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CASE #: 23-2-04489-4 SEA

9 SUPERIOR COURT OF THE STATE OF WASHINGTON
10 FOR KING COUNTY

11 [REDACTED] an individual;
12 [REDACTED], an individual,

13 Plaintiffs,

14 vs.

15 ST. LOUISE PARISH, CORPORATION
16 OF THE CATHOLIC ARCHBISHOP OF
17 SEATTLE, a sole corporation; JANE and
18 JOHN DOES 1-5,

19 Defendants.

No.

**COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER
DAMAGES**

Demand for Jury Trial

20 COMES NOW Plaintiffs, by and through their attorneys Darrell L. Cochran and Patrick
21 A. Brown of Pfau Cochran Vertetis Amala PLLC, and bring a cause of action against
22 Defendants and allege the following:

23 **I. INTRODUCTION**

24 1. Nature of Case. This is an action for childhood sexual abuse, negligence, and
25 other damages against Defendants St. Louise Parish and Corporation of the Catholic
26 Archbishop of Seattle (“Seattle Archdiocese”) (collectively “Defendant Seattle Archdiocese”),
which employed a dysfunctional alcoholic and sexual predator, Father Howard D. Lavelle
 (“Father Lavelle”), from approximately 1960 to 1976. At all times material, Plaintiff [REDACTED]

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES

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1 [REDACTED] was a boy who attended St. Louise Parish in Bellevue, Washington, as both a
2 parishioner and as a student. St. Louise Parish is one of 73 schools owned and operated by
3 Seattle Archdiocese. Defendant Seattle Archdiocese knew or should have known that it
4 employed a sexual predator who posed a threat to young male parishioners and students,
5 including [REDACTED]. Seattle Archdiocese also knew or should have known that the risk
6 of sexual abuse of young male parishioners and students was significant and measures were
7 needed to protect them. Despite this knowledge, Seattle Archdiocese allowed Father Lavelle to
8 have continuous and unfettered access to [REDACTED] when he was very young, and
9 unsurprisingly, he repeatedly sexually abused him on school grounds from the age of 9 years
10 old to 11 years old. The abuse and resultant damages were the result of Seattle Archdiocese's
11 failure to supervise or control Father Lavelle and to otherwise protect Plaintiff from the priest's
12 sexual predatory behavior.

13 2. The Seattle Archdiocese compounded the damages by concealing its knowledge
14 that Father Lavelle was a "credibly accused" priest, even in the wake of receiving multiple
15 reports of Lavelle's sexually abusive conduct in the early 2000s. The intentional act of
16 concealment and institutional neglect of its abused parishioners and students outrageously
17 exacerbated damages.

18 3. Plaintiff [REDACTED] brings a loss of consortium claim for the loss of love
19 and affection from her husband, [REDACTED]

20 II. PARTIES

21 2. [REDACTED] At all times material, [REDACTED] was an
22 adolescent male student at St. Louise Parish when he was sexually abused by Father Howard
23 A. Lavelle, a St. Louise Parish employee, during the time period 1963-1965. [REDACTED]
24 currently resides in Florida with his wife [REDACTED]

1 11. Through his duties at the school, Father Lavelle had learned that his position as
2 priest and supervisor of students allowed him to have unfettered access to information about
3 children in the school community. Having taken confession and knowing the history of the
4 children of St. Louise Parish, Father Lavelle was able to identify the most vulnerable children
5 who had troubled home lives. It was these children that he intentionally targeted and separated
6 from the flock. From there, Father Lavelle abused his power and authority as a priest and
7 supervisor at St. Louise Parish by physically isolating children from others in order to satisfy
8 his sexually deviant appetite.

9 12. In approximately 1963, Father Lavelle identified one such student, [REDACTED]
10 [REDACTED] whose sister had recently passed away and who was having difficulty coping with
11 the loss. Father Lavelle seized the opportunity and summoned [REDACTED] to his home to
12 punish him for allegedly having broken a rule in school. Father Lavelle ordered [REDACTED]
13 [REDACTED] to come to his home on campus where he was met by a nun and a room full of other
14 boys also waiting to be seen by Father Lavelle. The nun instructed [REDACTED] to go
15 upstairs to Father Lavelle's bedroom where Father Lavelle waited for him naked in his bed.
16 When [REDACTED] entered the bedroom, Father Lavelle got out of bed, exposed his penis,
17 forced [REDACTED] to undress, spanked him, and sexually abused him. This was the first
18 of many instances where Father Lavelle sexually abused the boy, [REDACTED] Father
19 Lavelle repeatedly sexually abused [REDACTED] approximately from 1963 to 1965, as well
20 as many other boys during these periods, and for many years afterwards.

21 13. The Seattle Archdiocese knew, or should have known, of Father Lavelle's
22 dangerously dysfunctional and sexually deviant behavior with child parishioners and students.
23 Father Lavelle actively targeted 9-year-old [REDACTED] by seeking him out, bringing him
24 to his home, and sexually abusing him.

1 14. [REDACTED] harm was foreseeable and preventable had Seattle
2 Archdiocese acted on Father Lavelle's red flags of grooming behavior, identifying vulnerable
3 children, and summoning them to his home under the guise of punishment. Father Lavelle
4 ordering children be sent to his home, children such as [REDACTED], and further, employees
5 of the school instructing children to go into his bedroom in his home on campus, should have
6 resulted in immediate action, especially given the inappropriate behavior and poor judgment
7 Father Lavelle admitted to in the past. Instead, Seattle Archdiocese and its employees willfully
8 turned a blind eye toward Father Lavelle's obvious grooming behavior and subsequent sexual
9 misconduct in his home and endangered [REDACTED] by ignoring the signs of a dangerous
10 sexual predator.

11 15. Father Lavelle exhibited red flags for decades. He was a dysfunctional alcoholic
12 and a dangerous sexual predator, who was shipped around within the Seattle Archdiocese's
13 organization. Despite Father Lavelle's history of dangerous and concerning behavior, the
14 Seattle Archdiocese took no action to protect parishioners and school children from him.
15 Instead, the Seattle Archdiocese actively endangered vulnerable parishioners and school
16 children by placing them in Father Lavelle's care and supervision.

17 16. Even after Father Lavelle died, the Seattle Archdiocese concealed that he was a
18 "credibly accused" priest. In 2005, the Seattle Archdiocese received multiple reports of Father
19 Lavelle sexually abusing parishioners and young schoolboys at St. Louise Parish. Despite
20 receiving credible accusations of Father Lavelle sexually abusing young boys, the Seattle
21 Archdiocese covered up his dangerous sexual behavior by excluding his name from the
22 "credibly accused" priests list.

23 17. As the proximate result of Defendants' negligence, Plaintiff [REDACTED]
24 suffered, and continues to suffer from, mental anguish and severe emotional distress. [REDACTED]
25 [REDACTED] losses include both economic and noneconomic, both past and future.

1 breaches in its duties owed proximately caused the sexual abuse and sexual exploitation of
2 Plaintiff and resultant damages for which Defendants are liable.

3
4 **COUNT III**
5 **LOSS OF CONSORTIUM**
6 **(Washington Common Law)**

7 19. Loss of Consortium. Based on the paragraphs set forth and alleged above,
8 Defendants had a duty of care, and having breached this duty, Defendants are liable for damages
9 proximately caused as a result, including the loss of love, affection, care, services,
10 companionship, society, and companionship between and/or among Plaintiffs.

11 **COUNT IV**
12 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
13 **(Washington Common Law)**

14 20. Negligent Infliction of Emotional Distress. Based on the paragraphs set forth
15 and alleged above, Defendants' conduct constituted negligent infliction of emotional distress,
16 and Defendants are liable for damages proximately caused as a result.

17 **COUNT V**
18 **OUTRAGE**
19 **(Washington Common Law)**

20 21. Outrage. Based on the paragraphs set forth and alleged above, Defendants
21 intentionally and/or recklessly caused severe emotional distress to Plaintiff due to its extreme
22 and outrageous conduct, as more fully described above, that went beyond all possible bounds
23 of decency and can only be regarded as atrocious and utterly intolerable in a civilized
24 community, constituting the tort of outrage for which Defendants are now liable.

25 **V. RESERVATION OF RIGHTS**

26 22. Reservation of Rights. Plaintiffs reserve the right to assert additional claims as
may be appropriate following further investigation and discovery.

1 **VI. JURY DEMAND**

2 24. Jury Demand. Plaintiffs demand that this action be tried before a jury.

3 **VII. PRAYER FOR RELIEF**

4 25. Relief. Plaintiffs respectfully request the following relief:

- 5 A. That the Court award Plaintiffs appropriate relief, to include all special
- 6 and general damages established at trial;
- 7 B. That the Court award costs, reasonable attorneys’ fees, and statutory
- 8 interest under any applicable law;
- 9 C. That the Court award pre-judgment interest on items of special
- 10 damages;
- 11 D. That the Court award post-judgment interest;
- 12 E. That the Court award Plaintiffs such other, favorable relief as may be
- 13 available and appropriate under law or at equity;
- 14 F. That the Court hold Defendants jointly and severely liable; and
- 15 G. That the Court enter such other and further relief as the Court may deem
- 16 just and proper.

17
18 SIGNED this 13th day of March, 2023.

19
20 PFAU COCHRAN VERTETIS AMALA PLLC

21 By: /s/ Darrell L. Cochran
22 Darrell L. Cochran, WSBA No. 22851
23 Patrick A. Brown, WSBA No. 56627
24 Attorneys for Plaintiff