

NEW YORK STATE SUPREME COURT  
ERIE COUNTY

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JENNIFER LINDSAY,

Plaintiff,

-against-

DIOCESE OF BUFFALO and QUEEN OF HEAVEN  
CHURCH AND SCHOOL,

Defendants.  
-----X

Index No.: \_\_\_\_\_

Date Filed: November 6, 2019

**SUMMONS**

Plaintiff designates Erie County as the place of trial.

The basis of venue is one defendant's residence.

**Child Victims Act Proceeding**  
**22 NYCRR 202.72**


TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: November 6, 2019

Respectfully Yours,

MARSH LAW FIRM PLLC

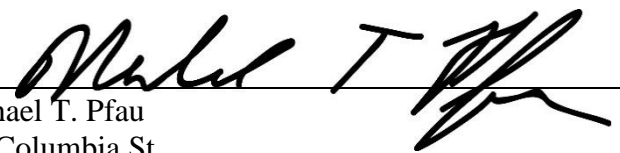
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NEW YORK STATE SUPREME COURT  
ERIE COUNTY

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JENNIFER LINDSAY,

Index No.: \_\_\_\_\_/\_\_\_

**COMPLAINT**

Plaintiff,

-against-

DIOCESE OF BUFFALO and QUEEN OF HEAVEN  
CHURCH AND SCHOOL,

**Child Victims Act Proceeding**  
**22 NYCRR 202.72**

Defendants.  
-----

Plaintiff Jennifer Lindsay, by and through her attorneys, the Marsh Law Firm PLLC and Pfau Cochran Vertetis Amala PLLC, respectfully alleges for her complaint the following:

**I. INTRODUCTION**

1. The Diocese of Buffalo (the “Diocese”) knew for decades that its priests, clergy, teachers, school administrators, employees, and volunteers were using their positions within the Diocese to groom and to sexually abuse children. Despite that knowledge, the Diocese failed to take reasonable steps to protect children from being sexually abused and actively concealed the abuse.

2. Since 2018, following decades of denial and cover-up, the Diocese of Buffalo began releasing the names of priests who were accused of sexually abusing children. While the Diocese of Buffalo has listed at least 80 priests with substantiated claims of sexual abuse of a minor, it has been reported that there are well over a 100 clergy in the Diocese of Buffalo who have faced allegations of sexually abusing a child. Based on the Diocese’s wrongful conduct, a reasonable person could and would conclude that it knowingly and recklessly disregarded the abuse of children and chose to protect its reputation and wealth over those who deserved protection. The result is not surprising: for decades hundreds, if not thousands, of children were

sexually abused by Catholic clergy and others who served the Diocese. The plaintiff in this lawsuit is one of many children who was sexually abused because of the Diocese's wrongful conduct.

## **II. PROCEEDING IN ACCORDANCE WITH CPLR 214-G AND 22 NYCRR 202.72**

3. This complaint is filed pursuant to the Child Victims Act (CVA) 2019 Sess. Law News of N.Y. Ch. 11 (S. 2440), CPLR 214-G, and 22 NYCRR 202.72. The CVA opened a historic one-year one-time window for victims and survivors of childhood sexual abuse in the State of New York to pursue lapsed claims. Prior to the passage of the CVA, plaintiff's claims were time-barred the day she turned 22 years old. The enactment of the CVA allows victims and survivors of childhood sexual abuse, for the first time in their lives, to pursue restorative justice in New York State.

## **III. PARTIES**

4. Plaintiff Jennifer Lindsay is an adult female who currently resides in Hamburg, New York.

5. Upon information and belief, the Diocese is currently a not-for-profit religious corporation organized under New York law with its principal office in Buffalo, New York.

6. Upon information and belief, at all relevant times the Diocese conducted business as the "Diocese of Buffalo" and/or "Diocese of Buffalo."

7. Upon information and belief, at all relevant times the Diocese employed priests, school administrators, teachers, religious sisters, and/or others who served various Catholic institutions and families, including plaintiff Jennifer Lindsay and her family.

8. Upon information and belief, Father Robert Moss ("Father Moss") was a priest employed by the Diocese to serve Catholic families, including plaintiff Jennifer Lindsay and her family. During the time Father Moss was employed by the Diocese, he used his position as a priest to groom and to sexually abuse plaintiff Jennifer Lindsay.

9. To the extent that the Diocese was a different entity, corporation, or organization during the period of time during which Father Moss used his position as a priest to sexually abuse plaintiff Jennifer Lindsay, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit.

10. To the extent the Diocese is a successor to a different entity, corporation, or organization which existed during the period of time during which Father Moss used his position as a priest to sexually abuse plaintiff Jennifer Lindsay, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit.

11. All such Diocese-related entities, corporations, or organizations are collectively referred to herein as the “Diocese.”

12. Upon information and belief, at all relevant times defendant Queen of Heaven Church and School (“Queen of Heaven”) was a not-for-profit religious corporation organized under New York law and wholly owned, operated, and controlled by the Diocese.

13. Upon information and belief, Queen of Heaven is currently a not-for-profit religious corporation organized under New York law with its principal office in West Seneca, New York.

14. Upon information and belief, at all relevant times Queen of Heaven conducted business as “Queen of Heaven,” “Queen of Heaven Church and School,” “Queen of Heaven Church,” “Queen of Heaven School,” and/or “Queen of Heaven Parish.”

15. Queen of Heaven is a parish with a church and school located in West Seneca, New York.

16. Upon information and belief, Father Robert Moss was a priest employed by Queen of Heaven to serve Catholic families in its geographic jurisdiction, including plaintiff Jennifer

Lindsay and her family. During the time Father Robert Moss was employed by Queen of Heaven, he used his position as a priest to groom and to sexually abuse plaintiff Jennifer Lindsay.

17. To the extent that Queen of Heaven was a different entity, corporation, or organization during the period of time during which Father Moss used his position as a priest to sexually abuse Jennifer, such entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit.

18. To the extent Queen of Heaven is a successor to a different entity, corporation, or organization which existed during the period of time during which Father Moss used his position as a priest to sexually abuse Jennifer, such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this lawsuit.

19. All such Queen of Heaven-related entities, corporations, or organizations are collectively referred to herein as “Queen of Heaven.”

#### **IV. VENUE**

20. Venue is proper because the Diocese is a domestic corporation authorized to transact business in New York with its principal office located in Erie County.

21. Venue is proper because Queen of Heaven is a domestic corporation authorized to transact business in New York with its principal office located in West Seneca, New York.

22. Venue is proper because Erie is the county in which a substantial part of the events or omissions giving rise to plaintiff’s claim occurred.

23. Venue is proper because plaintiff Jennifer Lindsay currently resides in Hamburg, New York.

#### **V. STATEMENT OF FACTS AS TO PLAINTIFF JENNIFER LINDSAY**

24. Upon information and belief, at all relevant times the Diocese was the owner of Queen of Heaven and held itself out to the public as the owner of Queen of Heaven.

25. Upon information and belief, at all relevant times the Diocese, its agents, servants, and employees managed, maintained, operated, and controlled Queen of Heaven.

26. Upon information and belief, at all relevant times the Diocese employed priests, school administrators, teachers, religious sisters, and/or others who served Catholic families at Queen of Heaven, including plaintiff Jennifer Lindsay and her family.

27. Upon information and belief, at all relevant times the Diocese, its agents, servants, and employees managed, maintained, operated, and controlled Queen of Heaven, and held out to the public its agents, servants, and employees as those who managed, maintained, operated, and controlled Queen of Heaven.

28. Upon information and belief, at all relevant times the Diocese was responsible for the hiring and staffing, and did the hiring and staffing, at Queen of Heaven.

29. Upon information and belief, at all relevant times the Diocese was responsible for and did the recruitment and staffing of volunteers at Queen of Heaven.

30. Upon information and belief, at all relevant times the Diocese materially benefited from the operation of Queen of Heaven, including the services of Father Moss and the services of those who managed and supervised Father Moss.

31. Upon information and belief, at all relevant times Queen of Heaven owned a parish, church, and school.

32. Upon information and belief, at all relevant times Queen of Heaven held itself out to the public as the owner of Queen of Heaven.

33. Upon information and belief, at all relevant times Queen of Heaven employed priests, school administrators, teachers, religious sisters, and/or others who served Catholic families, including plaintiff Jennifer Lindsay and her family.

34. Upon information and belief, at all relevant times Queen of Heaven, its agents, servants, and employees managed, maintained, operated, and controlled Queen of Heaven, and held out to the public its agents, servants and employees as those who managed, maintained, operated, and controlled Queen of Heaven.

35. Upon information and belief, at all relevant times Queen of Heaven was responsible for and did the staffing and hiring at Queen of Heaven.

36. Upon information and belief, at all relevant times Queen of Heaven was responsible for and did the recruitment and staffing of volunteers at Queen of Heaven.

37. Upon information and belief, at all relevant times Queen of Heaven materially benefitted from the operation of Queen of Heaven, including the services of Father Moss and the services of those who managed and supervised Father Moss.

38. Upon information and belief, at all relevant times Father Moss was a priest of the Diocese.

39. Upon information and belief, at all relevant times Father Moss was on the staff of, acted as an agent of, and served as an employee of the Diocese.

40. Upon information and belief, at all relevant times Father Moss was acting in the course and scope of his employment with the Diocese.

41. Upon information and belief, at all relevant times Father Moss was employed by the Diocese and assigned to Queen of Heaven.

42. Upon information and belief, at all relevant times Father Moss was a priest of Queen of Heaven.

43. Upon information and belief, at all relevant times Father Moss was on the staff of, was an agent of, and served as an employee of Queen of Heaven.



44. Upon information and belief, at all relevant times Father Moss was acting in the course and scope of his employment with Queen of Heaven.

45. Upon information and belief, at all relevant times Father Moss had an office on the premises of Queen of Heaven.

46. When plaintiff Jennifer Lindsay was a minor, she and her parents were members of the Diocese and Queen of Heaven, including when Jennifer was a parishioner.

47. At all relevant times, the Diocese and Queen of Heaven, their agents, servants, and employees, held Father Moss out to the public, to Jennifer, and to her parents, as their agent and employee.

48. At all relevant times, the Diocese and Queen of Heaven, their agents, servants, and employees, held Father Moss out to the public, to Jennifer, and to her parents, as having been vetted, screened, and approved by those defendants.

49. At all relevant times, Jennifer and her parents reasonably relied upon the acts and representations of the Diocese and Queen of Heaven, their agents, servants, and employees, and reasonably believed that Father Moss was an agent or employee of those defendants who was vetted, screened, and approved by those defendants.

50. At all relevant times, Jennifer and her parents trusted Father Moss because the Diocese and Queen of Heaven held him out as someone who was safe and could be trusted with the supervision, care, custody, and control of Jennifer.

51. At all relevant times, Jennifer and her parents believed that the Diocese and Queen of Heaven would exercise such care as would a parent of ordinary prudence in comparable circumstances when those defendants assumed supervision, care, custody, and control of Jennifer.

52. When Jennifer was a minor, Father Moss sexually abused her.

53. Jennifer was sexually abused by Father Moss from approximately age 10 to 13 years old.

54. Based on the representations of the Diocese and Queen of Heaven that Father Moss was safe and trustworthy, Jennifer and her parents allowed Jennifer to be under the supervision of, and in the care, custody, and control of, the Diocese and Queen of Heaven, including during the times when Jennifer was sexually abused by Father Moss.

55. Based on the representations of the Diocese and Queen of Heaven that Father Moss was safe and trustworthy, Jennifer and her parents allowed Jennifer to be under the supervision of, and in the care, custody, and control of, Father Moss, including during the times when Jennifer was sexually abused by Father Moss.

56. Neither Jennifer nor her parents would have allowed her to be under the supervision of, or in the care, custody, or control of, the Diocese, Queen of Heaven, or Father Moss if the Diocese or Queen of Heaven had disclosed to Jennifer or her parents that Father Moss was not safe and was not trustworthy, and that he in fact posed a danger to Jennifer in that Father Moss was likely to sexually abuse Jennifer.

57. No parent of ordinary prudence in comparable circumstances would have allowed Jennifer to be under the supervision of, or in the care, custody, or control of, the Diocese, Queen of Heaven, or Father Moss if the Diocese or Queen of Heaven had disclosed to Jennifer or her parents that Father Moss was not safe and was not trustworthy, and that he in fact posed a danger to Jennifer in that Father Moss was likely to sexually abuse her.

58. From approximately 1982 through 1984, Father Moss exploited the trust and authority vested in him by defendants by grooming Jennifer to gain her trust and to obtain control over her as part of Father Moss's plan to sexually molest and abuse Jennifer and other children.

59. Father Moss used his position of trust and authority as a priest of the Diocese and of Queen of Heaven to groom Jennifer and to sexually abuse her multiple times, including when Jennifer was under the supervision of, and in the care, custody, or control of, the Diocese, Queen of Heaven, and Father Moss.

60. At certain times, the sexual abuse of Jennifer by Father Moss occurred at Queen of Heaven, including on church grounds.

61. At certain times, Father Moss's sexual abuse of Jennifer occurred during activities that were sponsored by, or were a direct result of activities sponsored by, the Diocese and Queen of Heaven, including during religious services and counseling sessions.

62. Upon information and belief, prior to the times mentioned herein, Father Moss was a known sexual abuser of children.

63. Upon information and belief, at all relevant times, defendants, their agents, servants, and employees, knew or should have known that Father Moss was a known sexual abuser of children.

64. Upon information and belief, at all relevant times, it was reasonably foreseeable to defendants, their agents, servants, and employees that Father Moss's sexual abuse of children would likely result in injury to others, including the sexual abuse of Jennifer and other children by Father Moss.

65. Upon information and belief, at certain times between 1982 and 1984, defendants, their agents, servants, and employees knew or should have known that Father Moss was sexually abusing Jennifer and other children at Queen of Heaven and elsewhere.

66. Upon information and belief, defendants, their agents, servants, and employees knew or should have known that the sexual abuse by Father Moss of Jennifer was ongoing.

67. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, knew or should have known before and during Father Moss's sexual abuse of Jennifer that priests, school administrators, teachers, religious sisters, and/or other persons serving the Diocese and Queen of Heaven had used their positions with those defendants to groom and to sexually abuse children.

68. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, knew or should have known before and during Father Moss's sexual abuse of Jennifer that such priests, school administrators, teachers, religious sisters, and/or other persons could not be "cured" through treatment or counseling.

69. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, concealed the sexual abuse of children by Father Moss in order to conceal their own bad acts in failing to protect children from him, to protect their reputation, and to prevent victims of such sexual abuse by him from coming forward during the extremely limited statute of limitations prior to the enactment of the CVA, despite knowing that Father Moss would continue to molest children.

70. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, consciously and recklessly disregarded their knowledge that Father Moss would use his position with the defendants to sexually abuse children, including Jennifer.

71. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, disregarded their knowledge that Father Moss would use his position with them to sexually abuse children, including Jennifer.

72. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, acted in concert with each other or with Father Moss to conceal the

danger that Father Moss posed to children, including Jennifer, so that Father Moss could continue serving them despite their knowledge of that danger.

73. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, knew that their negligent, reckless, and outrageous conduct would inflict severe emotional and psychological distress, as well as personal physical injury, on others, including Jennifer, and she did in fact suffer severe emotional and psychological distress and personal physical injury as a result of their wrongful conduct.

74. Upon information and belief, the Diocese and Queen of Heaven, their agents, servants, and employees, concealed the sexual abuse of children by priests, school administrators, teachers, religious sisters, and/or others in order to conceal their own bad acts in failing to protect children from being abused, to protect their reputation, and to prevent victims of such sexual abuse from coming forward during the extremely limited statute of limitations prior to the enactment of the CVA, despite knowing that those priests, school administrators, teachers, religious sisters, and/or others would continue to molest children.

75. By reason of the wrongful acts of the Diocese and Queen of Heaven as detailed herein, Jennifer sustained physical and psychological injuries, including but not limited to, severe emotional and psychological distress, humiliation, fright, dissociation, anger, depression, anxiety, family turmoil and loss of faith, a severe shock to her nervous system, physical pain and mental anguish, and emotional and psychological damage, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature, and Jennifer has and/or will become obligated to expend sums of money for treatment.

**VI. CAUSES OF ACTION AS TO PLAINTIFF JENNIFER LINDSAY****A. FIRST CAUSE OF ACTION – NEGLIGENCE**

76. Plaintiff Jennifer Lindsay repeats and re-alleges all of her allegations above and below.

77. The Diocese and Queen of Heaven had a duty to take reasonable steps to protect plaintiff Jennifer Lindsay, a child, from foreseeable harm when she was under their supervision and in their care, custody, and control.

78. The Diocese and Queen of Heaven also had a duty to take reasonable steps to prevent Father Moss from using the tasks, premises, and instrumentalities of his position with the defendants to target, groom, and sexually abuse children, including Jennifer.

79. The Diocese and Queen of Heaven were supervising Jennifer, and had care, custody, and control of Jennifer, when she was a parishioner and at other times, during which time those defendants had a duty to take reasonable steps to protect her.

80. These circumstances created a special relationship between the Diocese and Jennifer, and between Queen of Heaven and Jennifer, which imposed on each of those defendants a duty to exercise the degree of care of a parent of ordinary prudence in comparable circumstances.

81. The Diocese and Queen of Heaven breached each of the foregoing duties by failing to exercise reasonable care to prevent Father Moss from harming Jennifer, including sexually abusing her.

82. In breaching their duties, including hiring, retaining, and failing to supervise Father Moss, giving him access to children, entrusting their tasks, premises, and instrumentalities to him, failing to train their personnel in the signs of sexual predation and to protect children from sexual abuse and other harm, failing to warn Jennifer, her parents, and other parents of the danger of sexual abuse, and failing to create a safe and secure environment for Jennifer and other children

who were under their supervision and in their care, custody, and control, the Diocese and Queen of Heaven created a risk that Jennifer would be sexually abused by Father Moss. The Diocese and Queen of Heaven through their actions and inactions created an environment that placed Jennifer in danger of unreasonable risks of harm under the circumstances.

83. In breaching their duties, including hiring, retaining, and failing to supervise Father Moss, giving him access to children, entrusting their tasks, premises, and instrumentalities to him, failing to train their personnel in the signs of sexual predation and to protect children from sexual abuse and other harm, failing to warn Jennifer, her parents, and other parents of the danger of sexual abuse, and failing to create a safe and secure environment for Jennifer and other children who were under their supervision and in their care, custody, and control, the Diocese and Queen of Heaven acted willfully and with conscious disregard for the need to protect Jennifer. The Diocese and Queen of Heaven through their actions and inactions created an environment that placed Jennifer in danger of unreasonable risks of harm under the circumstances.

84. It was reasonably foreseeable that defendants' breach of these duties of care would result in the sexual abuse of Jennifer.

85. As a direct and proximate result of the acts and omissions of the Diocese and Queen of Heaven, Father Moss groomed and sexually abused Jennifer, which has caused Jennifer to suffer general and special damages as more fully described herein.

**B. SECOND CAUSE OF ACTION – OUTRAGE AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

86. Plaintiff Jennifer Lindsay repeats and re-alleges all of her allegations above and below.

87. The Diocese and Queen of Heaven engaged in reckless, extreme, and outrageous conduct by providing Father Moss with access to children, including plaintiff Jennifer Lindsay,

despite knowing that he would likely use his position to groom and to sexually abuse them, including Jennifer. Their misconduct was so shocking and outrageous that it exceeds the reasonable bounds of decency as measured by what the average member of the community would tolerate and demonstrates an utter disregard by them of the consequences that would follow.

88. As a result of this reckless, extreme, and outrageous conduct, Father Moss gained access to Jennifer and sexually abused her.

89. The Diocese and Queen of Heaven knew that this reckless, extreme, and outrageous conduct would inflict severe emotional and psychological distress, including personal physical injury, on others, and Jennifer did in fact suffer severe emotional and psychological distress and personal physical injury as a result, including severe mental anguish, humiliation and emotional and physical distress.

#### **VII. CPLR 1603 – NO APPORTIONMENT OF LIABILITY**

90. Pursuant to CPLR 1603, the foregoing causes of action are exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(2), CPLR 1602(5), 1602(7) and 1602(11), thus precluding defendants from limiting their liability by apportioning some portion of liability to any joint tortfeasor.

#### **VIII. PRAYER FOR RELIEF**

91. Plaintiff Jennifer Lindsay demands judgment against the defendants named in her causes of action, together with compensatory and punitive damages to be determined at trial, and the interest, cost and disbursements pursuant to her causes of action, and such other and further relief as the Court deems just and proper.

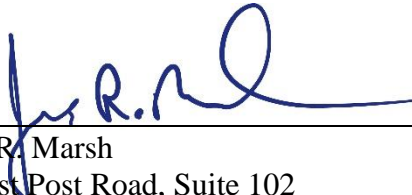


92. Plaintiff Jennifer Lindsay specifically reserves the right to pursue additional causes of action, other than those outlined above, that are supported by the facts pleaded or that may be supported by other facts learned in discovery.

Dated: November 6, 2019

Respectfully Yours,

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