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24. In the summer of 1985, Plaintiff [REDACTED] was informed he was to report to Saint Bernard's Church Rectory in Keene, New Hampshire for his reconfirmation counseling session with Father Gordon MacRae.

25. When Plaintiff [REDACTED] arrived for this session, he was led upstairs by Defendant Gordon MacRae. There Defendant Gordon MacRae again supplied Plaintiff [REDACTED] with alcohol, which Plaintiff [REDACTED] did consume.

26. While Plaintiff [REDACTED] was under the intoxicating influence of the alcohol, Defendant Gordon MacRae undressed Plaintiff [REDACTED] and performed fellatio on Plaintiff [REDACTED]  
[REDACTED]

27. Defendant Gordon MacRae then left the room. A short time later, another person entered the room and also performed fellatio on Plaintiff [REDACTED]. Afterwards this person left and Defendant MacRae returned to the room. Defendant MacRae then attempted to perform anal intercourse on the person of Plaintiff [REDACTED]. However, he was unsuccessful in this attempt.

28. During the period of time of 1985 through 1987, Defendant MacRae solicited [REDACTED] for continued sexual activity as well as for the purpose of prostitution.

29. Plaintiff [REDACTED] was particularly vulnerable to inappropriate sexual advances, as he was a minor at the time of the incidents alleged in this Writ.

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30. During all sexual acts Defendant Gordon MacRae told Plaintiff ██████████ that they were doing nothing wrong because of their close relationship. At all times during such acts Plaintiff ██████████ was confused and conflicted because of the position of Defendant MacRae as a Roman Catholic Priest. It was not until counselling in 1993 that Plaintiff ██████████ realized that such acts were wrong and has caused him severe emotional, psychological and sexual harm.

31. At all times during this time period Defendant MacRae abused his influence and authority over the then minor ██████████.

32. Gordon MacRae's conduct, as described above, was malicious and wanton under the law of New Hampshire.

33. Roman Catholic Bishop of Manchester, Inc., was reckless and/or negligent under the law of New Hampshire.

34. The allegations set forth above apply to each and every one of the counts and causes of action set forth below.

COUNT IBATTERY

35. At all times pertinent to this writ, Defendant MacRae had a duty to Plaintiff ██████████ to refrain from engaging in intentional unpermitted sexual contact.

36. From approximately 1979 through 1987, Defendant MacRae did engage in repeated ,intentional, unpermitted sexual

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contact with Plaintiff ██████████ which was offensive to Plaintiff ██████████ in that he disrobed Plaintiff ██████████ without his consent and performed fellatio on the body of Plaintiff ██████████ without his consent.

37. Such contact was harmful to Plaintiff ██████████ in that it caused him to suffer from fear, humiliation and shame.

38. Such contact was not consented to by Plaintiff ██████████ or otherwise privileged.

39. As a proximate cause of Defendant MacRae's intentional, unpermitted sexual contact with Plaintiff ██████████ Plaintiff ██████████ was caused to suffer severe sexual, psychological and emotional damage and will continue to suffer such damage in the future in an amount within the jurisdictional limits of the court.

40. Defendant MacRae is therefore liable to the Plaintiff for the intentional tort of battery.

COUNT II

ASSAULT

41. At all times pertinent to this Writ, Defendant MacRae had a duty to Plaintiff ██████████ to refrain from threatening Plaintiff ██████████ with intentional, unpermitted and offensive contact.

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42. At all times material to this Writ, Plaintiff [REDACTED] was in apprehension of Defendant MacRae's immediate harmful and offensive physical contact with him.

43. This threatened action was not consented to by Plaintiff [REDACTED] or otherwise privileged.

44. As a proximate cause of Father MacRae's threat of intentional, unpermitted contact with Plaintiff [REDACTED] Plaintiff [REDACTED] was caused to suffer severe sexual, psychological and emotional damage and will continue to suffer such damage in the future in an amount within the jurisdictional limits of the court.

45. Defendant MacRae is therefore liable to the Plaintiff for the intentional tort of assault.

COUNT IIIINVASION OF PRIVACY

46. At all times material to this Writ, Defendant MacRae had a duty to respect the privacy rights of Plaintiff [REDACTED]

47. Plaintiff [REDACTED] enjoys the right to be free from intrusion on his physical and mental solitude, as well as his sexual organs.

48. From approximately 1979 through 1987, on at least twenty different occasions, Defendant MacRae intruded on Plaintiff [REDACTED] right to solitude in a manner that would be considered objectionable to a reasonable person, namely that

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of disrobing Plaintiff ██████████ wholly without his permission and then performing fellatio on his person.

49. As a proximate cause of Defendant MacRae's invasion of Plaintiff ██████████ right to physical and mental solitude, Plaintiff ██████████ was caused to suffer severe sexual, psychological and emotional damage and will continue to suffer such damage in the future.

50. Defendant MacRae is therefore liable to the Plaintiff for the tort of invasion of privacy.

COUNT IVBREACH OF STATUTORY DUTYENDANGERING THE WELFARE OF A CHILD

51. At all times material to this Writ, Defendant MacRae had a duty to obey the laws of the State of New Hampshire, including RSA 639:3 (Endangering the Welfare of a Child), in his relationship with Plaintiff ██████████

52. Defendant MacRae breached his statutory and common law duties to Plaintiff ██████████ by deliberately providing alcohol, engaging in sexual contact with the Plaintiff, soliciting the Plaintiff for prostitution and otherwise violating RSA 639:3 and engaging in harmful and unlawful offensive and unpermitted physical contact with the Plaintiff.

53. As a proximate cause of Defendant MacRae's breach of said duty, the Plaintiff was caused to suffer severe sexual, psychological and emotional damage and will continue to suffer

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such damage in the future in an amount within the jurisdictional limits of the court.

54. Defendant MacRae is therefore liable to Plaintiff [REDACTED] for this breach of his statutory duty.

COUNT VBREACH OF STATUTORY DUTYPROVIDING ALCOHOL TO A MINOR

55. At all times material to this Writ, Defendant MacRae had a duty to obey the laws of the State of New Hampshire, including RSA 179:5 (Prohibited Sales of an Alcoholic Beverage), in his relationship with Plaintiff [REDACTED]

56. Defendant MacRae breached his statutory and common law duties to the Plaintiff by deliberately providing alcohol to the Plaintiff, who was a minor at all times material to this complaint.

57. As a proximate cause of Defendant MacRae's breach of said duty, the Plaintiff was caused to suffer severe sexual psychological and emotional damage and will continue to suffer such damage in the future in an amount within the jurisdictional limits of the court.

58. Defendant MacRae is therefore liable to Plaintiff [REDACTED] for this breach of his statutory duty.

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COUNT VIBREACH OF STATUTORY DUTYAGGRAVATED FELONIOUS SEXUAL ASSAULTRSA 632-A:2 (I) (b) - INABILITY TO RESIST

59. At all times material to this complaint, Defendant MacRae had a duty to obey the laws of the State of New Hampshire, including RSA 632-A:2 (I) (b) (Aggravated Felonious Sexual Assault When Victim is Unable to Resist), in his relationship with Plaintiff [REDACTED]

60. Defendant MacRae breached his statutory and common law duties to the Plaintiff by disrobing and performing fellatio on the body of Plaintiff [REDACTED] after he had plied Plaintiff [REDACTED] full of alcohol to the point that Plaintiff [REDACTED] was unable to resist.

61. As a proximate cause of Defendant MacRae's breach of said duty, the Plaintiff was caused to suffer severe sexual psychological and emotional damage and will continue to suffer such damage in the future in an amount within the jurisdictional limits of the court.

62. Defendant MacRae is therefore liable to Plaintiff [REDACTED] for this breach of his statutory duty.