

Bishop Stephen E. Blaire, Diocese of Stockton,  
1105 N. Lincoln St., Stockton, CA 95203;  
Bishop James M. Moynihan, Diocese of Syracuse,  
P.O. Box 511, Syracuse, NY 13201;  
Bishop Leonard P. Blair, Diocese of Toledo,  
P.O. Box 985, Toledo, OH 43697-0985;  
Bishop John M. Smith, Diocese of Trenton,  
701 Lawrenceville Rd., P.O. Box 5147, Trenton, NJ 08638;  
Bishop Gerald F. Kicanas, Diocese of Tucson,  
111 S. Church Ave., P.O. Box 31, Tucson, AZ 85702;  
Bishop Edward J. Slattery, Diocese of Tulsa,  
12300 91<sup>st</sup> St. S., Broken Arrow, OK 74012;  
Bishop Alvaro Corrada del Rio, Diocese of Tyler,  
1015 E.S.E. Loop 323, Tyler TX 75701-9663;  
Bishop John J. Nevins, Diocese of Venice,  
P.O. Box 2006, Venice, FL 34284;  
Bishop David E. Fellhauer, Diocese of Victoria in Texas,  
P.O. Box 4070, Victoria, TX 77903;  
Archbishop Theodore Cardinal McCarrick, Archdiocese of Washington,  
5001 Eastern Ave., P.O. Box 29260, Washington, D.C. 20017;  
Bishop Michael J. Bransfield, Diocese of Wheeling-Charleston,  
1300 Byron St., Wheeling, WV 26003;  
Bishop Michael Owen Jackels, Diocese of Wichita,  
424 N. Broadway, Wichita, KS 67202;  
Bishop Michael A. Saltarelli, Diocese of Wilmington,  
P.O. Box 2030, Wilmington, DE 19899-2030;  
Bishop Bernard J. Harrington, Diocese of Winona,  
55 W. Sanborn St., P.O. Box 588, Winona, MN 55987;  
Bishop Robert J. McManus, Diocese of Worcester,  
49 Elm St, Worcester, MA 01609;  
Bishop Carlos A. Sevilla, Diocese of Yakima,  
5301-A Tieton Dr., Yakima, WA 98908;  
Bishop Benedict C. Franzetta, Diocese of Youngstown,  
144 W. Wood St., Youngstown, OH 44503.

Defendants.

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## INTRODUCTION

1. This Complaint seeks injunctive relief against the Bishops and the USCCB. The Bishops and the USCCB have established a policy of harboring and protecting suspected child molesting agents, thereby endangering numerous children throughout the United States. The

Bishops and the USCCB have information about a number of suspected child molesting agents and former agents that it has never disclosed to law enforcement or the public at large, thereby causing harm to people such as Plaintiffs to be harmed. This injunction action seeks to have the Bishops and the USCCB turn over all documents regarding the molestation of children by its agents or former agents to law enforcement, and to release the names and locations of all agents or former agents accused of molesting children to law enforcement and to the public.

### **PARTIES**

2. Plaintiff Thomas O'Connell Sr. is an adult male resident of the state of Wisconsin.
3. Plaintiff Janet O'Connell is an adult male resident of the state of Wisconsin.
4. Plaintiff Thomas O'Connell Jr. is an adult male resident of the state of Wisconsin.
5. Plaintiff Kathleen O'Connell is an adult male resident of the state of Wisconsin.
6. Plaintiff Michael O'Connell is an adult male resident of the state of Wisconsin.
7. The United States Catholic Conference of Bishops (hereinafter "USCCB" consists of all Catholic Bishops from each diocese throughout the United States.
8. The USCCB controls extensive media operations that communicate with lay Catholics on an ongoing basis. The USCCB is supported, in part, by assessments from parishioners of each diocese. These assessments are used, in part, to fund various standing and ad hoc committees which study, advise, instruct, and issue policies and statements on the bishops' behalf to the Catholic faithful and to society in general on an exceptionally wide range of social and political issues. These organizations have the duty, the financial ability and structure to study, advise and instruct regarding prevention and treatment of child sexual abuse by Catholic clerics in a systematic and in-depth fashion.

9. Further, the USCCB meets annually to formulate policies and norms related to all matters of importance to the Catholic Bishops and the USCCB. For example, in 1985, the USCCB convened for their annual conference in Collegeville, Minnesota at St. John's where all bishops were in attendance. At that time, Father Thomas Doyle, Father Michael Peterson, and Ray Mouton prepared a comprehensive report that was given to the Catholic Bishops entitled "The Problem of Sexual Molestation by Roman Catholic Clergy/Meeting the Problem in a Comprehensive and Responsible Way." The report, among other things, provided strategies in prevention of child abuse and advocated against secrecy surrounding it. Upon information and belief, the USCCB at that time refused to act on these recommendations, ignored them and continued to deploy the practices complained of herein.

10. Defendant USCCB has agents and members, for example the bishops of each diocese, that transact business in every state.

11. The policies and practices of the USCCB described herein caused the USCCB to transact business in every state, including Wisconsin.

12. At all times material, the Bishop of the Diocese of Albany controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Albany is located at 40 N. Main Avenue, Albany, NY 12203. The current Bishop of the Diocese of Albany is Howard J. Hubbard. Bishop Howard J. Hubbard is sued in his individual capacity and in his capacity as Bishop of the Diocese of Albany.

13. At all times material, the Bishop of the Diocese of Alexandria controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Alexandria is located at 4400 Coliseum Blvd., P.O. Box 7417, Alexandria, LA 71306. The current Bishop of

the Diocese of Alexandria is Ronald P. Herzog. Bishop Ronald P. Herzog is sued in his individual capacity and in his capacity as Bishop of the Diocese of Alexandria.

14. At all times material, the Bishop of the Diocese of Allentown controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Allentown is located at 4029 W. Tilghman St., Allentown, PA 18104. The current Bishop of the Diocese of Allentown is Edward P. Cullen. Bishop Edward P. Cullen is sued in his individual capacity and in his capacity as Bishop of the Diocese of Allentown.

15. At all times material, the Bishop of the Diocese of Altoona-Johnstown controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Altoona-Johnstown is located at 126 Logan Blvd., Hollidaysburg, PA 16648. The current Bishop of the Diocese of Altoona-Johnstown is Joseph V Adamec. Bishop Joseph V. Adamec is sued in his individual capacity and in his capacity as Bishop of the Diocese of Altoona-Jamestown.

16. At all times material, the Bishop of the Diocese of Amarillo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Amarillo is located at 1800 N. Spring St., P.O. Box 5644. The current Bishop of the Diocese of Amarillo is John W. Yanta. Bishop John W. Yanta is sued in his individual capacity and in his capacity as Bishop of the Diocese of Amarillo.

17. At all times material, the Archbishop of the Archdiocese of Anchorage controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Anchorage is located at 225 Cordova St., Anchorage, AK 99501. The current Archbishop of the Archdiocese of Anchorage is Roger L. Schwietz. Archbishop Roger L. Schwietz is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Anchorage.

18. At all times material, the Bishop of the Diocese of Arlington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Arlington is located at 200 N. Glebe Rd., Ste 914, Arlington, VA 22203. The current Bishop of the Diocese of Arlington is Paul S. Loverde. Bishop Paul S. Loverde is sued in his individual capacity and in his capacity as Bishop of the Diocese of Arlington.

19. At all times material, the Archbishop of the Archdiocese of Atlanta controlled, operated and managed the affairs of the Diocese. The principal place of business of the Archdiocese of Atlanta is located at 680 W. Peachtree St., NW, Atlanta, GA 30308. The current Archbishop of the Archdiocese of Atlanta is Wilton D. Gregory. Archbishop Wilton D. Gregory is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Atlanta.

20. At all times material, the Bishop of the Diocese of Austin controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Austin is located at 1600 N. Congress Avenue, P.O. Box 13327, Austin, TX 78711. The current Bishop of the Diocese of Austin is Gregory M. Aymond. Bishop Gregory M. Aymond is sued in his individual capacity and in his capacity as Bishop of the Diocese of Austin.

21. At all times material, the Bishop of the Diocese of Baker controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Baker is located at P.O. Box 5999. The current Bishop of the Diocese of Baker is Robert Francis Vasa. Bishop Robert Francis Vasa is sued in his individual capacity and in his capacity as Bishop of the Diocese of Baker.

22. At all times material, the Archbishop of the Archdiocese of Baltimore controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the

Archdiocese of Baltimore is located at 320 Cathedral St., Baltimore, MD 21201. The current Archbishop of the Archdiocese of Baltimore is William Cardinal Keeler. Archbishop William Cardinal Keeler is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Baltimore.

23. At all times material, the Bishop of the Diocese of Baton Rouge controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Baton Rouge is located at Catholic Life Center, 1800 S. Acadian Thruway, P.O. Box 2028, Baton Rouge, LA 70821-2028. . The current Bishop of the Diocese of Baton Rouge is Robert William Muench. Bishop Robert William Muench is sued in his individual capacity and in his capacity as Bishop of the Diocese of Baton Rouge.

24. At all times material, the Bishop of the Diocese of Beaumont controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Beaumont is located at 703 Archie Center St., Beaumont, TX 77701. The current Bishop of the Diocese of Beaumont is Curtis John Gullory. Bishop Curtis John Gullory is sued in his individual capacity and in his capacity as Bishop of the Diocese of Beaumont.

25. At all times material, the Bishop of the Diocese of Belleville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Belleville is located at 222 S. Third St., Belleville, IL 62220-1985. The current Bishop of the Diocese of Belleville is Edward K. Braxton. Bishop Edward K. Braxton is sued in his individual capacity and in his capacity as Bishop of the Diocese of Belleville.

26. At all times material, the Bishop of the Diocese of Biloxi controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Biloxi is

located at 1790 Popps Ferry Rd., P.O. Box 1189, Biloxi, MS 39533. The current Bishop of the Diocese of Biloxi is Thomas J. Rodi. Bishop Thomas J. Rodi is sued in his individual capacity and in his capacity as Bishop of the Diocese of Biloxi.

27. At all times material, the Bishop of the Diocese of Birmingham controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Birmingham is located at P.O. Box 12047, Birmingham, AL 35202-2047. The current Bishop of the Diocese of Birmingham is David E. Foley . Bishop David E. Foley is sued in his individual capacity and in his capacity as Bishop of the Diocese of Birmingham.

28. At all times material, the Bishop of the Diocese of Bismarck controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Bismarck is located at 420 Raymond St., Box 1575, Bismarck, ND 58502-1575. The current Bishop of the Diocese of Bismarck is Paul A. Zipfel. Bishop Paul A. Zipfel is sued in his individual capacity and in his capacity as Bishop of the Diocese of Bismarck.

29. At all times material, the Bishop of the Diocese of Boise controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Boise is located at 303 Federal Way, Boise, ID 83705-5925. The current Bishop of the Diocese of Boise is Michael P. Driscoli. Bishop Michael P. Driscoli is sued in his individual capacity and in his capacity as Bishop of the Diocese of Boise.

30. At all times material, the Archbishop of the Archdiocese of Boston controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Boston is located at 2121 Commonwealth Avenue, Boston, MA 02135-3193. The current Archbishop of the Archdiocese of Boston is Sean Patrick Cardinal O'Malley. Archbishop

Sean Patrick Cardinal O'Malley is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Boston.

31. At all times material, the Bishop of the Diocese of Bridgeport controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Bridgeport is located at 238 Jewett Ave., Bridgeport, CT 06606-2892. The current Bishop of the Diocese of Bridgeport is William E. Lori. Bishop William E. Lori is sued in his individual capacity and in his capacity as Bishop of the Diocese of Bridgeport.

32. At all times material, the Bishop of the Diocese of Brooklyn controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Brooklyn is located at 75 Greene Avenue, P.O. Box C, Brooklyn, NY 11202. The current Bishop of the Diocese of Brooklyn is Nicholas A. DiMarzio. Bishop Nicholas A. DiMarzio is sued in his individual capacity and in his capacity as Bishop of the Diocese of Brooklyn.

33. At all times material, the Bishop of the Diocese of Brownsville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Brownsville is located at 1910 University Blvd., P.O. Box 2279, Brownsville, TX 78522-2279. The current Bishop of the Diocese of Brownsville is Michael P. Raymundo J. Pena. Bishop Raymundo J. Pena is sued in his individual capacity and in his capacity as Bishop of the Diocese of Brownsville.

34. At all times material, the Bishop of the Diocese of Buffalo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Buffalo is located at 795 Main St., Buffalo, NY 14203. The current Bishop of the Diocese of Buffalo is Edward U. Kmiec. Bishop Edward U. Kmiec is sued in his individual capacity and in his capacity as Bishop of the Diocese of Buffalo.

35. At all times material, the Bishop of the Diocese of Burlington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Burlington is located at 351 North Avenue, P.O. Box 489, Burlington, VT 05402-0489. The current Bishop of the Diocese of Burlington is Salvatore R. Matano. Bishop Salvatore R. Matano is sued in his individual capacity and in his capacity as Bishop of the Diocese of Burlington.

36. At all times material, the Bishop of the Diocese of Camden controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Camden is located at 631 Market St., P.O. Box 708, Camden, NJ 08101. The current Bishop of the Diocese of Camden is Joseph A. Galante. Bishop Joseph A. Galante is sued in his individual capacity and in his capacity as Bishop of the Diocese of Camden.

37. At all times material, the Bishop of the Diocese of Charleston controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Charleston is located at 119 Broad St., P.O. Box 818, Charleston, SC 29402. The current Bishop of the Diocese of Charleston is Robert J. Baker. Bishop Robert J. Baker is sued in his individual capacity and in his capacity as Bishop of the Diocese of Charleston.

38. At all times material, the Bishop of the Diocese of Charlotte controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Charlotte is located at P.O. Box 36776, Charlotte, NC 28236. The current Bishop of the Diocese of Charlotte is Peter J. Jurgis. Bishop Peter J. Jurgis is sued in his individual capacity and in his capacity as Bishop of the Diocese of Charlotte.

39. At all times material, the Bishop of the Diocese of Cheyenne controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Cheyenne is located at 2121 Capitol Ave., P.O. Box 1468, Cheyenne, WY 82003-1468. The current Bishop of

the Diocese of Cheyenne is David Laurin Ricken. Bishop David Laurin Ricken is sued in his individual capacity and in his capacity as Bishop of the Diocese of Cheyenne.

40. At all times material, the Archbishop of the Archdiocese of Chicago controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Chicago is located at P.O. Box 1979, Chicago, IL 60690. The current Archbishop of the Archdiocese of Chicago is Francis Cardinal George. Archbishop Francis Cardinal George is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Chicago.

41. At all times material, the Archbishop of the Archdiocese of Cincinnati controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Cincinnati is located at 100 E. Eighth St., Cincinnati, OH 45202-2129. The current Archbishop of the Archdiocese of Cincinnati is Daniel E. Pilarczyk. Archbishop Daniel E. Pilarczyk is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Cincinnati.

42. At all times material, the Bishop of the Diocese of Cleveland controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Cleveland is located at 1027 Superior Ave., Cleveland, OH 44114. The current Bishop of the Diocese of Cleveland is Richard Gerard Lennon. Bishop Richard Gerard Lennon is sued in his individual capacity and in his capacity as Bishop of the Diocese of Cleveland.

43. At all times material, the Bishop of the Diocese of Colorado Springs controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Colorado Springs is located at 228 N. Cascade Ave., Colorado Springs, CO 80903-1498. The current Bishop of the Diocese of Colorado Springs is Michael J. Sheridan. Bishop Michael J. Sheridan is sued in his individual capacity and in his capacity as Bishop of the Diocese of Colorado Springs.

44. At all times material, the Bishop of the Diocese of Columbus controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Columbus is located at 198 E. Broad St., Columbus, OH 43215. The current Bishop of the Diocese of Columbus is Frederick F. Campbell. Bishop Frederick F. Campbell is sued in his individual capacity and in his capacity as Bishop of the Diocese of Columbus.

45. At all times material, the Bishop of the Diocese of Corpus Christi controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Corpus Christi is located at 620 Lipan St., P.O. Box 2620, Corpus Christi, TX 78403-2620. The current Bishop of the Diocese of Corpus Christi is Edmond Carmody. Bishop Edmond Carmody is sued in his individual capacity and in his capacity as Bishop of the Diocese of Corpus Christi.

46. At all times material, the Bishop of the Diocese of Covington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Covington is located at P.O. Box 15550, Covington, KY 41015-0550 . The current Bishop of the Diocese of Covington is Roger J. Foys. Bishop Roger J. Foys is sued in his individual capacity and in his capacity as Bishop of the Diocese of Covington.

47. At all times material, the Bishop of the Diocese of Crookston controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Crookston is located at 1200 Memorial Dr., P.O. Box 610, Crookston, MN 56716. The current Bishop of the Diocese of Crookston is Victor H. Balke. Bishop Victor H. Balke is sued in his individual capacity and in his capacity as Bishop of the Diocese of Crookston.

48. At all times material, the Bishop of the Diocese of Dallas controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Dallas is located at 3725 Blackburn, P.O. Box 190507, Dallas, TX 75219. The current Bishop of the Diocese

of Dallas is Charles V. Grahmann. Bishop Charles V. Grahmann is sued in his individual capacity and in his capacity as Bishop of the Diocese of Dallas.

49. At all times material, the Bishop of the Diocese of Davenport controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Davenport is located at 2706 N. Gaines St., Davenport, IA 52804-1998. The current Bishop of the Diocese of Davenport is William E. Franklin. Bishop William E. Franklin is sued in his individual capacity and in his capacity as Bishop of the Diocese of Davenport.

50. At all times material, the Archbishop of the Archdiocese of Denver controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Denver is located at 1300 S. Steele St., Denver, CO 80210. The current Archbishop of the Archdiocese of Denver is Charles J. Chaput. Archbishop Charles J. Chaput is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Denver.

51. At all times material, the Bishop of the Diocese of Des Moines controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Des Moines is located at 601 Grand Avenue, Des Moines, IA 50309. The current Bishop of the Diocese of Des Moines is Joseph L. Charron. Bishop Joseph L. Charron is sued in his individual capacity and in his capacity as Bishop of the Diocese of Des Moines.

52. At all times material, the Archbishop of the Archdiocese of Detroit controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Detroit is located at 1234 Washington Blvd., Detroit, MI 48226. The current Archbishop of the Archdiocese of Detroit is Adam Cardinal Maida. Archbishop Adam Cardinal Maida is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Detroit.