

IN THE CIRCUIT OF ST. LOUIS COUNTY
STATE OF MISSOURI

02CC-0 00

FATHER ALEXANDER R. ANDERSON,)

Plaintiff,)

vs.)

ARTHUR P. ANDREAS,)

Serve at:)

7800 Stanford)
University City, MO 63130)

Defendant.)

6

Cause No.

Div.

JURY TRIAL DEMANDED

PETITION FOR DEFAMATION

Comes now Plaintiff, Father Alexander R Anderson, by and through its attorneys, Katherine L. Butler and Butler & Associates, P.C., and for his Petition for Defamation against Defendant, Arthur P. Andreas, states as follows to the Court:

1. That Plaintiff is and was at all times material herein a resident of St. Louis County, State of Missouri, employed as a Priest by the Archdiocese of St. Louis, Missouri.

2 That Plaintiff is and was at all times material herein a resident of St. Louis County, State of Missouri.

3. In and throughout the months of February, March, April, May and June 2002, Defendant, stated to employees of the City of St Louis Prosecuting Attorney's office,

representatives of the Archdiocese of St. Louis, and others, that Plaintiff engaged in “sexual misconduct and abuse of him” that was “repetitious” in nature.

4. In March or April 2002 , defendant authored a document entitled “Narrative” which Defendant had mimeographed and mailed/delivered to several persons, including Plaintiff’s employer on or about April 10, 2002, which stated, among other things, that Father Anderson had committed “four incidents” of sexual abuse toward Defendant and another person named “Louis”.

5. The verbal statements made by defendant were known by him to be false, were made without justification or cause and were made maliciously for the purpose on injuring plaintiff’s reputation and subjecting plaintiff to criminal prosecution and loss of employment.

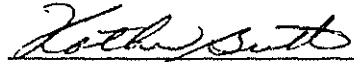
6. The written statements made by defendant were known by him to be false, were made without justification or cause and were made maliciously for the purpose on injuring plaintiff’s reputation and subjecting plaintiff to criminal prosecution and loss of employment.

7. As a direct and proximate result of defendant making the false and defamatory statements, the reputation of plaintiff as been damaged, plaintiff has been embarrassed within the community, and his chances for advancement and promotion within his profession has been impaired.

Wherefore, Plaintiff, Father Alexander R. Anderson, requests the entry of a Judgment in favor of Plaintiff and against Defendant, Arthur P. Andreas, for actual damages in an amount that is fair and reasonable in excess of twenty-five thousand dollars, for punitive damages, for court costs incurred herein, and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully Submitted,

BUTLER & ASSOCIATES, P.C.



KATHERINE L. BUTLER, #37373
123 South Central Ave., PO Box 286
Eureka, Missouri 63025
(636) 938-5253
(636) 938-5452 facsimile

Attorneys for Plaintiff Father Anderson