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June 13, 2002

District Attorney Martha Coakley
Middlesex County
Superior Courthouse
40 Thorndike Street
Cambridge, MA 02141

Dear District Attorney Coakley:

In accordance with the letter in which this office signed on behalf of the Roman Catholic Archbishop of Boston, a Corporation Sole with the Attorney General's Office dated March 1, 2002, enclosed please find a copy of a Complaint which has now been filed with the Suffolk Superior Court involving allegations of sexual abuse by Rev. Bernard J. Lane. I would ask that you secure the identity of Thomas Doe from his Counsel. By copy of this letter to Kurt Schwartz, I trust that you will notify the appropriate authorities in New Hampshire.

Thank you for your attention to this matter.

Very truly yours,

Wilson D. Rogers, Jr.

Wilson D. Rogers, Jr.

WDR/nmf

Enclosure

cc: Kurt N. Schwartz, Esquire ✓

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION

THOMAS A. DOE,**Plaintiff**

v.

**REVEREND FATHER BERNARD J. LANE,
THE ARCHDIOCESE OF BOSTON,
LIFE RESOURCES, INC., and ALPHA OMEGA,
INC.,****Defendants**

COMPLAINT AND DEMAND FOR JURY TRIAL**PARTIES**

1. The Plaintiff, Thomas A. Doe, is an individual, residing in Falmouth (Barnstable), Commonwealth of Massachusetts.
2. Defendant Father Bernard J. Lane (herein after "Father Lane"), is a Roman Catholic priest, residing at 72 Lake Shore Drive, Barnstead, NH, 03225 and during 1973 through 1979 was assigned to Alpha Omega in Littleton, (Middlesex), Commonwealth of Massachusetts. The incidents alleged herein occurred in Massachusetts and New Hampshire.
3. Defendant The Archdiocese of Boston, ("Archdiocese") is a Corporation Sole organized and existing pursuant to Chapter 506 of the Massachusetts Acts of 1897, with a usual place of business at 2121 Commonwealth Avenue, Brighton (Suffolk) Massachusetts.
4. Defendant Life Resources, Inc ("Life Resources") is a not-for-profit corporation with its principal place of business at 140 Adams Street, Braintree, (Norfolk), Commonwealth of Massachusetts, and is engaged in the business of delivering services to youthful offenders referred by the Division of Youth Services of the Commonwealth of Massachusetts ("DYS").

5. Defendant Alpha Omega, Inc ("Alpha Omega") is a not-for-profit corporation with its principal place of business at 4 Omega Way, Littleton (Middlesex), Commonwealth of Massachusetts, and is a subsidiary of Life Resources, Inc. and is engaged in the business of delivering services to youthful offenders referred by the Division of Youth Services of the Commonwealth of Massachusetts ("DYS").

STATEMENT OF FACTS

6. Plaintiff Thomas A. Doe was referred by the Massachusetts Division of Youth Services ("DYS") to Alpha Omega for approximately seven (7) to nine (9) months in or about the year nineteen seventy seven (1977) at the age of fifteen
7. Defendant Father Lane was director of the program and supervised the Plaintiff during the Plaintiff's stay at Alpha Omega.
8. While Plaintiff resided at Alpha Omega, in or about 1977, Defendant Father Lane cultivated and maintained a close relationship with him.
9. During the time he was assigned to Alpha Omega, Defendant Father Lane initiated and engaged in a pattern and practice of explicit sexual behavior with the Plaintiff.
10. Defendant Father Lane frequently brought the Plaintiff to his home in Littleton, MA or to the Alpha Omega house in New Hampshire to engage in explicit sexual behavior
11. While at Defendant Father Lane's house, Defendant Father Lane would take Plaintiff to his bedroom and both he and the Plaintiff would undress and lay in bed together. Defendant Father Lane would run his fingers over his back or stomach and fondle his genitals.
12. Defendant Father Lane told Plaintiff that if he could develop trust in him, then Plaintiff could restore his trust in his father.
13. Defendant Father Lane would take four or five residents of Alpha Omega up to New Hampshire for weekends.
14. Plaintiff believed his invitation to New Hampshire was a reward for his progress in the Alpha Omega Program.
15. The Alpha Omega Program, designed by Defendant Father Lane, and approved by Defendant Archdiocese, was sexually abusive in and of itself. It involved nudity, group nudity, dissemination of prurient magazines and encouragement of inappropriate physical conduct between the residents and with him. Defendant Father Lane told those in his charge that these behaviors would allow them to develop trusting relationships with others and help them open the door to their emotions. To encourage participation in these behaviors, Defendant Father Lane

told his charges that there was nothing wrong with sexual arousal between or among males.

16. At the end of each day in New Hampshire Defendant Father Lane would invite one of the boys to "spend time" with him in his bedroom.
17. Plaintiff would become jealous and feel that he had done something wrong if he was not invited to "spend time" with Defendant Father Lane.
18. On one of these trips, while Plaintiff and Defendant Father Lane were in bed together, Lane ground himself into Plaintiff's body and achieved an ejaculation wetting the bed and the Plaintiff.
19. Plaintiff immediately reported this activity to his caseworker at DYS or the Massachusetts Department of Social Services ("DSS"). The next day DYS or DSS brought the Plaintiff to Boston where he reported the full details of his time at Alpha Omega.
20. DYS or DSS then called in Defendant Father Lane to meet with them.
21. Despite Plaintiff's report to this agency, Defendant Father Lane was allowed to drive Plaintiff back to Alpha Omega from Boston. The ride was intimidating to Plaintiff.
22. When Plaintiff and Defendant Father Lane returned to Alpha Omega, Lane called an emergency group session where he informed the residents of Alpha Omega that he was leaving the program, he cried, screamed, and punched the "anger" bag.
23. Although Plaintiff reported the behavior to DSS and/or DYS, Defendant Father Lane's behavior was not reported to Plaintiff's parents.
24. Although Plaintiff reported the behavior to DSS and/or DYS, he was not offered any information about the impact the abuse may have on him or provided any mental health services by DSS or DYS.
25. Although DSS or DYS reported the incidents to the Archdiocese of Boston, the Archdiocese did not report the activity to Plaintiff's parents.
26. Although DSS or DYS reported the incidents to the Archdiocese of Boston, the Archdiocese offered no information to Plaintiff about the impact of the incidents on his mental health.
27. Although DSS or DYS reported the behavior to the Archdiocese of Boston, the Archdiocese failed to provide mental health services to Plaintiff.

28. Although the Archdiocese of Boston was informed of the incidents that occurred at Alpha Omega while it was operated under its auspices by Defendant Father Lane, the Archdiocese of Boston reassigned Defendant Father Lane to parish work with no restriction on his interactions with Catholic youth or children.
29. At all material times relevant to the explicit sexual behavior alleged herein, Defendant Father Lane was supervised by Defendant Archdiocese of Boston.
30. On information and belief, Defendant Father Lane had committed sexual assaults on several other children prior to or concurrently with sexually assaulting the Plaintiff.
31. On information and belief, Defendant Father Lane's sexual activity with minors was reported to the Defendant Archdiocese of Boston.
32. On information and belief, Defendant Archdiocese of Boston, knew or should have known that Defendant Father Lane was sexually abusing minors.
33. Despite such knowledge, Archdiocese of Boston took no action to restrict his activities with or access to minors.
34. As a result of the sexual assaults and psychological abuse of the Plaintiff, committed by Defendant Father Lane, the Plaintiff has suffered extreme pain and suffering and psychological damage, including by not limited to depression, feelings of guilt and confusion, anger, irritability, difficulty establishing and maintaining relationships with others, feelings of utter worthlessness and Loss of self.
35. The sexual assaults of the Plaintiff and the emotional and psychological abuse by Defendant Father Lane caused the Plaintiff to repress his memories of the sexual assaults from the time of the events until March 2002.
36. Not until March 2002, did the Plaintiff have knowledge that his pain and suffering and psychological damage resulted from the sexual assaults by Defendant Father Lane.

COUNT I
PLAINTIFF V. LANE
(ASSAULT)

37. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through thirty-six (36) as if fully set forth herein.
38. By his sexual attacks, Defendant Father Lane intentionally placed the Plaintiff in apprehension of an imminent unwanted touching and thereby committed assaults upon him.

39. As a direct and proximate cause of Defendant Father Lane's assaults on the Plaintiff, the Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief that the court deems just and equitable.

COUNT II
PLAINTIFF V. LANE
(BATTERY)

40. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through thirty-nine (39) as if fully set forth herein.
41. By his sexual contact with the Plaintiff, Defendant Father Lane acted intentionally so as to cause harmful, offensive, and unpermitted physical contact with the Plaintiff, thereby committing batteries upon him.
42. As a direct and proximate result of Defendant Father Lane's battery of the Plaintiff, the Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT III
PLAINTIFF V. LANE
(BREACH OF FIDUCIARY DUTY)

43. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through forty-two (42) as if fully set forth herein.
44. The Plaintiff, who was a minor when he was sexually assaulted and raped by the Defendant, was a vulnerable, impressionable child who, prior to the sexual assaults and rape, had great confidence in Defendant Father Lane.
45. Defendant Father Lane served as the Director of Alpha Omega and owed the Plaintiff a duty of care and faithfulness amounting to a fiduciary duty toward him.

46. By his conduct, Defendant Father Lane breached the fiduciary duty owed to the Plaintiff.
47. As a direct and proximate result of Defendant Father Lane's breach of his fiduciary duty to the Plaintiff, the Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE, Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT IV
PLAINTIFF V. LANE
(OUTRAGE)

48. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through forty-seven (47) as if fully set forth herein.
49. By his conduct, Defendant Father Lane intended to and did inflict emotional distress upon the Plaintiff, who was then only a teenager. Defendant Father Lane knew or should have known that severe emotional distress was the likely result of his conduct.
50. Defendant Father Lane's conduct was extreme, outrageous, beyond all reasonable bounds of decency, and utterly intolerable in a civilized community.
51. The mental distress and emotional injuries which the Plaintiff suffered and continues to suffer are severe and of such a nature that no reasonable person could be expected to endure them.
52. As a direct and proximate result of the conduct of Defendant Father Lane, the Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT V
PLAINTIFF V. LANE
 (NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)

53. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through fifty-two (52) as if fully set forth herein.
54. When the Plaintiff was a teenager, Defendant Father Lane cultivated a close personal bond with him. Father Lane owed the Plaintiff a duty to exercise reasonable care in his relationship with the Plaintiff.
55. Defendant Father Lane failed to exercise reasonable care in his relationship with the Plaintiff, engaged in unlawful sexual conduct toward him, and was emotionally and psychologically abusive towards him.
56. Defendant Father Lane knew or should have known that his conduct would inflict harm on the Plaintiff.
57. A reasonable person in the Plaintiff's position would have suffered extreme mental distress and emotional injuries under these circumstances.
58. As a proximate result of Father Lane's conduct in forcing the Plaintiff, who was then a teenager, to submit to unlawful and outrageous sexual conduct, the Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against the DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT VI
PLAINTIFF V. LANE
 (NEGLIGENCE)

59. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through fifty-eight (58) as if fully set forth herein.
60. Defendant Father Lane owed the Plaintiff a duty of reasonable care to do nothing that would harm him. This duty included reasonable care during the period that Defendant Father Lane supervised the Plaintiff at Alpha Omega and whenever he took the Plaintiff to New Hampshire, or any other location away from Alpha Omega.
61. Defendant Father Lane breached his duty of reasonable care by engaging in the unlawful sexual conduct described above.

62. As a direct and proximate result of the conduct of Defendant Father Lane, the Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT VII
PLAINTIFF V. LANE
(VIOLATION OF PLAINTIFF'S CIVIL RIGHTS)
(M.G.L. c, 12 § 11H and 11I)

63. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through sixty-two (62) as if fully set forth herein.

64. Defendant Father Lane was in a position of authority as a Roman Catholic priest and as Director of Alpha Omega when he sexually abused Plaintiff. Defendant Father Lane told Plaintiff that no one would believe him if he complained about the abuse; that only he or his family would be hurt by reporting the behavior; and, by stating that the behavior was appropriate between a boy and a man in order to coerce Plaintiff to engage in inappropriate sexual behavior.

65. By these statements and his behavior Defendant Father Lane engaged in threats, intimidation, and coercion in violation of Plaintiff's civil rights.

66. As a direct and proximate result of the conduct by Defendant Father Lane, Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined and punitive damages, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT VIII
PLAINTIFF V. LANE
(INVASION OF PRIVACY)
(M.G.L. c 214 § 1B)

67. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through sixty-six (66) as if fully set forth herein.

68. Defendant Father Lane's conduct in sexually abusing Plaintiff constituted an invasion of Plaintiff's privacy, violative of M.G.L. c. 214 § 1B.
69. As a direct and proximate result of the conduct of Defendant Father Lane's, Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT IX
PLAINTIFF V. LANE
(FALSE IMPRISONMENT)

70. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through sixty-nine (69) as if fully set forth herein.
71. Defendant Father Lane, by segregating Plaintiff from others and using his status as a priest, deprived Plaintiff of his liberty on every occasion of sexual molestation.
72. Because of Defendant's position of authority, Plaintiff believed that he could not escape, avoid, or report the sexual conduct perpetrated by the Defendant.
73. As a result of the conduct of the Defendant Father Lane, the Plaintiff was falsely imprisoned.
74. As a direct and proximate result of the conduct of Father Lane, Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT X
PLAINTIFF V. ARCHDIOCESE OF BOSTON AND LANE
(CIVIL CONSPIRACY TO INTENTIONALLY INFLICT EMOTIONAL DISTRESS)

75. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through seventy-four (74) as if fully clergy. Said policy included, *inter alia*: set forth herein.

76. At all times material Defendant Archdiocese had a policy of disregarding allegations of sexual abuse of minors at the hands of its employees clergy. Said policy included *inter alia*:
- i. Ignoring reports of abuse brought by other priests, diocesan employee or volunteers, or members of the laity;
 - ii. Failing to investigate allegations brought to them by victims or their families;
 - iii. Failing to keep records of allegations of sexual abuse in the personnel file of the charged priest;
 - iv. Re-assigning the offending priest to another parish or assignment with no notice of his record to those at the new parish or assignment;
 - v. Forcing victims and their families into secret agreements, settling their claims;
 - vi. Failing to search for additional victims of abusing priests
 - vii. Failing to notify or warn the laity participating in or being served by the abusing priests;
 - viii. Failing to report the abuse to officials who would prosecute the abusing priest criminally;
 - ix. Deterring victims and their families from making reports to officials who would prosecute the abusive priest criminally;
 - x. Deterring victims and their families from bringing and prosecuting civil claims against the abusing priests;
 - xi. Deterring its employees and agents from reporting incidents of abuse to appropriate civil authorities.
77. Defendant Archdiocese knew or should have known that Defendant Lane was engaging in inappropriate sexual conduct with children.
78. Despite said knowledge, and in furtherance of its policy to ignore allegations of sexual abuse by clergy, and specifically, Defendant Father Lane, Defendant Archdiocese along with Defendant Lane conspired to conceal material information from the victims, other children and their parents, and the laity of the Roman Catholic Church. In doing so, Defendant Archdiocese intentionally evaded prosecution, obstructed justice, avoided public scandal, and failed to protect the victim and future victims. Defendant Archdiocese therefore directly and/or indirectly aided and abetted Defendant Lane in engaging in sexual conduct and concealing his behavior from prosecuting authorities and the public. Further, Defendant Archdiocese and Lane obstructed victims and their families in the exercise of their rights to bring civil complaints against them.
79. Defendant Archdiocese and Defendant Lane each acted in concert with the other to conceal the true nature of Defendant Lane's sexual abuse of Plaintiff and conspired to emotionally injure Plaintiff and prevent him from seeking recovery and healing.

80. Through the power of this conspiracy Defendants knowingly and willfully inflicted severe emotional distress and other damages on Plaintiff.
81. As a result of the Defendants conspiracy and the acts they took in furtherance thereof, Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT FATHER LANE AND DEFENDANT ARCHDIOCESE OF BOSTON in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT XI
PLAINTIFF V. ARCHDIOCESE OF BOSTON, ALPHA OMEGA AND
LIFE RESOURCES, INC.
(PREMISES LIABILITY-FAILURE TO PROTECT PLAINTIFF AGAINST
ASSAULT)

82. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through eighty-one (81) as if fully set forth herein.
83. Defendant Life Resources, Inc. is a successor in interest to Alpha Omega.
84. Defendant Life Resources assumed all of the liabilities of Alpha Omega on takeover.
85. On information and belief, at all times material hereto, the Archdiocese of Boston or Alpha Omega owned, operated, and/or maintained, and/or controlled the premises where the abuse occurred.
86. At all times material hereto, Defendant Father Lane was permitted on the premises by and with the knowledge of the Archdiocese of Boston and Alpha Omega.
87. At all times material hereto and more specifically at the time of the sexual abuse of Plaintiff, Defendant Father Lane was retained in his position at the premises by Defendant Archdiocese of Boston and Alpha Omega.
88. Defendant Archdiocese of Boston and Alpha Omega knew or should have known the risk of harm to children lawfully on said premises, including the Plaintiff, and disregarded the risk.

89. Defendant Archdiocese and Alpha Omega intentionally and/or negligently failed to warn said children and failed to control or supervise Defendant Father Lane while on said premises.
90. Defendant Archdiocese of Boston and Alpha Omega thereby intentionally and/or negligently failed to make said premises safe from the sexual assault of Plaintiff, perpetrated by Defendant Father Lane.
91. As a direct and proximate result of the conduct of the Archdiocese of Boston and Alpha Omega, the Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANTS ARCHDIOCESE OF BOSTON AND ALPHA OMEGA in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT XII

**PLAINTIFF V. ARCHDIOCESE OF BOSTON, ALPHA OMEGA
AND LIFE RESOUCES, INC.**

(PREMISES LIABILITY-FAILURE TO PROTECT PLAINTIFF AGAINST RAPE)

92. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through ninety-one (91) as if fully set forth herein.
93. Defendant Life Resources, Inc. is a successor in interest to Alpha Omega.
94. Defendant Life Resources assumed all of the liabilities of Alpha Omega on takeover.
95. On information and belief, at all times material hereto, the Archdiocese of Boston and Alpha Omega owned, operated, and/or maintained, and/or controlled the premises where the abuse occurred.
96. At all times material hereto, Defendant Father Lane was permitted on the premises by and with the knowledge of the Archdiocese of Boston and Alpha Omega.
97. At all times material hereto and more specifically at the time of the sexual abuse of Plaintiff, Defendant Father Lane was retained in his position at the premises by Defendant Archdiocese of Boston and Alpha Omega.

98. Defendant Archdiocese of Boston and Alpha Omega knew or should have known the risk of harm to children lawfully on said premises, including the Plaintiff, and disregarding the risk.
99. Defendant Archdiocese and Alpha Omega intentionally and/or negligently failed to warn said children and failed to control or supervise Defendant Father Lane while on said premises.
100. Defendant Archdiocese of Boston and Alpha Omega thereby intentionally and/or negligently failed to make said premises safe from the rape of Plaintiff perpetrated by Defendant Father Lane.
101. As a direct and proximate result of the conduct of the Archdiocese of Boston and Alpha Omega, the Plaintiff suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANTS ARCHDIOCESE OF BOSTON, ALPHA OMEGA AND LIFE RESOURCES, INC., in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT XIII
PLAINTIFF V. ARCHDIOCESE OF BOSTON
(VIOLATION OF CIVIL RIGHTS)
M.G.L. c. 12 § 11H and 11I

102. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through one-hundred and one (101) as if fully set forth herein.
103. Defendant Archdiocese of Boston, by its mission to provide religious service to all Roman Catholic laity in its jurisdiction, oversaw a diverse array of programs directed at and involving children.
104. At all times material Defendant Archdiocese had a policy of disregarding allegations of sexual abuse of minors at the hands of its employee clergy. Said policy included, *inter alia*:
 - i. Ignoring reports of abuse brought by other priests, diocesan employee or volunteers, or members of the laity;
 - ii. Failing to investigate allegations brought to them by victims or their families;
 - iii. Failing to keep records of allegations of sexual abuse in the personnel file of the charged priest;

- iv. Re-assigning the offending priest to another parish or assignment with no notice of his record to those at the new parish or assignment;
 - v. Forcing victims and their families into secret agreements, settling their claims;
 - vi. Failing to search for additional victims of abusing priests
 - vii. Failing to notify or warn the laity participating in or being served by the abusing priests;
 - viii. Failing to report the abuse to officials who would prosecute the abusing priest criminally;
 - ix. Deterring victims and their families from making reports to officials who would prosecute the abusive priest criminally;
 - x. Deterring victims and their families from bringing and prosecuting civil claims against the abusing priests;
 - xi. Deterring its employees and agents from reporting incidents of abuse to appropriate civil authorities.
105. Defendant Archdiocese knew or should have known that Defendant Lane was engaging in inappropriate sexual conduct with children.
106. Despite said knowledge, and in furtherance of its policy to ignore allegations of sexual abuse by clergy, Defendant Archdiocese concealed material information from the victims, other children and their parents, and the laity of the Roman Catholic Church. In doing so, Defendant Archdiocese intentionally evaded prosecution, obstructed justice, avoided public scandal, and failed to protect the victim and future victims. Defendant Archdiocese therefore directly and/or indirectly aided and abetted Defendant Lane in engaging in sexual conduct and concealing his behavior from prosecuting authorities and the public. Further, Defendant Archdiocese obstructed victims and their families in the exercise of their rights to bring civil complaints against them.
107. This conduct by Defendant Archdiocese of deliberate indifference to the welfare of the children in its care, their families and the laity of the Roman Catholic Church violated the Plaintiff's civil rights.
108. As a direct and proximate result of the conduct of Defendant Archdiocese, Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT ARCHDIOCESE OF BOSTON in an amount to be determined and punitive damages, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT XIV
PLAINTIFF V. ARCHDIOCESE OF BOSTON
(BREACH OF FIDUCIARY DUTY)

109. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through one hundred and eight (108) as if fully set forth herein.
110. The Plaintiff, who was a minor when he was sexually assaulted and raped by Defendant Father Lane, was a vulnerable, impressionable child who was placed in the care of Defendant Father Lane at Alpha Omega by the Archdiocese.
111. Defendant Archdiocese, owed the Plaintiff a duty of care and faithfulness amounting to a fiduciary duty toward him.
112. By its conduct, Defendant Archdiocese breached its fiduciary duty owed to the Plaintiff.
113. As a direct and proximate result of Defendant Archdiocese' breach of its fiduciary duty to the Plaintiff, the Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE, Plaintiff demands judgment in his favor against DEFENDANT ARCHDIOCESE OF BOSTON in an amount to be determined, plus interest and costs, together with such other relief as this court deems just and equitable.

COUNT XV
PLAINTIFF V. ARCHDIOCESE OF BOSTON
(NEGLIGENT HIRING/SUPERVISION)

114. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through one hundred and fourteen (114) as if fully set forth herein.
115. The Archdiocese of Boston had a duty to supervise the work of Defendant Father Lane.
116. The Archdiocese of Boston negligently failed to properly supervise Defendant Father Lane in his operation of Alpha Omega.
117. The Archdiocese of Boston knew that the participants in the Alpha Omega program were children between the ages of thirteen and eighteen.

118. The Archdiocese of Boston had a duty to make sure that children involved in programs run under the auspices of the Archdiocese of Boston were not exposed to sexual abuse.
119. The Archdiocese of Boston had a duty to create a supervisory system to monitor the behavior of the priests under its supervision and control.
120. Defendant Father Lane's conduct was undertaken in the course of his employment as a priest of the Archdiocese of Boston. Defendant Father Lane told Plaintiff the inappropriate behavior was essential to the Alpha Omega program and part of its therapeutic goal of improving the plaintiff's trust of and intimacy with their fathers, mothers, and siblings. He further represented that the conduct he advocated in the program would foster the Plaintiff's ability to form and maintain intimate, trusting adult relationships.
121. By negligently failing to properly supervise Defendant Father Lane and by failure to put in place a policy for the investigation and resolution of allegations of sexual abuse by priests, the Archdiocese of Boston breached its duty to Plaintiff to properly supervise the activities of Defendant Father Lane
122. As a direct and proximate result of the Archdiocese's negligent and wrongful acts or omissions, Plaintiff has suffered and will continue to suffer severe and permanent emotional and psychological injuries, financial losses for medical care and treatment, diminution of earning capacity, loss of enjoyment of life and other damages.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT ARCHDIOCESE OF BOSTON in an amount to be determined and punitive damage, plus interest and costs, together with such other relief as this court deems just and equitable

COUNT XVI
PLAINTIFF V. ARCHDIOCESE OF BOSTON
(RESPONDENT SUPERIOR)

123. The Plaintiff repeats and re-alleges the allegations contained in paragraphs one (1) through one hundred and twenty-two (122) as if fully set forth herein.
124. At all times relevant hereto Defendant Father Lane and the priests who were superior to him were agents, servants, and/or employees of the Archdiocese of Boston.
125. By creating the Alpha Omega Program Defendant Father Lane put himself in a position to gain exclusive access to Plaintiff and to use the powers and influence of his position and status as director of Alpha Omega to sexually abuse Plaintiff

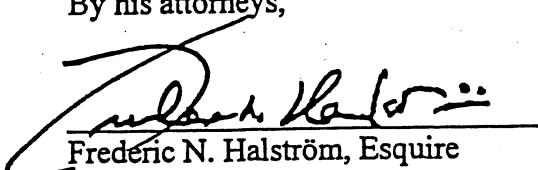
126. Defendant Father Lane represented to Plaintiff that his actions were part of the rehabilitation program designed to assist wayward youth in more appropriate social behavior.
127. As a direct result of Defendant Father Lane's negligent conduct and the negligent conduct of superior priests in the ordinary course of their employment, the Plaintiff was damaged.
128. Defendant Archdiocese by its agents, servants and employees acting under the scope of their duties/employment was reasonably on notice that a priest could exploit the power of his position and his relationship with minors as a confidant and teacher to abuse and sexually molest them.
129. Despite this knowledge, Defendant Archdiocese did nothing to monitor, or supervise its agent Defendant Lane who assignment was one specifically related to the care of minors.
130. Defendant Archdiocese of Boston is vicariously liable for the negligent and intentional actions of its agent Defendant Father Lane, and the actions of the superior priests, all acting with the scope of their duties/employment.

WHEREFORE Plaintiff demands judgment in his favor against DEFENDANT ARCHDIOCESE OF BOSTON in an amount to be determined and punitive damage, plus interest and costs, together with such other relief as this court deems just and equitable

DEMAND FOR JURY TRIAL

The Plaintiff demands a trial by jury as to all issues so triable.

Plaintiff,
By his attorneys,


Frederic N. Halström, Esquire
BBO#218420
Halström Law Offices, P.C.
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Date: May 2, 2002

ECKERT SEAMANS CHERIN & MELLOTT

May 31, 1994

PERSONAL AND CONFIDENTIAL

James McKenna, Program Director
Alpha-Omega
544 Newton Road
P.O. Box 922
Littleton, MA 01460

Re: Sexual Abuse by Father Bernard Lane and Father C. Melvin Surrette
of Alpha-Omega

Dear Mr. McKenna:

The undersigned represents [REDACTED] a former resident of Alpha-Omega in Littleton, Massachusetts. During the time that [REDACTED] was a resident at Alpha-Omega, he was repeatedly sexually abused by Father Bernard J. Lane ("Father Lane"), formerly the Director of Alpha-Omega, and Father C. Melvin Surrette ("Father Surrette"), on various occasions and in different locations, between October 1975 and the fall of 1976. He has suffered profound emotional and psychological distress in the years since the commencement of this abuse, which abuse and resulting harm forms the basis for his legal claims against Father Lane and Father Surrette, Alpha-Omega and the Archdiocese of Boston ("Archdiocese"), as the facts below will substantiate.

[REDACTED] first became associated with Father Lane in the fall of 1975, when [REDACTED] was sixteen years old. Because of difficulties at school, [REDACTED] parents recommended he participate in Alpha-Omega, a residential group treatment center founded and directed by Father Lane. This novel treatment program was financially supported, in part, by the Archdiocese. At any one time, Father Lane oversaw a community of some 18-20 adolescent boys of varying ages. Father Lane lived on-site during the entire time that [REDACTED] was a resident there.

[REDACTED] informs us that Father Lane's abuse continued during the entire period of [REDACTED] residency at Alpha-Omega. [REDACTED] states that the abuse began as part of the boys' "therapy." Father Lane, as with the other boys at Alpha-Omega, spent several weeks gaining [REDACTED]'s trust through therapy meetings and social outings, either alone or with other individuals. Although the therapy sessions appeared innocent at first, Father Lane gradually requested [REDACTED] to remove different articles of clothing during their private sessions. Eventually, Father Lane would insist on giving [REDACTED] back rubs and full-body massages, calling these massages "rushes." According to [REDACTED] Father Lane explained the massages to the boys by saying that it was necessary to do this so that Father Lane could teach the boys how to satisfy women when they eventually graduated from Alpha-Omega.

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From this point on, the nature of the abuse escalated. After a period of time, Father Lane began to concentrate these massages on [REDACTED]'s genital area; that is, [REDACTED] states that Fr. Lane would masturbate [REDACTED], and rub his erect penis against [REDACTED] body.

[REDACTED] recalls that Father Lane would climb on top of [REDACTED], place his penis against [REDACTED]'s stomach and genital areas, and begin "humping" [REDACTED] until Father Lane ejaculated. During the entire act, [REDACTED] informs us that Father Lane would whisper promises to the boy to the effect that Father Lane would not "stick [his penis] in him." Father Lane would justify these actions as therapy, claiming that the ultimate objective of such "sessions" was to teach [REDACTED] how to ejaculate simultaneously with another individual.

These abusive "sessions" occurred numerous times at Alpha-Omega, usually in Father Lane's private quarters. According to [REDACTED], Father Lane always had a few "favorites" among the young residents at Alpha-Omega, who were encouraged to sleep with Father Lane. At any given time, there was always an Alpha-Omega resident staying overnight in Father Lane's private bedroom and being subjected to this same treatment. From time to time, Father Lane also took some of the boys, either alone or in groups, to his lakeside cabin in New Hampshire. Father Lane's bedroom at this cabin was outfitted with ceiling mirrors and colored lights. [REDACTED] was abused by Father Lane on at least one occasion that he can recall during an overnight stay at this house, and he is aware of other boys being requested to sleep in Father Lane's bed with the priest. The abuse of [REDACTED] stopped when [REDACTED] "graduated" from Alpha-Omega in 1976.

Father Surrette was a friend of Father Lane and a part-time counsellor at Alpha-Omega. [REDACTED] alleges that Fr. Surrette invited [REDACTED] to his parish residence at a church in Cambridge, Massachusetts, and asked [REDACTED] to remove his shirt and lie on the floor. [REDACTED] states that Father Surrette proceeded to rub [REDACTED] back and buttocks, and then Father Surrette tried to get [REDACTED] to remove his pants. [REDACTED] refused. Father Surrette often invited young boys out for a sail on his 30-foot sailboat, out of Marblehead. On one occasion in particular, Father Surrette invited [REDACTED] out for a sail. [REDACTED] remembers that Fr. Surrette encouraged [REDACTED] to remove his clothing, and then Father Surrette removed his own. Father Surrette held [REDACTED] close to him, requesting that his young counselee sit naked between Father Surrette's legs while the priest operated the rudder. [REDACTED] asserts that Father Surrette would stare at [REDACTED] and take pictures of [REDACTED] while [REDACTED] was nude, steering the sailboat.

According to [REDACTED] there is substantial evidence to support the claim that the Director of Alpha-Omega, Father Lane, conspired with Father Surrette to sexually abuse the young boys at Alpha-Omega, or at least knew that each other was sexually abusing youths in their care. For example, [REDACTED] states that Father Surrette employed the

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same methods for gaining the trust and confidence of Alpha-Omega residents, and Father Surrette invariably cultivated this "trust" with most of the same youths who Father Lane particularly favored and was able to sexually abuse. In addition, Father Surrette's abusive actions followed the same progression as Father Lane's; namely, Fr. Surrette began by having youths partially undress, and then gave them "rushes," all under the guise of therapy and mentoring. This escalated to "humping", masturbating the youths, and possibly oral sex. Father Lane and Father Surrette also both used the same pseudo-therapeutic "language" with regard to their sexual activities, to convince the youths that what they were engaging in was part of a process of "getting close" to other males. Their abusive behavior began in similar contexts wherein a counselling relationship was fostered and encouraged, with troubled youths looking to the two priests for moral and spiritual guidance in their lives. In the case of both Father Lane and Father Surrette, this client-therapist relationship and context was methodically expanded to include various forms of outright sexual molestation, all the while presenting itself as mentoring and therapy. Finally, on at least one occasion, ██████████ recalls Father Surrette sexually abusing him in one bed in Father Lane's bedroom while Father Lane was simultaneously abusing another youth in an adjoining bed. In addition, only Father Lane could give permission for Alpha-Omega residents to go sailing with Father Surrette. All of this points directly to a collusive relationship between Father Lane and Father Surrette with regard to the sexual abuse of youths in their care.

Shortly after ██████████ left the Alpha-Omega program, he heard that Father Lane was accused by one youth of sexual abuse. This youth was apparently a recent referral from the Massachusetts Department of Youth Services ("DYS"). According to some of ██████████ friends who had remained at Alpha-Omega, Father Lane had escalated his sexual acts quickly with the new arrival, and the boy had reported the sexual abuse to his DYS caseworker. In response, Father Lane was suddenly removed from Alpha-Omega. This office has also learned that the Archdiocese received a complaint in or about 1978 regarding sexual abuse by Father Lane. The person who succeeded Father Lane as director at Alpha-Omega, Joseph O'Malley, in reporting to ██████████ about Father Lane's removal, stated that Father Lane was removed because "you know how Bernie [Father Lane] is -- what he does...."

██████████ claims that a great number of the residents at Alpha-Omega were similarly subjected to Father Lane's and Father Surrette's sexually abusive "therapies." He describes how Father Lane often spent weeks attempting to gain a young resident's trust, even going so far as to declare to many of them that he was the boys' true "father-figure." ██████████ estimates that nearly all of those residents who went on to become resident counselors at Alpha-Omega had been put through Father Lane's peculiar form of therapy: He has provided this office with a partial list of more than ten young men who he knows for certain were sexually abused by Father Lane and/or Father Surrette while enrolled at Alpha-Omega, and ██████████ has expressed a willingness to contact these individuals in the coming days.

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In the years since [REDACTED] left Alpha-Omega, his life has been fraught with severe problems. Though he returned to high school and reached the Honor Roll, [REDACTED] started to deeply distrust authority, and to direct his anger particularly at Catholic Clerics. He attended Assumption College, but grew to distrust the motives of the priests, who were his teachers. He considered them all to be hypocrites. He dropped out of college without gaining his degree. Though brought up in a Catholic family, he grew to detest the idea of going to Mass, and "gets sick" when he has to go into a church for a wedding or funeral; he refused to be married in a church. [REDACTED] compares his educational experiences with his siblings, all of whom finished college and three of whom went on to receive Masters degrees, and were able to retain their Catholic faith, while he lost both the benefits of higher education and his parents' faith). He has had an extremely bad substance abuse problem since he left Alpha-Omega, including drugs and alcohol, and by his own admission the years since then have been one long attempt to "numb" himself against any memory of the pain, the guilt and shame inflicted on him by Father Lane's and Father Surrette's predatory and deceptive sexual abuse. He has also engaged in highly abusive relationships since leaving Alpha-Omega, and his first marriage ended in divorce.

In addition, since taking part in Alpha-Omega, [REDACTED] has had deep problems with his sexual identify, and this is causally tied to the trauma of this abuse. Though his own parents were happily married, after leaving Alpha-Omega, [REDACTED] began to question his own father's sexuality, and wondered if someday his father too would insist on lying naked with him. Because of this extreme reaction, [REDACTED] avoided his father as much as possible, and only recently has been able to trust that his father does not have the same motives as the priests who mentored him at Alpha-Omega. In general, however, he has continued to have an extremely profound struggle trusting other people's motives, especially men. His long bout with substance abuse, brought on by his stated need to "numb" himself against the extreme shame and guilt of these actions, has caused him employment problems, and even cost him several promising jobs outright. In addition, the fact that my client was abused in the context of a therapy relationship has made it impossible for him to obtain the therapy which he needs at the present time. Stated simply, it is impossible for [REDACTED] to trust any therapist at this time since he was exploited in his therapy by Father Lane.

In or about June, 1992, [REDACTED] made the connection between his psychological difficulties and the sexual abuse by Fathers Lane and Surrette.

If [REDACTED] estimates are accurate -- and we have every reason to believe they are -- then Father Lane's and Father Surrette's sexually abusive actions have touched the lives of an enormous number of Massachusetts' youth. It is shocking, too, that despite being cited for sexual abuse as far back as 1978, Father Lane was, until recently, in charge of

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a local church, Our Lady of Grace, which is connected to a grammar school, and was only removed from this assignment when [REDACTED] first brought these charges to the attention of the Archdiocese, in July of 1993. Our client is deeply anguished by the prospect that Father Lane was allowed to have continued unrestricted access to youth in the years since he left Alpha-Omega, even though the Archdiocese and Alpha-Omega was alerted to Father Lane's ephebophilic activities as long as fifteen years ago.

Additionally, Father Surrette has been, until fairly recently, Director of Life Resources, Inc., a social service agency linked to the Archdiocese under the auspices of the Drug Commission of the Archdiocese. Life Resources "sponsors" and supports Alpha-Omega as one of its programs. [REDACTED] is profoundly anguished that Father Surrette, through his affiliation with Alpha-Omega (by virtue of his directorship of Life Resources) had continued to have unrestricted access to youth, especially troubled youth, who [REDACTED] knows from personal experience have a very great tendency to look up to and trust the clerical role models who run these treatment programs. Father Surrette's predator-like abuse of his priestly office at least during the years that [REDACTED] was a resident of Alpha-Omega, gives reasonable grounds to believe that Father Surrette may have been continuing his abusive sexual activities up to quite recently. All of the clinical and pastoral literature dealing with the treatment of known pedophiles and ephebophiles indicates that these are in no way entirely "curable" or treatable conditions. Alpha Omega knew or should have known that Fathers Lane and Surrette were sexually assaulting [REDACTED] and scores of other youths in the program. Alpha Omega failed to properly investigate, train and supervise Fathers Lane and Surrette.

[REDACTED] has retained this office to represent him with respect to his claims against Father Lane, Father Surrette, Alpha-Omega, its employees and the Archdiocese. The abuse perpetrated upon [REDACTED] was an open secret. According to [REDACTED], it was common knowledge among employees at Alpha-Omega that Father Lane had sexual relations with children, even before the DYS allegations referenced above. In particular, I would refer you to a former employee at Alpha-Omega, Joseph O'Malley, and a former psychologist with Alpha-Omega, Cornelius Coco.

In light of the severity of [REDACTED] injuries, as well as the blatant behavior of Father Lane and Father Surrette, the conspiratorial nature with which they carried on their abusive activities and the negligence of Alpha Omega, my client hereby makes demand upon Father Lane, Father Surrette, Alpha-Omega, its employees, and the Archdiocese in the amount of \$500,000.00.

I have enclosed a Tolling Agreement which I request that you execute.

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If you have not already done so, I urge you to retain legal counsel and have them contact me as soon as possible.

Very truly yours,

Roderick MacLeish, Jr.

MPS/bba

[REDACTED]

Enclosures

20206

PERSONAL AND CONFIDENTIAL REPORT

Rev. Bernard Lane

July 31, 1993

Allegation:

On July 31, 1993 [REDACTED] who is presently thirty-four years of age made the following allegation about Fr. Lane:

When at age fifteen he was a resident at the Alpha-Omega House in Littleton. He was sexually abused by Father Lane. He described the circumstances as such:

Father Lane was heavy into one-on-one counseling. In order to teach [REDACTED] how to relax, love his own body, and learn intimacy, he would have him lie down on the floor of the office, remove pieces of clothing such as his shirt and progressively over a period of time, all his clothing. He would invite [REDACTED] to lay naked in bed with him when he was naked.

He would then at times massage [REDACTED] rush him, try to masturbate him and teach him how to feel orgasm. They would talk about oral and anal sex, but he would not do it. He reported that this happened about twenty times within one year. It is not clear how often the actual massaging, etc. took place.

[REDACTED] thinks that some of the other counselors might have done things like this to other boys. He thinks Father Lane might have done it to other boys. He gave the names of other boys who lived at Alpha-Omega to Attorney MacLeish.

He described Father Lane as one who had a charismatic approach to boys. He held a sway over them and they wanted to be liked by him.

He reported Father Lane as bringing some boys to his house in New Hampshire.

He wanted to know what we are going to do with him and to make sure that he is not in touch with children.

The following is a summary of the response made by Fr. Lane regarding these matter on August 6, 1993:

1. Therapy which all the counselors used was based on Bethel Training Program which emphasized being more comfortable with the body.

However, there were no doors to the rooms.

He never engaged in massage or masturbation of the boys.

The boys were street boys and generally did not have underwear at night or pajamas or bathing suits for swimming.

Fr. Lane recognizes now that this was not a good professional or common sense approach.

Fr. Lane had not been involved with boys since leaving Alpha-Omega House.

2. Fr. Lane wants to diffuse situation:

resignation probably for poor health
assessment

placement in ministry where there are no minors.

3. In recent conversation with Fr. Lane, he further clarified his response particularly in regard to Alpha-Omega House.

He describes Alpha-Omega as a place for street kids. It was a ministry that he began when he was a high school chaplain. This street ministry eventually developed into a residential program. Those who were residents were street kids who were often given a last chance before going to jail. There were about sixteen boys in residence at any one time.

The therapy that was used at Alpha-Omega was reflective of the times. They included Primal Scream, psycho-motor, and Gestalt therapies. He also describes common use of a program learned at Bethel Maine which stressed sensitivity to the body. This was meant to teach kids respect for the body. Nudity was seen as natural and massage was also used.

Much of the therapy used then seems very different from today's viewpoint. He describes nudity as being presented as nothing to be ashamed about. He describes Alpha-Omega as a confrontational community. The boys always felt free to go to see him or other residential counselors at night. Thus, the boys would sometimes be in the same bed, very often naked.

Much of the therapy was geared to the background of the boys. Many had been used sexually on the streets. At

Alpha-Omega it was stressed that you can have intimacy without having sex.

He describes therapy there as body to body, person to person. There was nudity. It wasn't done in any sexual way. Rather, it was explicitly stated that 'I will not be anal or oral with you'.

He did bring boys to his home in New Hampshire, but only in groups of three. They were supervised. At one time he recalls having to bring all the residents there for several weeks because of a fire at the residence.

Fr. Lane feels that [REDACTED] is twisting this approach to fit his allegation.