

STATE OF RHODE ISLAND
PROVIDENCE, S.C.

SUPERIOR COURT

JOHN DOE,

Plaintiff,

v.

**THE ROMAN CATHOLIC BISHOP OF
PROVIDENCE,
A CORPORATION SOLE,**

and

**SAINT LUKE’S CHURCH
CORPORATION, BARRINGTON,**

Defendants.

JURY TRIAL DEMANDED

Civil Action No.:

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff John Doe (“Plaintiff”), by and through undersigned counsel, files this Complaint against The Roman Catholic Bishop of Providence, a Corporation Sole d/b/a Diocese of Providence (the “Diocese”), and Saint Luke’s Church Corporation, Barrington (“St. Luke’s” or the “Parish”) (collectively, “Defendants”), and alleges as follows:

I. NATURE OF THE ACTION

1. Like too many other children in Rhode Island, Plaintiff turned to the Church as a place of refuge where he could find connections and a sense of belonging. He was born into a devout Irish Catholic family and was taught to view priests with unquestioning respect and obedience. In his early childhood, he found comfort in the Church.

2. Plaintiff's family moved to the affluent community of Barrington, Rhode Island, when he was 10 years old. Shortly thereafter, they joined the bustling St. Luke's community and felt welcomed and accepted.

3. Plaintiff quickly volunteered to become an altar boy—a point of pride for Plaintiff's family.

4. St. Luke's is a prominent Rhode Island parish not far from the Diocese's headquarters, and it was frequently visited by the head of the Diocese at the time, Bishop Louis E. Gelineau ("Bishop Gelineau").

5. The Parish quickly changed from a place where Plaintiff felt safe and accepted to an environment where he suffered repeated, horrific abuse. St. Luke's was the center of a ring of pedophiles led by Bishop Gelineau himself.

6. Plaintiff was first targeted by Rev. Oscar Ferland ("Ferland"), who noticed Plaintiff shortly after he joined the Parish and showed him special attention from the start.

7. Ferland started abusing Plaintiff shortly after he became an altar boy. He summoned Plaintiff into the sacristy, the rectory, and the Parish basement under the guise of Plaintiff's altar boy duties. The abuse continued for years, and Ferland was not the only abuser.

8. When Bishop Gelineau visited the Parish, Ferland brought Plaintiff to the rectory where Bishop Gelineau joined in sexually assaulting and sodomizing him.

9. In addition, Plaintiff was abused by a third priest, Rev. Clifford J. Cabral ("Cabral"). Cabral went so far as to abuse Plaintiff on trips meant to reward the Parish's altar boys, using the cover of darkness on amusement park rides to molest him.

10. Like countless innocent Rhode Island children, Plaintiff trusted Defendants to protect, nurture, and guide him, and Defendants violated that trust in a manner that robbed him of his childhood and left him with a lifetime of struggle. The abuse by Ferland, Bishop Gelineau, and Cabral (collectively, the “Abusers”), Catholic leaders who represented the highest authority in the Church, shattered Plaintiff’s fundamental understanding of his faith, his sense of safety, and his ability to trust.

11. After a lifetime of living in the shadows, filled with shame and stigma, Plaintiff now seeks justice from the Diocese and the Parish, which turned a blind eye to obvious signs of abuse when they should have stepped up to protect the Catholic children in the most Catholic state in the nation.

12. In response to the Rhode Island Attorney General’s March 2026 report on clergy sexual abuse in the Diocese (the “Attorney General’s Report”), Bishop Bruce Lewandowski publicly acknowledged the Diocese’s institutional failures. In a video statement released on March 4, 2026, Bishop Lewandowski stated: “[w]e know and understand that the effects of abuse even from many decades past can persist, as if the abuse occurred yesterday. The Church failed them. Their abusers betrayed their trust and robbed them of their innocence and, in some cases, destroyed their lives. Their faith in God and His Church has been shaken and even lost,” and further apologized to victim-survivors “for the failures of Church personnel and others in past decades to protect them and keep them safe.” This public acknowledgment by the Diocese’s own current leadership confirms that the Diocese knew or should have known of the risk of harm to children within its institutions and failed to take adequate measures to protect them.

13. But those apologies ring hollow. The victims whose lives were wrecked by rampant abuse in the Diocese deserve real justice, which is what Plaintiff respectfully seeks in this lawsuit.

II. STATUTE OF LIMITATIONS

14. In June 2026, the Rhode Island General Assembly amended R.I. Gen. Laws § 9-1-51 (the “2026 Amendments”) to create a two-year revival window for survivors of child sexual abuse whose claims had previously been time-barred (the “Revival Window”). The 2026 Amendments took effect on July 1, 2026, enabling survivors like Plaintiff to seek long overdue justice.

15. The Diocese has a long history of prioritizing institutional protection over the safety of the children attending its parishes, schools, and other institutions it controls throughout Rhode Island. The Attorney General’s Report, a 284-page report released in March 2026, details the findings of a six-year investigation into the Diocese, identifying 72 clergy with credible allegations of sexual abuse of more than 300 victims spanning over six decades. The Attorney General’s Report found that the Diocese systematically concealed abusive clergy from the public and law enforcement, transferred known abusers to new assignments without disclosing their histories, and failed to report abuse to civil authorities.

16. The Diocese and its institutions harbored abusers, ignored red flags, and failed to institute basic safeguards to keep the children entrusted to their care safe from abuse they knew or should have known to be occurring at Catholic institutions throughout the state.

17. The General Assembly’s passage of the 2026 Amendments, creating a Revival Window that runs from July 1, 2026, through June 30, 2028, enables survivors of childhood sexual abuse, like Plaintiff, to seek justice for the unimaginable toll that abuse has wrought on their lives.

18. Plaintiff’s claims are timely pursuant to R.I. Gen. Laws § 9-1-51 and the 2026 Amendments because they arise out of criminal sexual abuse perpetrated against Plaintiff while he was a minor.

19. Plaintiff's claims fall within the Revival Window because they are asserted against the Diocese as a non-perpetrator institutional defendant whose supervisory personnel enabled, concealed, and otherwise failed to report the sexual abuse of Plaintiff, as further alleged herein. Plaintiff files this Complaint within the period prescribed by the Revival Window and expressly invokes its provisions to the extent any otherwise-applicable limitations period would bar these claims.

20. Defendants are further equitably estopped from asserting any statute of limitations defense because Defendants' own affirmative acts of concealment—including the suppression of complaints, the transfer of accused clergy to avoid public disclosure, and the failure to report allegations to civil authorities—prevented Plaintiff from discovering the facts necessary to bring a timely claim. Defendants may not benefit from a limitations defense that their own misconduct caused Plaintiff to miss.

III. PARTIES

21. All facts alleged in any part of this Complaint are alleged as to all relevant times unless otherwise specified.

22. Plaintiff John Doe is a citizen of the State of Rhode Island. At all relevant times, Plaintiff was a minor who resided in Rhode Island and attended St. Luke's Church in Barrington, Rhode Island.

23. Defendant St. Luke's is a domestic non-profit corporation incorporated in Rhode Island with its principal place of business at 108 Washington Road, Barrington, Rhode Island 02806. St. Luke's operates within the territory and at the direction of the Diocese.

24. The Diocese is a corporation sole organized and existing under the laws of Rhode Island, with its principal place of business at One Cathedral Square, Providence, Rhode Island 02903.

25. The Diocese is a corporation organized by act of the General Assembly of the State of Rhode Island and is a corporate entity through which the Diocese of Providence of the Roman Catholic Church and its agencies conduct the religious and other affairs of the Diocese of Providence.

26. The Diocese was established in 1872 and currently encompasses and operates all Roman Catholic parishes, schools, missions, and affiliated institutions operating within Rhode Island.

27. The Diocese has ultimate control over hiring, training, and supervising its agents, servants, and employees, and owns and manages land, parishes, schools, and other affiliated entities throughout Rhode Island.

28. The Diocese has ultimate control over activities on properties within its geographic and canonical jurisdiction, including Catholic schools and parish properties within its geographic boundaries.

29. The Diocese has authority and responsibility for hiring, training, educating, ordaining, and placing clergy and other employees, agents, and volunteers within its jurisdiction.

30. The Diocese is responsible for monitoring and investigating the moral, ethical, psychological, educational, and emotional fitness of candidates for the priesthood, ordained priests, and any other servant of the Diocese during their ministry and/or tenure.

31. The Diocese is responsible for supervising, investigating, disciplining, removing, recommending for laicization, and reporting to civil authorities any clergy ordained within or transferred to its jurisdiction.

32. The Diocese is responsible for investigating and responding to reports of sexual abuse at institutions within its jurisdiction, including reporting allegations or suspicions of sexual abuse in compliance with Rhode Island's mandatory reporting statute, R.I. Gen. Laws § 40-11-3.

33. The Diocese is responsible for promulgating and enforcing policies and procedures to protect children at its facilities, for reporting suspected child sexual abuse, and for taking appropriate action based on those reports at institutions within its jurisdiction.

34. At all relevant times, the Diocese acted by and through its agents, servants, and employees, including the clergy members identified herein.

IV. JURISDICTION AND VENUE

35. This Court has subject matter jurisdiction over this case pursuant to R.I. Gen. Laws § 8-2-14 because this is an action for personal injury arising under Rhode Island law, for acts and omissions that occurred within the State of Rhode Island, and the amount in controversy exceeds the Court's jurisdictional minimum.

36. This Court is the proper venue under R.I. Gen. Laws § 9-4-3 because one or more of the parties resides or maintains its principal place of business in the County of Providence, State of Rhode Island.

V. FACTS COMMON TO ALL COUNTS

A. DEFENDANTS KNEW OR SHOULD HAVE KNOWN ABOUT THE PREVALENCE OF CHILD SEX ABUSE IN CHURCH INSTITUTIONS

37. Rhode Island is home to one of the largest Catholic populations per capita in the United States, with over 39% of residents self-identifying as Catholic.

38. The Catholic Church is no stranger to allegations of sexual abuse against its institutions and employees.

39. Even in the Church's infancy, there was significant discussion about the need to take care in weeding out priests who exhibited behaviors suggesting that they might pose a threat to children in the Church.

40. Starting in the 1940s, Catholic leaders in the U.S. discussed and debated ways to identify and weed out clergy and potential clergy engaged in abuse and/or exhibiting behavior demonstrating a propensity to sexually abuse children.

41. The U.S. Conference of Catholic Bishops knew about the problem of widespread sexual abuse of minors by priests, nuns, and laypeople starting in the late 1940s, at the latest.

42. Religious leaders and scholars, such as Aquinas Richard Sipe, studied the link between celibacy and pedophilia and how that link related to the epidemic of child abuse. Researchers also examined other mental health issues linked to celibacy that also contributed to the growing problem of sexual abuse by priests.

43. In 1971, the *Loyola Psychological Study of the Ministry and Life of the American Priest* was published. The study was commissioned by the U.S. bishops, and it revealed that a substantial percentage of priests sampled were psychosexually immature, lonely, and/or sexually active after ordination.

44. In 1977, the United States Conference of Catholic Bishops opened a psychiatric hospital for troubled priests called the Saint Luke Institute Inc. ("SLI") in Silver Spring, Maryland, supervised by the Archdiocese of Washington. SLI was one of several centers that housed priests the Church considered troubled or fallen. Although SLI initially focused on substance abuse, it quickly became a premier psychiatric facility for priests who sexually assaulted minors.

45. In 1985, the Director of SLI, along with Vatican Embassy canon lawyer Rev. Thomas Doyle, authored a confidential document for the U.S. bishops that warned, in dire terms, of the problem of widespread sexual abuse of children in Catholic institutions and outlined immediate reforms to protect children from abuse. The 92-page report, commonly known as the “Manual,” was provided to every U.S. bishop and archbishop at their meeting in 1985 in Collegeville, Minnesota. In December 1985, the Manual was sent to each diocesan bishop in the United States through SLI. The bishops ignored the report and removed Fr. Doyle from his post.

46. The Diocese’s use of out-of-state treatment centers to manage accused clergy was not a good-faith effort to protect children, but rather a deliberate mechanism to conceal abuse, neutralize complaints, and return predatory priests to active ministry. According to the Attorney General’s Report, at least 21 Diocese priests with documented allegations of child sexual abuse were sent to church-affiliated treatment facilities, including the Servants of the Paraclete in Jemez Springs, New Mexico; the House of Affirmation in Whitinsville, Massachusetts; the Queen of the Clergy Villa in Escoheag, Rhode Island; SLI in Silver Spring, Maryland; and the Saint John Vianney Center in Downingtown, Pennsylvania. These referrals were used as a cynical pretext to give the appearance of remedial action while avoiding disclosure to law enforcement, parishioners, and the public.

47. The Attorney General’s Report identified 119 separate instances in which the Diocese failed to report abuse allegations to law enforcement.

48. Bishop Louis E. Gelineau, the sixth Bishop of Providence (appointed December 1971, consecrated January 1972, retired 1997), acted as the highest official representative of the Diocese for 25 years, serving as the top legislator, executive, and judge, either personally or through his agents.

49. Bishop Gelineau had sole authority to suspend, remove, laicize, or deny clergy access to children. Bishop Gelineau's documented knowledge of abuse allegations, and his failure to meaningfully respond to them, establish that the Diocese had actual, repeated notice of the multitude of clergy who posed an ongoing danger to children.

50. The Attorney General's Report demonstrates that the Diocese's failure to report allegations of child sexual abuse to authorities was not an oversight but rather internal policy and established practice. The Attorney General's Report makes clear that the Diocese had an explicit institutional practice of refusing to investigate allegations of abuse and of returning accused clergy to new parishes, thereby covering up the abuse and giving abusers access to more children.

51. Defendants were aware that the problem of sexual abuse of children in the Church went far beyond Catholic priests and included abuse by teachers, employees, volunteers, and others in almost every Catholic institution.

52. Defendants owed Plaintiff a duty to exercise reasonable care to protect him from harm while under Defendants' custody and control.

53. Defendants owned, operated, managed, maintained, and/or controlled the premises at which much of the abuse occurred, and the abuse was committed by actual and/or apparent agents, servants, and/or employees of Defendants.

54. Defendants had the power, ability, and authority to hire, train, supervise, and terminate priests, other clergy, and others with positions of authority over children.

55. Defendants held themselves out as competent and capable of serving in a position of trust, confidence, and authority over children.

56. Defendants created and facilitated an environment in which the Abusers could manipulate, groom, and abuse Plaintiff under the guise of religious ministry and instruction.

57. Because Plaintiff was a minor, Plaintiff did not, and could not, consent to the abuse Plaintiff suffered. Moreover, the Abusers inflicted their abuse through coercion, intimidation, undue influence, and/or the threat of physical and emotional harm.

58. Defendants had actual and/or constructive knowledge of the Abusers' sexual abuse of children, either before they hired, appointed, or assigned them, or after that employment or agency began.

B. DEFENDANTS KNEW BISHOP GELINEAU WAS A DANGER TO CHILDREN PRIOR TO AND DURING HIS ABUSE OF PLAINTIFF

59. Louis E. Gelineau was ordained in 1954 and served as Chancellor and then Vicar General over the course of 17 years in the Diocese of Burlington.

60. Prior to Gelineau's time in Providence, he was responsible for the management and assignment of priest perpetrators in the Diocese of Burlington.

61. In December 1971, Gelineau was appointed the sixth Bishop of Providence. Bishop Gelineau retired in June 1997.

62. As the Roman Catholic Bishop and the highest official representative of the Diocese of Providence, Gelineau functioned as the ultimate governor of the Roman Catholic Diocese of Providence, serving as the legislator, executive, and judge, either personally or through his agents.

63. As part of his role as Bishop, Gelineau visited local parishes within the Diocese. It was during one of these visits that Plaintiff first met Gelineau at St. Luke's.

64. During these visits, Gelineau paid special attention to the altar boys.

65. Acts by Gelineau himself, and actions of others observed by Gelineau, as Bishop and representative of the Diocese of Providence, served as notice to Defendants.

C. DEFENDANTS KNEW FATHER OSCAR FERLAND WAS ABUSING CHILDREN PRIOR TO AND DURING HIS ABUSE OF PLAINTIFF

66. Ferland was ordained on December 23, 1944, and served as a member of the clergy for nearly 50 years, before retiring on June 1, 1991.

67. According to the Attorney General's list of credibly accused clergy, accusations of sexual abuse by Ferland date back to 1964. Ferland was accused of sexually abusing at least four young girls and one boy across four decades of active ministry.

68. The first accusation of sexual abuse predates Ferland's assignment to St. Luke's; while he was assigned to St. Michael Church in Providence, Rhode Island, Ferland sexually assaulted a young boy between 1964 and 1968.

69. During his time at St. Luke's, Ferland openly engaged in red-flag behaviors that did or should have raised concerns on the part of Defendants.

70. While assigned at St. Luke's, Ferland worked and lived alongside Father (and later Auxiliary Bishop) McManus ("McManus"), who served as Diocesan Vicar of Education.

71. The Attorney General's Report details that while at St. Luke's, a young girl's father spoke to McManus about the common knowledge that Ferland was inappropriately physical with students at the school. The Diocese took no action in response.

72. It was no secret that Ferland lavished attention on minors, including, but not limited to, spending excessive time alone with altar boys in the rectory, before and after mass, and frequently taking altar boys on trips to amusement parks with Cabral. Ferland was also known to be inappropriate with young girls at St. Luke's School.

73. Defendants were or should have been aware of Ferland's overtly inappropriate behavior. Yet the Diocese failed to take any action to investigate Ferland's conduct or to remove him from his position.

D. FATHER CABRAL ABUSED PLAINTIFF WHILE HE WAS AN ALTAR BOY AND PARISHIONER AT ST. LUKE'S

74. Cabral was ordained as a priest in 1979 and was assigned to St. Luke's as an assistant priest.

75. Cabral and Ferland frequently took St. Luke's altar boys to Rocky Point Amusement Park.

76. During these visits, Cabral would invite and/or join the young altar boys, including Plaintiff, on rides that had significant portions or areas that were dark. Cabral then used the cover of darkness to fondle, grope, and/or molest the children on the rides.

77. On one or more occasions, Cabral joined Plaintiff on rides at Rocky Point Amusement Park and fondled Plaintiff.

E. FATHER OSCAR FERLAND AND BISHOP LOUIS GELINEAU ABUSED PLAINTIFF WHILE HE WAS AN ALTAR BOY AND PARISHIONER AT ST. LUKE'S

78. Plaintiff was born to a devout Irish Catholic family. He was raised in Massachusetts until the age of 10, when his family moved to Barrington, Rhode Island.

79. Seeking community in their new home, Plaintiff's family regularly attended mass at St. Luke's, where Plaintiff first encountered Ferland in approximately 1982.

80. Plaintiff, only 10 years old, served as an altar boy at St. Luke's under Ferland. Plaintiff was eventually appointed head altar boy.

81. Shortly after Plaintiff became an altar boy, Ferland took a special interest in Plaintiff.

82. This began years of sexual abuse that continued through approximately 1987.

83. Before and after mass, Ferland would often take Plaintiff to the sacristy or the rectory where he would sexually abuse Plaintiff. This deviant and sexually abusive behavior occurred numerous times at multiple locations including, but not limited to, the basement of St. Luke's, the sacristy, and the rectory. The abuse included, but was not limited to, groping, fondling, molestation, oral rape, and anal rape.

84. On at least one occasion, Father Collins observed Ferland taking Plaintiff into Ferland's bedroom in the rectory and took no action to intervene.

85. But this abuse went beyond the local parish when Bishop Gelineau joined Ferland in sexually assaulting Plaintiff in the St. Luke's rectory.

86. It was a great honor and an exciting time for the parishioners when Bishop Gelineau visited the Parish in approximately 1983 or 1984.

87. After evening mass at the Parish, a dinner was hosted for Bishop Gelineau with altar boys and clergy in attendance.

88. Ferland informed Plaintiff that Bishop Gelineau requested that Plaintiff give the Bishop a tour of the rectory, beginning in Ferland's bedroom.

89. McManus watched Bishop Gelineau take Plaintiff up to the bedroom and took no action to intervene.

90. As they walked up the stairs, Bishop Gelineau picked up a jar of Vaseline sitting on the small table outside Ferland's room.

91. Once in the bedroom, Bishop Gelineau violently sexually assaulted and sodomized Plaintiff.

92. Approximately one year later, Bishop Gelineau visited St. Luke's a second time. On this visit, prior to mass, Bishop Gelineau requested that Plaintiff join him in Ferland's room in the rectory. Once in the bedroom, Gelineau again sexually assaulted Plaintiff.

93. Ferland continued to abuse Plaintiff until approximately 1987, when Plaintiff graduated from high school and aged out of Ferland's preferences.

94. Plaintiff's abuse, which was facilitated, enabled, and covered up by Defendants, has devastated Plaintiff emotionally and caused him severe struggle throughout his life. Plaintiff has suffered physically, mentally, and emotionally for the past several decades. The Abusers' conduct shattered Plaintiff's faith, family, and trust in authority figures.

VI. CAUSES OF ACTION

COUNT I

Negligence

(Plaintiff v. All Defendants)

95. Plaintiff realleges and incorporates by reference the factual allegations contained in the preceding paragraphs as if fully stated in this Count.

96. Defendants owed Plaintiff a duty of reasonable care to protect him from injury, because he was a minor child committed to Defendants' care and custody.

97. Defendants owed Plaintiff a duty of care because they had a special relationship with Plaintiff.

98. Defendants also had a duty arising from the special relationship that existed with Plaintiff to properly train and supervise their representatives, agents, and employees.

99. Defendants owed Plaintiff a duty to protect Plaintiff from harm because Defendants were on notice of the Abusers' histories of abuse and were their employers and/or had authority over them.

100. Defendants also had a duty to take reasonable steps to prevent the Abusers from using their authority or the tasks, premises, and instrumentalities of their positions to target and sexually abuse children generally, including Plaintiff.

101. By establishing and/or operating as religious institutions and holding their facilities and programs out to be a safe environment for children like Plaintiff, Defendants owed Plaintiff a duty to properly supervise Plaintiff to prevent harm to him from foreseeable dangers.

102. Defendants owed Plaintiff a duty to protect him from harm because they invited Plaintiff onto their property, and the Abusers posed a potentially dangerous condition on Defendants' property.

103. In breach of the duties owed to Plaintiff, Defendants, among other things:

- a. failed to use ordinary care in determining whether their facilities were safe and/or determining whether they had sufficient information to represent their facilities as safe;
- b. failed to protect Plaintiff from a known or potential danger;
- c. failed to have sufficient policies and procedures in place to prevent child abuse and child sex abuse;
- d. failed to properly implement policies and procedures to prevent child abuse and child sex abuse;
- e. failed to take reasonable measures to ensure that policies and procedures to prevent child abuse and child sex abuse were effective;
- f. failed to adequately inform families and children of the risks of child abuse and child sex abuse;
- g. failed to investigate risks of child abuse and child sex abuse;

- h. failed to properly screen prospective employees for hire, and once hired, to train and supervise their employees;
- i. failed to fulfill their duty to report child abuse and child sex abuse to law enforcement authorities;
- j. failed to fulfill their duty to report child abuse and child sex abuse to relevant authorities pursuant to R.I. Gen. Laws § 40-11-3;
- k. failed to investigate suspected child abuse and child sex abuse;
- l. failed to dismiss employees, agents, and/or servants who were sexually abusing children in their care;
- m. failed to inform the parents of children who were sexually abused;
- n. failed to acknowledge to the children and to their parents or guardians that wrongs had been committed against them, that they were not to blame, to offer any medical care or mental health care to the abused children, or to offer just compensation for their injuries;
- o. failed to have any outside agency test their safety procedures;
- p. failed to protect the children under their care from child abuse and child sex abuse;
- q. failed to adhere to the applicable standard of care for child safety;
- r. failed to investigate the amount and type of information necessary to represent Defendants and their programs, administration, and staff as safe;
- s. failed to train their representatives, agents, and employees properly to identify and report signs of child abuse and child sex abuse by fellow employees;

- t. failed to create and foster a culture of accountability and shared responsibility for the welfare of the children in their care; and
- u. failed to otherwise exercise ordinary and reasonable care to ensure the safety of children in their care.

104. Defendants also breached their duty to Plaintiff by failing to warn Plaintiff or his family about the Abusers' histories of child abuse, including child sexual abuse, and Defendants' knowledge of same.

105. The sexual abuse and resulting injuries to Plaintiff were caused solely and wholly by reason of the negligent failures of Defendants.

106. As a direct and proximate result of Defendants' negligence, Plaintiff suffered severe and lasting injuries and damages, including, without limitation, non-economic damages in the form of mental anguish, severe physical, emotional, and psychological injuries, suffering, immense pain, trauma, and loss of enjoyment of life, economic damages in the form of the cost of counseling and other mental health treatment, and loss of earning capacity resulting from his trauma. Plaintiff's injuries were caused solely by Defendants' negligence, without any negligence by Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants in an amount sufficient to establish the jurisdiction of this Court for economic and non-economic compensatory damages, prejudgment interest pursuant to R.I. Gen. Laws § 9-21-10, attorneys' fees, and costs, and such other relief as the Court deems just and appropriate.

COUNT II
Negligent Hiring of Employees
(Plaintiff v. All Defendants)

107. Plaintiff realleges and incorporates by reference the factual allegations contained in the preceding paragraphs as if fully stated in this Count.

108. Defendants owed Plaintiff a duty to use reasonable care in their vetting of the Abusers before hiring, appointing, or assigning them, including, without limitation, by performing background checks, mental health screenings, psychological evaluations, and in-depth reviews of references and prior work history with children and youth.

109. In breach of that duty, Defendants failed to use reasonable care in their evaluation and selection of the Abusers to serve in positions in which they would foreseeably come into contact with children. Defendants' hiring procedures were insufficient to ensure that the Abusers were competent and fit for the work assigned to them, and that they would not cross professional or personal boundaries in the performance of their duties.

110. Had Defendants performed appropriate pre-hiring diligence and investigation, they would have discovered the Abusers' unsuitability for employment by Defendants and would not have retained them in their positions considering the information they knew, or should have known, of their prior histories of abuse, including sexual abuse, of children.

111. As a direct and proximate result of Defendants' negligence, Plaintiff suffered severe and lasting injuries and damages, including, without limitation, non-economic damages in the form of mental anguish, severe physical, emotional, and psychological injuries, suffering, immense pain, trauma, and loss of enjoyment of life, economic damages in the form of the cost of counseling and other mental health treatment, and loss of earning capacity resulting from his trauma. Plaintiff's injuries were caused solely by Defendants' negligence, without any negligence by Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants in an amount sufficient to establish the jurisdiction of this Court for economic and non-economic compensatory damages, prejudgment interest pursuant to R.I. Gen. Laws § 9-21-10, attorneys' fees, and costs, and such other relief as the Court deems just and appropriate.

COUNT III
Negligent Supervision and Retention of Employees
(Plaintiff v. All Defendants)

112. Plaintiff realleges and incorporates by reference the factual allegations contained in the preceding paragraphs as if fully stated in this Count.

113. At all relevant times, the Abusers were employed by Defendants and were under their direct supervision, employment, and control when they committed the wrongful acts alleged herein.

114. Defendants had a duty to supervise and retain only those employees who were suitable for the position for which they were hired, and specifically, had a duty to retain the Abusers only if they acted in a professional and appropriate manner toward children in general, and Plaintiff, in particular.

115. In breach of that duty, Defendants failed to monitor the Abusers' conduct and performance of their duties and unlawfully retained them in Defendants' employ.

116. Had Defendants reasonably supervised and monitored the Abusers, they would have discovered their unsuitability for continued employment.

117. As a direct and proximate result of Defendants' negligence, Plaintiff suffered severe and lasting injuries and damages, including, without limitation, non-economic damages in the form of mental anguish, severe physical, emotional, and psychological injuries, suffering, immense pain, trauma, and loss of enjoyment of life, economic damages in the form of the cost of counseling and other mental health treatment, and loss of earning capacity resulting from his trauma. Plaintiff's injuries were caused solely by Defendants' negligence, without any negligence by Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants in an amount sufficient to establish the jurisdiction of this Court for economic and non-economic compensatory damages, prejudgment interest pursuant to R.I. Gen. Laws § 9-21-10, attorneys' fees, and costs, and such other relief as the Court deems just and appropriate.

COUNT IV
Premises Liability
(Plaintiff v. All Defendants)

118. Plaintiff realleges and incorporates by reference the factual allegations contained in the preceding paragraphs as if fully stated in this Count.

119. Defendants owed Plaintiff, a minor and an invitee on their premises, the highest duty to provide safe premises, free of the risk of harm and/or injury by Defendants' representatives, employees, and/or agents.

120. Defendants had a duty to eliminate dangerous conditions on their premises of which they were or should have been aware.

121. In breach of their duty to Plaintiff, Defendants negligently failed to provide safe premises, free of the risk of harm or injury. Defendants had ample notice and opportunity to protect the children entrusted to their care, including Plaintiff, from harassment, sexual abuse, and battery.

122. As a direct and proximate result of Defendants' negligence in failing to maintain safe premises, and to otherwise protect Plaintiff from harm, Plaintiff was harassed and sexually exploited, abused, and battered on Defendants' premises.

123. As a direct and proximate result of Defendants' negligence, Plaintiff suffered severe and lasting injuries and damages, including, without limitation, non-economic damages in the form of mental anguish, severe physical, emotional, and psychological injuries, suffering, immense pain, trauma, and loss of enjoyment of life, economic damages in the form of the cost of counseling and other mental health treatment, and loss of earning capacity resulting from his trauma. Plaintiff's injuries were caused solely by Defendants' negligence, without any negligence by Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants in an amount sufficient to establish the jurisdiction of this Court for economic and non-economic compensatory damages, prejudgment interest pursuant to R.I. Gen. Laws § 9-21-10, attorneys' fees, and costs, and such other relief as the Court deems just and appropriate.

VII. JURY DEMAND

124. Plaintiff hereby respectfully demands a trial by jury of all issues so triable.

Dated: October 16, 2026

Respectfully submitted,

**Plaintiff,
By his attorneys,**

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