

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF POLK

NINTH JUDICIAL DISTRICT

Case Type: Personal Injury

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Ronald Vasek,

Court File No.:

Plaintiff,

**COMPLAINT**

vs.

Diocese of Crookston and  
Bishop Michael Joseph Hoepfner,Defendants.  

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Plaintiff, for his cause of action against Defendants, alleges that:

**PARTIES**

1. At all times material, Plaintiff Ronald Vasek resided and continues to reside in the State of Minnesota.

2. At all times material, Defendant Diocese of Crookston (hereinafter "Diocese") was and continues to be an organization or entity which includes, but is not limited to, civil corporations, decision making entities, officials, and employees, authorized to conduct business and conducting business in the State of Minnesota with its principal place of business at 1200 Memorial Drive, Crookston, Minnesota. The Diocese of Crookston was created in approximately 1908. Later, the Diocese created a corporation called the Diocese of Crookston to conduct some of its affairs. The Diocese operates its affairs as both a corporate entity and as an organization named the Diocese of Crookston, with the Bishop as the top official. Both of these entities and all other corporations and entities controlled by the Bishop are included in this Complaint as being the Diocese. The Bishop is the top official of the Diocese and is given authority over all matters

within the Diocese as a result of his position. The Diocese functions as a business by engaging in numerous revenue producing activities and soliciting money from its members in exchange for its services. The Diocese has several programs which seek out the participation of children in the Diocese's activities. The Diocese, through its officials, has control over those activities involving children. The Diocese has the power to appoint, supervise, monitor, and fire each person working with children within the Diocese.

3. At all times material, the Bishop of the Diocese of Crookston controlled, operated, and managed the affairs of the Diocese. The current Bishop of the Diocese of Crookston is Michael Joseph Hoepfner. Bishop Hoepfner is sued in his individual capacity and in his capacity as the Bishop of the Diocese of Crookston.

#### **FACTS**

4. At all times material, Rev. Msgr. Roger Grundhaus (hereinafter "Msgr. Grundhaus") was a Roman Catholic priest employed by the Diocese of Crookston. Msgr. Grundhaus remained under the direct supervision, employ and control of the Diocese. Defendant Diocese placed Msgr. Grundhaus in positions where he had access to and worked with children as an integral part of his work.

5. Plaintiff was raised in a devout Roman Catholic family and attended Holy Trinity in Tabor, Minnesota, in the Diocese of Crookston. Plaintiff and his family came in contact with Msgr. Grundhaus as an agent and representative of the Diocese.

6. Plaintiff participated in youth activities and church activities at Holy Trinity. Plaintiff, therefore, developed great admiration, trust, reverence and respect for the Roman Catholic Church, including the Diocese and their agents, including Msgr. Grundhaus.

7. During and through these activities, Plaintiff, as a minor and vulnerable child, was dependent on the Diocese and Msgr. Grundhaus. The Diocese had custody of Plaintiff and

accepted the entrustment of Plaintiff. The Diocese had responsibility for Plaintiff and authority over him.

8. In approximately 1971, when Plaintiff was approximately 16 years old, Msgr. Grundhaus engaged in unpermitted sexual contact with Plaintiff in Columbus, Ohio, while he accompanied Msgr. Grundhaus to a meeting of canon lawyers.

9. In approximately 2009 or 2010, Plaintiff disclosed the abuse to a priest in another diocese while Plaintiff was considering becoming a member of the diaconate program in the Diocese of Crookston. The priest from the other diocese reported the abuse to the Vicar General of his diocese who then contacted Bishop Hoepfner of the Diocese of Crookston.

10. Bishop Hoepfner then scheduled an in-person meeting with Plaintiff at the Diocese of Crookston Chancery. During this meeting, Plaintiff told Bishop Hoepfner that Msgr. Grundhaus had sexually abused him in Columbus, Ohio, when Plaintiff was a minor. Bishop Hoepfner asked Plaintiff how he was going to proceed with the accusation and whether Plaintiff intended to formally report the abuse or attempt to press charges against Msgr. Grundhaus. Bishop Hoepfner indicated to Plaintiff that it would be detrimental to Msgr. Grundhaus and his reputation in the Diocese if the accusations were made public.

11. Throughout the meeting, Bishop Hoepfner communicated to Plaintiff that he was not to tell anyone about the abuse, including his wife. When Plaintiff asked how his diaconate program would be impacted by the incident of abuse, Bishop Hoepfner indicated that it would not be a problem so long as Plaintiff did not mention the abuse to anyone else. When Plaintiff left the meeting, he felt pressure from Bishop Hoepfner not to disclose the abuse to anyone else.

12. In approximately 2011, Plaintiff entered the diaconate program in the Diocese of Crookston.

13. On approximately July 10, 2010, Plaintiff's son was ordained a priest for the Diocese of Crookston where he continues to work today.

14. On approximately October 21, 2015, Plaintiff received a phone call from Bishop Hoepfner inviting him to the Bishop's private residence for a meeting. When Plaintiff arrived for the meeting, the Bishop indicated to Plaintiff that Msgr. Grundhaus was unable to minister in the other diocese because they had Plaintiff's report of abuse in their files. Bishop Hoepfner handed Plaintiff a letter authored by Msgr. Michael Foltz, Vicar General of the Diocese of Crookston, which essentially retracted Plaintiff's statements regarding the sexual abuse involving Msgr. Grundhaus and indicated that the abuse in Ohio never happened. The Bishop told Plaintiff that he should sign the letter and that they needed it for the Diocese's files. The Bishop indicated to Plaintiff that if he should refuse to sign the letter, the Bishop would have difficulty ordaining Plaintiff as a deacon for the Diocese of Crookston and that Plaintiff's son's priesthood in the Diocese of Crookston would be negatively impacted. Plaintiff perceived this as a threat by the Bishop against both his career as a deacon and his son's priesthood in the Diocese of Crookston.

15. Bishop Hoepfner insisted several times that Plaintiff sign the letter despite the falsity of its contents and despite Plaintiff's initial refusal. In light of the Bishop's threats to Plaintiff's profession as a deacon and his son's priesthood, Plaintiff felt that he had no choice and was eventually coerced by the Bishop to sign the letter. The Bishop indicated that he would keep the letter in his vault in case he ever needed it.

16. Plaintiff's relationship to the Diocese, Msgr. Grundhaus and Bishop Hoepfner first as a vulnerable child, student, parishioner, and participant in church activities, and later as an adult and student in the diaconate program, was one in which Plaintiff was subject to the ongoing influence of Defendants and Monsignor Grundhaus. The threats made against Plaintiff by Bishop

Hoepfner created pressure on Plaintiff not to report Msgr. Grundhaus's abuse until recently.

17. Due to Bishop Hoepfner's threats to Plaintiff's participation and success in the diaconate program and to his son's priesthood and his coercion in obtaining Plaintiff's signature on the letter retracting the report of abuse, Plaintiff was prevented from reporting the incident of abuse by Msgr. Grundhaus to civil authorities and from obtaining legal counsel prior to May 25, 2016, in order to file a timely civil claim under the Minnesota Child Victims Act (Minn. Stat. § 541.073, subd. 5(b) (three-year provision)).

18. Prior to the sexual abuse of Plaintiff, the Diocese learned or should have learned that Msgr. Grundhaus was not fit to work with children.

19. The Diocese knew or should have known that Msgr. Grundhaus was a danger to children before Msgr. Grundhaus sexually molested Plaintiff.

20. The Diocese negligently or recklessly believed that Msgr. Grundhaus was fit to work with children and/or that any previous problems he had were fixed and cured; that Msgr. Grundhaus would not sexually molest children and that Msgr. Grundhaus would not injure children; and/or that Msgr. Grundhaus would not hurt children.

21. By holding Msgr. Grundhaus out as safe to work with children, and by undertaking the custody, supervision of, and/or care of the minor Plaintiff, the Diocese entered into a fiduciary relationship with the minor Plaintiff. As a result of Plaintiff being a minor, and by the Diocese undertaking the care and guidance of the then vulnerable minor Plaintiff, the Diocese held a position of empowerment over Plaintiff.

22. By accepting custody of the minor Plaintiff, the Diocese established an *in loco parentis* relationship with Plaintiff and in so doing, owed Plaintiff a duty to protect Plaintiff from injury.

23. Further, the Diocese, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted this position of empowerment. This empowerment prevented the then minor Plaintiff from effectively protecting himself and the Diocese thus entered into a fiduciary relationship with Plaintiff.

24. The Diocese had a special relationship with Plaintiff.

25. The Diocese owed Plaintiff a duty of reasonable care because it had superior knowledge about the risk that Msgr. Grundhaus posed to Plaintiff, the risk of abuse in general in its programs and/or the risks that its facilities posed to minor children.

26. The Diocese owed Plaintiff a duty of reasonable care because it solicited youth and parents for participation in its youth programs; encouraged youth and parents to have the youth participate in their programs; undertook custody of minor children, including Plaintiff; promoted their facilities and programs as being safe for children; held their agents, including Msgr. Grundhaus, out as safe to work with children; encouraged parents and children to spend time with their agents; and/or encouraged their agents, including Msgr. Grundhaus, to spend time with, interact with, and recruit children.

27. The Diocese owed a duty to Plaintiff to protect him from harm because Defendant's actions created a foreseeable risk of harm to Plaintiff. As a vulnerable child participating in the programs and activities Defendant offered to minors, Plaintiff was a foreseeable victim. As a vulnerable child who Msgr. Grundhaus had access to through Defendant's facilities and programs, Plaintiff was a foreseeable victim.

28. The Diocese's breach of their duties include, but are not limited to: failure to have sufficient policies and procedures to prevent child sex abuse, failure to properly implement the policies and procedures to prevent child sex abuse, failure to take reasonable measures to make

sure that the policies and procedures to prevent child sex abuse were working, failure to adequately inform families and children of the risks of child sex abuse, failure to investigate risks of child molestation, failure to properly train the workers at institutions and programs within Defendant's geographical confines, failure to have any outside agency test their safety procedures, failure to protect the children in their programs from child sex abuse, failure to adhere to the applicable standard of care for child safety, failure to investigate the amount and type of information necessary to represent the institutions, programs, leaders and people as safe, failure to train their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and/or failure by relying on people who claimed that they could treat child molesters.

29. The Diocese failed to use ordinary care in determining whether their facilities were safe and/or to determine whether they had sufficient information to represent their facilities as safe. These failures include, but are not limited to: failure to have sufficient policies and procedures to prevent abuse at their facilities, failure to investigate risks at their facilities, failure to properly train the workers at their facilities, failure to have any outside agency test their safety procedures, failure to investigate the amount and type of information necessary to represent their facilities as safe, failure to train their employees properly to identify signs of child molestation by fellow employees, failure by relying upon mental health professionals, and/or failure by relying upon people who claimed that they could treat child molesters.

30. The Diocese also breached their duties to Plaintiff by failing to warn him and his family of the risk that Msgr. Grundhaus posed and the risks of child sexual abuse by clerics. They also failed to warn them about any of the knowledge that Defendant had about child sex abuse.

31. The Diocese also violated a legal duty by failing to report known and/or suspected

abuse of children by Msgr. Grundhaus and/or their other agents to the police and law enforcement.

32. The Diocese also breached their duties to Plaintiff by actively maintaining and employing Msgr. Grundhaus in a position of power and authority through which Msgr. Grundhaus had access to children, including Plaintiff, and power and control over children, including Plaintiff.

33. The Diocese knew or should have known that some of the leaders and people working at Catholic institutions within the Diocese of Crookston were not safe.

34. The Diocese knew or should have known that they did not have sufficient information about whether or not their leaders and people working at Catholic institutions within the Diocese of Crookston were safe.

35. The Diocese knew or should have known that there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese of Crookston.

36. The Diocese knew or should have known that they did not have sufficient information about whether or not there was a risk of child sex abuse for children participating in Catholic programs and activities within the Diocese of Crookston.

37. The Diocese knew or should have known that they had numerous agents who had sexually molested children. Defendant knew or should have known that child molesters have a high rate of recidivism. They knew or should have known that there was a specific danger of child sex abuse for children participating in their youth programs.

38. The Diocese held their leaders and agents out as people of high morals, as possessing immense power, teaching families and children to obey these leaders and agents, teaching families and children to respect and revere these leaders and agents, soliciting youth and families to their programs, marketing to youth and families, recruiting youth and families, and holding out the people that worked in the programs as safe.



39. The Diocese were negligent and/or made representations to Plaintiff and his family during each and every year of his minority.

40. Since 2014, Defendant Diocese of Crookston has publicly admitted that it knew of seven priests who worked in the Diocese who were credibly accused of sexually molesting minors. The Diocese of Crookston continues to conceal important information about the priests on that list and the names and information about accused priests not on the list. Notably, despite receiving a direct report of abuse in approximately 2009 or 2010 from Plaintiff, the Diocese has not included Msgr. Grundhaus on its public list of credibly accused priests. Additional information has also not been disclosed about the credibly accused priests' patterns of grooming and sexual abuse. As a result, children are at risk of being sexually molested.

41. Upon information and belief, prior to and since 2014, Defendant Diocese failed to report multiple allegations of sexual abuse of children by its agents to the proper civil authorities. As a result, children are at risk of being sexually molested.

42. As a direct result of Defendants' conduct described herein, Plaintiff has suffered, and will continue to suffer, great pain of mind and body, severe and permanent emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, physical, personal and psychological injuries. Plaintiff was prevented, and will continue to be prevented, from performing normal daily activities and obtaining the full enjoyment of life; and/or has incurred and will continue to incur expenses for psychological treatment, therapy, and counseling, and, on information and belief has and/or will incur loss of income and/or loss of earning capacity.

#### **COUNT I: COERCION AGAINST BISHOP HOEPPNER**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under

this Count.

43. Bishop Hoepfner's conduct towards Plaintiff in the form of threatening Plaintiff's participation and success in the diaconate program and to Plaintiff's son's priesthood in order to obtain Plaintiff's signature on the letter retracting the report of abuse was unlawful or wrongful.

44. As a result of Bishop Hoepfner's conduct, Plaintiff was forced, against his will, to sign the letter retracting the report of abuse and was prevented, against his will, from reporting the incident of abuse by Msgr. Grundhaus to civil authorities and from obtaining legal counsel until recently.

45. As a proximate result of Bishop Hoepfner's conduct, Plaintiff has suffered the damages described herein.

**COUNT II: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST BISHOP HOEPFNER**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

46. Bishop Hoepfner's conduct towards Plaintiff in the form of threatening Plaintiff to remain silent and coercing Plaintiff to sign a letter retracting his report of abuse constitutes extreme and outrageous conduct.

47. Bishop Hoepfner's conduct was done with the intention of causing, or reckless disregard of the probability of causing, severe emotional distress to Plaintiff.

48. As a proximate result of Bishop Hoepfner's conduct, Plaintiff has suffered and continues to suffer severe or extreme emotional distress.

**COUNT III: NUISANCE (COMMON LAW AND MINN. STAT. § 609.74)  
AGAINST DEFENDANT DIOCESE**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under

this Court.

49. Defendant Diocese continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of Msgr. Grundhaus and the Diocese's other accused priests; and/or 2) conceal from proper civil authorities sexual assaults and abuse committed by Msgr. Grundhaus and the Diocese's other agents against minor children; and/or 3) attack the credibility of victims of the Diocese's agents; and/or 4) protect the Diocese's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 5) allow known child molesters to live freely in the community without informing the public.

50. The negligence and/or deception and concealment by Defendant Diocese has maintained or permitted a condition which unreasonably endangers the safety and health of a considerable number of members of the public including, but not limited to, children and residents in the Diocese and other members of the general public who live in communities where Defendant's agents who molested children live. Defendant's failure to report multiple allegations of sexual assault and abuse of children to proper authorities, as well as its failure to inform the public about sexual abuse, or priests accused of sexual abuse of minors has prevented the public from knowing of a real danger, and has thereby endangered the safety and health of a considerable number of the members of the public by allowing child molesters to avoid prosecution and remain living freely in unsuspecting communities and working with and around children. These child molesters, known to the Diocese but not to the public, pose a threat of additional abuse to a considerable number of members of the public.

51. The negligence and/or deception and concealment by Defendant Diocese was specially injurious to Plaintiff's health as Plaintiff was sexually assaulted by Defendant Diocese's

agent, Msgr. Grundhaus.

52. The negligence and/or deception and concealment by Defendant Diocese also was specially injurious to Plaintiff's health in that when Plaintiff finally discovered the negligence and/or deception and concealment of Defendant Diocese, Plaintiff experienced mental, emotional and/or physical distress that he had been the victim of Defendant Diocese's negligence and/or deception and concealment.

53. Plaintiff has suffered and/or continues to suffer special, particular, and peculiar psychological and emotional harm and/or peculiar pecuniary harm, different in kind from the general public, after learning of Defendant Diocese's concealment of names and information about priests accused of sexually molesting minors and as a result of the dangerous condition maintained and/or permitted by Defendant Diocese, which continues as long as decisions are made and actions are taken to keep the information about the abuse and/or the accused priests concealed. As a result of the negligence and/or deception and concealment, Plaintiff has suffered and continues to suffer lessened enjoyment of life, and/or impaired health, and/or emotional distress, and/or physical symptoms of emotional distress and/or pecuniary loss including medical expenses and/or wage loss.

54. Plaintiff's injuries are also particular to him and different from certain members of the public who have not been harmed by the nuisance. People who have not been harmed by the nuisance include those who have not suffered any injury at all, those who are unaware of the nuisance, those who do not believe that the Defendant Diocese ever concealed anything about child sex abuse, and those who think that any concealment only occurred decades ago.

55. The continuing public nuisance created by Defendant Diocese was, and continues to be, the proximate cause of Plaintiff's special injuries and damages as alleged.

56. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff's rights.

57. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

**COUNT IV: NUISANCE (MINN. STAT. § 561.01)**  
**AGAINST DEFENDANT DIOCESE**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

58. Defendant Diocese continues to conspire and engage and/or has conspired and engaged in efforts to: 1) conceal from the general public the sexual assaults committed by, the identities of, and the pedophilic/ephebophilic tendencies of, Msgr. Grundhaus and Defendant's other accused priests; and/or 2) conceal from proper civil authorities sexual assaults and abuse committed by Msgr. Grundhaus and Defendant's other agents against minor children; and/or 3) attack the credibility of victims of Defendant's agents; and/or 4) protect Defendant's agents from criminal prosecution for their sexual assaults and abuse against children; and/or 5) allow known child molesters to live freely in the community without informing the public.

59. The negligence and/or deception and concealment by Defendant Diocese was and is injurious to the health and/or indecent or offensive to the senses of the general public including, but not limited to, residents in the Diocese and other members of the general public who live in communities where Defendant's accused molesters live. It was and is indecent and offensive to the senses, so as to interfere with the general public's comfortable enjoyment of life in that many in the general public cannot trust Defendant to warn parents of the presence of the current and/or former accused molesters, nor to identify their current and/or former accused molesters, nor to disclose said credibly accused molesters' and other accused molesters' assignment histories, nor

to disclose their patterns of conduct in grooming and sexually assaulting children, all of which create an impairment of the safety of children in the neighborhoods in Minnesota and throughout the Midwest United States where Defendant conducted, and continues to conduct, its business.

60. The negligence and/or deception and concealment by Defendant Diocese was injurious to Plaintiff's health and/or Plaintiff's personal enjoyment of life as Plaintiff was sexually assaulted by Defendant's agent, Msgr. Grundhaus.

61. The negligence and/or deception and concealment by Defendant Diocese also was injurious to Plaintiff's health and/or personal enjoyment of life in that when Plaintiff discovered the negligence and/or deception and concealment of Defendant that led to Plaintiff's sexual assault, Plaintiff experienced mental, emotional, and/or physical distress that Plaintiff had been the victim of the Defendant's negligence and/or deception and concealment.

62. The continuing nuisance created by Defendant Diocese was, and continues to be, a proximate cause of Plaintiff's injuries and damages as alleged.

63. In doing the aforementioned acts, Defendant acted negligently and/or intentionally, maliciously and with conscious disregard for Plaintiff's rights.

64. As a result of the above-described conduct, Plaintiff has suffered the injuries and damages described herein.

#### **COUNT V: NEGLIGENCE AGAINST DEFENDANT DIOCESE**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

65. Defendant owed Plaintiff a duty of reasonable care.

66. Defendant owed Plaintiff a duty of care because Defendant had a special relationship with Plaintiff.

67. Defendant owed Plaintiff a duty to protect Plaintiff from harm because Defendant had a special relationship with Msgr. Grundhaus.

68. Defendant owed Plaintiff a duty to protect Plaintiff from harm because Defendant's active misfeasance created a foreseeable risk of harm.

69. Defendant owed Plaintiff a duty to protect Plaintiff from harm because Defendant invited him onto its property and Msgr. Grundhaus posed a dangerous condition on Defendant's property.

70. By establishing and operating the Diocese of Crookston, accepting the minor Plaintiff as a participant in their programs, holding their facilities and programs out to be a safe environment for Plaintiff, accepting custody of the minor Plaintiff *in loco parentis*, and by establishing a fiduciary relationship with Plaintiff, Defendant entered into an express and/or implied duty to properly supervise Plaintiff and provide a reasonably safe environment for children, who participated in their programs. Defendant owed Plaintiff a duty to properly supervise Plaintiff to prevent harm from foreseeable dangers.

71. By establishing and operating the Diocese of Crookston, which offered educational programs to children and which may have included a school, and by accepting the enrollment and participation of the minor Plaintiff as a participant in those educational programs, Defendant owed Plaintiff a duty to properly supervise Plaintiff to prevent harm from generally foreseeable dangers.

72. Defendant breached its duties to Plaintiff. Defendant's failures include, but are not limited to, failing to properly supervise Msgr. Grundhaus, failing to properly supervise Plaintiff and failing to protect Plaintiff from a known danger.

73. Defendant's breach of its duties was the proximate cause of Plaintiff's injuries.

74. As a direct result of Defendant's negligent conduct, Plaintiff has suffered the

injuries and damages described herein.

**COUNT VI: NEGLIGENT SUPERVISION AGAINST DEFENDANT DIOCESE**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

75. At all times material, Msgr. Grundhaus was employed by Defendant Diocese and was under Defendant's direct supervision, employ and control when he committed the wrongful acts alleged herein. Msgr. Grundhaus engaged in the wrongful conduct while acting in the course and scope of his employment with Defendant and/or accomplished the sexual abuse by virtue of his job-created authority. Defendant failed to exercise ordinary care in supervising Msgr. Grundhaus in his assignments and failed to prevent the foreseeable misconduct of Msgr. Grundhaus from causing harm to others, including the Plaintiff herein.

76. As a direct result of Defendant's negligent conduct, Plaintiff has suffered the injuries and damages described herein.

**COUNT VII: NEGLIGENT RETENTION AGAINST DEFENDANT DIOCESE**

Plaintiff incorporates all consistent paragraphs of this Complaint as if fully set forth under this Count.

77. Defendant Diocese, by and through their agents, servants and/or employees, became aware, or should have become aware, of problems indicating that Msgr. Grundhaus was an unfit agent with dangerous and exploitive propensities, yet Defendant failed to take any further action to remedy the problem and failed to investigate or remove Msgr. Grundhaus from working with children.

78. As a direct result of Defendant's negligent conduct, Plaintiff has suffered the injuries and damages described herein.



**PRAYER FOR RELIEF**

Plaintiff demands judgment against Defendants, individually, jointly and severally in an amount in excess of \$50,000.00, plus costs, disbursements, reasonable attorneys' fees, interest, and such other and further relief as the court deems just and equitable.


Plaintiff requests an order requiring that Defendant Diocese of Crookston publicly release the names of all agents, including priests, accused of child molestation, each agent's history of abuse, each such agent's pattern of grooming and sexual behavior, and his last known address. This includes the release of Defendant Diocese of Crookston's documents on the agents.

Plaintiff requests an order requiring that Defendant Diocese discontinue its current practice and policy of dealing with allegations of child sexual abuse by its agents secretly, and that it work with civil authorities to create, implement and follow a policy for dealing with such molesters that will better protect children and the general public from further harm.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated: May 8, 2017

JEFF ANDERSON & ASSOCIATES, P.A.

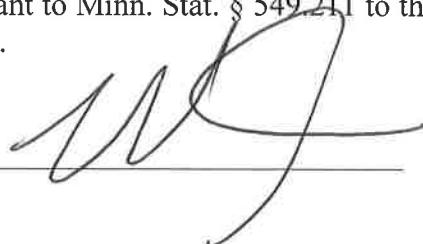


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**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorneys' fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in this pleading are asserted.



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