

EXHIBIT "17"

**EVALUATION FACTORS TO BE USED BY SPECIAL
ARBITRATOR IN ALLOCATING DISTRIBUTIONS FROM THE
SETTLEMENT TRUST**

1. Type, nature and severity of the abuse
 - Exposure, touching, rape, etc.
 - Duration of abuse
 - Number of incidents
 - Circumstances of the incidents
2. Vulnerability of the victim
 - Relationship of the child to the perpetrator (position of trust vs. passing acquaintance, etc.)
 - Nature and extent of damages suffered
3. Age of the victim at the onset of abuse
4. Overall conduct of the perpetrator
 - Serial abuser with many victims vs. one time or limited involvement
5. Mitigating or aggravating factors
 - Statute of limitations issues
 - Incarceration or criminal conduct of victim
 - Present physical or emotional condition of victim