

IN THE SUPERIOR COURT OF THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT **BETHEL**

JAMES DOE 59 through 71, JAMES DOE 73)
through 94, JANET DOE 4 through 7, and)
JEAN DOE 3 through 6,)

Plaintiffs,)

vs.)

THE SOCIETY OF JESUS, OREGON)
PROVINCE; THE SOCIETY OF JESUS)
ALASKA; THE SOCIETY OF JESUS,)
FATHER GENERAL ADOLFO NICOLAS, SJ)
AND HIS PREDECESSORS; THE PIONEER)
EDUCATIONAL SOCIETY; FATHER)
STEPHEN SUNDBORG, S.J.; ANTON)
SMARIO; FATHER HENRY G.)
HARGREAVES; and DOES 1 through 100,)
inclusive,)

Defendants.)

Case No. 4BE-09-_____

COMPLAINT

Plaintiffs JAMES DOE¹ 59 through 71, JAMES DOE 73 through 94, JANET DOE 4 through 7, and JEAN DOE 3 through 6, by and through their attorneys Cooke Roosa, LLC, and Manly & Stewart, complain and allege as follows:

ALLEGATIONS COMMON TO ALL CLAIMS

1. Plaintiffs, JAMES DOE 59 through 71, JAMES DOE 73 through 94, JANET DOE 4 through 7, and JEAN DOE 3 through 6, at the time of the wrongful

¹ The DOE names in this complaint are pseudonyms, used to protect the identities of the plaintiffs in this case. The true names of the plaintiffs, and the correlative pseudonyms for each, will be filed with the court under seal.

conduct described herein, were residents of Nulato, Hooper Bay, Stebbins, Chevak, Mountain Village, Nunam Iqua or St. Michael, Alaska. Because the events described in this Complaint are of an extremely personal and sensitive nature and occurred during the minority of all of the named Plaintiffs, all Plaintiffs choose to identify themselves only by pseudonyms in the public documents filed in this case.

2. Defendant SOCIETY OF JESUS, OREGON PROVINCE (also referred to herein as the Oregon Province or the Jesuits) is a foreign corporation incorporated in Oregon on February 21, 1918. Its agent for service of process is Mark A. Stayer, 1211 SW Fifth Ave., Ste. 1700, Portland, OR, 97204. The chief operating officer of defendant Oregon Province is Father Patrick J. Lee, S.J. He is the person personally responsible for the personnel and operations of Oregon Province, which reaches from Point Barrow, Alaska, to Southern Oregon and from the Pacific Ocean to the plains of Eastern Montana. According to the Province's website (www.nwjesuits.org) some 320 Jesuit priests work in the province, serving 15,000 students at two universities and four high schools, parishioners, and Native American missions, including those facilities located in Bethel and Dillingham, Alaska. Upon ordination, each and every Jesuit priest of defendant Society of Jesus, Oregon Province, vows poverty, complete continence and obedience to the Pope, and/or his religious supervisors and their successors. In addition, the Society of Jesus, Oregon Province is responsible for the supervision and the behavior of each and every Jesuit Priest and non-Jesuit Lay Volunteer working with or under the supervision of a Jesuit priest, or who is assigned to any location within the Province.

3. Defendant Society of Jesus, Alaska (also referred to herein as the Alaska

Jesuits or jointly with the Oregon Province as the Jesuit defendants) is a domestic corporation sole, incorporated in Alaska on July 31, 1964. Its principal office in Alaska is located at 1318 Peger Road, Fairbanks, Alaska, 99709. Its agent for service of process is Paul M. Cochran, P.O. Box 49, St. Mary's, Alaska, 99658. The sole shareholder of defendant Alaska Jesuits is Father Patrick J. Lee, S.J, the Provincial and chief operating officer of the Society of Jesus, Oregon Province. He is the person personally responsible for the personnel and operations of defendant Alaska Jesuits, which, (according to its amended and restated Articles of Incorporation on file with the State of Alaska Department of Commerce and Economic Development, Corporations Section) exists to further the interests of the Society of Jesus and to acquire property and things of value and to "generally deal with and improve the property of the corporation." In addition, the Society of Jesus, Alaska is responsible for the supervision and the behavior of each and every Jesuit Priest and non-Jesuit Lay Volunteer working with or under the supervision of a Jesuit priest, or who is assigned to any location within the State of Alaska.

4. Defendant THE SOCIETY OF JESUS, FATHER GENERAL ADOLFO NICOLAS SJ AND HIS PREDECESSORS (hereinafter referred to as "Father General") is a foreign religious entity, with its headquarters in Rome, Italy and operating and controlling numerous regional offices all over the world. Father General Adolfo Nicolas functions in two ways. First, the Father General owns and controls the assets of the Society of Jesus worldwide. Second, the Father General exerts complete control over the Order worldwide in an essentially monarchical fashion as applied to all Jesuits priests and members of the Society of Jesus. Each and every member of the Society of Jesus owes the Father General

absolute obedience. Failure to fulfill this duty of absolute obedience is grounds for immediate removal by the Father General. The Father General's authority is, in part, set forth in the Society of Jesus' General Congregation 35, Decree 5, page 36, paragraph 7 and in the Constitutions of the Society of Jesus, numbers 666 and 719.

5. Defendant the Pioneer Educational Society (also referred to herein as Pioneer or jointly with the Oregon Province, the Alaska Jesuits and the Father General as the Jesuit defendants) is a foreign religious non-profit corporation, incorporated in Oregon on August 18, 1919. Its principal offices are located at 3215 SE 45th Avenue, Portland, Oregon, 97206 (this is also the address of the Provincial of the Oregon Jesuits, Patrick J. Lee, S.J.) and 1107 N Astor, Spokane, Washington, 99202. At all times relevant hereto, the President, Vice-President, Secretary and other officers of the Pioneer Educational Society were members of the Oregon Province of the Society of Jesus. Currently, the President of the Pioneer Educational Society is the Provincial of the Oregon Jesuits, Patrick J. Lee, S.J. The current Vice-President of the Pioneer Educational Society is Thomas Lankenau, the Socius of the Oregon Jesuits. At all times since its incorporation, the Pioneer Educational Society's officers have been high ranking members of the Oregon Jesuits, including but not limited to the Provincials, Socius' and Treasurers of the Oregon Jesuits. Its agent for service of process is Michael A. Tyrrell (the current Treasurer of the Oregon Jesuits and a former Socius of the Oregon Jesuits), 3215 SE 45th Avenue, Portland, Oregon, 97206. Defendant the Pioneer Educational Society is, and at all times relevant hereto was, an alter ego of defendant the Oregon Province of the Society of Jesus. The Pioneer Educational Society and the Oregon Province of the Society of Jesus have, at all times relevant hereto,

shared a unity of interest and ownership.

6. At all times mentioned herein, each and every Defendant was an employee, agent, and/or servant of all named defendants and DOES 1 through 100, inclusive, and/or was under their complete control and/or active supervision. Defendants and each of them are individuals, corporations, partnerships and/or other entities that engaged in, joined in, and conspired together and with Defendants and wrongdoers in carrying out the tortuous and unlawful activities described in this Complaint.

7. Defendants DOES 1 through 100, inclusive, and each of them, are sued herein under fictitious names. Plaintiff is ignorant as to the true names and capacities of DOES 7 through 100, whether individual, corporate, associate, or otherwise, and therefore sue these Defendants by fictitious names. When their true names and capacities are ascertained, Plaintiff will request leave of Court to amend this Complaint to state their true names and capacities herein.

8. Plaintiff is informed and believes, and on that basis alleges, that at all times mentioned herein, each fictitiously named Defendant was responsible in some manner or capacity for the occurrences herein alleged, and that Plaintiffs' damages, as herein alleged, were proximately caused by all said DOE Defendants.

9. Each and every named defendant, and DOES 1 through 100, inclusive, are sometimes collectively referred to herein as "Defendants" and/or as "All Defendants"; such collective reference refers to all specifically named Defendants as well as those fictitiously named herein.

10. Plaintiff is informed and believes, and on that basis alleges, that at all times

mentioned herein, there existed a unity of interest and ownership among Defendants and each of them, such that any individuality and separateness between Defendants, and each of them, ceased to exist. Defendants and each of them, were the successors-in-interest and/or alter egos of the other Defendants, and each of them, in that they purchased, controlled, dominated and operated each other without any separate identity, observation of formalities, or other manner of division. To continue maintaining the facade of a separate and individual existence between and among Defendants, and each of them, would serve to perpetrate a fraud and an injustice.

11. Plaintiff is informed and believes, and on that basis alleges, that at all times mentioned herein, Defendants and each of them were the agents, representatives and/or employees of each and every other Defendant. In doing the things hereinafter alleged, Defendants and each of them, were acting within the course and scope of said alternative personality, capacity, identity, agency, representation and/or employment and were within the scope of their authority, whether actual or apparent.

12. Plaintiff is informed and believes, and on that basis alleges, that at all times mentioned herein, Defendants and each of them were the trustees, partners, servants, joint venturers, shareholders, contractors, and/or employees of each and every other Defendant, and the acts and omissions herein alleged were done by them, acting individually, through such capacity and within the scope of their authority, and with the permission and consent of each and every other Defendant and that said conduct was thereafter ratified by each and every other Defendant, and that each of them is jointly and severally liable to Plaintiff.

13. Plaintiffs JAMES DOE 59 through 71, JAMES DOE 73 through 94, JANET DOE 4 through 7, and JEAN DOE 3 through 6 attended services at the Little Flower of Jesus Parish, located in Hooper Bay, Alaska, at St. Michael's Parish located in St. Michael, Alaska, at St. Bernard's Parish located in Stebbins, Alaska, St. Lawrence Catholic Church located in Mountain Village, Alaska, Sacred Heart Parish in Chevak, Alaska, St. Peter Catholic Church in Nunam Iqua, Alaska and/or Our Lady of the Snows Parish located in Nulato, Alaska. Many of these plaintiffs served as altar boys in their home parishes. The village churches are activities of the Catholic Church and the Jesuit defendants, and were at all times relevant hereto operated, managed, staffed, and controlled by the Jesuit defendants.

14. Joseph Lundowski², born in 1918, was a Trappist monk who left the Order because of his inability to withstand the rigors of monastic life. Plaintiffs assert that this is “code” for his improper and illegal sexual involvement with children. He was recruited and directly supervised by a Jesuit priest, Father George S. Endal, S.J.³, as a worker in the Holy Rosary Mission School in Dillingham, Alaska and at Clark’s Point, Alaska, at least as early as 1960. Among other duties, Father Endal placed Joseph Lundowski in charge of the boys’ dormitory at the Holy Rosary Mission School, of which Father Endal was the Father Superior, and assigned him to clerical duties at Clark’s Point, Alaska. Father Endal also gave Joseph Lundowski the religious title of “Brother.” Joseph Lundowski followed Father Endal to Nulato in 1962, where he was involved in a scandal with a

² Joseph Lundowski is deceased.

³ Father George Endal, S.J. is deceased.

person who was “not a woman.” Although Bishop Francis Gleeson (himself a Jesuit priest) and Father Jules Convert, the Superior Regular of all Alaskan Jesuits, were both aware of Joseph Lundowski's illegal sexual proclivities, and the danger he posed to children, he was not discharged from his duties; rather, he was transferred to Hooper Bay with Father Endal, where he continued to molest and sexually assault boys and young men. Father George Endal, S.J., was aware of and participated in the abuse of children by Joseph Lundowski. In an affidavit filed in Superior Court in Alaska, James Doe 29 stated: “*Father Endal knew that I was being abused, because he came into the back of the church one day and saw Joe sucking on my penis. He did nothing to stop the abuse, and simply told me to stay away from Joe because it wasn't safe. I was six years old. On a later occasion, Father Endal also tried to molest me, but stopped when another student came into the room. Father Grief also knew of Joe Lundowski's abusive acts, and he too warned me not to be alone with Brother Joe. I tried to protect myself, but I was only a child.*”

15. Brother Lundowski's sexual predation of children accelerated after he and Father Endal were transferred to St. Michael and Stebbins 1968. While he was in Stebbins and St. Michael, Joseph Lundowski began serving as a *de facto* Deacon, giving homilies and conducting religious services, including administering communion to the faithful. He also served as a catechist, often molesting boys after Mass or catechism. He engaged or attempted to engage in genital fondling, masturbating and/or oral copulation with Plaintiffs James Does 59 through 71 and 73-94 and fondled the genitals and breasts of Janet Does 4 through 6, rubbed his penis against Janet Does 4 through 7 and forcibly

vaginally raped Janet Doe 4. He also forced many of these individuals to submit to anal sodomy, and required them to masturbate him or to perform fellatio on him or on each other while he watched. Most frequently Brother Lundowski performed fellatio on the children who came to the rectory. He gave them hard candy, money he stole from the collection plate, cooked food, baked goods, beer, sacramental wine, brandy and/or better grades (silver, blue, or gold stars) on their catechism assignments in exchange for sexual favors. Joseph Lundowski told many of the children not to tell about the sexual acts he engaged in with them, and also warned some of them that if they told what he was doing to them, no one would believe them because he worked for God. Joseph Lundowski continued his molestations of children until 1975, when he was caught by Martha Abouchuk (now deceased) in an illicit sexual act with James Doe 20, a plaintiff in a previously filed suit who has now settled his claims with defendants. He was thereafter discharged from his service with the Diocese of Fairbanks, and left the State of Alaska. Joseph Lundowski's is deceased.

16. Defendant Anton Smario (also known as known as Anthony Smario) is a resident of California. His address is 3724 Merridan Street, Concord, CA 94518. At all times relevant Anton Smario was a Franciscan Monk of the third order and a member of the Friars of Saint Francis, Province of Santa Barbara. The Friars of Saint Francis are a Catholic Order whose legal name is the Franciscan Friars of California, Inc. He was received into the third order of Saint Francis at the Saint Boniface Church in the Archdiocese of San Francisco, taking the name "Brother Epiphany." Saint Boniface Church is an activity of the Franciscan Friars of California. Anton Smario is also listed in

the Diocese of Fairbanks February 1968 Directory as a lay volunteer responsible for Public Relations. Subsequent to his assignment at Copper Valley School, he was transferred to the parishes of Stebbins and St. Michaels, Alaska, where he worked as a *de facto* Deacon and catechist, holding services in the Catholic churches in St. Michael and Stebbins in the absence of the assigned Jesuit priest, Father Endal. He also taught catechism in Stebbins and St. Michael, Alaska. Smario taught religion classes to the young girls and Joseph Lundowski taught the young boys. After catechism Smario would let the young girls stay in the classroom at the rectory and play or color in coloring books, offering them food, juice, and sweets as an inducement to remain after class. He then would unzip his pants, and completely expose his genitals to these children, and masturbate to ejaculation as he walked around the classroom. He would ask the girls to touch his penis, and would rub his erect penis on their backs, necks, and arms. Sometimes he would wipe or rub his semen on the girls after he ejaculated.

17. Father Norman E. Donohue, S.J., (“Father Donohue”) was ordained as a Jesuit priest, and was a member of the Oregon Province of the Society of Jesus. From approximately August 12, 1941 through at least 1983, Father Donohue was assigned by the Father General and/or the Diocese of Fairbanks and/or the Oregon Province and/or the Alaska Jesuits to duties in Alaska. From 1967 through 1973 Father Donohue was the resident pastor in Kaltag and Nulato, living variously in both places. He was the pastor at Our Lady of the Snows Catholic Church at all times relevant to the events which give rise to the complaint in this case. At all times relevant herein, Father Norman Donohue, S.J. was acting as an agent and/or at the direction of the defendants the Oregon Province, the

Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100⁴.

18. Defendant Henry G. Hargreaves, S.J., hereinafter identified as “Father Hargreaves,” is a Roman Catholic Priest and a member of the Society of Jesus, Oregon Province. His current residence address is Regis Jesuit Community, 1107 N. Astor Street, Spokane, Washington 99202-1724. Father Hargreaves was assigned by the Oregon Province to work as a Roman Catholic priest in Alaska for many years, beginning in 1949 and continuing through the early 2000’s, and at all times relevant was a resident of the State of Alaska.

19. At all times relevant, Father Hargreaves worked under the direct supervision of defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, a position presently filled by Father General Adolfo Nicolas, S.J.. Father Hargreaves, born in 1914, was ordained as a Roman Catholic Priest for the Society of Jesus in 1947. He first came to Alaska in 1949 as a Roman Catholic Priest and was given faculties, that is, authority to serve as a Roman Catholic priest, by Bishop Francis D. Gleeson in 1949. Those faculties continued in effect and were not revoked or amended during the time period relevant to this complaint. During his 50-year career with the Society of Jesus, Rome, the Oregon Jesuits, the Alaska Jesuits, and the Fairbanks Diocese in Alaska, Father Hargreaves was assigned to work in Hooper Bay, Chevak, Fairbanks, Bethel, St. Michael, Stebbins, Unalakleet, Nulato, Kotlik, Toksuk Bay, Emmonak, Alakanuk, Numan Iqua, Nelson Island and Tununak,

⁴Father Norman E. Donohue, S.J. is deceased.

Alaska. Joseph Lundowski, Father Endal, Anton Smario, Father Hargreaves, Father Donohue and Father Fallert are at times collectively referred to herein as "the abusers."

20. Defendant Stephen Sundborg, S.J., is a Roman Catholic Priest and a member of the Society of Jesus, Oregon Province. Father Sundborg currently serves as the President of Seattle University, a Jesuit institution. From 1990 to 1996, Father Sundborg served as the Provincial of the Oregon Province of the Society of Jesus. The provincial is the personal representative of the Father General at the Province level and the Provincial receives new members into the society on the behalf of the Father General. General Congregation 35, Decree 5, page 40, paragraph 24. The Provinces are a geographic section of the Society of Jesus established for the best administration of the work of the Society of Jesus. Provinces are both created and suppressed by the Father General in Rome.

21. As Provincial, Father Sundborg had access to the personnel and/or confidential file of each and every Jesuit priest serving in the Oregon Province, including all Jesuits priest assigned to Alaska. Father Thomas R. Royce, S.J., who served as the Provincial of the Oregon Province from approximately 1980 to 1986 (a mere four years before Father Sundborg became Provincial), testified in his deposition that located in the Provincial's office was a group of files called the "hell files." These files contained information about Jesuit priests that was "special," "not public" and "not good." (10/6/05 Deposition of Thomas R. Royce, S.J., page 24, lines 2 through 7). Specifically, as Provincial, Father Sundborg had access to the personnel file and/or "hell file" of Father Henry G. Hargreaves and other molester Jesuits. As such, Father Sundborg had actual or constructive notice and possessed actual and/or constructive knowledge that Father

Hargreaves was a serial child molestor. Despite this knowledge, Father Sundborg allowed Father Hargreaves to remain in ministry. As a direct result of Father Sundborg's decision, Father Hargreaves was able to continue molesting children, including but not limited to JAMES DOE 94, who was raped by Father Hargreaves in 1992, when JAMES DOE was approximately 6 years old.

22. Father Francis J. Fallert, S.J.⁵, hereinafter identified as "Father Fallert," was a Roman Catholic Priest and a member of the Society of Jesus, Oregon Province. Father Fallert was assigned by the Oregon Province to work as a Roman Catholic priest in Alaska for many years, beginning in 1947, during his "regency" period, and continuing through the early 1990, and at all times relevant was a resident of the State of Alaska. Father Fallert, during his career as a Jesuit priest, was assigned to St. Michael, Stebbins, Kaltag, Unalakleet, Anchorage, Mountain Village, Toksook Bay, Newtok and Tununak. Father Fallert also served as the Principal of the Copper Valley School from 1956 to 1965. Father Fallert served as the General Superior of the Alaska Jesuits from 1976 to 1982.

23. At all times relevant herein, the Native villages of the State of Alaska were essentially a "dumping ground" for Jesuit priests unsuited to serve anywhere else in the Jesuit organization. At all times relevant herein, there were no fewer than fifteen pedophile priests in active ministry in the Native villages in Alaska. Defendants, and each of them, intentionally, willfully and recklessly chose to place these known pedophile priests in assignments in Native villages for a variety of reasons, including, but not limited to: 1) At all times relevant the Native Alaskan population lived in remote, often inaccessible locales

⁵ Father Francis J. Fallert, S.J., is deceased,

with little or no access to law enforcement, making it virtually impossible for them to report any child sexual abuse to the authorities; and 2) At all times relevant the Native Alaskan population lived in remote, often inaccessible locales with little or no access to proper healthcare, making it virtually impossible for any trained healthcare provider to detect the signs of childhood sexual abuse in the Native population. Defendants, and each of them, made a calculated effort, initiated at the highest levels of the Society of Jesus, including, but not limited to, each and every Father General of the Order during the time periods alleged herein, to “dump” these “problem priests” in a location in which the priests could avoid detection and continued to sexually abuse countless Native children.

24. At all times relevant herein, the hierarchy of the Society of Jesus exhibited a callous disregard towards the mental, physical and emotional well-being, health and welfare of the Native population of Alaska and any possible effects the sexual abuse of minor children would have on the Native population. Father William J. Loyens, S.J.⁶, a member of the Society of Jesus since 1947, served as the General Superior of the Alaska Jesuits from 1973 to 1976 and then served as the Provincial of the Oregon Province of the Society of Jesus, testified in his 2004 deposition that the Native population was “fairly loose on sexual matters” and that heinous sexual abuse of Native children by a priest would be “less impressive” than sexual abuse of a white child and that heinous sexual abuse of Native children by a priest wouldn’t have much of an impact. (1/16/04 Deposition of Father William J. Loyens, S.J., Page 54, line 13 to Page 56, line 14).

FIRST CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

⁶ Father William J. Loyens, S.J. is deceased

25. Plaintiff James Doe 59 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 59 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 59 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

26. In 1967 through 1970, when he was 13 through 16 years of age, James Doe 59 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 59 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

27. On unknown dates in 1967 through 1970, when he was 13 through 16 years of age, Plaintiff James Doe 59 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 59. The sexual abuse occurred in the church and the rectory. Brother Lundowski would give Plaintiff food and money to keep quiet about the sexual abuse.

28. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 59 suffered great injury and

harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

SECOND CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

29. Plaintiff James Doe 60 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 60 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 60 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

30. In 1965 through 1968, when he was 9 through 12 years of age, Plaintiff James Doe 60 was a parishioner at Little Flower of Jesus Parish, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Parish, Plaintiff James Doe 60 came to know, admire, trust, revere and respect Father George Endal, S.J., the pastor of Little Flower of Jesus Parish and Joseph Lundowski, his

Roman Catholic deacon and religious instructor.

31. On unknown dates in 1965 through 1968, when he was 9 through 12 years of age, Plaintiff James Doe 60 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 60, Joseph Lundowski fondling and masturbating Plaintiff, Joseph Lundowski masturbating in front of Plaintiff, and Joseph Lundowski forcing Plaintiff to perform oral sex on him. The sexual abuse occurred in the parish rectory and other locations on parish property.

32. On unknown dates in 1965 through 1968, when he was 9 through 12 years of age, Plaintiff James Doe 60 was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal performing fellatio on Plaintiff James Doe 60 and Father Endal anally raping Plaintiff. The sexual abuse occurred in the parish rectory and other locations on parish property.

33. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 60 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRD CLAIM FOR RELIEF-- SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

34. Plaintiff James Doe 61 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 61 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 61 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

35. In 1967 through 1968, when he was 13 through 14 years of age, Plaintiff James Doe 61 was a parishioner Little Flower of Jesus Church, located within the Fairbanks Diocese. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 61 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

36. On unknown dates in 1967 through 1968, when he was 13 through 14 years of age, Plaintiff James Doe 61 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 61 Joseph Lundowski penetrating Plaintiff's anus with his fingers, Joseph Lundowski forcing Plaintiff to masturbate him and Joseph Lundowski attempting to penetrate Plaintiff's anus with his penis. The sexual abuse occurred in the parish rectory.

37. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 61 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FOURTH CLAIM FOR RELIEF-- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

38. Plaintiff James Doe 62 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 62 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 62 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

39. In 1965 through 1968, when he was 14 through 17 years of age, Plaintiff James Doe 62 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little

Flower of Jesus Church, Plaintiff James Doe 62 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

40. On unknown dates in 1965 through 1968, when he was 14 through 17 years of age, Plaintiff James Doe 62 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 62, Joseph Lundowski masturbating to ejaculation while molesting Plaintiff, and Joseph Lundowski attempting to penetrate Plaintiff's anus with his penis. The sexual abuse occurred in the parish rectory.

41. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 62 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FIFTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

42. Plaintiff James Doe 63 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 63 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a

devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 63 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

43. In 1971 through 1972 when he was 9 through 10 years of age, Plaintiff James Doe 63 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 63 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

44. On unknown dates in 1971 through 1972, when he was 10 through 15 years of age, Plaintiff James Doe 63 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff's penis, Joseph Lundowski masturbating Plaintiff and Joseph Lundowski attempting to perform fellatio on Plaintiff James Doe 63. The sexual abuse occurred in the parish rectory.

45. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 63 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of

\$100,000.00, the exact amount to be proven at trial.

SIXTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

46. Plaintiff James Doe 64 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 64 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 64 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

47. In or about 1975 when he was 10 or 11 years of age, Plaintiff James Doe 64 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 64 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

48. On unknown dates in 1975 when he was 10 or 11 years of age, Plaintiff James Doe 64 was sexually molested by Joseph Lundowski on multiple occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 64 and Joseph Lundowski forcing Plaintiff to fondle his penis. The sexual abuse occurred in the parish rectory.

49. As a direct and proximate result of the felony sexual abuse of a minor

described in the preceding paragraphs, Plaintiff James Doe 64 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

SEVENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

50. Plaintiff James Doe 65 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 65 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 65 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

51. In 1964 through 1965 when he was 9 through 10 years of age, Plaintiff James Doe 65 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 65 came to know, admire, trust, revere and respect

Joseph Lundowski, his Roman Catholic deacon and religious instructor.

52. On unknown dates in 1964 through 1965, when he was 9 through 10 years of age, Plaintiff James Doe 65 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski forcing Plaintiff James Doe 65 to masturbate him. The sexual abuse occurred in the parish rectory.

53. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 65 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

EIGHTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

54. Plaintiff James Doe 66 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 66 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 66 developed great admiration, trust, reverence, and respect

for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

55. In or about 1965 when he was 15 years of age, Plaintiff James Doe 66 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 66 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

56. On unknown dates in 1965, when he was 15 years of age, Plaintiff James Doe 66 was sexually molested by Joseph Lundowski. The molestation included, but was not limited to, Joseph Lundowski providing alcohol to James Doe 66, getting him intoxicated and then fondling Plaintiff's penis and attempting to force Plaintiff to fondle Joseph Lundowski's penis. The sexual abuse occurred in the parish rectory.

57. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 66 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

NINTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

58. Plaintiff James Doe 67 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 67 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 67 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

59. In 1965 through 1968 when he was 12 through 15 years of age, Plaintiff James Doe 67 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 67 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

60. On unknown dates in 1965 through 1968, when he was 12 through 15 years of age, Plaintiff James Doe 67 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski forcibly dragging Plaintiff into his room at Little Flower of Jesus Church, removing his false teeth and performing fellatio on Plaintiff James Doe 67. The sexual abuse occurred in the parish rectory. On one occasion, Father Donohue (who was visiting Hooper Bay) caught Joseph Lundowski sexually molesting Plaintiff James Doe 67, but said nothing and left the room, allowing Joseph Lundowski to continue molesting Plaintiff.

61. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 67 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

62. Plaintiff James Doe 68 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 68 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 68 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

63. In 1974 through 1975 when he was 6 through 7 years of age, Plaintiff James Doe 68 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 68 came to know, admire, trust, revere and respect Joseph Lundowski, his

Roman Catholic deacon and religious instructor.

64. On unknown dates in 1974 through 1975, when he was 6 through 7 years of age, Plaintiff James Doe 68 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski exposing his penis to Plaintiff, Joseph Lundowski masturbating in front of Plaintiff, Joseph Lundowski masturbating Plaintiff, and Joseph Lundowski performing fellatio on Plaintiff James Doe 68. The sexual abuse occurred in the parish rectory.

65. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 68 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

ELEVENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

66. Plaintiff James Doe 69 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 69 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly

celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 69 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

67. In 1965 through 1968 when he was 11 through 14 years of age, Plaintiff James Doe 69 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 69 came to know, admire, trust, revere and respect Father George S. Endal, S.J., the pastor of Little Flower of Jesus Church, Father Norman E. Donohue, S.J., a Jesuit priest assigned to Little Flower of Jesus Church and Joseph Lundowski, his Roman Catholic deacon and religious instructor.

68. On unknown dates in 1965 through 1968 when he was 11 through 14 years of age, Plaintiff James Doe 69 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff's penis, Joseph Lundowski performing fellatio on Plaintiff, and Joseph Lundowski penetrating Plaintiff James Doe 69's anus with his penis. The sexual abuse occurred in the parish rectory.

69. On unknown dates in 1965 through 1968 when he was 11 through 14 years of age, Plaintiff James Doe 69 was sexually molested by Father Norman E. Donohue on numerous occasions. The molestations included, but were not limited to, Father Donohue penetrating Plaintiff James Doe 69's anus with his penis. The sexual abuse occurred in the parish rectory.

70. On unknown dates in 1965 through 1968 when he was 11 through 14 years of age, Plaintiff James Doe 69 was sexually molested by Father George S. Endal, S.J. on numerous occasions. The molestations included, but were not limited to, Father Endal penetrating Plaintiff's penis with his anus. Father Endal would give Plaintiff James Doe 69 hard candy after he had raped Plaintiff. The sexual abuse occurred in the parish rectory.

71. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 69 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWELFTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

72. Plaintiff James Doe 70 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 70 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 70 developed great admiration, trust, reverence, and respect for, and

obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

73. In 1969 through 1971 when he was 10 through 12 years of age, Plaintiff James Doe 70 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 70 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

74. On unknown dates in 1969 through 1971 when he was 10 through 12 years of age, Plaintiff James Doe 70 was sexually molested by Joseph Lundowski. The molestation included, but was not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 70 and Joseph Lundowski penetrating Plaintiff's anus with his penis. The sexual abuse occurred in the parish rectory.

75. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 70 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

76. Plaintiff James Doe 71 incorporates by reference the preceding paragraphs of

this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 71 and his family were members of the Catholic Church, and they attended services at Our Lady of the Snows Parish, located in Nulato, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 71 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

77. In 1957 through 1967 when he was 6 through 16 years of age, Plaintiff James Doe 71 was a parishioner at Our Lady of the Snows Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Our Lady of the Snows Church, Plaintiff James Doe 71 came to know, admire, trust, revere and respect Father Henry G. Hargreaves, S.J., a priest assigned to Our Lady of the Snows Church, and Joseph Lundowski, his Roman Catholic deacon and religious instructor.

78. On unknown dates in 1957, when he was 6 or 7 years of age, Plaintiff James Doe 71 was sexually molested by Father Hargreaves on multiple occasions. The molestations included, but were not limited to, Father Hargreaves fondling Plaintiff James Doe 71's genitals. The sexual abuse occurred at Fish Island, a pond that Father Hargreaves took Plaintiff to for the ostensible purpose of teaching Plaintiff how to swim.

79. On unknown dates between 1964 and 1967, when he was 13 through 16 years of age, James Doe 71 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski

massaging Plaintiff, putting his hands underneath Plaintiff's shirt and shorts, and Joseph Lundowski fondling Plaintiff James Doe 71's penis. The sexual abuse occurred at the rectory.

80. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 71 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FOURTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

81. Plaintiff James Doe 73 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 73 and his family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 73 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

82. In 1965 through 1968 when he was 8 through 11 years of age, Plaintiff James Doe 73 was a parishioner at Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Little Flower of Jesus Church, Plaintiff James Doe 73 came to know, admire, trust, revere and respect Father George S. Endal, S.J., pastor of Little Flower of Jesus Church, and Joseph Lundowski, his Roman Catholic deacon and religious instructor.

83. On unknown dates in 1965 through 1968, when he was 8 through 11 years of age, Plaintiff James Doe 73 was sexually molested by Joseph Lundowski on at least one occasion. The molestation included, but was not limited to, Joseph Lundowski fondling Plaintiff's penis, masturbating Plaintiff James Doe 73, and forcing Plaintiff to perform fellatio on him. The sexual abuse occurred in the parish.

84. On unknown dates in 1965 through 1968, when he was 8 through 11 years of age, Plaintiff James Doe 73 was sexually molested by Father Endal on at least one occasion. The molestation included, but was not limited to, Father Endal fondling Plaintiff James Doe 73's penis and masturbating Plaintiff James Doe 73. The sexual abuse occurred on the parish property.

85. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 73 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession,

and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FIFTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

86. Plaintiff James Doe 74 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 74 and his family were members of the Catholic Church, and they attended services in the Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 74 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

87. In 1967 through 1969 when he was 10 through 12 years of age, Plaintiff James Doe 74 was a parishioner at the Little Flower of Jesus, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at the Little Flower of Jesus Church, Plaintiff James Doe 74 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

88. On unknown dates in 1967 through 1969, when he was 10 through 12 years of age, James Doe 74 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff's penis and masturbating Plaintiff James Doe 74. The sexual abuse occurred in the parish

rectory.

89. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 74 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

SIXTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

90. Plaintiff James Doe 75 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 75 and his family were members of the Catholic Church, and they attended services in St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 75 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

91. In 1969 through 1970 when he was approximately 12 years of age, Plaintiff James Doe 75 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's

Church, Plaintiff James Doe 75 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

92. On unknown dates in 1969 through 1970, when he was approximately 12 years of age, Plaintiff James Doe 75 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski exposing his penis to Plaintiff, Joseph Lundowski masturbating in front of Plaintiff James Doe 75, and Joseph Lundowski rubbing his erect penis on Plaintiff's anus. Plaintiff recalls that after the sexual abuse by Joseph Lundowski, Plaintiff's underwear would be bloody. The sexual abuse occurred in the parish rectory.

93. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 75 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

SEVENTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

94. Plaintiff James Doe 76 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 76 and his family were members of the Catholic Church, and they

attended services in Sacred Heart Parish, located in Chevak, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 76 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

95. In 1967 through 1968 when he was 11 through 12 years of age, Plaintiff James Doe 76 was a parishioner at Sacred Heart Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Sacred Heart Church, Plaintiff James Doe 76 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

96. On unknown dates in 1967 through 1968 when he was 11 through 12 years of age, Plaintiff James Doe 76 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff, Joseph Lundowski forcing Plaintiff to fondle his penis, and forcing Plaintiff to watch as other minor boys masturbated Joseph Lundowski to ejaculation. The sexual abuse occurred in the parish rectory.

97. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 76 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession,

and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

EIGHTEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

98. Plaintiff James Doe 77 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 77 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 77 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

99. In 1971 through 1972 when he was 9 through 10 years of age, Plaintiff James Doe 77 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 18 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

100. On unknown dates in 1971 through 1972, when he was 9 through 10 years of age, James Doe 77 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff's penis, Joseph Lundowski exposing his penis to Plaintiff, Joseph Lundowski forcing Plaintiff to masturbate him, Joseph Lundowski performing fellatio on Plaintiff and Joseph

Lundowski penetrating Plaintiff James Doe 77's anus with his fingers. The sexual abuse occurred in the parish rectory.

101. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 77 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including but not limited to Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

NINETEENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

102. Plaintiff James Doe 78 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 78 and his family were members of the Catholic Church, and they attended services in St. Michael's Parish, located in St. Michael, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 78 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

103. In 1974 through 1975 when he was 11 through 13 years of age, Plaintiff James Doe 78 was a parishioner at St. Michael's Church, located within the Diocese of

Fairbanks. Through his membership and participation as a parishioner at St. Michael's Church, Plaintiff James Doe 78 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

104. On unknown dates in 1974 through 1975 when he was 11 through 13 years of age, Plaintiff James Doe 78 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 78. The sexual abuse occurred in the parish rectory.

105. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 78 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTIETH CLAIM FOR RELIEF -- SEXUAL ASSAULT
(Against All Jesuit Defendants)

106. Plaintiff James Doe 79 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 20 and his family were members of the Catholic Church, and they attended services at Our Lady of the Snows Parish, located in Nulato, Alaska. He was

raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 79 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

107. In 1962 through 1963 when he was 12 through 13 years of age, Plaintiff James Doe 79 was a parishioner at Our Lady of the Snows Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at Our Lady of the Snows Church, Plaintiff James Doe 79 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

108. On unknown dates in 1962 through 1963, when he was 12 through 13 years of age, Plaintiff James Doe 79 was sexually assaulted by Joseph Lundowski on numerous occasions. These sexual assaults included, but were not limited to, Joseph Lundowski forcing Plaintiff to sit on his lap and Joseph Lundowski unzipping Plaintiff's pants and fondling Plaintiff James Doe 79. The sexual abuse occurred in a shed on the parish property.

109. As a direct and proximate result of the felony sexual assault described in the preceding paragraphs, Plaintiff James Doe 79 suffered great injury and harm including, but not limited to, pain and suffering, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession,

and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-FIRST CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

110. Plaintiff James Doe 80 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 80 and his family were members of the Catholic Church, and they attended services in St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 80 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

111. In 1978 through 1981 when he was 7 through 10 years of age, Plaintiff James Doe 80 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 80 came to know, admire, trust, revere and respect Father George S. Endal, S.J., pastor of St. Bernard's Church.

112. On unknown dates in 1978 through 1981 when he was 7 through 10 years of age, James Doe 80 was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal fondling Plaintiff and Father Endal forcing Plaintiff to perform fellatio on him. The sexual abuse occurred in the parish rectory.

113. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 80 suffered great injury and harm including, but was not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including but not limited to Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-SECOND CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

114. Plaintiff James Doe 81 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 81 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 81 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

115. In 1972 through 1974 when he was 7 through 9 years of age, Plaintiff James Doe 81 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 81 came to know, admire, trust, revere and respect Father George S.

Endal, S.J., the pastor of St. Bernard's Church and Joseph Lundowski, his Roman Catholic deacon and religious instructor.

116. On unknown dates in 1972 through 1974 when he was 7 through 9 years of age, Plaintiff James Doe 81, was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal forcing Plaintiff to lay on Father Endal's bed, Father Endal fondling Plaintiff's penis while telling Plaintiff that God wanted Father Endal to molest Plaintiff and that God would be happy that Father Endal was molesting Plaintiff. Father Endal also forcibly raped Plaintiff James Doe 81, penetrating Plaintiff's anus with his penis, then ejaculating on Plaintiff James Doe 81. The sexual assault and abuse occurred in the parish rectory.

117. On unknown dates in 1972 through 1974 when he was 7 through 9 years of age, Plaintiff James Doe 81, was sexually molested by Joseph Lundowski. The molestations included, but were not limited to, Joseph Lundowski exposing his penis to Plaintiff and attempting to force Plaintiff to masturbate him using Vaseline. The sexual assault and abuse occurred in the parish rectory.

118. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 81 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of

\$100,000.00, the exact amount to be proven at trial.

TWENTY-THIRD CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

119. Plaintiff James Doe 82 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 82 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 82 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

120. In 1979 through 1980 when he was 7 through 8 years of age, Plaintiff James Doe 82 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 82 came to know, admire, trust, revere and respect Father George S. Endal, S.J., pastor of St. Bernard's Church.

121. On unknown dates in 1979 through 1980 when he was 7 through 8 years of age, Plaintiff James Doe 82 was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal forcing Plaintiff to lay in Father Endal's bed with him, Father Endal fondling Plaintiff's penis, Father Endal exposing his penis to Plaintiff, and Father Endal forcing Plaintiff to fondle his penis. The sexual abuse occurred in the parish rectory.

122. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 82 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-FOURTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

123. Plaintiff James Doe 83 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 83 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 83 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

124. In 1968 through 1972 when he was 7 through 12 years of age, Plaintiff James Doe 83 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 83 came to know, admire, trust, revere and respect Joseph Lundowski, his

Roman Catholic deacon and religious instructor.

125. On unknown dates in 1968 through 1972 when he was 7 through 12 years of age, Plaintiff James Doe 83 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 83 at least three to four times per month. The sexual abuse occurred in the parish rectory.

126. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 83 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-FIFTH CLAIM FOR RELIEF -- SEXUAL ASSAULT
(Against All Jesuit Defendants)

127. Plaintiff James Doe 84 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 84 and his family were members of the Catholic Church, and they attended services at the Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a

result, Plaintiff James Doe 84 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

128. In 1965 through 1968 when he was 15 through 18 years of age, Plaintiff James Doe 84 was a parishioner at the Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at the Little Flower of Jesus Church, Plaintiff James Doe 84 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

129. On unknown dates in 1965 through 1968 when he was 15 to 18 years of age, Plaintiff James Doe 84 was sexually molested by Joseph Lundowski. The molestation included, but was not limited to, Joseph Lundowski providing Plaintiff with alcohol and getting Plaintiff intoxicated and Joseph Lundowski forcing Plaintiff to fondle his penis and masturbate Joseph Lundowski. The sexual assaults occurred in the parish rectory.

130. As a direct and proximate result of the felony sexual assault described in the preceding paragraphs, Plaintiff James Doe 84 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-SIXTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

131. Plaintiff James Doe 85 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 85 and his family were members of the Catholic Church, and they attended services in St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 85 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

132. In 1968 through 1969 when he was 10 through 11 years of age, Plaintiff James Doe 85 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 85 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

133. On unknown dates in 1968 through 1969 when he was 10 through 11 years of age, James Doe 85 was sexually molested by Joseph Lundowski on at least one occasion. The molestation included, but was not limited to, Joseph Lundowski forcibly grabbing Plaintiff from behind, Joseph Lundowski fondling Plaintiff over Plaintiff's clothes and Joseph Lundowski putting his hands inside Plaintiff's pants and rubbing Plaintiff's penis. The sexual abuse occurred in the Joseph Lundowski's office, located on parish property.

134. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 85 suffered great injury and

harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-SEVENTH CLAIM FOR RELIEF-- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

135. Plaintiff James Doe 86 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 86 and his family were members of the Catholic Church, and they attended services at St. Michael's Parish, located in St. Michael, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 86 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

136. In 1973 through 1975, when he was 12 through 14 years of age, Plaintiff James Doe 86 was a parishioner at St. Michael's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Michael's Church, Plaintiff James Doe 86 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

137. On unknown dates in 1973 through 1975, when he was 12 through 14 years

of age, Plaintiff James Doe 86, was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski providing Plaintiff with alcohol and performing fellatio on Plaintiff James Doe 86. The sexual abuse occurred in the parish rectory.

138. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 86 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-EIGHTH CLAIM FOR RELIEF-- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

139. Plaintiff James Doe 87 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 87 and his family were members of the Catholic Church, and they attended services at St. Michael's Parish, located in St. Michael, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 87 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

140. In or about 1973, when he was approximately 7 years of age, Plaintiff James Doe 87 was a parishioner at St. Michael's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Michael's Church, Plaintiff James Doe 87 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

141. On unknown dates in or about 1973, when he was approximately 7 years of age, Plaintiff James Doe 87 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski forcing Plaintiff to fondle Joseph Lundowski's penis. The sexual abuse occurred in the parish rectory.

142. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 87 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

TWENTY-NINTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

143. Plaintiff James Doe 88 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life.

Plaintiff James Doe 88 and his family were members of the Catholic Church, and they attended services at St. Lawrence's Parish, located in Mountain Village, Alaska . He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 88 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

144. In 1955 through 1960, when he was 6 through 10 years of age, Plaintiff James Doe 88 was a parishioner at St. Lawrence's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Lawrence's Church, Plaintiff James Doe 88 came to know, admire, trust, revere and respect Father George S. Endal, S.J., who travelled to Mountain Village to perform mass and other sacraments at St. Lawrence's Church.

145. On unknown dates in 1955 through 1960, when he was 6 through 10 years of age, Plaintiff James Doe 88 was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal giving Plaintiff alcohol to make Plaintiff more compliant with Father Endal's perverse sexual demands, Father Endal fondling Plaintiff James Doe 88's penis and Father Endal forcing Plaintiff to fondle his penis. The sexual abuse occurred in the parish rectory.

146. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 88 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual

theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTIETH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

147. Plaintiff James Doe 89 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 89 and his family were members of the Catholic Church, and they attended services in St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 89 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

148. In 1973 through 1975 when he was 10 through 13 years of age, Plaintiff James Doe 89 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 89 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

149. On unknown dates in 1973 through 1975 when he was 10 through 13 years of age, James Doe 89 was sexually molested by Joseph Lundowski. The molestations

included, but were not limited to, Joseph Lundowski performing fellatio on Plaintiff James Doe 89. The sexual abuse occurred in the parish rectory.

150. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 89 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY FIRST CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

151. Plaintiff James Doe 90 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 90 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 90 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

152. In 1974 through 1975 when he was 8 through 9 years of age, Plaintiff James Doe 90 was a parishioner at St. Bernard's Church, located within the Diocese of

Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 90 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

153. On unknown dates in 1974 through 1975 when he was 8 through 9 years of age, Plaintiff James Doe 90 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski exposing himself to Plaintiff and Joseph Lundowski attempting to perform fellatio on Plaintiff James Doe 90 and others in his presence. These acts of sexual abuse occurred in the parish rectory.

154. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 90 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY SECOND CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

155. Plaintiff James Doe 91 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 91 and his family were members of the Catholic Church, and they

attended services at the Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 91 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

156. In or about 1965, when he was approximately 10 or 11 years of age, Plaintiff James Doe 91 was a parishioner at the Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at the Little Flower of Jesus Church, Plaintiff James Doe 91 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

157. On unknown dates in or about 1965, when he was approximately 10 or 11 years of age, Plaintiff James Doe 91 was sexually molested by Joseph Lundowski on at least one occasion. The molestation included, but was not limited to, Joseph Lundowski pulling Plaintiff's pants down and fondling Plaintiff and Joseph Lundowski masturbating Plaintiff until Plaintiff ejaculated. These acts of sexual abuse occurred in the parish rectory. Plaintiff's mother reported the sexual abuse to Father George S. Endal, S.J., Joseph Lundowski's supervisor and the pastor of the Little Flower of Jesus Church. Despite Father Endal's actual knowledge that Joseph Lundowski was a serial pedophile and rapist, Father Endal rebuffed Plaintiff's mother and informed Plaintiff's mother that Joseph Lundowski was a servant of God.

158. As a direct and proximate result of the felony sexual abuse of a minor and felony sexual assault described in the preceding paragraphs, Plaintiff James Doe 91 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY THIRD CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

159. Plaintiff James Doe 92 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 92 and his family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 92 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

160. In or about 1973, when he was approximately 12 years of age, Plaintiff James Doe 92 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Bernard's Church, Plaintiff James Doe 92 came to know, admire, trust, revere and respect

Joseph Lundowski, his Roman Catholic deacon and religious instructor.

161. On unknown dates in or about 1973, when he was approximately 12 years of age, Plaintiff James Doe 92 was sexually molested by Joseph Lundowski on at least one occasion. The molestation included, but was not limited to, Joseph Lundowski touching Plaintiff on his buttocks and genitals, Joseph Lundowski rubbing Plaintiff's penis and Joseph Lundowski pressing his body against Plaintiff's penis. These acts of sexual abuse occurred in the parish rectory.

162. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 92 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY FOURTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

163. Plaintiff James Doe 93 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 93 and his family were members of the Catholic Church, and they attended services at the Little Flower of Jesus Parish, located in Hooper Bay, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly

celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 93 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

164. In 1958 through 1966, when he was approximately 6 through 14 years of age, Plaintiff James Doe 93 was a parishioner at the Little Flower of Jesus Parish, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at the Little Flower of Jesus Church, Plaintiff James Doe 93 came to know, admire, trust, revere and respect Joseph Lundowski, his Roman Catholic deacon and religious instructor.

165. On unknown dates in or about 1958 through 1966, when he was approximately 6 through 14 years of age, Plaintiff James Doe 93 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski touching Plaintiff on his buttocks and genitals, Joseph Lundowski penetrating Plaintiff's anus with his penis, forcibly sodomizing Plaintiff. These acts of sexual abuse occurred in the parish and in other locations on church property.

166. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 93 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession,

and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY FIFTH CLAIM FOR RELIEF – SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

167. Plaintiff James Doe 94 incorporates by reference the preceding paragraphs of this Complaint and further alleges that he has lived in Western Alaska his entire life. Plaintiff James Doe 94 and his family were members of the Catholic Church, and they attended services at St. Peter's Parish, located in Nunam Iqua, Alaska. He was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff James Doe 94 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

168. In or about 1990 through 1992, when he was approximately 5 through 6 years of age, Plaintiff James Doe 94 was a parishioner at St. Peter's Church, located within the Diocese of Fairbanks. Through his membership and participation as a parishioner at St. Peter's Church, Plaintiff James Doe 94 came to know, admire, trust, revere and respect Father Henry G. Hargreaves, S.J., his Roman Catholic priest and the pastor at St. Peter's Church.

169. On unknown dates in or about 1990 through 1992, when he was approximately 5 through 6 years of age, Plaintiff James Doe 94 was sexually molested by Father Hargreaves on at least one occasion. The molestation included, but was not limited to, Father Hargreaves forcibly bending Plaintiff over Father Hargreaves bed so that Plaintiff

was face down, Father Hargreaves touching and fondling Plaintiff on his buttocks, Father Hargreaves spreading apart Plaintiff's buttocks with his hands, and Father Hargreaves penetrating Plaintiff's anus with his erect penis. Father Hargreaves held Plaintiff's arms tightly so that Plaintiff could not escape. Father Hargreaves sodomized Plaintiff for approximately five minutes. For several days after he was raped by Father Hargreaves, Plaintiff bled from his rectum, was in severe pain and had great difficulty going to the bathroom. These acts of sexual abuse occurred in Father Hargreaves house in Nunam Iqua, owned by the Jesuits and given to Father Hargreaves by the Jesuits for his use while he served in Nunam Iqua.

170. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff James Doe 94 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to his damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY SIXTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

171. Plaintiff Janet Doe 4 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Janet Doe 4 and her family were members of the Catholic Church, and they

attended services at St. Bernard's Parish, located in Stebbins, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Janet Doe 4 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

172. In 1971 through 1973 when she was 10 through 12 years of age, Plaintiff Janet Doe 4 was a parishioner at St. Bernard's Church, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at St. Bernard's Church, Plaintiff Janet Doe 4 came to know, admire, trust, revere and respect Joseph Lundowski and Anton Smario, her Roman Catholic deacons and religious instructors.

173. On an unknown date 1971 through 1973 when she was 10 through 12 years of age, Plaintiff Janet Doe 4 was sexually molested by Joseph Lundowski. The molestation included, but was not limited to, Joseph Lundowski rubbing Plaintiff's back and chest, fondling Plaintiff Janet Doe 4's genitals under her underwear, and Joseph Lundowski vaginally raping Plaintiff Janet Doe 4. These acts of sexual abuse occurred in the parish rectory.

174. On an unknown date 1971 through 1973 when she was 10 through 12 years of age, Plaintiff Janet Doe 4 was sexually molested by Anton Smario. The molestation included, but was not limited to, Anton Smario exposing his penis to Plaintiff and Anton Smario masturbating himself in front of Plaintiff and other minor children. These acts of sexual abuse occurred on parish property.

175. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff Janet Doe 4 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY SEVENTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

176. Plaintiff Janet Doe 5 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Janet Doe 5 was raised in a religious home and attended services at St. Bernard's Parish, located in Stebbins, Alaska Parish, located in Stebbins, Alaska. She was raised in a devout family, was baptized, confirmed, and regularly attended catechism at the Roman Catholic Church. As a result, Plaintiff Janet Doe 5 developed great admiration, trust, reverence, and respect for, and obedience to, priests and members of religious orders.

177. Beginning in 1966 and continuing through 1967 when she was 9 through 10 years of age, Plaintiff Janet Doe 5 attended catechism at St. Bernard's Parish, located within the Diocese of Fairbanks. Through her participation at catechism at St. Bernard's Church, Plaintiff Janet Doe 5 came to know, admire, trust, revere and respect Joseph Lundowski, a Roman Catholic deacon and religious instructor.

178. On unknown dates in 1966 through 1968 when she was 14 through 16 years of age, Plaintiff Janet Doe 5 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski fondling Plaintiff's body and breasts, providing Plaintiff with alcohol to the point that Plaintiff would pass out and pulling down Plaintiff's underwear and fondling her. These acts of sexual abuse occurred in the parish.

179. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff Janet Doe 5 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the sacraments of the church, including, but not limited to, Holy Communion, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY EIGHTH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

180. Plaintiff Janet Doe 6 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Janet Doe 6 and her family were members of the Catholic Church, and they attended services at St. Michael's Parish, located in St. Michael, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Janet Doe 6 developed great admiration, trust, reverence, and respect for, and obedience

to, Roman Catholic priests and members of Roman Catholic religious orders.

181. In 1956 through 1966 when she was 6 through 15 years of age, Plaintiff Janet Doe 6 was a parishioner at St. Michael's Church, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at St. Michael's Church, Plaintiff Janet Doe 6 came to know, admire, trust, revere and respect Father Frank Fallert, S.J., a priest serving at St. Michael's Church and Joseph Lundowski, her Roman Catholic deacon and religious instructor.

182. On unknown dates in 1956 through 1957 when she was approximately 6 years of age, Plaintiff Janet Doe 6 was sexually molested by Father Fallert on numerous occasions. The molestations included, but were not limited to, Father Fallert touching and fondling Plaintiff's back, shoulders, neck, chest, breasts and body. These acts of sexual abuse occurred in the parish rectory.

183. On unknown dates in 1965 through 1966 when she was approximately 15 years of age, Plaintiff Janet Doe 6 was sexually molested by Joseph Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski forcibly restraining Plaintiff so that he could fondle her and Joseph Lundowski rubbing his penis against Plaintiff's vagina and buttocks. These acts of sexual abuse occurred in multiple locations on the parish property.

184. As a direct and proximate result of the felony sexual abuse of a minor and felony sexual assault described in the preceding paragraphs, Plaintiff Janet Doe 6 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social

interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

THIRTY NINTH CLAIM FOR RELIEF – SEXUAL ABUSE OF A MINOR

(Against All Jesuit Defendants)

185. Plaintiff Janet Doe 7 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Janet Doe 7 and her family were members of the Catholic Church, and they attended services at the Little Flower of Jesus Parish, located in Hooper Bay, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Janet Doe 7 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

186. In 1968 through 1975 when she was 14 through 21 years of age, Plaintiff Janet Doe 7 was a parishioner at the Little Flower of Jesus Church, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at the Little Flower of Jesus Church, Plaintiff Janet Doe 7 came to know, admire, trust, revere and respect Joseph Lundowski, her Roman Catholic deacon and religious instructor.

187. On unknown dates in 1968 through 1975 when she was approximately 14 through 21 years of age, Plaintiff Janet Doe 7 was sexually molested by Joseph

Lundowski on numerous occasions. The molestations included, but were not limited to, Joseph Lundowski molesting several different minor children in front of Plaintiff and forcing Plaintiff to watch while Joseph Lundowski molested these children. These acts of sexual abuse occurred on parish property.

188. As a direct and proximate result of the felony sexual abuse of a minor and felony sexual assault described in the preceding paragraphs, Plaintiff Janet Doe 7 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FORTIETH CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

189. Plaintiff Jean Doe 3 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Jean Doe 3 and her family were members of the Catholic Church, and they attended services at St. Bernard's Parish, located in Stebbins, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Jean Doe 3 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

190. In 1978 through 1979, when she was approximately 8 years of age, Plaintiff Jean Doe 3 was a parishioner at St. Bernard's Parish, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at St. Bernard's Church, Plaintiff Jean Doe 3 came to know, admire, trust, revere and respect Father George S. Endal, the pastor of St. Bernard's Church.

191. On unknown dates in 1978 through 1979 when she was approximately 8 years of age, Plaintiff Jean Doe 3 was sexually molested by Father Endal on numerous occasions. The molestations included, but were not limited to, Father Endal forcing Plaintiff to lie on his bed, Father Endal French kissing Plaintiff, Father Endal forcing his hands inside of Plaintiff's pants and Father Endal penetrating Plaintiff's vagina with his fingers. These acts of sexual abuse occurred in the parish rectory.

192. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff Jean Doe 3 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FORTY FIRST CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

193. Plaintiff Jean Doe 4 incorporates by reference the preceding paragraphs of

this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Jean Doe 4 and her family were members of the Catholic Church, and they attended services at Little Flower of Jesus Parish, located in Hooper Bay, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Jean Doe 4 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

194. In or about 1965, when Plaintiff was approximately 7 or 8 years of age, Plaintiff Jean Doe 4 was a parishioner at the Little Flower of Jesus Parish, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at the Little Flower of Jesus Catholic Church, Plaintiff Jean Doe 4 came to know, admire, trust, revere and respect Father George S. Endal, the pastor of the Little Flower of Jesus Church.

195. On unknown dates in or about 1965, when she was approximately 7 or 8 years of age, Plaintiff Jean Doe 4 was sexually molested by Father Endal. The molestation included, but was not limited to, Father Endal forcing Plaintiff to lay on his bed, Father Endal forcing Plaintiff to touch his penis and Father Endal penetrating Plaintiff's vagina with his finger. Father Endal then gave Plaintiff money to keep quiet about the sexual abuse and told her she would burn in hell if she ever told anyone about the abuse. These acts of sexual abuse occurred in the parish rectory.

196. As a direct and proximate result of the felony sexual abuse of a minor

described in the preceding paragraphs, Plaintiff Jean Doe 4 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FORTY SECOND CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

197. Plaintiff Jean Doe 5 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Jean Doe 5 and her family were members of the Catholic Church, and they attended services at St. Michael's Parish, located in St. Michael, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Jean Doe 5 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

198. In 1978 through 1979, when she was approximately 13 years of age, Plaintiff Jean Doe 5 was a parishioner at St. Michael's Parish, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at St. Michael's Church, Plaintiff Jean Doe 5 came to know, admire, trust, revere and respect Father George S. Endal, the pastor of St. Michael's Church.

199. On unknown dates in 1978 through 1979 when she was approximately 13 years of age, Jean Doe 5 was sexually molested by Father Endal on at least one occasion. The molestation included, but was not limited to, Father Endal fondling Plaintiff's breasts and Father Endal penetrating Plaintiff Jean Doe 5's vagina with his fingers. These acts of sexual abuse occurred on parish property.

200. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff Jean Doe 5 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the church, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FORTY THIRD CLAIM FOR RELIEF -- SEXUAL ABUSE OF A MINOR
(Against All Jesuit Defendants)

201. Plaintiff Jean Doe 6 incorporates by reference the preceding paragraphs of this Complaint and further alleges that she has lived in Western Alaska her entire life. Plaintiff Jean Doe 6 and her family were members of the Catholic Church, and they attended services at St. Michael's Parish, located in St. Michael, Alaska. She was raised in a devout Roman Catholic family, was baptized, confirmed, and regularly celebrated mass and received the sacraments through the Roman Catholic Church. As a result, Plaintiff Jean Doe 6 developed great admiration, trust, reverence, and respect for, and obedience to, Roman Catholic priests and members of Roman Catholic religious orders.

202. In 1980 through 1982, when she was 10 through 12 years of age, Plaintiff Jean Doe 6 was a parishioner at the St. Michaels church, located within the Diocese of Fairbanks. Through her membership and participation as a parishioner at St. Michael's Church, Plaintiff Jean Doe 6 came to know, admire, trust, revere and respect Father George S. Endal, the pastor of St. Michael's Church.

203. On unknown dates in 1980 through 1982, when she was 10 through 12 years of age, Plaintiff Jean Doe 6 was sexually molested by Father Endal on at least one occasion. The molestation included, but was not limited to, Father Endal putting his hands down the front of Plaintiff's blouse and fondling her breasts. The sexual abuse occurred on the parish property.

204. As a direct and proximate result of the felony sexual abuse of a minor described in the preceding paragraphs, Plaintiff Jean Doe 6 suffered great injury and harm including, but not limited to, severe emotional distress, great mental anguish, spiritual theft, loss of faith in God and the Catholic Church, loss of social interaction with others in the community, fear of priests and religious, loss of access to the Holy Sacraments of the Roman Catholic Church, including, but not limited to, Holy Communion and Confession, and other economic and non-economic injury all to her damage in an amount in excess of \$100,000.00, the exact amount to be proven at trial.

FORTY-FIRST CLAIM FOR RELIEF -- RESPONDEAT SUPERIOR
(Against All Jesuit Defendants)

205. Plaintiffs reallege and incorporate by reference herein each and every allegation contained herein above as though fully set forth herein, and further allege that at

all times described herein Father George S. Endal, S.J., Joseph C. Lundowski, Anton Smario, Father Frank Fallert, S.J., Father Henry G. Hargreaves, S.J. and Father Norman E. Donohue, S.J., were acting as agents, servants and/or employees of defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100. Therefore, the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J. and the Society of Jesus, Rome, are vicariously liable to the plaintiffs for each and every act of the abusers, alleged herein, and all injuries and damages caused thereby or resulting there from.

FORTY-SECOND CLAIM FOR RELIEF -- AIDED IN AGENCY
(Against All Jesuit Defendants)

206. Father George S. Endal, S.J., Joseph C. Lundowski, Anton Smario, Father Frank Fallert, S.J., Father Henry G. Hargreaves, S.J. and Father Norman E. Donohue, S.J., were aided in the commission of acts injurious to Plaintiffs by their agency relationship with the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100. Accordingly, the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100 are vicariously liable to the Plaintiffs for each and every act of their agents as alleged herein, and all injuries and damages caused thereby or resulting there from.

FORTY-THIRD CLAIM FOR RELIEF -- NEGLIGENT SUPERVISION
(Against All Jesuit Defendants)

207. Plaintiffs incorporate by reference the preceding paragraphs of this Complaint and further allege that as Religious Orders of the Catholic Church, and trainers of Priests

and religious persons, and by accepting parishioners and holding themselves out as a place of safety, guidance, healing, refuge and support, defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, agreed to and did undertake to provide for the supervision, care and physical safety of Plaintiffs. All Defendants had a duty to use reasonable care in providing supervision of the minor Plaintiffs. Defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, breached this duty of care by exposing the minor Plaintiffs to unsupervised contact with Father George S. Endal, S.J., Joseph C. Lundowski, Anton Smario, Father Frank Fallert, S.J., Father Henry G. Hargreaves, S.J. and/or Father Norman E. Donohue, S.J., enabling them to sexually abuse Plaintiffs. Plaintiffs further allege that at all times described herein defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, were grossly negligent in their placement, supervision and management of their agents and employees Father George S. Endal, S.J., Joseph C. Lundowski, Anton Smario, Father Fallert, S.J., Father Henry G. Hargreaves, S.J. and/or Father Norman E. Donohue, S.J.. As a direct and proximate result of this negligence the Plaintiffs suffered the injuries and damages described in the other paragraphs of this Complaint, and defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, are directly liable to the Plaintiffs for such injury, damage and loss.

208. During all times relevant herein, Defendants' agents directed, allowed

and/or executed customs, patterns, policies and practices of sexual abuse by failing to supervise, monitor, discipline and otherwise protect Plaintiffs, ultimately leading to the abuse alleged herein.

FORTY-FORTH CLAIM FOR RELIEF -- PUNITIVE DAMAGES
(Against All Jesuit Defendants)

209. The conduct of the Defendants and the abusers (all of whom were agents and /or employees of the corporate defendants in this case), as described in this Complaint, was willful and wanton misconduct, illegal, outrageous and malicious behavior, and conduct which showed a reckless indifference to the interests and well-being of minor children; therefore, Plaintiffs should be awarded punitive damages against all Defendants.

FORTY-FIFTH CLAIM FOR RELIEF -- EQUITABLE ESTOPPEL BASED ON
CONCEALMENT AND BREACH OF FIDUCIARY DUTIES
(Against All Jesuit Defendants)

210. The conduct of the Defendants, as described above, misrepresented and concealed material facts concerning the abusers' relationships with and motives in relating to all Plaintiffs. In particular, the abusers were presented as beneficent, caring adult males whose intentions were to help and guide Plaintiffs, when in fact their relationship was to be one of sexual exploitation. Further, the Defendants acted with the intent that such conduct be acted upon by Plaintiffs and without knowledge of the real facts. Plaintiffs relied upon Defendants' conduct, without knowledge of the real facts, to their detriment. In addition, Defendants' continuing concealment of the abusers' sexual misconduct and Defendants' misrepresentations, intentional concealment and/or negligent and/or reckless failure to prevent, disclose or discover the abusers' acts of sexual

misconduct, also prevented Plaintiffs from discovering or suing upon the wrongs done to them. Defendants are therefore equitably estopped from asserting the statute of limitations in this action.

211. The sexual abuse of Plaintiffs and the circumstances under which it occurred caused Plaintiffs to develop confusion, various coping mechanisms and symptoms of psychological disorders, including great shame, guilt, self-blame, depression, repression and disassociation. As a result, Plaintiffs were unable to perceive or know that the conduct of the abusers was wrongful or abusive, to comprehend the existence or nature of their psychological and emotional injuries and their connection to the sexual abuse perpetrated upon them by the abusers. Only within two years prior to the service of this Complaint have the Plaintiffs begun to know or have reasons to know that the abusers and Defendants' wrongful or abusive acts caused their injuries. Plaintiffs' actions are therefore timely.

FORTY-SIXTH CLAIM FOR RELIEF -- EQUITABLE ESTOPPEL BASED ON
SPIRITUAL AND SOCIAL DURESS
(Against All Jesuit Defendants)

212. After committing the wrongful acts complained of herein, Defendants' agents discouraged Plaintiffs from communicating with parents and family members the facts alleged herein.

213. Defendants are equitably estopped from asserting a statute of limitations defense because they and/or their agents knowingly intimidated Plaintiffs and told Plaintiffs that if they were to come forward with the truth about the abuse, they would face humiliation, ridicule, and/or be retaliated against. The perpetrators of the wrongful

acts complained of herein communicated with Plaintiffs, and each of them, that if they disclosed the facts alleged herein to anyone, Plaintiffs and/or their families would be humiliated, denied access to the Holy Sacraments and/or spiritual blessings/and or would be condemned to eternal damnation or otherwise harmed.

214. Since Plaintiffs have suffered abuse by the agents of Defendants herein, they have been in fear of retaliation by agents of the Catholic Church and by Defendants' agents. Plaintiffs were also and continue to be in fear of spiritual and social retaliation and embarrassment for disclosing the physical and sexual abuse in the form of filing a lawsuit or pursuing a claim.

215. Plaintiffs were, accordingly, under duress, due fear of retaliation, ridicule, humiliation and further harm, tolling the statute of limitations for childhood sexual abuse claims.

FORTY-SEVENTH CLAIM FOR RELIEF – SPOLIATION OF EVIDENCE
(Against All Jesuit Defendants)

216. Defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, were aware that they had potential liability for abuse of children and others by their priests and religious even before they were put on notice of the existence of the claims involving sexual abuse of minors by agents and employees of the defendants in the Fall of 2002 and in February 2003, respectively. Nevertheless, officers, employees and agents of Defendants the Oregon Province, the Alaska Jesuits, Father Stephen Sundborg, S.J., the Pioneer Education Society, the Father General and/or DOES 1 through 100, concealed and

destroyed by discarding, shredding, and burning documentary evidence relating to the misconduct of their priests and religious prior to January of 2003 and thereafter.

217. The evidence which was destroyed was important to the Plaintiffs' ability to prove their case and to defeat the Defendants' statute of limitations defense.

218. The destruction and concealment of this documentary evidence will impair Plaintiffs' ability to prove their claims and to defeat the Defendants' statute of limitations defense in this case.

219. Accordingly, Plaintiffs are entitled to damages for spoliation of evidence, for an order barring the Defendant from asserting any statute of limitations defense in this case, and for the presumption arising from the destruction of documents as authorized by the Supreme Court of Alaska in Sweet v. Sisters of Providence, 895 P2d 484 (Alaska 1995).

AD DAMNUM

As a direct result of their sexual abuse and sexual exploitation by Father George S. Endal, S.J., Joseph C. Lundowski, Anton Smario, Father Fallert, S.J., Father Henry G. Hargreaves, S.J. and/or Father Norman E. Donohue, S.J., Plaintiffs have suffered and continue to suffer pain and suffering, severe and permanent emotional distress, resulting in physical manifestations, embarrassment, loss of self-esteem, humiliation and psychological injuries, were prevented and will continue to be prevented from performing their normal daily activities and obtaining the full enjoyment of life, and have incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling, and on information and belief, have incurred and will continue to incur loss

of income and/or loss of earning capacity.

WHEREFORE, Plaintiffs pray for judgment against the defendants as follows:

A. To all Plaintiffs, and each of them, compensatory damages awarded against all Defendants in an amount to be proven at trial, but which in any event is greater than \$100,000.00 on each claim;

B. To all Plaintiffs, and each of them, an award of punitive damages against all Defendants;

C. To all Plaintiffs, awards of pre-judgment interest, costs, and attorney's fees, including an award of full, reasonable attorney fees under A.S. 09.60.070; and

D. For such other and further relief as the Court deems just and proper.

DATED at Anchorage, Alaska, this ____ day of January, 2009.

Cooke Roosa, LLC
Attorneys for Plaintiffs

By: _____
Christopher R. Cooke ABA No. 7011052