

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
CIVIL DIVISION

D.O.

PLAINTIFF

v.

DIOCESE OF LITTLE ROCK,
OUR LADY OF THE HOLY SOULS,
OUR LADY OF THE HOLY SOULS CATHOLIC SCHOOL.

DEFENDANTS

COMPLAINT

COMES NOW, Plaintiff D.O., by and through undersigned counsel, and for his
complaint as to the Defendants, states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff D.O. is an adult resident of the State of Arkansas. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Little Rock, Arkansas.
2. Plaintiff has elected to proceed using his initials in this matter because it concerns allegations of a sensitive and highly personal nature that are of the utmost privacy. *See Doe v. Weiss*, 2010 Ark. 150. D.O.'s full name and identity soon will be made known to the Defendants, under separate cover, conditioned on a proper protective order or agreement and can be given in another pleading or document under seal with the Court as directed by the Court. To disclose his name publicly at this point would potentially subject him to further harm.
3. Defendant Diocese of Little Rock (hereinafter "Diocese of LR"), a Roman Catholic Diocese, is an unincorporated non-profit business entity licensed to and doing business in

the State of Arkansas. Diocese of Little Rock's address is 2500 N. Tyler Street, Little Rock, Arkansas 72207.

4. Defendant Our Lady of the Holy Souls (hereinafter "OLHS") is a Roman Catholic parish within the Diocese of LR. OLHS is an unincorporated Arkansas business entity whose address is 1003 North Tyler Street, Little Rock, Arkansas 72205.
5. Defendant Our Lady of the Holy Souls Catholic School (hereinafter "OLHS SCHOOL") is a Roman Catholic school associated with OLHS within the Diocese of LR. OLHS School is an unincorporated Arkansas business entity whose address is 1001 North Tyler Street, Little Rock, Arkansas 72205.
6. Venue is proper pursuant to Ark. Code Ann. § 16-60-101(a)(2)(B) and 16-60-101(e).
7. Plaintiff's cause of action arises from the sexual abuse of Plaintiff by Father Joseph Correnti (hereinafter Fr. Correnti) at OLHS and a staff member at OLHS SCHOOL in approximately 1976 when Plaintiff was approximately 7 years old.
8. The present lawsuit currently involves the following issues: child sexual abuse, negligence, negligent supervision and retention of employee, negligent failure to protect, and negligence/premises liability.
9. Plaintiff's claim is timely filed under the Justice for Vulnerable Victims of Sexual Abuse Act, codified at Ark. Code Ann. § 16-118-118. Pursuant to this law, survivors, regardless of when the childhood sexual abuse occurred, must file their lawsuit by January 31, 2026.

FACTUAL BACKGROUND

10. The proceeding paragraphs are incorporated herein as if set forth word for word.
11. Fr. Correnti was an ordained Roman Catholic priest in 1972 and employed by and was an agent of Defendants at all times relevant and material to this cause of action.

12. Fr. Correnti had numerous other assignments throughout Arkansas beginning in 1972 and lasting until approximately 2002, including at least one period for “leave of absence.”
13. Joseph Correnti is on the Diocese of LR’s public “Clergy Disclosure List,” described as “clergy for whom allegations of sexual abuse of a minor have been admitted, substantiated or determined or considered to be credible.”
14. At all times relevant and material, Fr. Correnti was assigned to OLHS in Little Rock, Arkansas, as a priest.
15. The 1976 *Official Catholic Directory* lists Fr. Correnti as a priest at OLHS in Little Rock.
16. The staff member was employed by and an agent of Defendants Diocese of LR and OLHS SCHOOL at all times relevant and material to this cause of action.
17. At all times relevant and material, the staff member was assigned to OLHS SCHOOL in Little Rock, Arkansas, as a staff member.
18. At all times relevant to this matter, Defendants Diocese of LR and/or OLHS was the legal owner and/or tenant/occupier of the aforementioned church and school located in Little Rock, Arkansas.
19. At all times relevant and material, Fr. Correnti and the staff member remained under the direct supervision, employ, and control of the Defendants Diocese of LR, OLHS, OLHS SCHOOL.
20. Plaintiff attended OLHS from approximately 1975-1976 and would attend Sunday mass at OLHS during that time. Plaintiff also attended OLHS SCHOOL from approximately 1975-1976 while in first and second grade.

21. Plaintiff, therefore, developed great admiration, trust, reverence, and respect for the Roman Catholic Church and its agents, including the Archbishop/Bishop, and Fr. Correnti.
22. During his time as a parishioner at OLHS, there were instances of conduct between Plaintiff and Fr. Correnti that culminated in Fr. Correnti fondling D.O.'s genitals and forcing the Plaintiff to fondle and orally copulate Fr. Correnti's genitals. Plaintiff was approximately seven years old at the time of the sexual abuse.
23. The sexually abusive encounters between Plaintiff and Fr. Correnti happened at OLHS under the direct supervision, employ, and control of the Defendants Diocese of Little Rock and OLHS.
24. During his time as a student at OLHS SCHOOL, there were instances of conduct between Plaintiff and the staff member that culminated in the staff member fondling D.O.'s genitals, digitally penetrating D.O.'s genitals and attempting to anally penetrate D.O. with his penis. The staff member also masturbated in the presence of D.O. and ejaculated onto D.O. Plaintiff was approximately seven years old at the time of the sexual abuse.
25. The sexually abusive encounters between Plaintiff and the staff member happened at OLHS SCHOOL under the direct supervision, employ, and control of the Defendants Diocese of Little Rock and OLHS.
26. Plaintiff, unable to deal with the guilt, shame, and trauma that he suffered as a result of the abuse from Fr. Correnti and the staff member, started acting out in school and abusing drugs at a young age.
27. The problem of clergy sexual abuse of minors is well-documented throughout the history of the Roman Catholic Church.

28. In 1961, the Vatican issued an instruction on the training of candidates for the priesthood, which was based upon the 1917 Code of Canon Law which stated:

Advancement to religious vows and ordination should be barred to those who are afflicted with evil tendencies to homosexuality or pederasty, since for them the common life and priestly ministry would constitute serious dangers.

29. Knowledge that Catholic clergy were sexually abusing minors continued through the Middle Ages and into recent years. In 1962, Pope John XXIII approved the publication *De Modo Procendendi in Causis Solicitationis*, a special procedural law for solicitation of sex in the confessional. This document contained prohibitions prohibiting clergy from having sex with minors under the age of sixteen. This document was distributed to every bishop and major religious superior in the world and was to be kept by them with the deepest secrecy. In addition, this document reflected the Catholic church's insistence on maintaining the highest degree of secrecy regarding the worst sexual crimes perpetrated by clergy.

30. In 1947, a priest named Fr. Gerald Fitzgerald founded a religious order of priests called the Servants of the Paracletes. This religious order was founded to assist and treat Catholic clergy who experienced mental health problems. By 1952, Fr. Fitzgerald wrote that he had already treated a handful of priests who had sexually abused minors. By 1963, the Paracletes were treating so many sexually abusive clergy that they developed a shorthand code, "code 3," to describe the offense. By 1966, the Paracletes began specializing in treatment of pedophile Catholic clergy.

31. As early as 1971, the issue of sexual misconduct by clergy was being discussed in the Commonwealth of Massachusetts. Bishop Bernard Flanagan, Bishop of Worcester

(Massachusetts) testified that as early as February 1971, there had been discussions about sexual misconduct among priests. According to Bishop Flanagan, “I think by 1971 I had heard of other cases of this type [sic] sexual misconduct and I knew that they were taking place in other dioceses too.”

32. That same year, Dr. Conrad Baars and Dr. Anna Terruwe presented a scholarly paper titled “The Role of the Church in the Causation, Treatment and Prevention of the Crisis in the Priesthood” to the 1971 Synod of Bishops at the Vatican and to the U.S. Conference of Catholic Bishops about psychiatric problems in Catholic clergy and how psychosexual immaturity manifested itself in heterosexual and homosexual activity.
33. In 1985, the public prosecution of a priest in Lafayette, Louisiana led to the creation of the 100-page document titled, “*The Problem of Sexual Molestation by Roman Catholic Clergy: Meeting the Problem in a Comprehensive and Responsible Manner*” by Fr. Thomas Doyle, F. Ray Mouton, and Fr./Dr. Michael Peterson. This document was distributed to every Catholic Bishop and religious order ordinary in the United States. A large portion of this document describes how significant the sexual abuse of children by Catholic clergy had become.

COUNT I.
NEGLIGENCE
Against all Defendants

34. The proceeding paragraphs are incorporated herein as if set forth word for word.
35. Before Plaintiff was sexually abused by Fr. Correnti and the staff member, the Diocese of LR knew or should have known about their sexual misconduct, impulses, and behavior.
36. By holding Fr. Correnti and the staff member out as safe to work with children, and by undertaking the custody, supervision of, and/or care of the Plaintiff when he was a minor,

the Defendants Diocese of LR, OLHS, OLHS SCHOOL entered into a special relationship with the Plaintiff.

37. As a result of Plaintiff being a minor, and by the Defendants Diocese of LR, OLHS, OLHS SCHOOL undertaking the care and guidance of the then-vulnerable Plaintiff, he was uniquely vulnerable, without his parents and incapable of self-protection.
38. Defendants Diocese of LR, OLHS, OLHS SCHOOL, 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 Plaintiff from effectively protecting himself.
39. Defendants Diocese of LR, OLHS, OLHS SCHOOL thereby entered into a special relationship with the Plaintiff.
40. By holding themselves out as a safe, moral, and trusted institution to Plaintiff's parents, Defendants Diocese of LR, OLHS, OLHS SCHOOL induced Plaintiff's parents to entrust their child to the Defendants and thereby deprived Plaintiff of the protection of his family.
41. Defendants Diocese of LR, OLHS, OLHS SCHOOL allowed Fr. Correnti and the staff member to have unsupervised and unlimited access to minor children who attended church at OLHS and/or school at OLHS SCHOOL.
42. Defendants failed to warn Plaintiff about any of the knowledge Defendants had about previous child sex abuse perpetrated by Fr. Correnti or other clergy members.
43. Defendants Diocese of LR, OLHS, OLHS SCHOOL took no action to investigate Fr. Correnti's or the staff members pedophilia, determine whether they were fit to work with

children, and/or protect children from them. This lack of action on the part of the Defendants increased the likelihood that Plaintiff would be harmed.

44. Defendants Diocese of LR, OLHS, OLHS SCHOOL owed the Plaintiff a duty of care as described herein.

45. Defendants Diocese of LR, OLHS, OLHS SCHOOL breached their duties of due care.

46. Defendants Diocese of LR, OLHS, OLHS SCHOOL'S breach of their duties were the proximate cause of Plaintiff's injuries described herein.

47. Plaintiff's injuries were foreseeable to Defendants Diocese of LR, OLHS, OLHS SCHOOL.

COUNT II.
NEGLIGENT SUPERVISION AND RETENTION OF EMPLOYEE
Against all Defendants

48. The proceeding paragraphs are incorporated herein as if set forth word for word.

49. Defendants Diocese of LR, OLHS, OLHS SCHOOL had a duty to use reasonable care in retaining its employees in positions where they were exposed to children who were unsupervised by their parents.

50. Defendants Diocese of LR, OLHS, OLHS SCHOOL by and through their agents, servants, and employees, knew or reasonably should have known of the staff members and Fr. Correnti's dangerous and exploitive propensities and/or that they were unfit agents.

51. Despite such knowledge, Defendants Diocese of LR, OLHS, OLHS SCHOOL breached their duty to properly supervise the staff member and Fr. Correnti and failed to use reasonable care in investigating them.

52. Under the circumstances, the staff member and Fr. Correnti's sexual abuse of the Plaintiff was foreseeable to Defendants Diocese of LR, OLHS, OLHS SCHOOL.

COUNT III.
NEGLIGENT FAILURE TO PROTECT
Against all Defendants

53. The proceeding paragraphs are incorporated herein as if set forth word for word.

54. Defendants Diocese of LR, OLHS, OLHS SCHOOL had a duty to protect the minor Plaintiff from harm based upon the special relationship between the Defendants Diocese of LR, OLHS, OLHS SCHOOL and the Plaintiff, whereby the Plaintiff was in the custody of an agent of Defendants Diocese of LR, OLHS, OLHS SCHOOL and without the normal protections of his family.

55. The Defendants breached their duty to protect the Plaintiff.

56. It was foreseeable that the minor Plaintiff would be sexually abused if Defendants Diocese of LR, OLHS, OLHS SCHOOL failed to properly protect him while he was in the custody of the Defendants and its agent(s).

COUNT IV.
NEGLIGENCE/PREMISES LIABILITY
Against all Defendants

57. The proceeding paragraphs are incorporated herein as if set forth word for word.

58. Defendants Diocese of LR, OLHS, OLHS SCHOOL had the duty to exercise ordinary care to maintain OLHS and OLHS SCHOOL in a reasonably safe condition for the benefit of invitees.

59. The Plaintiff was a business invitee of the Defendants Diocese of LR, OLHS, OLHS SCHOOL when Fr. Correnti and the staff member engaged him in unwanted sexual abuse.

60. Defendants Diocese of LR, OLHS, OLHS SCHOOL owed the Plaintiff a duty to protect him from dangerous conditions on their premises that they knew about, or in the exercise of reasonable care could have discovered.
61. Defendants Diocese of LR, OLHS, OLHS SCHOOL owed the Plaintiff a duty to provide a reasonably safe environment where he would be free from the threat of unwanted sexual contact while on the Defendants Diocese of LR, OLHS, OLHS SCHOOL'S premises.
62. Defendants Diocese of LR, OLHS, OLHS SCHOOL owed the Plaintiff a duty to take reasonable precautions to ensure safety while on its premises.
63. Prior to the sexual misconduct perpetrated by Fr. Correnti and the staff member upon the Plaintiff, Defendants Diocese of LR, OLHS, OLHS SCHOOL knew, or in the exercise of reasonable care, should have known, of the general problem of priests and other clergy engaged in sexual misconduct with children.
64. Prior to the sexual misconduct perpetrated by Fr. Correnti and the staff member upon the Plaintiff, Defendants Diocese of LR, OLHS, OLHS SCHOOL knew, or in the exercise of reasonable care, should have known, that Fr. Correnti and the staff member were unfit for the intimate duties assigned to them, that they did not exhibit appropriate behavior with children, and otherwise posed a risk of perpetrating unwanted sexual contact upon children.
65. Defendants Diocese of LR, OLHS, OLHS SCHOOL breached the duty owed to the Plaintiff by failing to make the premises reasonably safe for him despite what they knew or should have known about the existence of a potential threat of harm on their premises.

66. Defendants Diocese of LR, OLHS, OLHS SCHOOL breached the duty they owed to the Plaintiff by failing to warn him of the dangers and risks involved in participating in programs at OLHS/OLHS SCHOOL given their superior knowledge of the potential risk of harm to the Plaintiff and others similarly situated.

67. At all times relevant to this matter, Defendants Diocese of LR, OLHS, OLHS SCHOOL had inadequate policies and procedures to protect children entrusted to their care and protection, including the Plaintiff, which substantially contributed to the creation of a dangerous environment.

DAMAGES

68. The proceeding paragraphs are incorporated herein as if set forth word for word.

69. As a result of all Defendants' conduct described above, the 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 and psychological injuries, was prevented and will continue to be prevented from performing normal daily activities and obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

RELIEF REQUESTED

70. The proceeding paragraphs are incorporated herein as if set forth word for word.

71. The Plaintiff claims he is entitled to recover for the following damages, all of which were proximately caused by the negligent, intentional, willful, wanton, extreme, and/or outrageous acts of the Defendants and/or their agents:

- a. Damages for past emotional distress after the sexual abuse and injury and/or continuing through present.
- b. Damages for pain and suffering due to his injuries.
- c. Compensatory damages for medical and other out of pocket expenses.
- d. Damages for future pain and suffering and emotional and psychological trauma.
- e. Damages for medical expenses to be incurred in the future.
- f. Compensatory damages for sexual abuse.
- g. Punitive damages in an amount to be determined by proof at trial.
- h. Lost wages in an amount to be determined by proof at trial.
- i. Attorney fees for bringing this action.
- j. Any and all other damages allowed under state and federal laws.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that this Court enter judgment against the Defendants, jointly and severally, in a sufficient sum to fully compensate his damages; enter its judgment against the Defendants, jointly and severally, in an amount to be determined at trial to compensate the Plaintiff for his pain and suffering; award him costs, including a reasonable attorney fee, for the necessitation of this action; award him pre and post judgment interest against the Defendants, jointly and severally; and grant Plaintiff any and all other equitable, legal, and proper relief to which he may be entitled.

Dated: January 30, 2026

Respectfully submitted,

/s/Damon C. Singleton

Damon Singleton

AR Bar#2010132

WATTS LAW FIRM, LLP

811 Barton Springs Road, # 725

Austin, TX 78704

Telephone: (888) 889-2887

E-mail: damon@wattslp.com