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LAW OFFICE OF
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A PROFESSIONAL LAW CORPORATION
831 West Ninth Street
San Pedro, California 90731
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Attorney for Plaintiffs

FILED

MAR 08 1991

GARY L. GRANVILLE, County Clerk
By _____ DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

RONALD GLENANE,)
)
Plaintiff,)
)
v.)
)
IMMACULATE HEART OF MARY)
PARISH; ROMAN CATHOLIC)
DIOCESE OF ORANGE; ROMAN)
CATHOLIC ARCHDIOCESE OF LOS)
ANGELES; ELUCETERIO RAMOS)
AKA AL RAMOS; ROMAN CATHOLIC)
BISHOP OF ORANGE; BISHOP)
WILLIAM JOHNSON; BISHOP)
McFARLAND; ARCHBISHOP THOMAS)
CLAVEL; FRANCIS MORAN;)
JOHN WEENHOFFER; and DOES)
1 through 100, inclusive,)
and each of them,)
)
Defendants.)

CASE NO. **651899**
COMPLAINT FOR PERSONAL
INJURIES AND DAMAGES
1. ASSAULT AND BATTERY
2. FALSE IMPRISONMENT
3. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS
4. NEGLIGENCE
5. NEGLIGENT FAILURE TO WARN
6. NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS

COMES NOW, Plaintiff, RONALD GLENANE, and alleges against
Defendants as follows:

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THIS CASE HAS BEEN ASSIGNED TO THE DIFFERENTIAL CASE MANAGEMENT PROGRAM (DCM) ALL PARTIES MUST COMPLY WITH THE PROGRAM RULES AS SET FORTH IN COURT ORDER NO. 2000-0001 AND COURT ORDER NO. 2000-0002. PLEASE REFER TO THE COURT ORDER FOR THE COMPLETE RULES AND PROCEDURES. THE COURT ORDER IS AVAILABLE ON THE COURT WEBSITE AT WWW.COURT.CA.GOV.

1
2 FOR A FIRST, SEPARATE AND DISTINCT CAUSE OF ACTION
3 FOR ASSAULT AND BATTERY AGAINST ALL DEFENDANTS,
4 AND EACH OF THEM, PLAINTIFF ALLEGES AS FOLLOWS:

5 1. Plaintiff, RONALD GLENANE, is, and at all times
6 mentioned herein was, a resident of the County of Orange, State of
7 California.

8 2. Plaintiff is informed and believes and thereon
9 alleges, that Defendants IMMACULATE HEART OF MARY PARISH, ROMAN
10 CATHOLIC DIOCESE OF ORANGE, ROMAN CATHOLIC ARCHDIOCESE OF LOS
11 ANGELES and DOES 1 through 50, and each of them, are, and at all
12 times mentioned herein were, business entities, association or
13 church organizations having their principle place of business in
14 the County of Orange, State of California. Many of the
15 molestations and other wrongful acts giving rise to the causes of
16 action herein, occurred at or about the premises commonly known as
17 IMMACULATE HEART OF MARY PARISH, located at or about 1100 South
18 Center Street, in the City of Santa Ana, County of Orange, State
19 of California.

20 3. Plaintiff is ignorant of the true names and
21 capacities of Defendants sued herein as DOES 1 through 100,
22 inclusive, and each of them, and, therefore, sues said Defendants
23 by such fictitious names. Plaintiff will amend this Complaint to
24 allege their true names and capacities when ascertained. Plaintiff
25 is informed and believes, and thereon alleges, that each said
26 fictitiously named Defendant is negligently, intentionally, or
27 otherwise responsible, in some manner as alleged herein, and that
28 the injuries and damages sustained by Plaintiff as more
particularly set forth herein, were directly and proximately caused

1 by said wrongful conduct.

2 4. All Defendants, and each of them, at all times
3 mentioned herein, were the agents, employees, servants or
4 representatives of each of their co-Defendants and, in doing the
5 things herein described, were acting within the course and scope
6 of their authority as such agent, employee, servant, or
7 representative, and each such act was with the authority,
8 permission, consent, knowledge and/or ratification of each said
9 co-Defendant.

10 5. Plaintiff, RONALD GLENANE, was born on October 9,
11 1964, and was a minor at the time of the wrongful conduct of each
12 said Defendant, as more particularly set forth and alleged herein.

13 6. From approximately, but not limited to, October 1974,
14 up through and including, but not limited to, approximately
15 December 1981, Plaintiff was a member of the congregation at
16 IMMACULATE HEART OF MARY PARISH, and was an alter boy and/or house
17 boy for the rectory located at said parish.

18 7. Plaintiff is informed and believes, and thereon
19 alleges, that at all times mentioned herein, that Defendants
20 ELUCETERIO RAMOS AKA AL RAMOS and JOHN WEENHOFFER were Fathers at
21 the IMMACULATE HEART OF MARY PARISH and performed sermons, over-
22 saw and managed the youth groups, alter boys, and house boys, and
23 performed various other duties at said parish, all within the
24 course and scope of the authority and/or employment with said
25 parish, with the knowledge, and permission, consent, authority
26 and/or ratification of each of their employers, principals and/or
27 superiors.

28 8. Plaintiff is informed and believes, and thereon

1 alleges, that at all times mentioned herein, Defendant FRANCIS
2 MORAN was Pastor, Defendants WILLIAM JOHNSON and McFARLAND were
3 Bishops, and THOMAS CLAVEL was Archbishop at the IMMACULATE HEART
4 OF MARY PARISH.

5 9. Plaintiff is informed and believes, and thereon
6 alleges, that Defendants IMMACULATE HEART OF MARY PARISH, ROMAN
7 CATHOLIC DIOCESE OF ORANGE, ROMAN CATHOLIC ARCHDIOCESE OF LOS
8 ANGELES and DOES 51 through 100, inclusive, and each of them, were
9 the owners, operators, licensors, licensees, lessors, lessees,
10 principals, employers, employees, overseers, or otherwise in
11 control and supervision of the premises commonly know as IMMACULATE
12 HEART OF MARY PARISH, as well as all church, religious, and other
13 activities events, and occurrences at said location.

14 10. From approximately, but not limited to, October 1974
15 up through and including, but not limited to, approximately
16 December 1981, Defendants ELUCETERIO RAMOS AKA AL RAMOS and DOES
17 1 through 25, inclusive, and each of them, verbally abused,
18 disparaged, and insulted Plaintiff, in addition to verbally and
19 physically threatening him that said Defendants would strike,
20 batter, maim, or otherwise unlawfully touch and perform illegal
21 acts including, but not limited to, sexual molestation, lewd and
22 lascivious acts and oral copulation, with the present intent of
23 carrying out said threats. As a result of said conduct of
24 Defendants, and each of them, Plaintiff justifiably feared for his
25 life, health, strength and well-being.

26 11. Defendants ELUCETERIO RAMOS AKA AL RAMOS and DOES
27 1 through 25, and each of them, then proceeded to strike, batter,
28 unlawfully touch, sexually molest, commit lewd and lascivious acts

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1 with Plaintiff, including, but not limited to oral copulation, and
2 otherwise physically and mentally abuse and cause serious injury
3 and harm to Plaintiff as herein alleged, and thereafter continued
4 to so batter, molest, commit lewd and lascivious acts, including
5 but not limited to oral copulation, and abuse Plaintiff, causing
6 him to suffer great physical and emotional injury, as more
7 particularly set forth herein.

8 12. As a result of the nature of Defendants' conduct,
9 and each of them, and of the injuries and damages sustained herein
10 by Plaintiff, said actions of Defendants, and each of them, were
11 psychologically repressed, prior to Plaintiff reaching the age of
12 majority, thereby causing him to forget the acts of assault,
13 batter, sexual molestation, abuse, lewd and lascivious acts,
14 including, but not limited to, oral copulation, and other physical
15 and emotional abuse and injury. It was not until approximately
16 March 29, 1990, that Plaintiff began to first recall said wrongful
17 acts. Thereafter, Plaintiff first became aware that said wrongful
18 acts of Defendants, and each of them, which were then recently
19 discovered, were the cause of Plaintiff's psychological, emotional
20 and other injuries and damages as more particularly set forth
21 herein.

22 13. Said wrongful acts of Defendants, and each of them,
23 were known, or should have been known, to each of their co-
24 Defendants herein who authorized, permitted, allowed, sanctioned,
25 or ratified said conducted resulting in the injuries and damages
26 to Plaintiff as herein alleged.

27 14. Said acts of Defendants, and each of them,
28 constitute unprovoked conduct which was willful, wanton, malicious,

1 oppressive, and beyond all recognized bounds of decency, in
2 conscious disregard for the physical and emotional health, safety
3 and well-being of Plaintiff.

4 15. By reason of said wrongful acts of Defendants, and
5 each of them, Plaintiff has suffered extreme and severe mental
6 anguish, physical pain, and has been injured and damaged as more
7 particularly set forth herein.

8 16. As a further result of said wrongful acts of
9 Defendants, and each of them, Plaintiff was required to, and did,
10 expend money and incur obligations for medical, psychiatric,
11 psychological and other health care services, hospitalization,
12 medicine and medical supplies, therapy, rehabilitation, and other
13 services, and will in the future be compelled to incur additional
14 obligations for same. Plaintiff does not know the reasonable value
15 of said obligations at this time, but prays that same may be in
16 inserted herein when ascertained or upon proof thereof.

17 17. At the time of the aforementioned improper conduct
18 of Defendants, and each of them, Plaintiff was gainfully employed
19 for compensation, and as a further direct and proximate result of
20 Defendants' wrongful conduct, Plaintiff has been deprived of
21 earnings and earning capacity, and will in the future be so
22 deprived. Plaintiff does not know the reasonable value of same at
23 this time but prays that same be inserted when ascertained or upon
24 proof thereof.

25 18. Said wrongful conduct of Defendants, and each of
26 them, was intended to cause injury and damages to Plaintiff or,
27 alternatively, were despicable and unconscionable conduct carried
28 on with a willful, wanton and conscious disregard of the rights,

1 health, safety and well-being of Plaintiff, subjecting Plaintiff
2 to cruel and unjust hardship, injuries and damages, and are of the
3 kind justifying an award of exemplary and punitive damages.

4 FOR A SECOND, SEPARATE AND DISTRICT CAUSE OF ACTION
5 FOR FALSE IMPRISONMENT AGAINST ALL DEFENDANTS,
6 AND EACH OF THEM, PLAINTIFF ALLEGES AS FOLLOWS:

7 19. The Plaintiff hereby refers to, repeats and
8 incorporates by this reference, each and every paragraph and
9 allegation contained therein of the First Cause of Action, as
10 though fully set forth at this point.

11 20. In doing each and every wrongful act aforescribed,
12 Defendants ELUCETERIO RAMOS AKA AL RAMOS and DOES 1 through 25,
13 inclusive, and each of them, forcibly, against Plaintiff's will,
14 and without his consent and over his protest, kept Plaintiff in
15 said Defendants' presence and caused Plaintiff, by force and
16 threats of physical violence, and otherwise, to remain in
17 Defendants' presence until said Defendants had completed their
18 battery, sexual molestation, lewd and lascivious acts, including
19 but not limited to oral copulation, and abuse of Plaintiff.

20 21. Immediately prior to said wrongful acts of said
21 Defendants, and each them, Plaintiff had been peacefully visiting,
22 staying, attending, performing church duties, and otherwise acting
23 lawfully at the IMMACULATE HEART OF MARY PARISH, and at all other
24 locations wherein said wrongful acts and conduct of Defendants, and
25 each of them, occurred throughout the time period referred to
26 herein.

27 22. In making said threats of physical harm and
28 otherwise wrongfully restraining and imprisoning Plaintiff,
29 Defendants, and each of them, acted with malice, intent, and in

1 wanton and conscious disregard for the health, safety and well-
2 being of Plaintiff, for the purpose of sexually abusing, molesting,
3 and otherwise injuring him.

4 23. Said wrongful conduct of Defendants, and each of
5 them, was intended to cause injury and damages to Plaintiff or,
6 alternatively were despicable and unconscionable conduct carried
7 on with a willful, wanton and conscious disregard of the rights,
8 health, safety and well-being of Plaintiff, subjecting Plaintiff
9 to cruel and unjust hardship, injuries and damages, and are of the
10 kind justifying an award of exemplary and punitive damages.

11 FOR A THIRD, SEPARATE AND DISTINCT CAUSE OF ACTION
12 FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST ALL
13 DEFENDANTS AND EACH OF THEM, PLAINTIFF ALLEGES AS FOLLOWS:

14 24. Plaintiff hereby refers to, repeats, and realleges
15 each and every paragraph contained in the First, Second and Third
16 Causes of Action, and each and every allegation contained therein,
17 and incorporates same by this reference as though fully set forth
18 at this point.

19 25. Defendants, and each of them, knew, or should have
20 known, that their failure to exercise reasonable conduct and due
21 care in the carrying out of their duties to Plaintiff, that said
22 negligence and carelessness would cause severe mental anguish,
23 emotional and physical distress and profound shock to Plaintiff's
24 nervous system.

25 26. As a further direct and proximate result of said
26 wrongful acts of Defendants, and each of them, Plaintiff has
27 suffered, and continues to suffer severe mental anguish, emotional
28 and physical distress, and profound shock to his nervous system,
resulting in the injuries and damages set forth herein.

1 27. At the time of the aforementioned improper conduct
2 of Defendants, and each of them; Plaintiff was gainfully employed
3 for compensation, and as a further direct and proximate result of
4 Defendants' wrongful conduct, Plaintiff has been deprived of
5 earnings and earning capacity, and will in the future be so
6 deprived. Plaintiff does not know the reasonable value of same at
7 this time but prays that same be inserted when ascertained or upon
8 proof thereof.

9 FOR A FOURTH, SEPARATE AND DISTINCT CAUSE OF ACTION
10 AGAINST ALL DEFENDANTS, AND EACH OF THEM
11 FOR NEGLIGENCE, PLAINTIFF ALLEGES AS FOLLOWS:

12 28. Plaintiff hereby refers to, repeats, and realleges
13 each and every paragraph contained in the First and Second Causes
14 of Action, and each and every allegation contained therein, and
15 incorporates same by this reference as though fully set forth at
16 this point.

17 29. At all times mentioned herein, Plaintiff was a house
18 boy in the rectory at IMMACULATE HEART OF MARY PARISH. As such,
19 Defendants, and each of them, had a duty to protect, keep safe from
20 harm, care for, and supervise him in a reasonably prudent manner,
21 a duty to not violate Plaintiff's civil rights, a duty not to
22 perform any illegal acts against Plaintiff, a duty not to engage
23 in lewd or lascivious acts with Plaintiff, a duty to not violate
24 Plaintiff's person, a duty to investigate and cease any such
25 wrongful or illegal acts and activities involving Plaintiff, who
26 was a minor at all times material herein.

27 30. At all times material herein, Defendants IMMACULATE
28 HEART OF MARY PARIS, ROMAN CATHOLIC DIOCESE OF ORANGE, ROMAN
CATHOLIC DIOCESE OF LOS ANGELES and DOES 51 through 100, inclusive,

1 and each of them, had a duty to hire, retain, supervise,
2 investigate, train, and employ priests who were fit to perform
3 their functions within the church, particularly as it pertains to
4 contact with house boys and members of the public, such as
5 Plaintiff herein.

6 31. Defendants, and each of them, breached their
7 respective duty owed to Plaintiff in that they acted negligent and
8 careless in performing their duties as it pertained to Plaintiff.

9 32. At all times material herein, Defendants ELUCETERIO
10 RAMOS AKA AL RAMOS and DOES 1 through 25, inclusive, and each of
11 them, negligently and carelessly cared for, taught, chaperoned,
12 supervised, treated, protected and controlled Plaintiff, so that
13 Plaintiff's person was violated, resulting in illegal acts, sexual
14 abuse, sexual misconduct, lewd and lascivious conduct, being
15 performed on Plaintiff, so as to violated his civil rights, so as
16 to cause physical and emotional damages and injuries to Plaintiff
17 and directly and proximately caused the injuries and damages set
18 forth herein.

19 33. At all times material herein, Defendants IMMACULATE
20 HEART OF MARY PARIS, ROMAN CATHOLIC DIOCESE OF ORANGE, ROMAN
21 CATHOLIC DIOCESE OF LOS ANGELES, FRANCIS MORAN, ARCHBISHOP THOMAS
22 CLAVEL, BISHOP WILLIAM JOHNSON, BISHOP McFARLAND, JOHN WEENHOFFER
23 and DOES 26 through 100, negligently and carelessly cared for,
24 taught, chaperoned, supervised, treated, protected, and controlled
25 Plaintiff, and, further, negligently and carelessly hired,
26 retained, supervised, employed, trained and investigated priests
27 such as Defendant ELUCETERIO RAMOS AKA AL RAMOS and DOES 1 through
28 25, inclusive, and each of them, and retained said priests, despite

1 the fact that they had a right and duty to properly hire, control,
2 retain, supervise, employ and investigate said priests, and were
3 placed on notice of said priests' wrongful conduct and foreseeable
4 injury to persons lawfully situated such as Plaintiff herein.

5 34. As a direct and proximate result of the negligence
6 and carelessness of Defendants, and each of them, Plaintiff was
7 hurt and suffered injuries to his health, strength, and activity,
8 sustaining injury to his nervous system and person, all of which
9 injuries have caused, and continue to cause, Plaintiff great
10 mental, physical, and nervous pain and suffering, some permanent
11 disability, and other injuries presently undiagnosed, all in a sum
12 in an amount within the jurisdiction of this Court. Plaintiff will
13 seek leave of court to amend this Complaint to insert the true
14 value of same when all damages have been ascertained.

15 35. As a further direct and proximate result of said
16 negligence and carelessness of Defendants, and each of them,
17 Plaintiff has been compelled to incur obligations as and for
18 medical, psychiatric, psychological and other health care services,
19 hospitalization, medicine and medical supplies, and other related
20 expenses, and will in the future be compelled to incur additional
21 obligations for same. Plaintiff does not know the reasonable value
22 of said obligations at this time, but will seek leave to amend to
23 insert the true value of same when ascertained or upon proof
24 thereof.

25 36. At the time of the aforementioned improper conduct
26 of Defendants, and each of them, Plaintiff was gainfully employed
27 for compensation, and as a further direct and proximate result of
28 Defendants' wrongful conduct, Plaintiff has been deprived of

1 earnings and earning capacity, and will in the future be so
2 deprived. Plaintiff does not know the reasonable value of same at
3 this time but prays that same be inserted when ascertained or upon
4 proof thereof.

5 AS A FIFTH, SEPARATE AND DISTINCT CAUSE OF ACTION
6 FOR FAILURE TO WARN AGAINST ALL DEFENDANTS,
7 AND EACH OF THE, PLAINTIFF ALLEGES AS FOLLOWS:

8 37. Plaintiff hereby refers to, repeats, and realleges
9 each and every paragraph contained in the First, Second, Third and
10 Fourth Causes of Action, and each and every allegation contained
11 therein, and incorporates same by this reference as though fully
12 set forth at this point.

13 38. Defendants, and each of them, knew, or should have
14 know, that ELUCETERIO RAMOS AKA AL RAMOS and DOES 1 through 25,
15 inclusive, and each of them, were suffering from mental, emotional,
16 or physical injury, disability, or other illness, whereby it was,
17 or should have been, foreseeable that he would engage in illegal
18 acts and activity with Plaintiff under the guise of his authority
19 bestowed upon him by, and through, the church. Despite such
20 knowledge and duty to investigate, control, and take other
21 appropriate actions with respect to Defendants ELUCETERIO RAMOS AKA
22 AL RAMOS and DOES 1 through 25, inclusive, and each of them, said
23 Defendants negligently and carelessly failed to take appropriate
24 action and failed to report said Defendants to the appropriate
25 authorities, failed to warn Plaintiff and other members of the
26 public or persons affiliated or associated with the congregation
27 of said dangerous and illegal propensities, and further failed to
28 Plaintiff, other appropriate authorities, or members of the public,
any illegal acts, sexual molestation or abuse, and lewd and

1 lascivious conduct towards and upon Plaintiff, or any other person.

2 39. As a direct and proximate result of said negligent
3 and careless failure to warn, Plaintiff was injured in his person,
4 body, health and well-being, as more particularly stated herein.
5 Additionally, Plaintiff continued to be so injured and damaged, and
6 was not afforded the opportunity to obtain appropriate
7 rehabilitation, counselling and treatment for his physical, mental,
8 emotional and other injuries, within a reasonable time after
9 Defendants' wrongful conduct, acts and actions against him, thereby
10 causing him to suffer further injuries and damages to his health,
11 body, strength and well-being, as more particularly stated herein.

12 AS A SIXTH, SEPARATE AND DISTINCT CAUSE OF ACTION
13 FOR NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
14 AGAINST ALL DEFENDANTS, AND EACH OF THEM,
15 PLAINTIFF ALLEGES AS FOLLOWS:

16 40. Plaintiff hereby refers to, repeats, and realleges
17 each and every paragraph contained in the First and Second Causes
18 of Action, and each and every allegation contained therein, and
19 incorporates same by this reference as though fully set forth at
20 this point.

21 41. Said conduct of Defendants, and each of them, was
22 willful, intentional, malicious, wanton, reckless, and in conscious
23 disregard for the well-being of Plaintiff's emotional and mental
24 state, and done for the purpose of causing him to suffer
25 humiliation, mental anguish and emotional distress and suffering.

26 42. As a direct and proximate result of the
27 aforementioned wrongful acts of Defendants, and each of them,
28 Plaintiff suffered humiliation, mental anguish, emotional distress
and suffering, profound shock to his nervous system, and was

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1 injured in mind and body, and suffered other damages as more
2 particularly stated herein, in an amount within the jurisdictional
3 limits of this Court.

4 43. The aforementioned conduct of Defendants, and each
5 of them, was intended to cause injury to Plaintiff or, in the
6 alternative, was despicable conduct carried on with a willful,
7 wanton, reckless and conscious disregard of the rights and safeties
8 of Plaintiff, subjecting him to cruel and unjust hardship,
9 humiliation, mental anguish, and emotional distress and suffering,
10 so as to justify an award of exemplary and punitive damages.

11 WHEREFORE, Plaintiff prays as follows:

12 AS FOR ALL CAUSES OF ACTION

- 13 1. General damages according to proof;
- 14 2. Medical and related expenses, past, present, and
15 future, according to proof;
- 16 3. Loss of earnings, past, present, and future, and loss
17 of earning capacity, in a sum according to proof;
- 18 4. Other items of special damage according to proof;
- 19 5. Costs of suit incurred herein;
- 20 6. Prejudgment interest as provided by law; and,
- 21 7. Such other and further relief as may be deemed just
22 and proper.

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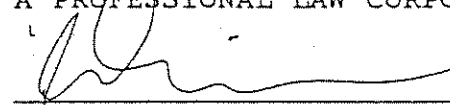
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AS FOR THE FIRST, SECOND, AND SIXTH CAUSES OF ACTION

8. For punitive and exemplary damages in an amount deemed just and proper.

DATED: March 8, 1991

LAW OFFICE OF WERNER R. MEISSNER
A PROFESSIONAL LAW CORPORATION



Werner R. Meissner
Attorney for Plaintiff