur was acting as a “deliverance minister,” and they knew, at the very least, the contents of the “Agreement for spiritual help” that was signed by the Plaintiff.

20. At the time that the aforesaid “Agreement for spiritual help” was signed by the Plaintiff, Euteneur knew that the Plaintiff believed that she was in desperate need of the rite of exorcism. He confirmed to her that her case was “severe,” and he promised that he would never abandon her and would always be her friend.

21. Between February, 2008 and March, 2008, the Plaintiff and Euteneur had regular and frequent meetings in the offices and buildings of HLI and HLIE, among other places. During and after said meetings, Euteneur began touching the Plaintiff in inappropriate ways that included, but were not limited to, prolonged and tight hugs and the touching and stroking of the Plaintiff’s back and legs.

22. In April, 2008, Euteneur announced to the Plaintiff that he had received permission from the Diocese to perform the rite of exorcism on behalf of the Plaintiff.

23. On or about April 11, 2008, after a particularly difficult meeting, Euteneur began to hug the Plaintiff while saying “I wish I could go a lot further.” He carried the Plaintiff into a guest residence bedroom at HLI and HLIE, laid her on the bed, embraced her, touched her under her bra, and attempted to touch her under her underclothes, which the Plaintiff stopped. Euteneur spent the entire night in bed with the Plaintiff.

24. During the following weeks, during every meeting, Euteneur became progressively persistent in touching the Plaintiff inappropriately. He kissed the corners of her mouth; stroked her legs, breasts and thighs; caressed her face; laid his body on top of hers; and frequently explained full, passionate kisses as “blowing the Holy Spirit into” her.

25. Between April, 2008 and June, 2010, Euteneur conducted regular and frequent exorcisms and deliverance ministry sessions with the Plaintiff and without any support team.

26. The overwhelming majority of said exorcisms and sessions occurred in the offices of the corporate headquarters of HLI and HLIE, and with the knowledge and consent of HLI and HLIE.

27. Between April, 2008 and June, 2010, Euteneur, in addition to committing the acts described in Paragraph 20, above, on approximately six separate occasions, directed the Plaintiff to undress; touched and kissed the Plaintiff on all parts of her body; and digitally penetrated the Plaintiff's vagina. In addition, Euteneur directed the Plaintiff to touch his penis.

28. At all times when the aforesaid acts were perpetrated, Euteneur knew that the Plaintiff suffered from a dissociative disorder; knew that she had become physically, emotionally, and spiritually dependent on him; and knew that his sexual violations on the Plaintiff were not committed with her consent. In addition, Euteneur knew that his behavior, as described, would cause severe emotional distress to the Plaintiff.

29. The sexual abuse perpetrated by Euteneur on the Plaintiff caused the Plaintiff constant pain, mental anguish, confusion, and fear of abandonment.

30. The sexual abuse by Euteneur was always paired with deliverance or exorcism sessions which created in the Plaintiff a distorted and damaging belief that exorcism was tied to sexual activity, and sexual activity was necessary to keep her spiritual adviser.

31. In September, 2008, Euteneur offered to move the Plaintiff from her home in Sterling, Virginia to Front Royal, Virginia. To entice her to make the move, Euteneur offered to pay for all moving expenses and to help pay her rent. In addition, Euteneur, as President of HLI and HLIE, made arrangements to hire the Plaintiff as an independent contractor.

32. Between September 11, 2008 and February 25, 2009, the Plaintiff was hired by HLI for contract services. On March 25, 2010, the Plaintiff became a full time employee of HLI. The circumstances surrounding the hiring of the Plaintiff were contrary to HLI corporate policy but were ratified and approved by HLI and HLIE.

33. Between September 11, 2008 through June, 2010, Euteneur had numerous deliverance sessions with the Plaintiff during which he sexually abused her during working hours and in various rooms at HLI and HLIE headquarters.

34. Between February 28, 2008 through June, 2010, Euteneur frequently gave money to the Plaintiff and paid for her personal needs. The fact that the Plaintiff relied on Euteneur for her job as well as for monetary assistance created an additional dependence of the Plaintiff on Euteneur.

35. Between November, 2008 and the Spring of 2009, Euteneur paid thousands of dollars in expenses to have the Plaintiff work with Stephen Oglevie to assist in dealing with her problems.

36. Euteneur paid for all expenses, including, but not limited to, plane fare, hotel costs, incidental costs and professional fees incurred for approximately six sessions with Stephen Oglevie.

37. In August, 2009, Euteneur paid for all expenses incurred by the Plaintiff to meet with a psychologist whose offices were in Florence, Kentucky. The Plaintiff met with said psychologist on approximately five occasions for two days on each occasion.

38. In June, 2009, the Plaintiff and her family planned a trip to Hawaii. Euteneur advised the Plaintiff not to go on the trip. At the same time, Euteneur was told by the Plaintiff that she had kept a private journal which covered her time spent with Euteneur. Euteneur

convinced the Plaintiff to entrust her journal to him for safekeeping while she was in Hawaii, which the Plaintiff did.

39. Euteneur flew to Hawaii and secretly met with the Plaintiff every morning while she was there.

40. Euteneur returned to Virginia several days before the Plaintiff and went to the Plaintiff's home for the purpose of finding and collecting any and all other journals that the Plaintiff might have kept. His attempt was unsuccessful.

41. Upon her return from Hawaii, the Plaintiff asked Euteneur for the return of her journal. After a delay of two weeks, Euteneur reported that he had burned the journal "because it would scandalize the public and harm HLI." No concern was given to the trauma that this act caused to the Plaintiff.

42. The Plaintiff contacted a representative of the Diocese to report Euteneur's refusal to return the journal. When she learned the journal had been burned, she did not pursue her complaint with the Diocese.

43. After a period of approximately two months of no contact with Euteneur, except at HLI headquarters, Euteneur agreed to resume the deliverance ministry and rite of exorcism.

44. Between September, 2009 and the Spring of 2010, Euteneur sexually abused the Plaintiff repeatedly and as described above.

45. On or about June 19, 2010, in a motel room in Lansing, Michigan, while representing HLI at a conference, Euteneur invited the Plaintiff to his room to "pray over" her. After praying over the Plaintiff, Euteneur removed her clothes, touched her body, and penetrated her digitally.

46. Shortly after this event, the Plaintiff reached the conclusion that her treatment by Euteneur was illegal, inappropriate, outrageous, harmful and completely contrary to the dictates of her understanding of Roman Catholic beliefs and practices.

47. On or about July 7, 2010, the Plaintiff met personally with Father Creegan of the Catholic Diocese of Arlington, and gave him a detailed description of the history of her relationship with Euteneur.

48. Despite the information given to the Defendants, Euteneur remained at HLI and HLIE for over two months.

49. On August 10, 2010 and September 5, 2010, Euteneur again sexually violated the Plaintiff. On the first occasion, Euteneur's digital penetration of the Plaintiff was so rough that she was in pain for three days and she experienced a bloody discharge.

50. In August, 2010, Euteneur resigned as President of HLI and HLIE and was recalled to the Diocese of Palm Beach, Florida.

51. On January 31, 2011, Euteneur published a statement in which he wrote: "I must acknowledge, however, that one particularly complex situation clouded my judgment and led me to imprudent decisions with harmful consequences, the worst of which was violating the boundaries of chastity with an adult female who was under my spiritual care."

CAUSE OF ACTION NO. 1 (all Defendants)

(Assault)

52. All allegations contained in Paragraphs 1 – 51 are incorporated herein by reference.

53. On numerous occasions, but specifically on June 19, 2010, August 10, 2010 and September 5, 2010, Euteneur made acts of a threatening sexual nature that put the Plaintiff in reasonable fear of physical injury.

54. All of the aforementioned acts of assault were committed by Euteneur during the perpetration of either his deliverance ministry or his performance of the rite of exorcism as a Roman Catholic priest practicing under the oversight and guidance of the Diocese and Bishop Loverde and within the scope and course of his employment by HLI and HLIE.

55. All of the aforementioned acts of assault were committed by Euteneur while performing his duties as a Roman Catholic priest in and for the Defendants.

56. All of the aforementioned acts of assault were committed by Euteneur within the scope and course of his employment by the Defendants.

57. As a direct and proximate result of the assaults on the Plaintiff she has suffered permanent, severe, debilitating pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.

CAUSE OF ACTION NO. 2 (all Defendants)
(Battery)

58. All of the allegations contained in Paragraphs 1 – 57 are incorporated herein by reference.

59. On numerous occasions, but specifically on June 19, 2010, August 10, 2010 and September 5, 2010, Euteneur touched the Plaintiff, without her consent, in a rude and angry way.

60. All of the aforementioned acts of battery were committed by Euteneur during the perpetration of either his deliverance ministry or his performance of the rite of exorcism as a Roman Catholic priest practicing under the oversight and guidance of the Diocese and Bishop Loverde and within the scope and course of that employment.

61. All of the aforementioned acts of battery were committed by Euteneur while performing his duties as a Roman Catholic priest in and for the Diocese.

62. At the time of the commission of said acts, Euteneur was an employee of HLI and HLIE.

63. All of the aforementioned acts of battery were committed by Euteneur within the scope and course of his employment by HLI and HLIE.

63. As a direct and proximate result of the battery on the Plaintiff she has suffered permanent, severe, debilitating pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.

CAUSE OF ACTION NO. 3 (all Defendants)
(Intentional Infliction of Emotional Distress)

64. All allegations contained in Paragraphs 1 – 63 are incorporated herein by reference.

65. The described sexual abuse of the Plaintiff by Euteneur was both intentional and reckless.

66. The described sexual abuse of the Plaintiff by Euteneur was outrageous and intolerable, offending generally accepted standards of decency and morality.

67. The Plaintiff, as a direct result of the described sexual abuse, suffered severe and debilitating emotional distress, pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.

68. All of the aforementioned acts of sexual abuse were committed by Euteneur during the perpetration of either his deliverance ministry or his performance of the rite of exorcism as a Roman Catholic priest practicing under the oversight and guidance of the Diocese and Bishop Loverde and within the scope and course of that employment.

69. All of the aforementioned acts of sexual abuse were committed by Euteneur while performing his duties as a Roman Catholic priest in and for the Diocese.

70. All of the aforementioned acts of sexual abuse were committed by Euteneur within the scope and course of his employment by HLI and HLIE.

CAUSE OF ACTION NO. 4 (all Defendants)
(Negligent Entrustment)

71. All allegations contained in Paragraphs 1 – 70 are incorporated herein by reference.

72. The Defendants knowingly, freely, and voluntarily gave permission to Euteneur to engage in deliverance ministry and the rite of exorcism for the Plaintiff.

73. At the time said permission was given, the Defendants knew that the activities were likely to create a harm or create a risk of harm to the Plaintiff.

74. Despite their knowledge that the deliverance ministry and the rite of exorcism were likely to create a harm or create a risk of harm to the Plaintiff, the Defendants did nothing by way of oversight to monitor or control the actions of Eutener's commission of these harmful acts, including at HLI and HLIE's corporate offices, to whom the activities were entrusted.

75. As a direct and proximate cause of the actions of the Defendants, the Plaintiff suffered pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.

CAUSE OF ACTION NO. 5 (all Defendants)
(Negligent Infliction of Emotional Distress)

76. All of the allegations contained in Paragraphs 1 – 75 are incorporated herein by reference.
77. The described sexual abuse of the Plaintiff by Euteneur was negligently inflicted.
78. The described sexual abuse of the Plaintiff by Euteneur was outrageous and intolerable, offending generally accepted standards of decency and morality.
79. The Plaintiff, as a direct result of the described sexual abuse, suffered severe and debilitating emotional distress, pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.
80. All of the aforementioned acts of sexual abuse were committed by Euteneur during the perpetration of either his deliverance ministry or his performance of the rite of exorcism as a Roman Catholic priest practicing under the oversight and guidance of the Diocese and Bishop Loverde and within the scope and course of the employment.
81. All of the aforementioned acts of sexual abuse were committed by Euteneur while performing his duties as a Roman Catholic priest in and for the Defendants.
82. All of the aforementioned acts of assault were committed by Euteneur within the scope and course of his employment by HLI and HLIE.

CAUSE OF ACTION NO. 6 (All Defendants)
(Negligent Retention)

83. All of the allegations contained in Paragraph 1 – 82 are incorporated herein by reference.

84. On July 7, 2010, the Plaintiff reported in graphic detail the abuse she had received at the hands of Euteneur.

85. The Defendants took no action for two months to remove Euteneur from his position as President of HLI and HLIE and his position as a practicing Roman Catholic priest.

86. The Defendants knew that the Plaintiff was an employee at HLI and HLIE and knew or should have known that her desk was immediately opposite to Euteneur's office.

87. On July 7, 2010, the Defendants knew that the Plaintiff was in a dangerous psychological condition, most of which had been caused by the actions of Euteneur.

88. In spite of this knowledge, the Defendants did nothing for a period of two months to ensure that Euteneur and the Plaintiff were, at least, physically separated.

89. The retention of Euteneur in his position at HLI and HLIE and as a priest for two months was done negligently and with a total disregard for the Plaintiff's mental and physical health.

90. The allegations made by the Plaintiff and her psychologist to the Defendants on July 7, 2010 clearly established that Euteneur was unfit for retention.

91. The information given to the Defendants on July 7, 2010 clearly established that the Defendants knew or should have known that the retention of Euteneur could cause harm to the Plaintiff.

92. As a direct and proximate result of the negligent retention of Euteneur by the Defendants, the Plaintiff was sexually abused by Euteneur on August 10, 2010 and September 5, 2010 and as further described above.

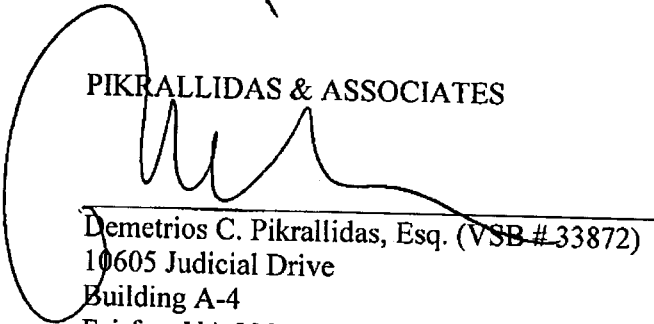
93. The Plaintiff, as a direct result of the described sexual abuse, suffered severe and debilitating emotional distress, pain and suffering; traumatic and permanent psychological injuries; she has incurred, and will in the future incur, medical bills and expenses for her needed care and treatment; and she has suffered the loss of her employment and the ability to obtain gainful employment.

WHEREFORE, Plaintiff moves this Court for Judgment against the Defendants, jointly and severally, for compensatory damages in the amount Five Million Dollars (\$5,000,000.00), punitive damages in the amount of Three Hundred Fifty Thousand Dollars (\$350,000.00), together with pre-judgment interest, her costs expended in this action, and for such other relief as is just and proper.

A TRIAL BY JURY IS DEMANDED.

JANE DOE
By Counsel

PIKRALLIDAS & ASSOCIATES



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