

DOUGLAS BIENVENU,
JOHN DOE 1, JOHN DOE 2,
JOHN DOE 3, JOHN DOE 4,
JOHN DOE 5, JOHN DOE 6,
JOHN DOE 7, JOHN DOE 8,
JOHN DOE 9, and JOHN DOE 10

: 16th JUDICIAL DISTRICT COURT

VS., DOCKET NO. 87184-D : PARISH OF ST. MARTIN

SOCIETY OF THE ROMAN
CATHOLIC CHURCH OF THE
DIOCESE OF LAFAYETTE and
SAINT MARTIN DE TOURS
CATHOLIC CHURCH

: STATE OF LOUISIANA

ORIGINAL PETITION FOR DAMAGES

THIS IS THE JOINT PETITION of DOUGLAS BIENVENU, JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, and JOHN DOE 10, individuals suing for acts that occurred in St. Martin Parish, Louisiana, who seek damages for the following reasons:

1.

Made defendant herein is **SOCIETY OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF LAFAYETTE, INC.**, a Louisiana religious corporation with its principal place of business in Lafayette, Louisiana.

2.

Made defendant herein is **SAINT MARTIN DE TOURS CATHOLIC CHURCH**, with its place of domicile in Parish of Saint Martin, Louisiana.

3.

Saint Martin de Tours Church is one of the oldest Catholic churches in America and the third oldest in the state of Louisiana. It was founded in 1765 by a group of Acadian exiles who were driven from Canada by the English. The current church structure was built in 1836. Two other buildings on the church square include the two

story parish hall and the rectory, where much of the abuse inflicted by Father Morvant occurred. Over the years, the church has become a place where countless faithful have encountered god. Unfortunately, it has also been the scene of the tragedy that occurred to the young minors in this lawsuit who had the power of their faith perverted in a disgusting manner.

4.

Beginning in 1971 and continuing until at least 1979, Plaintiffs were all victims of sexual molestation at the hands of Father Kenneth Morvant. The abuse that Morvant inflicted on all of the minors was consistent in its use of both alcohol and the power of God to prey on minors who attended and were altar boys at the St. Martin de Tours Catholic Church.

5.

The abuse inflicted by Morvant caused emotional damage and pain, which continues to this date, and is tortious conduct that is ongoing in nature. All of the Plaintiffs developed dissociative amnesia following the abuse and repressed the incidents. Following recovery of the memories of sexual abuse inflicted by their priest, Plaintiffs timely commenced suit against the Defendants in the Superior Court of the District of Columbia. That lawsuit, Case No. 17-000927, *John Doe 1, et al. v. United States Conference of Catholic Bishops*, was served on the Defendants herein, who appeared in, and ultimately had the claims dismissed for lack of personal jurisdiction. Pursuant to Article 3462 of the Louisiana Civil Code, prescription was interrupted for the two defendants sued herein as a result of the filing of Case No. 18-000927.

6.

From 1971 to 1973, Douglas Bienvenu was molested repeatedly by Father Kenneth Morvant. During the time when this Plaintiff was only 8 to 9.5 years old, Morvant plied him with alcohol and sexually molested him on at least 15 separate occasions. The acts

inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

7.

John Doe 1 was 12 years old when he was molested by Morvant in 1976. On at least three occasions this Plaintiff was invited to spend the night at the rectory with Father Morvant. He was plied with alcohol on each of these nights before passing out. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

8.

John Doe 2 was sexually molested by Morvant while attending sleepovers at the rectory and church during the years 1972-1973. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, oral sex performed by Morvant on the Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

9.

John Doe 3 was molested by Morvant over a four year period between his 8th grade year and Junior year of high school. The first time Father Morvant met John Doe

3, Morvant told him: "God put me here to serve people; God put you here to serve me."

The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, oral sex performed by Morvant on the Plaintiff, masturbation by Morvant, placing Plaintiff's hand on Morvant's genitals, and sodomization of the Plaintiff. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

10.

John Doe 4 sang in choir at St. Martin de Tours Catholic Church at age 14. John Doe 4 endured molestation in or about 1978-1979. Morvant used to try and corner him after choir practice to perform further physical assaults. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing, physical touching of Plaintiff, oral sex performed by Morvant on the Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

11.

The molestation of John Doe 5 occurred one night following a youth dance. Morvant invited the Plaintiff and his younger brother to spend the night. Morvant provided alcohol to the youths, and then molested John Doe 5. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

12.

In 1977, after his confirmation ceremony, John Doe 6 was provided alcohol by Morvant. Once Plaintiff was inebriated, Morvant climbed into bed and assaulted him. A few months later, following a street fair, Morvant abused him for a second time. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

13.

John Doe 7 was 14 when Father Morvant provided him with tickets to purchase beer at the church bazaar. Later that night he was molested by Morvant at the rectory. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

14.

John Doe 8 was molested on multiple occasions by Father Morvant when he stayed at the rectory. Over a two-year period, John Doe 8 was molested approximately two times per month by Morvant. Like many of the others, Morvant provided him with alcohol prior to the molestation. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, oral sex performed by Morvant on the Plaintiff, masturbation by Morvant, placing Plaintiff's hand on Morvant's genitals, and sodomization of the

Plaintiff. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

15.

In 1974 John Doe 9 was abused by Morvant at the church rectory. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

16.

In 1974 John Doe 10 was abused by Morvant at the church rectory. The acts inflicted on Plaintiff by Father Morvant included the following: removing Plaintiff's clothing while asleep or drunk, physical touching of Plaintiff, oral sex performed by Morvant on the Plaintiff, and masturbation by Morvant. Plaintiff was so traumatized by the abuse that occurred that he developed dissociative amnesia to repress the incidents. Father Morvant's acts inflicted emotional damage and pain that is ongoing in nature and impacts Plaintiff every single day.

17.

Beginning in 1971, the Diocese of Lafayette and St. Martin de Tours Church exposed Plaintiffs to sexual abuse inflicted by their parish priest, Kenneth Morvant. The Defendants had a duty to (a) hire, supervise and retain competent, fit, and otherwise competent priests for St. Martin de Tours Catholic Church and to make sure that children who attended the church were safe and not exposed to sexual abuse and molestation; and (b) fully investigate all priests to ensure they were not committing sexual abuse on minors.

18.

These Defendants breached their duties, by, among other things, the following acts of omissions: (a) hiring Father Morvant to work in a position where he was interacting with individuals, including minors; (b) failing to supervise Father Morvant so that he would not pose an unreasonable risk of harm to the parishioners; (c) failing to investigate Father Morvant to ensure he was not committing sexual abuse on minor parishioners; (d) providing Father Morvant with unfettered access to children; and (e) failing to take prompt remedial action by notifying parishioners that their children had been exposed to a known or suspected pedophile so that, among other things, the victims of Father Morvant could receive mental health treatment to prevent any further harm to themselves.

19.

As a direct and proximate result of the Defendants' wrongful acts or omissions, Plaintiffs have suffered damages which are ongoing in nature.

20.

At all times relevant to this action, the Defendants had a duty to provide reasonably safe premises for its parishioners. At all times relevant to this action, the Defendants knew or should have known that Father Morvant's conduct would subject minors to an unreasonable risk of harm on their property. The Defendants breached their duty by, among other things, the following acts or omissions: (a) failing to warn the minor Plaintiffs, who were entrusted to the care and attention of the Defendants and Father Morvant, on premises owned and operated by the Defendants, that they would be subject to an unreasonable risk of harm on their premises; (b) failing to inform parishioners, specifically the Plaintiffs, that they had been exposed to a known or suspected pedophile; (c) failing to take prompt remedial action, including notification to

parishioners so that victims of Father Morvant could receive mental health treatment to prevent any further and/or ongoing harm to themselves and their families.

21.

The Defendants knew or should have known of Father Morvant's deviant behavior toward children and recklessly and/or intentionally allowed Father Morvant to remain a parish priest where he had unfettered access to children. Defendants' conduct was extreme and outrageous, beyond all possible bounds of decency, and utterly intolerable in a civilized community. Defendants' conduct directly and proximately caused Plaintiffs' extreme emotional distress of a nature that no reasonable man could be expected to endure. This emotional distress is ongoing in nature and continues to this date. The Plaintiffs suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

22.

At all times relevant to this action, the Defendants fostered and encouraged the relationship between priest and parishioner. The Plaintiffs, who were minors when they were sexually abused by Father Morvant, reposed trust and confidence in the Defendants, to whom Father Morvant reported. The Defendants, as fiduciaries to the parishioners and to children entrusted to the care and attention of priests acting on behalf of them, owed the Plaintiffs a duty of trust and loyalty. The Defendants breached their fiduciary duty owed to the Plaintiffs and abused its position of trust and confidence. As a direct and proximate result of the Defendants' breach of fiduciary duty, the Plaintiffs have been damaged.

23.

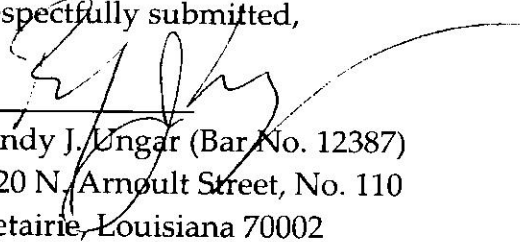
The Defendants' acts and/or omissions rose to the level of gross negligence and warrant the imposition of exemplary damages. The Defendants consciously ignored their legal, moral and religious duty to protect the minor children who were serving as altar boys at the St. Martin de Tours Catholic Church which proximately caused Plaintiffs damages. While reports of sexual abuse of minors both in the Diocese of Lafayette and throughout the United States were rampant, Defendants in this lawsuit willfully ignored what was occurring. These Defendants exhibited conscious indifference to the rights of the Plaintiffs, which proximately caused their injuries. Furthermore, these defendants deliberately concealed the proliferation of sexual abuse of minors that was occurring in the Diocese of Lafayette in order to protect their own interests.

24.

Defendants proximately caused injury to Plaintiffs, which resulted in the following damages to Plaintiffs: physical pain in the past and future, mental anguish in the past and future, disfigurement in the past and future, physical impairment in the past and future, medical expenses in the past and future, loss of earning capacity in the past and future, exemplary and punitive damages.

WHEREFORE, PLAINTIFFS pray for judgment in their favor and against SOCIETY OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF LAFAYETTE, INC. and SAINT MARTIN DE TOURS CATHOLIC CHURCH for all sums to which they are entitled for general and special damages under the laws of this state or the United States; pre-judgment and post-judgment interest; costs of suit; and all other relief to which they may be entitled in law or in equity.

Respectfully submitted,


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PLEASE SERVE:

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SAINT MARTIN DE TOURS CATHOLIC CHURCH
Serve: Father Rusty Richard
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