

RETURN DATE: NOVEMBER 10, 2009

SUPERIOR COURT

JOHN DOE #1, JOHN DOE #2, JOHN DOE #3,
JOHN DOE #4, JOHN DOE #5, JOHN DOE #6,
JOHN DOE #7, JOHN DOE #8, JOHN DOE #9,
JOHN DOE #10, JOHN DOE #11, JOHN DOE #12,
JOHN DOE #13, JOHN DOE #14, JOHN DOE #15,
JOHN DOE #16, JOHN DOE #17, JOHN DOE #18,
JOHN DOE #19, JOHN DOE #20, JOHN DOE #21,
JOHN DOE #22, JOHN DOE #23, JOHN DOE #24,
JOHN DOE #25, JOHN DOE #26, JOHN DOE #27,
JOHN DOE #28, JOHN DOE #29, JOHN DOE #30,
JOHN DOE #31, JOHN DOE #32, JOHN DOE #33,
JOHN DOE #34, JOHN DOE #35, JOHN DOE #36,
JANE DOE #1, JANE DOE #2, JANE DOE #3,
JANE DOE #4, JANE DOE #5, JANE DOE #6,
JANE DOE #7, JANE DOE #8, JANE DOE #10,
JANE DOE #11, JANE DOE #12, JANE DOE #13,
and JANE DOE #14

COMPLEX LITIGATION
DOCKET

AT WATERBURY

V.

HARTFORD ROMAN CATHOLIC
DIOCESAN CORPORATION

OCTOBER 14, 2009

TEMPORARY EX PARTE APPLICATION FOR THE USE OF A PSEUDONYM

The plaintiffs, pursuant to Practice Book § 11-20A(h)(2), move the court for a temporary *ex parte* order to proceed with pseudonyms in this action. The plaintiffs are adults who were victims of sexual molestation by Dr. George Reardon, while minors, at the St. Francis Hospital, controlled and managed by the defendant, Hartford Roman Catholic Diocesan Corporation at all relevant times, as set forth in the attached summons and complaint. In accordance with General Statutes §§ 54-86d-54-86e (providing for protection of victims of sexual assault), and Practice Book § 11-20A(h)(2), the plaintiffs request that an *ex parte* order be granted allowing prosecution in fictitious

names until a hearing can be held within 15 days after the return date so the court can determine whether continued prosecution under pseudonyms be allowed.

THE PLAINTIFFS,

By _____

JOEL T. FAXON
PAUL T. EDWARDS
STRATTON FAXON
59 ELM STREET
NEW HAVEN, CT 06510
TEL. 203-624-9500
FAX. 203-624-9100
JURIS NO.: 421593
jfaxon@strattonfaxon.com

ORDER

The foregoing order, having been heard, is hereby ordered: GRANTED / DENIED.

Ordered: The court finds the plaintiffs' interest in protecting their identities compelling and significant in light of the allegations of sexual molestation and a pseudonym is necessary to accomplish same. Such interest outweighs the public's interest in knowing their names and no lesser alternative will suffice. This order shall remain in effect until a hearing on _____ at _____ am/pm at which time this question will be considered anew. Further ordered, plaintiffs' identity to be disclosed to defense counsel.

By _____

SUMMONS - CIVIL

JD-CV-1 Rev. 9-08
 C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,
 52-48, 52-259, P.B. Secs. 3-1 through 3-21, 8-1

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov

See page 2 for instructions

- "X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
- "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
- "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code)	Return Date (Must be a Tuesday)
300 Grand Street, Waterbury CT 06702		(203) 591-3300	November 10, 2009 <small>Month Day Year</small>
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	<input type="checkbox"/> G.A. Number:	At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349)	Case type code (See list on page 2)
		Waterbury	Major: T Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)	Juris number (to be entered by attorney only)
Stratton Faxon, 59 Elm Street, New Haven CT 06510	421593
Telephone number (with area code)	Signature of Plaintiff (if self-represented)
(203) 624-9500	

Number of Plaintiffs: **49** Number of Defendants: **1** Form JD-CV-2 attached for additional parties

Parties	Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)	
First Plaintiff	Name: Doe, John #1, care of Stratton Faxon Address: 59 Elm Street New Haven CT 06510	P-01
Additional Plaintiff	Name: Doe, John #2, care of Stratton Faxon Address: 59 Elm Street New Haven CT 06510	P-02
First Defendant	Name: Hartford Roman Catholic Diocesan Corporation Address: 134 Farmington Avenue Hartford, CT 06105	D-50
Additional Defendant	Name: Address:	D-51
Additional Defendant	Name: Address:	D-52
Additional Defendant	Name: Address:	D-53

Notice to Each Defendant

- YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
- To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
- If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
- If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
- If you have questions about the Summons and Complaint, you should talk to an attorney quickly. **The Clerk of Court is not allowed to give advice on legal questions.**

Signed (Sign and "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left	Date signed
		Joel T. Faxon	10/13/2009

If this Summons is signed by a Clerk: a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.	<i>For Court Use Only</i>	
	File Date	

I certify I have read and understand the above.	Signed (Self-Represented Plaintiff)	Date

Name and address of person recognized to prosecute in the amount of \$250		Date	Docket Number
Jason K. Gamsby, Stratton Faxon, 59 Elm Street, New Haven CT 06510		10/13/2009	
Signed (Official taking recognizance, "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk		

**CIVIL SUMMONS
CONTINUATION OF PARTIES**

**STATE OF CONNECTICUT
SUPERIOR COURT**

JD-CV-2 Rev. 4-97

FIRST NAMED PLAINTIFF *(Last, First, Middle Initial)*

Doe, John #1, care of Stratton Faxon

FIRST NAMED DEFENDANT *(Last, First, Middle Initial)*

Hartford Roman Catholic Diocesan Corporation

ADDITIONAL PLAINTIFFS		
NAME <i>(Last, First, Middle Initial, if individual)</i>	ADDRESS <i>(No., Street, Town and ZIP Code)</i>	CODE
Doe, John #3, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		03
Doe, John #4, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		04
Doe, John #5, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		05
Doe, John #6, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		06
Doe, John #7, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		07
Doe, John #8, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		08
Doe, John #9, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		09
Doe, John #10, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		10
Doe, John #11, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		11
Doe, John #12, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		12
Doe, John #13, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		13

ADDITIONAL DEFENDANTS		
NAME <i>(Last, First, Middle Initial, if individual)</i>	ADDRESS <i>(No., Street, Town and ZIP Code)</i>	CODE
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**CIVIL SUMMONS
CONTINUATION OF PARTIES**

STATE OF CONNECTICUT
SUPERIOR COURT

JD-CV-2 Rev. 4-97

FIRST NAMED PLAINTIFF *(Last, First, Middle Initial)*

Doe, John #1, care of Stratton Faxon

FIRST NAMED DEFENDANT *(Last, First, Middle Initial)*

Hartford Roman Catholic Diocesan Corporation

ADDITIONAL PLAINTIFFS		
NAME <i>(Last, First, Middle Initial, if individual)</i>	ADDRESS <i>(No., Street, Town and ZIP Code)</i>	CODE
Doe, John #14, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		03
Doe, John #15, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		04
Doe, John #16, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		05
Doe, John #17, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		06
Doe, John #18, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		07
Doe, John #19, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		08
Doe, John #20, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		09
Doe, John #21, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		10
Doe, John #22, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		11
Doe, John #23, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		12
Doe, John #24, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		13

ADDITIONAL DEFENDANTS		
NAME <i>(Last, First, Middle Initial, if individual)</i>	ADDRESS <i>(No., Street, Town and ZIP Code)</i>	CODE
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**CIVIL SUMMONS
CONTINUATION OF PARTIES**

STATE OF CONNECTICUT
SUPERIOR COURT

JD-CV-2 Rev. 4-97

FIRST NAMED PLAINTIFF (Last, First, Middle Initial)

Doe, John #1, care of Stratton Faxon

FIRST NAMED DEFENDANT (Last, First, Middle Initial)

Hartford Roman Catholic Diocesan Corporation

ADDITIONAL PLAINTIFFS		
NAME (Last, First, Middle Initial, if Individual)	ADDRESS (No., Street, Town and ZIP Code)	CODE
Doe, John #25, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		03
Doe, John #26, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		04
Doe, John #27, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		05
Doe, John #28, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		06
Doe, John #29, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		07
Doe, John #30, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		08
Doe, John #31, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		09
Doe, John #32, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		10
Doe, John #33, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		11
Doe, John #34, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		12
Doe, John #35, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		13

ADDITIONAL DEFENDANTS		
NAME (Last, First, Middle Initial, if Individual)	ADDRESS (No., Street, Town and ZIP Code)	CODE
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**CIVIL SUMMONS
CONTINUATION OF PARTIES**

STATE OF CONNECTICUT
SUPERIOR COURT

JD-CV-2 Rev. 4-97

FIRST NAMED PLAINTIFF (Last, First, Middle Initial)

Doe, John #1, care of Stratton Faxon

FIRST NAMED DEFENDANT (Last, First, Middle Initial)

Hartford Roman Catholic Diocesan Corporation

ADDITIONAL PLAINTIFFS		
NAME (Last, First, Middle Initial, if individual)	ADDRESS (No., Street, Town and ZIP Code)	CODE
Doe, John #36, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		03
Doe, Jane #1, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		04
Doe, Jane #2, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		05
Doe, Jane #3, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		06
Doe, Jane #4, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		07
Doe, Jane #5, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		08
Doe, Jane #6, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		09
Doe, Jane #7, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		10
Doe, Jane #8, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		11
Doe, Jane #10, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		12
Doe, Jane #11, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		13

ADDITIONAL DEFENDANTS		
NAME (Last, First, Middle Initial, if individual)	ADDRESS (No., Street, Town and ZIP Code)	CODE
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**CIVIL SUMMONS
CONTINUATION OF PARTIES**

STATE OF CONNECTICUT
SUPERIOR COURT

JD-CV-2 Rev. 4-97

FIRST NAMED PLAINTIFF (*Last, First, Middle Initial*)

Doe, John #1, care of Stratton Faxon

FIRST NAMED DEFENDANT (*Last, First, Middle Initial*)

Hartford Roman Catholic Diocesan Corporation

ADDITIONAL PLAINTIFFS		
NAME (<i>Last, First, Middle Initial, if individual</i>)	ADDRESS (<i>No., Street, Town and ZIP Code</i>)	CODE
Doe, Jane #12, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		03
Doe, Jane #13, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		04
Doe, Jane #14, care of Stratton Faxon 59 Elm Street, New Haven CT 06510		05
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ADDITIONAL DEFENDANTS		
NAME (<i>Last, First, Middle Initial, if individual</i>)	ADDRESS (<i>No., Street, Town and ZIP Code</i>)	CODE
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		DOCKET NO.

RETURN DATE: NOVEMBER 10, 2009	:	SUPERIOR COURT
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JOHN DOE #1, JOHN DOE #2, JOHN DOE #3, JOHN DOE #4, JOHN DOE #5. JOHN DOE #6, JOHN DOE #7, JOHN DOE #8, JOHN DOE #9, JOHN DOE #10, JOHN DOE #11, JOHN DOE #12, JOHN DOE #13, JOHN DOE #14, JOHN DOE #15, JOHN DOE #16, JOHN DOE #17, JOHN DOE #18, JOHN DOE #19, JOHN DOE #20, JOHN DOE #21, JOHN DOE #22, JOHN DOE #23, JOHN DOE #24, JOHN DOE #25, JOHN DOE #26, JOHN DOE #27, JOHN DOE #28, JOHN DOE #29, JOHN DOE #30, JOHN DOE #31, JOHN DOE #32, JOHN DOE #33, JOHN DOE #34, JOHN DOE #35, JOHN DOE #36, JANE DOE #1, JANE DOE #2, JANE DOE #3, JANE DOE #4, JANE DOE #5, JANE DOE #6, JANE DOE #7, JANE DOE #8, JANE DOE #10, JANE DOE #11, JANE DOE #12, JANE DOE #13, and JANE DOE #14	:	COMPLEX LITIGATION DOCKET
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	:	AT WATERBURY
	:	
V.	:	
	:	
HARTFORD ROMAN CATHOLIC DIOCESAN CORPORATION	:	OCTOBER 14, 2009

COMPLAINT

COUNT ONE: (Negligence – John Doe #1-36, & Jane Doe #1-8, and 10-14 as to the Hartford Roman Catholic Diocesan Corporation)

1. At all times relevant to this action, the plaintiffs, were minor residents of the State of Connecticut and sought medical treatment or examination from Dr. George Reardon (“Reardon”) during the 1960’s, and/or 1970’s, and/or 1980’s, and/or 1990’s. The plaintiffs contact and abuse at the hands of Reardon follows:

a. John Doe #1: At all times relevant to this action, the plaintiff, John Doe #1, was a minor resident of the State of Connecticut and sought medical treatment from the defendant George Reardon during the 1960’s, 1970’s and/or 1980’s. The plaintiff had gone to St. Francis and to Reardon’s home during the

and/or 1980's. The plaintiff had gone to St. Francis and to Reardon's home during the 1960's, 1970's and/or 1980's ,seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. During the 1960's, 1970's and/or 1980's, Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographed him naked and in a sexually aroused condition, forced the plaintiff to use Vaseline as a lubricant during the forced masturbation so as to purportedly enhance the quality of the photography and under threat of intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, and other inducements to help him continue his deviant sexual pursuits.

b. John Doe #2: At all times relevant to this action, the plaintiff, John Doe #2, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital and photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon

would further intimidate the minor plaintiff by revealing and brandishing a concealed firearm that he carried. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

c. John Doe #3: At all times relevant to this action, the plaintiff, John Doe #3, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would further intimidate the minor plaintiff by revealing and brandishing a concealed firearm that he carried. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

d. John Doe #4: At all times relevant to this action, the plaintiff, John Doe #4, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, by digitally penetrating the plaintiff's anus and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon performed testicular and penile massage on the plaintiff while a minor under the guise of requiring the genital manipulation for a purported "study". Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

e. John Doe #5: At all times relevant to this action, the plaintiff, John Doe #5, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing

him naked, in a sexually aroused condition, by causing the plaintiff to obtain an erection through the provision of pornographic material and thereafter Reardon grabbed the plaintiff's penis and rubbed it until the plaintiff ejaculated, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would reward minors after his exploitative actions, including provision of cash payments, and other inducements to help Reardon continue his deviant sexual pursuits.

f. John Doe #6: At all times relevant to this action, the plaintiff, John Doe #6, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s to the 1980's. During the 1960s to the 1980's the plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. During the 1960s to the 1980's Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital and photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon forced the plaintiff to pose in sexually explicit positions with his sibling. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

g. John Doe #7: At all times relevant to this action, the plaintiff, John Doe #7, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s to the 1980's. During the 1970s to the 1980's the plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. During the 1970s to the 1980's Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would further intimidate the minor plaintiff by revealing and brandishing a concealed firearm that he carried. Reardon repeatedly anally raped the plaintiff against his will, filmed the plaintiff and otherwise sexually abused him. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

h. John Doe #8: At all times relevant to this action, the plaintiff, John Doe #8, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s to the 1980's. During the 1960s to the 1980's, the plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination

concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. During the 1960s to the 1980's Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, by forcing him to be photographed in positions suggestive of anal sex with his siblings and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon inappropriately touched and rubbed the plaintiff's genitals while a minor under the guise of requiring the genital manipulation for a purported "study". Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits. Reardon provided the minor plaintiff ice cream at his home as a further inducement to continue in his purported "study".

i. John Doe #9: At all times relevant to this action, the plaintiff, John Doe #9, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, by forcing him to be photographed in positions suggestive of anal sex with his siblings and under threat and intimidation, forced him to remain naked for

a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon inappropriately touched and rubbed the plaintiff's genitals while a minor under the guise of requiring the genital manipulation for a purported "study". Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits. Reardon provided the minor plaintiff ice cream at his home as a further inducement to continue in his purported "study".

j. John Doe #10: At all times relevant to this action, the plaintiff, John Doe #10, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Initially, Reardon stalked the plaintiff's sister while she was an inpatient receiving injuries due to a trauma. Reardon found the plaintiff's sister on the floor and requested from the plaintiff's mother that she consent to allow him to examine him in connection with a purported study. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographed him naked and in sexually explicit poses, including requiring the plaintiff to maintain a sexual position under his sibling who was hovering over the genitals of the plaintiff, sexually molested and fondled the plaintiff and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification.

k. John Doe #11: At all times relevant to this action, the plaintiff, John Doe #11, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital and photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon forced the plaintiff to pose in sexually explicit positions with his sibling. Reardon caused the minor plaintiff to obtain an erection through fondling of the plaintiff's genitals and would pose the plaintiff in sexual positions with his sibling. Reardon would reward minors after his exploitative actions by providing cash, ice cream, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

l. John Doe #12: At all times relevant to this action, the plaintiff, John Doe #12, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of

minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon repeatedly inserted his finger in the minor plaintiff's anus against his will and otherwise sexually abused him. The minor plaintiff was anally raped at gunpoint by an agent or associate of Reardon. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

m. John Doe #13: At all times relevant to this action, the plaintiff, John Doe #13, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, by forcing him to obtain an erection and manually causing the minor plaintiff to ejaculate. During the assaults Reardon placed a towel or shroud over the minor plaintiff's face and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual

gratification. Further, Reardon inappropriately touched and rubbed the plaintiff's genitals while a minor under the guise of requiring the genital manipulation for a purported "study". Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

n. John Doe #14: At all times relevant to this action, the plaintiff, John Doe #14, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. The minor plaintiff suffered from multiple disabilities and was required to undergo surgery for undescended testicles at which time he was referred to Reardon for treatment. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographing him naked and in sexually explicit poses. Reardon anally raped the plaintiff while covering his head with a pillow. Reardon restrained the plaintiff with handcuffs and tied his feet with a rope. Reardon forced the minor plaintiff to suck Reardon's penis. In addition, Reardon sexually molested and fondled the plaintiff and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification.

o. John Doe #15: At all times relevant to this action, the plaintiff, John Doe #15, was a minor resident of the State of Connecticut and sought medical

treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would further intimidate the minor plaintiff by revealing and brandishing a concealed firearm that he carried. Reardon repeatedly anally raped the plaintiff against his will, filmed the plaintiff and otherwise sexually abused him. Reardon would reward minors after his exploitative actions by providing cash, trips to the Hartford Gun Club, trips to remote locations where he would engage in lewd and lascivious behavior with minors and other inducements to help Reardon continue his deviant sexual pursuits.

p. John Doe #16: At all times relevant to this action, the plaintiff, John Doe #16, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1980s. The plaintiff had gone to St. Francis seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and forcing him to remain naked for a prolonged

period of time so Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

q. John Doe #17: At all times relevant to this action, the plaintiff, John Doe #17, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, and photographing him naked. During the assaults Reardon placed a bag over the minor plaintiff's face and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon inappropriately directed the minor plaintiff to anally penetrate another minor male patient. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

r. John Doe #18: At all times relevant to this action, the plaintiff, John Doe #18, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies

purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, by photographing him naked, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon also supplied the minor plaintiff with pornographic photographs of minor children in books and forced him to obtain an erection and caused the minor plaintiff to ejaculate. During the assaults Reardon placed a sheet or shroud over the minor plaintiff's face. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

s. John Doe #19: At all times relevant to this action, the plaintiff, John Doe #19, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographing him naked and in sexually explicit poses, and forcing him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

t. John Doe #20: At all times relevant to this action, the plaintiff, John Doe #20, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographing him naked and in sexually explicit poses, and under threat and intimidation, forced him to remain naked for a prolonged period of time so that Reardon could obtain sexual gratification. Reardon also attempted to insert his finger in the minor plaintiff's anus against his will and otherwise sexually abused him. Reardon also supplied the minor plaintiff with pornographic photographs of minor female children and directed him to obtain an erection and manually assisted the minor plaintiff to ejaculate. Reardon would also require the minor plaintiff to pose in various positions to take photographs of his erect penis. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

u. John Doe #21: At all times relevant to this action, the plaintiff, John Doe #21, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies

purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographing him naked and in sexually explicit poses, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Reardon also attempted to insert his finger in the minor plaintiff's anus against his will and otherwise sexually abused him. Reardon would also measure the minor plaintiffs' penis and testicles during these consultations. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

v. John Doe #22: At all times relevant to this action, the plaintiff, John Doe #22, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, photographing him naked and in sexually explicit poses, and under threat and intimidation, forced him to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon inappropriately touched and rubbed the plaintiff's genitals while a minor under the guise of requiring the genital manipulation for a purported "study". During these assaults, Reardon would

occasionally cover the minor plaintiffs face with a pillow. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

w. John Doe #23: At all times relevant to this action, the plaintiff, John Doe #23, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, covering his face with a towel, and then photographing him naked and in sexually explicit poses, while forcing him to remain naked for a prolonged period of time. During these visits, Reardon would also fondle the plaintiff, so that Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

x. John Doe #24: At all times relevant to this action, the plaintiff, John Doe #24, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1970s and/or early 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested

the plaintiff by taking him to his office at St. Francis Hospital, forcing him to lay face down with a towel over his head, spreading wide his buttocks and, without the consent of plaintiff, anally penetrating the plaintiff with multiple fingers. Additionally during these visits, Reardon would fondle the plaintiff's genitals so that he, (Reardon) could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

y. John Doe #25: At all times relevant to this action, the plaintiff, John Doe #25, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the mid to late 1960s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, covering his face with a pillow, and then photographing him naked and in sexually explicit poses, while forcing him to remain naked for a prolonged period of time. During these visits, Reardon would also fondle the plaintiff and forcibly insert foreign objects into the plaintiff anally, causing much pain and anguish. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

z. John Doe #26: At all times relevant to this action, the plaintiff, John Doe #26, was a minor resident of the State of Connecticut and sought medical

treatment or examination from the defendant George Reardon during the early 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, forcing him to lay down with a towel over his head, spreading wide his buttocks and, without the consent of plaintiff, anally penetrating the plaintiff, causing much pain and anguish. Additionally, during these visits, Reardon would fondle the plaintiff's genitals to the point of ejaculation, so that he, (Reardon) could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

aa. John Doe #27: At all times relevant to this action, the plaintiff, John Doe #27, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the early 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, forcing him to lay down with a towel over his head, while Reardon fondled the plaintiff's genitals to the point of ejaculation, so that he, (Reardon) could obtain sexual gratification. Reardon would provide

rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

bb. John Doe #28: At all times relevant to this action, the plaintiff, John Doe #28, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the early 1980s. The plaintiff had gone to St. Francis seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where he would fondle, prod, and manipulate the minor plaintiff's genitals, in order that he (Reardon), could obtain sexual gratification, and during the molestations, Reardon also took lewd photographs of the plaintiff. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

cc. John Doe #29: At all times relevant to this action, the plaintiff, John Doe #29, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1960's and/or early 1970's. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where he fondled, prodded, and manipulate the minor plaintiff's genitals, in order that he

(Reardon), could obtain sexual gratification, and during the molestations, Reardon also took lewd photographs of the plaintiff. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

dd. John Doe #30: At all times relevant to this action, the plaintiff, John Doe #30, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where Reardon forced the plaintiff to participate in pornographic-like photo shoots. Reardon would apply a "sparkling lotion" and or lubrication on the genitals of the plaintiff so that the "pictures would come out clearer" and Reardon would then masturbate the plaintiff. Due to such degradations, plaintiff was made to become so nervous that, upon entering the examination room of Reardon's, plaintiff would often wet himself. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

ee. John Doe #31: At all times relevant to this action, the plaintiff, John Doe #31, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1980s.

The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, and then photographing him naked and in sexually explicit poses, while forcing him to remain naked for a prolonged period of time. During these visits, Reardon would also fondle the plaintiff, so that Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

ff. John Doe #32: At all times relevant to this action, the plaintiff, John Doe #32, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or early 1980s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, forcing him to lay face down, spreading wide his buttocks and, without the consent of the minor plaintiff, would rape and sodomize by anally penetrating the plaintiff with not only his own (Reardon's) genitalia, but with multiple fingers and various objects, including wooden sticks. Reardon would provide rewards to minors after his

exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

gg. John Doe #33: At all times relevant to this action, the plaintiff, John Doe #33, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1960s or early 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where Reardon forced the plaintiff to participate in pornographic-like photo shoots. In addition to simply taking photographs, Reardon fondled and manipulated the minor plaintiff's genitals in a "before and after" photo shoot. Reardon would then masturbate the plaintiff. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

hh. John Doe #34: At all times relevant to this action, the plaintiff, John Doe #34, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960's thru the 1980's. During the 1960's thru the 1980's, the plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon

sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where he fondled, prodded, manipulated and molested the minor plaintiff, in order that he (Reardon) could obtain sexual gratification, and during the molestations, Reardon also took lewd photographs of the plaintiff. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

ii. John Doe #35: At all times relevant to this action, the plaintiff, John Doe #35, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960's thru the 1980's. During the 1960's thru the 1980's the plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, where Reardon forced the plaintiff to participate in pornographic-like photo shoots. Reardon would attempt to masturbate the plaintiff in order that he (Reardon) could obtain gratification. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

jj. John Doe #36: At all times relevant to this action, the plaintiff, John Doe #36, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960's thru the 1980's. During the 1960's thru the 1980's the plaintiff had gone to St.

Francis seeking treatment and examination concerning his health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking him to his office at St. Francis Hospital, and other places, and then photographing him naked and in sexually explicit poses, while forcing him to remain naked for a prolonged period of time. During these visits, Reardon would also molest the plaintiff, so that Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

kk. Jane Doe #1: At all times relevant to this action, the plaintiff, Jane Doe #1, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s and/or 1980s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, photographed her naked and in sexually explicit poses, sexually assaulted the plaintiff by fondling her genitals and under threat and intimidation, forced her to remain naked for a prolonged period of time so Reardon could obtain sexual gratification.

ll. Jane Doe #2: At all times relevant to this action, the plaintiff, Jane Doe #2, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s

to the 1990's. The plaintiff had gone to St. Francis during the 1960s to the 1980's, seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Initially, Reardon stalked the plaintiff while she was an inpatient receiving injuries due to a trauma. Reardon found the plaintiff on the floor and requested from the plaintiff's mother that she consent to allow him to examine her in connection with a purported study. During the 1960s to the 1980's, Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, photographed her naked and in sexually explicit poses, including requiring the plaintiff to maintain a sexual position hovering over the genitals of the plaintiff's sibling, forced the plaintiff to mount an examining table and lie on the table with her legs spread so that Reardon could photograph her and under threat and intimidation, forced her to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. During the perpetration of the assault, Reardon's caustic and humiliating actions caused the plaintiff to break down crying. At that time Reardon dismissed the plaintiff from the examination room and then fondled and groped the plaintiff's sibling.

mm. Jane Doe #3: At all times relevant to this action, the plaintiff, Jane Doe #3, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s and/or 1970s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis.

Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, by photographing her naked, by forcing her to be photographed in positions suggestive of anal sex with her siblings and under threat and intimidation, forced her to remain naked for a prolonged period of time so Reardon could obtain sexual gratification. Further, Reardon inappropriately touched and rubbed the plaintiff's genitals while a minor under the guise of requiring the genital manipulation for a purported "study". Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits. Reardon provided the minor plaintiff ice cream at her home as a further inducement to continue in his purported "study".

nn. Jane Doe #4: At all times relevant to this action, the plaintiff, Jane Doe #4, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis Hospital, where he would cover her face using a black mask or a paper bag. With her face covered, Reardon would then force her to pose naked alongside her twin sister in sexually explicit positions for a prolonged period of time, so that he, (Reardon) could obtain sexual gratification and take lewd photographs of her. Reardon

would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

oo. Jane Doe #5: At all times relevant to this action, the plaintiff, Jane Doe #5, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1970s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis Hospital, where he would cover her face using a black mask or a paper bag. With her face covered, Reardon would then force her to pose naked alongside her twin sister in sexually explicit positions for a prolonged period of time, so that he, (Reardon) could obtain sexual gratification and take lewd photographs of her. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

pp. Jane Doe #6: At all times relevant to this action, the plaintiff, Jane Doe #6, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s. The plaintiff had gone to St. Francis and to Reardon's other premises seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking her to

his office at St. Francis Hospital, where Reardon forced the plaintiff to participate in pornographic-like photo shoots. In addition to being subjected to the degradation of being photographed in the nude, Reardon outrageously caused the plaintiff to be anally penetrated by her own brother in order to satisfy his vulgar and deviant sexual pursuits. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

qq. Jane Doe #7: At all times relevant to this action, the plaintiff, Jane Doe #7, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1970s thru the early 1980's. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis Hospital, where he would cover her face using a mask or a paper bag. With her face covered, Reardon would then force her to pose naked, with her own brother, in sexually explicit positions for a prolonged period of time, so that he, (Reardon) could obtain sexual gratification and take lewd photographs of them both.

rr. Jane Doe #8: At all times relevant to this action, the plaintiff, Jane Doe #8, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the mid to late 1960s. The plaintiff had gone to St. Francis and to Reardon's other

premises seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis Hospital, where he would cover her face using a mask or a paper bag. With her face covered, Reardon would then force her to pose naked alongside her brother in sexually explicit poses for a prolonged period of time, so that he, (Reardon) could obtain sexual gratification and take lewd photographs of her and her brother. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

ss. Jane Doe #10: At all times relevant to this action, the plaintiff, Jane Doe #10, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the early 1970s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, and then photographing her naked and in sexually explicit poses, while forcing her to remain naked for a prolonged period of time. During these visits, Reardon would also fondle the plaintiff, so that Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

tt. Jane Doe #11: At all times relevant to this action, the plaintiff, Jane Doe #11, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the late 1970s. The plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, and then photographing her naked and in sexually explicit poses, while forcing her to remain naked for a prolonged period of time. During these visits, Reardon would also fondle the plaintiff and "clean" the plaintiff's external genitals, so that Reardon could obtain sexual gratification. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

uu. Jane Doe #12: At all times relevant to this action, the plaintiff, Jane Doe #12, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960's thru the 1980s. During the 1960's thru the 1980's, the plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis Hospital, where he would fondle, prod, and manipulate the minor plaintiff's genitals, in order that he (Reardon), could obtain sexual gratification, and during the molestations, Reardon also took lewd

photographs of the plaintiff. Occasionally, plaintiff was forced to pose naked alongside her brother. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

vv. Jane Doe #13: At all times relevant to this action, the plaintiff, Jane Doe #13, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1960s thru the 1980s. During the 1960s thru the 1980s the plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon repeatedly sexually molested the plaintiff by taking her to his office at St. Francis Hospital, and then photographing her naked and in sexually explicit poses, while forcing her to remain naked for a prolonged period of time. Reardon would provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

ww. Jane Doe #14: At all times relevant to this action, the plaintiff, Jane Doe #14, was a minor resident of the State of Connecticut and sought medical treatment or examination from the defendant George Reardon during the 1980s. During the 1980's, the plaintiff had gone to St. Francis seeking treatment and examination concerning her health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis. Reardon sexually molested the plaintiff by taking her to his office at St. Francis

Hospital, where he would fondle, prod, and manipulate the minor plaintiff's genitals, including inserting his fingers into the plaintiff's genitals to the point of causing bleeding, in order that he (Reardon), could obtain sexual gratification, and during the molestations, Reardon also took lewd photographs of the plaintiff. In addition, would rub salves on the plaintiff. Reardon would then provide rewards to minors after his exploitative actions and other inducements to help Reardon continue his deviant sexual pursuits.

2. At all times relevant to this action, Reardon was a resident of the State of Connecticut and a physician with privileges at the St. Francis Medical Center, Inc. and/or St. Francis Care, Inc. (collectively "St. Francis"). The defendant Hartford Roman Catholic Diocesan Corporation ("HRDC") through its servants, agents, apparent agents, contractors, principals and/or employees operated and/or controlled St. Francis through 1988, upon information and belief, with *de facto* control thereafter. Upon information and belief, St. Francis and HRDC, operated as joint venturers and/or partners in all material respects at all relevant times. Sister Mary Madeleine Forcier, on behalf of HRDC, operated and controlled St. Francis as executive director from 1962-1973; Sister Francis Marie Garvey, on behalf of HRDC, operated and controlled St. Francis as executive director from 1973-1988. The reigning Archbishop of HRDC has perpetually operated as chairman of the board of directors of St. Francis. From the 1960s forward sister Mary Madeline Forcier was a member of the research committee charged with overseeing the St. Francis sponsored Reardon "growth study".

3. At all times relevant to this action, Reardon was acting as an agent, employee or apparent agent of St. Francis, and by virtue of its relationship with St. Francis, HRDC, which was and is a corporation organized and existing under the laws of the State of Connecticut. The following conduct was carried out within the scope of Reardon's authority or employment or agency with St. Francis and HRCD.

4. At all times relevant to this action, St. Francis, through its employees, agents and/or apparent agents made the determination of who would serve as physicians with privileges and as department chairs at its facilities and accordingly assigned Reardon to serve in that capacity.

5. Prior to and during his assignment at St. Francis, St. Francis made a determination that Reardon was fit, qualified and competent in all respects to serve as a physician with privileges and as chair of the endocrinology department.

6. By providing Reardon with privileges and access to its facilities, St. Francis intended to represent to patients, including the plaintiffs, that Reardon was fit, qualified and competent in all respects to serve as a physician and chair of its endocrinology department and to provide instruction, guidance and treatment to patients, including minors like the plaintiffs.

7. At all times relevant to this action, St. Francis authorized and encouraged Reardon to meet with minors, including the plaintiffs, for the purpose of providing treatment, testing and examination.

8. At all times relevant to this action, St. Francis was aware that Reardon was providing treatment, testing and examination to minors at St. Francis and other office/treatment locations, and authorized and encouraged Reardon to perform these duties.

9. At all times relevant to this action, St. Francis, through its directors and executive officers, authorized and encouraged Reardon to meet with minors, including the plaintiff, including after hours and on weekends, for the purpose of providing medical treatment, testing and examination.

10. By authorizing and encouraging Reardon to meet with minors, St. Francis intended to represent to its patients that Reardon was fit, qualified and competent in all respects to provide medical treatment, testing and examination to minors, including the plaintiff.

11. At all times relevant to this action, St. Francis permitted and encouraged Reardon to meet with minors at his offices in the hospital.

12. The plaintiffs sought medical treatment and/or examination from Reardon.

13. While they were minors, the plaintiffs had occasion to meet with Reardon at St. Francis and other locations.

14. The plaintiffs had gone to St. Francis, seeking treatment and examination concerning their health and in connection with studies purportedly concerning the sexual development of minors under the auspices of St. Francis.

15. During the 1960's and/or 1970's and/or 1980's and/or 1990's, Reardon repeatedly sexually molested the plaintiffs.

16. As a result of Reardon's reckless sexual battery, the plaintiffs have suffered bodily intrusion and severe emotional injuries, some or all of which may be permanent and sustained economic damages.

17. As a result of Reardon's sexual battery, the plaintiffs have sustained injury to their ability to carry on and enjoy life's activities.

18. In breach of its duty, HRDC, through itself and St. Francis, was careless and negligent in one or more of the following ways:

- a. it knew or should have known that Reardon had a propensity to sexually batter minors, yet failed to take steps to prevent his sexual assault and battery of the plaintiffs;
- b. in that it failed to promulgate policies and regulations prohibiting physicians from having minors in private areas alone after hours or on weekends in its facilities;
- c. in that it allowed and encouraged Reardon to oversee minors when it knew or should have known that Reardon posed a threat to such persons;
- d. in that it failed to properly and adequately supervise Reardon in order to prevent the sexual assault and battery of minors, including the plaintiffs;
- e. in that it induced the plaintiffs to entrust their physical well being and safety to its physicians, then presented Reardon to the plaintiffs for the purpose of providing medical services and examination;
- f. in that it failed to protect the plaintiffs from the sexual assault and battery and exploitation at the hands of Reardon;
- g. in that it allowed and encouraged Reardon to freely interact and have unsupervised one-on-one contact with minors including the plaintiffs;
- h. in that it failed to warn the minor plaintiffs and their parents of Reardon's propensity to commit sexual assault and battery upon minors;

- i. in that it knew or should have known that Reardon had abused minor patients, but failed to take adequate preventive measures to keep the plaintiffs safe and free from harm;
- j. in that it failed to establish, maintain and enforce a policy of reporting, investigating and removing physicians engaged in sexual misconduct, and instead adhered to a policy of discouraging the dissemination of information regarding the sexual misconduct of physicians with minors, very similar to the practices of secrecy and suppression followed at HRCD;
- k. in that it failed to take adequate steps to advise persons in association with physicians or in a supervisory position over physicians of the dangers posed by certain physicians having contact with minors;
- l. in that it failed to adequately seek out victims of sexual abuse, including the plaintiff, in order to render assistance and prevent or reduce further damage to untreated victims, like the plaintiff, and actively supported and defended Reardon by claiming that accusations against Reardon were baseless, a sham and made by individuals with mental illness or defect;
- m. in that it failed to adequately police the activities of Reardon – including his purported studies – upon premises it owned and controlled or knew or should have known that Reardon would take his victims to for prurient, lewd and lascivious activities; and,
- n. in that it systematically covered-up sexual misconduct by Reardon so as to further endanger minors like the plaintiffs.

19. The carelessness and negligence of HRDC, through St. Francis, is a substantial and proximate cause of the injuries suffered by the plaintiffs.

WHEREFORE, the plaintiffs claim the following damages from the defendant,
HRCD, exceeding \$15,000:

1. Monetary damages;
2. All other appropriate relief.

This matter is within the jurisdiction of the court.

THE PLAINTIFFS,

By



JOEL T. FAXON
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JURIS NO.: 421593
jfaxon@strattonfaxon.com

PLEASE ENTER THE APPEARANCE OF:

STRATTON FAXON FOR THE PLAINTIFFS
JURIS # 421593

RETURN DATE: NOVEMBER 10, 2009	:	SUPERIOR COURT
	:	
JOHN DOE #1, JOHN DOE #2, JOHN DOE #3, JOHN DOE #4, JOHN DOE #5. JOHN DOE #6, JOHN DOE #7, JOHN DOE #8, JOHN DOE #9, JOHN DOE #10, JOHN DOE #11, JOHN DOE #12, JOHN DOE #13, JOHN DOE #14, JOHN DOE #15, JOHN DOE #16, JOHN DOE #17, JOHN DOE #18, JOHN DOE #19, JOHN DOE #20, JOHN DOE #21, JOHN DOE #22, JOHN DOE #23, JOHN DOE #24, JOHN DOE #25, JOHN DOE #26, JOHN DOE #27, JOHN DOE #28, JOHN DOE #29, JOHN DOE #30, JOHN DOE #31, JOHN DOE #32, JOHN DOE #33, JOHN DOE #34, JOHN DOE #35, JOHN DOE #36, JANE DOE #1, JANE DOE #2, JANE DOE #3, JANE DOE #4, JANE DOE #5, JANE DOE #6, JANE DOE #7, JANE DOE #8, JANE DOE #10, JANE DOE #11, JANE DOE #12, JANE DOE #13, and JANE DOE #14	:	COMPLEX LITIGATION DOCKET
	:	
	:	AT WATERBURY
	:	
V.	:	
	:	
HARTFORD ROMAN CATHOLIC DIOCESAN CORPORATION	:	OCTOBER 14, 2009

CERTIFICATE

I, JOEL T. FAXON, hereby certify that I have made reasonable inquiry, as permitted by the circumstances, to determine whether there are grounds for a good faith belief that there has been negligence in the care and treatment of the plaintiffs. This inquiry has given rise to a good faith belief on my part that grounds exist for an action against the defendant. Attached are similar health care provider reports attached as Exhibits A – C.

THE PLAINTIFFS,

By



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Paul T. Edwards
 Stratton Faxon
 59 Elm Street
 New Haven, CT 06510

12/1/07

Dear Mr. Edwards,

The following is a report of my review of the case materials which you provided regarding allegations against Dr. George Reardon, M.D., deceased. I have reviewed the following materials:

Consent Order, State of Connecticut, Department of Public Health and Addiction Services, Bureau of Health System Regulation, Division of Medical Quality Assurance
 Letter from Tyrone Butler, Department of Health, State of New York to Dr. Reardon and Ann Gayle

Determination and Order, State of New York, Department of Health, State Board for Professional Medical Conduct

Article: The Hartford Courant by Daniel Jones and Hilda Mmoz: "Police: Former Doctor Had Child Porn Stash"

Article: The Hartford Courant by Associated Press: "Police Seek Victims of Child Porn Stash Found in West Hartford"

Article: The Hartford Courant by Associated Press: "Hidden Stash of Porn Found in West Hartford Home"

Article: The Hartford Courant by Steve Feica: "Conn. Cops Seek Dead Doc's Porn Victims"

Article: The Hartford Courant by Daniel Jones, Fulvio Cativo and William Hathaway: "A Cache of Porn: Police Report Finding Thousands of Explicit Images of Children in Doctor's Former Home"

Article: The Hartford Courant by Daniel Jones: "Doctor's Alleged Victims Talking"

Fox News.Com by Associated Press: "Police Search for Victims of Child Porn Found in Doctor's Home 10 Years After His Death"

CNN.Com: "Police Fear Child Porn Stash Could Yield Hundreds of Victims"

WFSB.Com: "Child Porn Stash Found in Doctor's Former Home"

WFSB.Com: "Police Search for Victims After Porn Discovery"

Based upon my training and experience as a board-certified internist, it is my opinion that Dr. George Reardon was below the standard of care for a practicing

physician of internal medicine if he took photographs of his patients in order to obtain sexual gratification or use or distribute as pornography, and/or touched his patients in order to obtain sexual gratification, and/or sexually exposed himself to his patients, and/or masturbated in his patients' presence, and/or engaged in any other type of inappropriate sexual behavior with his patients or in their presence. It is also my opinion that such behavior, if carried out by Dr. Reardon, would probably cause significant emotional harm to those patients of Dr. Reardon.

All of my opinions are to a reasonable degree of medical certainty. I reserve the right to amend this report in the future upon receipt of additional information. My current Curriculum Vitae is attached.

Sincerely,

December 3, 2007

Paul T. Edwards, Esq.
Stratton Faxon
59 Elm Street
New Haven, CT 06510

RE: Doe v. St. Francis Medical Hospital and Medical Center, Inc., et al

Dear Mr. Edwards:

Thank you for asking me to review the above-noted matter. My qualifications to do so are as follows:

I am Board Certified in Hospital and Healthcare Administration, and am a Fellow of the American College of Healthcare Executives.

My 39+ year career in Health Care Administration includes senior executive management of acute care hospitals for 16 years.

Based on my background, training, and experience I am an expert in the administrative community standards applicable to all hospitals in the United States, including St. Francis Medical Hospital and Medical Center, Inc.

The standards promulgated by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) are the nationally accepted minimum standards of care governing the administrative behavior of Hospitals, and their employees and agents, and are applicable to New Milford Hospital. The Center for Medicare Services (CMS), the federal oversight agency that monitors and oversees all hospitals in the United States that accept federal funds, recognizes the JCAHO standards as the minimum national standards by which all hospitals must comply. Hospitals that achieve JCAHO accreditation are deemed to meet the minimum standards for participation in the Medicare and Medicaid programs.¹ In addition, the State of Connecticut recognizes JCAHO standards as applicable to hospitals in Connecticut.

Additional standards, above these minimums, may be established by state and local authorities, clinical specialty organizations, and through the bylaws and policies of individual hospitals.

In the matter of Doe v. St. Francis Medical Hospital and Medical Center, Inc. *et al.*, I have reviewed the Complaint and newspaper articles published in the Hartford Courant. It is my understanding that George E. Reardon, M.D. was an employee/agent of St. Francis Medical Hospital and Medical Center (St. Francis) over a period of several decades, starting in the 1950's. During much of his tenure at St. Francis, Dr. Reardon held the position of Chief of Endocrinology. St. Francis held Dr. Reardon out as being an expert in Endocrinology with specific expertise in childhood sexual development.

¹Title 42 Code of Federal Regulations, Chapter IV, Part 488, Subpart A, Section 488.5 Effect of JCAHO or AOA Accreditation of Hospitals:

(a) Deemed to meet. Institutions accredited as hospitals by the JCAHO or AOA are deemed to meet all of the Medicare conditions of participation for hospitals, except

(1) The requirement for utilization review as specified in section 1861(e)(6) of the Act and in Sec. 482.30 of this chapter;

(2) The additional special staffing and medical records requirements that are considered necessary for the provision of active treatment in psychiatric hospitals (section 1861(f) of the Act) and implementing regulations; and

(3) Any requirements under section 1861(e) of the Act and implementing regulations that CMS, after consulting with JCAHO or AOA, identifies as being higher or more precise than the requirements for accreditation (section 1865(a)(4) of the Act).

(b) Deemed status for providers and suppliers that participate in the Medicaid program. Eligibility for Medicaid participation can be established through Medicare deemed status for providers and suppliers that are not required under Medicaid regulations to comply with any requirements other than Medicare participation requirements for that provider or supplier type.

Title 42 Code of Federal Regulations, Chapter IV, Part 488, Subpart A, Section 488.10 State survey agency review. Statutory provisions.(d) Section 1865(a) of the Act also provides that if CMS finds that accreditation of a hospital... by any national accreditation organization provides reasonable assurance that any or all Medicare conditions are met, CMS may treat the provider or supplier as meeting the conditions.

With offices located on the campus of the hospital, and with obvious apparent agency indicators such as wearing hospital-supplied lab coats with his name, title, and hospital rank prominently displayed, St. Francis enabled Dr. Reardon to project his status at the hospital to unsuspecting parents and children. Using the resources of the hospital, and with the hospital's knowledge, Dr. Reardon examined children in his office, which was located in the hospital. Dr. Reardon directed minor children to engage in sexually explicit acts, including but not limited to masturbation under the guise of conducting scientific clinical research. Further, to create an illusion of ratification, Dr. Reardon misled parents of said children to sign consent forms authorizing said behaviors as a further shield to conceal his criminal conduct.

The hospital knew or should have known that examination of children with regard to their sexual development had the potential for abuse. St. Francis had a duty to protect its young, vulnerable patients by ensuring that chaperones were offered during intimate examinations. St. Francis had a duty to be cognizant of the research activities that were being carried out by hospital employees/agents, on hospital premises, and using hospital resources.

It is my opinion that there exists a reasonable probability that St. Francis Medical Hospital and Medical Center, Inc. failed to meet the administrative community standards required of hospitals, and that such conduct was a cause in bringing about the harm to Mr. Doe.

My opinions are based upon the information that is available to me at this time, and may be modified and updated if additional information is received.

June 16, 2009

Paul T. Edwards, Esq.
Stratton Faxon
59 Elm Street
New Haven, CT 06510

RE: Doe *et al* v. St. Francis Medical Hospital and Medical Center, Inc., *et al*

Dear Mr. Edwards:

Thank you for asking me to review the above-noted matter. My qualifications to do so are as follows:

I am Board Certified in Hospital and Healthcare Administration, and am a Fellow of the American College of Healthcare Executives.

My 39+ year career in Health Care Administration includes senior executive management of acute care hospitals for 16 years.

Based on my background, training, and experience I am an expert in the administrative community standards applicable to all hospitals in the United States, including St. Francis Medical Hospital and Medical Center, Inc.

The standards promulgated by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) are the nationally accepted minimum administrative community standards governing the administrative behavior of Hospitals, and their employees and agents, and are applicable to St. Francis Hospital & Medical Center. The Center for Medicare Services (CMS), the federal oversight agency that monitors and oversees all hospitals in the United States that accept federal funds, recognizes the JCAHO standards as the minimum national standards by which all hospitals must comply. Hospitals that achieve JCAHO accreditation are deemed to meet the minimum standards for participation in the Medicare and Medicaid programs. In addition, the State of Connecticut recognizes JCAHO standards as applicable to hospitals in Connecticut.

The regulations and community standards for the protection of human subjects are directly relevant to this matter as well. Additional standards, above these minimums, may be established by state and local authorities, clinical specialty organizations, and through the bylaws and policies of individual hospitals.

In the matter of Doe *et al* v. St. Francis Hospital and Medical Center, Inc. *et al*, I have reviewed the following documents: Complaint; newspaper articles published in the Hartford Courant; Depositions of Richard J. Fiorentino and Ernesto Canalis, MD and exhibits; and the index of St. Francis Hospital's Responses to Plaintiff's Request for Production. It is my understanding that George E. Reardon, M.D. was an employee of St. Francis Medical Hospital and Medical Center (St. Francis) over a period of several decades, starting in the 1950's. During much of his tenure at St. Francis, Dr. Reardon held the position of Chief of Endocrinology. St. Francis held Dr. Reardon out to the community and patients it served as being an expert in Endocrinology with specific expertise in childhood sexual development.

By providing Dr. Reardon with offices to practice medicine and conduct research located on the campus of the hospital, and lab coats with Dr. Reardon's name, title, and hospital affiliation prominently displayed, St. Francis ratified and actively promoted Dr. Reardon's status at the hospital and enabled him to project St. Francis' endorsement of his practice and research to unsuspecting parents and children. Using the resources of the hospital, and with the hospital's knowledge, Dr. Reardon examined and photographed children in his hospital-based office, ostensibly in the practice and clinical research of pediatric endocrinology. Dr. Reardon instructed minor children to engage in sexually explicit acts, including but not limited to masturbation under the guise of conducting scientific clinical research.

The hospital knew or should have known that examination of children with regard to their sexual development is an extremely delicate matter and has the potential for abuse. St. Francis had a duty to protect its young, vulnerable patients by establishing and enforcing a policy that ensured same gender chaperones were present during intimate examinations or were explicitly declined by parents.

St. Francis had a duty to be cognizant of the nature and specific details of any and all research activities conducted on hospital premises, by hospital employees or other physicians, using hospital resources. St. Francis had a duty to require periodic reports to, and audits by, appropriate committees of the hospital and medical staff. This duty was further obliged by the fact that Dr. Reardon's research activities were carried out under the auspices of St. Francis, and were funded by St. Francis' Endocrine Research and Education Fund, which paid for laboratory tests performed on Dr. Reardon's research subjects, as well as all supplies used in the program, including more than \$13,000 for film, cameras, and dark room supplies. There is no evidence that the hospital monitored Dr. Reardon's activities in any manner to ensure that he enabled the hospital to comply with the community standards for conducting research on human subjects. Specifically, those community standards include the Nuremberg Code of 1949, the National Institutes of Health's Policy for the Protection of Human Subjects of 1953, the Helsinki Declaration of 1964, the National Research Act of 1974, the Belmont Report of 1978, and the Department of Health & Human Services' regulations included in Title 45, Part 46 of the Code of Federal Regulations in 1981. These community standards were obliged of all hospitals in the United States where research on human subjects was conducted, including St. Francis. These community standards were in effect during the entire period of time in which Dr. Reardon carried out research on children under the auspices of St. Francis.

Among the documents reviewed was Dr. Reardon's 15-page memo, apparently written in 1970 in response to a complaint made about him to the Hartford County Medical Association. St. Francis had a pre-existing duty to require that a similarly detailed description of the research goals and protocols, including Dr. Reardon's description of the methods to be used for measurement of genitalia, be presented to St. Francis Hospital for review by the hospital's Human Subjects, Research, or Ethics Committees before the research on patients was begun. Given the delicate and sensitive nature of the examinations and the age of the research subjects, it was incumbent upon St. Francis to take positive, definitive steps to ensure that the children who participated in the study were adequately protected from abuse. It was incumbent upon St. Francis to ensure that appropriate safeguards were implemented to protect these children as a pre-condition of the hospital's approval to conduct such research. It was incumbent upon St. Francis to periodically monitor Dr. Reardon's research project, and require comprehensive reports to Medical Staff and hospital committees, as well as recurring reports to the Governing Body, on the progress and findings of the research program. Through Medical Staff and hospital committees, the hospital had a duty to conduct periodic audits of all of its research activities, including Dr. Reardon's program, to ensure compliance with all patient and community safeguards intended for the protection of human subjects.

Deposition testimony of Ernesto Canalis, M.D., the hospital's Director of Research, confirms that the hospital provided no oversight of Dr. Reardon's research activities, and that Dr. Reardon's research protocols were never presented to the hospital's Committee for the Protection of Human Subjects, or to the Institutional Review Board when that committee was formed.

It is my opinion that St. Francis Hospital and Medical Center, Inc. negligently failed to review and monitor the research that it funded on behalf of its employee, Dr. Reardon. St. Francis knew or should have known that Dr. Reardon's research project focused on the sexual development of children, yet failed to implement safeguards to protect these children, as were required by the administrative community standards required of hospitals that were in effect at the time and throughout the time period of Dr. Reardon's research activities. The hospital's failure in this regard caused or contributed in a material way to the injuries suffered by Mr. Doe and others who were similarly harmed.

It is also my opinion that the failure to require pre-approval by Medical Staff and hospital committees to projects involving research on human subjects, the failure to require built-in safeguards including those noted above, and the failure to require periodic audits and formal reports to hospital and Medical Staff committees reflect a total abdication of the fiduciary duty obliged of the Governing Body and Chief Executive Officer on behalf of the community.

My opinions are based upon the information that is available to me at this time, and may be modified and updated if additional information is received.