

Attorneys for Plaintiffs Burke

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

██████████, for herself, ██████████ and ██████████ minors, by and through
their Guardian Ad Litem, ██████████

Plaintiffs,

v.

TEEN HELP, a partnership; TRANQUILITY BAY, a corporation; THE CARIBBEAN CENTER
FOR CHANGE, a corporation; WORLDWIDE ASSOCIATION OF SPECIALTY PROGRAMS, a
corporation; BRIGHTWAY HOSPITAL, a corporation; RESOURCE REALIZATIONS, a
corporation; R&B BILLING, a corporation; DIXIE CONTRACT SERVICES, a
corporation; TEEN ESCORT SERVICES, a corporation; KEN KAY; ROBERT B.
LICHFIELD; KARR FARNSWORTH; BRENT M. FACER; JAY KAY; JEAN DAVIS; LORRAINE
BLACK; and DELBERT GOATES, M.D.; DAVID GILCREASE,

Defendants.

No.

COMPLAINT FOR NEGLIGENCE; NEGLIGENT CHILD ABUSE; FALSE IMPRISONMENT;
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; BREACH OF FIDUCIARY DUTY; RICO;
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

JURY TRIAL DEMANDED

Come now plaintiffs, ██████████ on behalf of herself, and ██████████ and
██████████, by and through their Guardian Ad Litem, ██████████, and allege
as follows:

PARTIES

1. Plaintiff ██████████ is the mother of the plaintiffs ██████████ and
██████████, who are minors, and appears for both herself and for her minor
sons as their Guardian Ad Litem. ██████████ and ██████████ were enrolled in
Tranquility Bay from 1997 to 1998. The Plaintiffs were, at all times
material, and are currently, all citizens of the State of Texas.

2. The Worldwide Association of Specialty Programs is a non-profit corporation organized under the laws of the State of Utah with its principal place of business in St. George, Utah, of which Karr Farnsworth is the Executive Director. It is an umbrella organization controlling and regulating all Teen Help programs. It is the alter ego of each and every other named entity defendant, being under the control of and responsible to a centralized governing group of the named individual defendants, among others.

3. Teen Help is a partnership organized under the laws of the State of Utah and doing business in the State of Utah, nationally, and internationally. It is the alter ego of each and every other named defendant, Robert B. Lichfield being its general partner, and answers to a centralized governing group of the named individual defendants. It purports to help the parents of troubled adolescents find placement in appropriate treatment centers, but, in practice, only refers such parents to its own stable of youth camps. It is the defendants' marketing arm to recruit adolescent inmates for Tranquility Bay, Paradise Cove, Casa By The Sea, and other off-shore cult camps run by some of the other defendants.

4. Tranquility Bay is a corporation organized under the laws of the State of Utah and is doing business within in the State of Utah, nationally, and internationally. It sometimes goes by the name of The Caribbean Center For Change. It is the alter ego of each and every other named defendant, being under the control of and responsible to a centralized governing group of the named individual defendants, among others. It is one of many closed and secret cult centers owned and operated by the defendants where adolescents are impounded, tortured, berated, brainwashed, and otherwise abused by the defendants.

5. Brightway Hospital was at all times material a corporation organized and licensed under the laws of the State of Utah and was doing business within the State of Utah. It is the alter ego of each and every other named defendant, being under the control of and responsible to a centralized governing group of the named individual defendants. It purported to be an adolescent treatment center which, among other things, conducted psychological evaluations. In reality, Brightway was a lock-down facility to which kidnapped adolescents were transported and held before being placed in and transported to various cult centers owned and operated by the defendants, among others. Its operation was so incompetent that the State of Utah has revoked its hospital license.

6. Dixie Contract Services is a corporation organized under the laws of the State of Utah and is doing business within in the State of Utah, nationally, and internationally. It is the alter ego of each and every other named defendant, being under the control of and responsible to a centralized governing group of the named individual defendants, among others. It hires and directs so-called escort services to kidnap adolescent candidates from their homes, often in the middle of the night, and take them by force to Brightway hospital for psychological screening and passport procurement before being transported abroad.

7. R & D Billing is a corporation organized under the laws of the State of Utah and is doing business within in the State of Utah, nationally, and internationally. It is the alter ego of each and every other named defendant, being under the control of and responsible to a centralized governing group of the named individual defendants, among others. It bills and collects exorbitant fees charged by the various Teen Help cult centers by misrepresenting to insurance companies that the Teen Help programs are either therapeutic or educational depending on the coverage available.

8. Resource Realizations is a corporation organized under the laws of the

State of Utah and is doing business within in the State of Utah, nationally, and internationally. It is the alter ego of each and every other named defendant, being under the control of and responsible to a centralized governing group of the named individual defendants, among others. It plans and conducts the behavior modification seminars for inductees and their parents, which modifies the values and impairs the psychological health of both groups.

9. Robert B. Lichfield is an owner, partner, shareholder, or otherwise directs the conduct and activities of each and every named corporate or partnership defendant.

10. Karr Farnsworth was, at all times material, an owner, partner, shareholder, or otherwise directed the conduct and activities of each and every named corporate or partnership defendant.

11. Brent M. Facer was, at all times material, an owner, partner, shareholder, or otherwise directed the conduct and activities of each and every named corporate or partnership defendant.

12. Jay Kay was, at all times material, the director of Jamaica Bay, and an owner, partner, shareholder, or otherwise directed the conduct and activities of each and every named corporate or partnership defendant.

13. Jean Davis, a citizen of Jamaica, was, at all times material, an employee of some or all of the other defendants, and the director of Jamaica Bay III.

14. Lorraine Black, a citizen of Jamaica, was, at all times material, an employee of some or all of the other defendants, and the case worker assigned to Scott Burke.

15. Delbert Goates, M.D. was, at all times material, a citizen of the State of Utah, and a psychiatrist attached to Brightway Hospital. He purported to screen enrollees into the Teen Help programs, but routinely rendered services of no value for which he separately billed the parents abandoning their children to Teen Help amounts in addition to the exorbitant fees they were already paying. Furthermore, he routinely allowed into the program young people who either were ineligible under any standard to be incarcerated by the defendants or who were so mentally ill that they should have been hospitalized someplace clinically sound.

16. David Gilcrease was, at all times material, a citizen of the State of Utah, and the director of Resource Realizations, Inc. He is an owner, partner, shareholder, or otherwise directed the conduct and activities of each and every other named corporate or partnership defendant. He runs introductory secret TASK seminars designed to brain wash the child and use him to recruit the parents into the program. If the parents refuse to participate in the seminars, they are not allowed to talk to their children who have participated. Due to the seminars, the children become co-dependent upon the defendants, and so do the parents once they attend. If the parents do not attend, their children, due to the dogmas taught, perceive themselves as elite and isolated from their parents, and come to belong to the defendants more than they belong to their parents.

17. Doe defendants I through X are persons unknown to the plaintiffs but who will be added to the complaint when their identity is ascertained.

18. In all things herein alleged and at all times material, all defendants

were acting as agents for or joint venturers with the other defendants.

JURISDICTION

19. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1332(a)(1). The matter in controversy exceeds the sum of Seventy Five Thousand Dollars, exclusive of interest and costs.

VENUE

20. Venue is appropriate in this Court pursuant to the provisions of 28 U.S.C. § 1391(a) and (c).

FACTS

21. Donna Burke was, in 1997, a single mother of two sons [REDACTED] aged 16 years, and [REDACTED] aged 14 years. She had been previously divorced from her wealthy husband, David Burke, who goes by the name "Stoney". His new wife, Lynda, was, at all times material, a family law judge in Houston, Texas. Defendants have exploited her judicial position by retaining her as one of their recruiters.

22. Shortly before August, 1997, [REDACTED] Burke, then living with his mother, had begun to experiment with marijuana and engage in minor truanancies. Donna informed Stoney of this behavior, and encouraged him to take greater part in their son's life. In response, Stoney, without telling Donna, obtained a custody order from family court which he delivered to defendants, directing them to abduct [REDACTED] by force from his middle school while it was in session into the Teen Help program.

23. In August, 1997, they did so, and took [REDACTED] to Brightway Hospital, where they forcibly detained him on the pretext of psychological evaluation while they speedily got his passport. Dr. Goates, meanwhile, administered medications to keep [REDACTED] from fighting back.

24. Donna was frantic that her son [REDACTED] had suddenly disappeared from school and was nowhere to be found. She eventually learned that he had been abducted into Teen Help. When she finally discovered that he had been taken out of the country to Jamaica, she tried by telephone to contact him, but was told by defendants, both in Utah and Jamaica, that she would not be allowed any contact. She then resorted to writing letters, but later learned that not one of them had been delivered to [REDACTED].

25. Donna then began to fear that the same fate awaited her older son, [REDACTED]. In contrast to [REDACTED], [REDACTED] was a model son, obedient to all rules, respectful of authority, an "A" student, and a star soccer player at his high school. [REDACTED], however, had been ill as a result of an Epstein-Barr virus which had sidelined him for a year.

26. In November, 1997, Defendants, at Stoney's behest and again, without notice to Donna, abducted [REDACTED] by force from his high school while it was in session and took him to Brightway Hospital. There, Dr. Goates could plainly see that [REDACTED] had no behavioral or psychological problems that would warrant his being in the Teen Help program. Defendants, however, once in possession of [REDACTED] passport and his father's money, shipped him off to Jamaica as well.

27. Both [REDACTED] and [REDACTED] had already suffered from years of their father's

abuse caused by alcohol. David's response had been to become totally obedient and to achieve the highest standards, with which he father was never satisfied. S█████ rebelled, and had begun to act out his frustrations over his father's abandonment.

28. As if these two fine young men had not suffered enough, Defendants began to heap upon them the most sadistic and unwarranted physical and psychological abuse. Defendants subjected them to a steaming squalid jungle camp infested with flies, mosquitoes, scorpions, and vermin. The food was primitive, filthy, and meager. The so-called case workers were untrained, unlettered, and uncredentialed natives. Hygiene consisted of bathing by garden hose without soap. There was no ventilation in the buildings. There was no protection outdoors from the sun. Scott and Donna, both fair skinned, were so burned that their skin was cracking. Defendants deprived Donna of his ulcer medication and Scott of his Attention Deficit Disorder medicine. The boys slept upon mattresses with no sheets with no protection from the swarms of insects. They were covered with bites.

29. Worse still was the psychological abuse, by which punishment was meted out for infractions so minor as to sink to the level of dementia. The merest glance away from one's paper in class, or moving without permission could result in severe punishment such as being forced to lie on the floor for 24 hours without bathroom privileges and without letting one's chin touch the floor. Monitors were everywhere, and there was never any privacy. Donna was not allowed to telephone. Her mail never reached the boys, and their's to her reflected predictable nothingness.

30. Whereas, from Defendants' video advertisement, Donna initially thought that there might be some merit in Scott's being at Tranquility Bay, Donna's abduction made no sense whatsoever, and finally woke her to the fact that something was wrong. Donna's friends held a car wash to raise money for her airfare to Jamaica.

31. She went with her brother in March, 1998. There, she saw first hand the terrible condition of her sons, their surroundings, food, and the prison environment in which they were subsisting. After traveling several hours by plane and five hours by taxi, she arrived to a most stilted visit. A staff member lurked within five feet so that there was no privacy. After only four hours, when she was forced to leave, her sons clinged to her, begging her not to go.

32. Her custody fight with Stoney proceeded in the Houston courts. Walter Mahoney, the court-appointed counsel for Scott and Donna, went to visit them in Jamaica, but spent no time with them and did nothing to get them out of the program. The court-appointed psychologist, Richard Austin, Ph.D., was no more effective.

33. About this time, David Van Blarrigan's attempt to free himself from Tranquility Bay hit the news. Donna was galvanized by the plight of other captives. She became militant and determined to rescue her sons. In August, 1998, she returned unannounced to Jamaica with a female colleague. They got by the guard at the barbed wire compound called Tranquility Bay III, in a valley 45 minutes from the seaside compound. She saw the bedraggled young men without shoes and covered with bites, rashes, and chemical burns. Being away from the coast the heat was stifling, even for a Houston resident. The smell of raw sewage was overpowering. Donna reprimanded the director, Jean Davis, for allowing such conditions. The behavior of some captives showed should have been hospitalized in mental institutions. Others, like Donna, should not have been there at all.

34. At the hotel, Donna met a woman who was taking her son out. Donna returned and demanded that her sons be released to her. Tranquility Bay personnel telephoned Stoney, who refused. Lorraine Black, S█████ case worker, who was uneducated, told Donna, who is highly educated, that she was crazy and was the reason that her sons were in the program. The entire compound, and especially her sons, were punished for Donna's disruption as a warning to parents who show up without permission and unannounced.

35. The boys were allowed telephone communication with their father, but not with their mother. Defendants further breached the biological family unit by appointing among the native staff "fathers" and "mothers" and organizing groups of captives into "families". These surrogate parents, by demanding the strictest obedience to their every whim, engendered the co-dependence upon which the program thrives, further breaking the will and spirit of Donna's two sons. When she left this time, S█████ slipped a note in her pocket asking to come home. When this note got to the family law judge, and then, through counsel, to Stoney, he notified Tranquility Bay, and S█████ was punished.

36. D█████ was released on November 30, 1998, and S█████ on December 23, 1998. Both are changed from the wonderful, spontaneous young men that they were before Tranquility Bay into robotic victims, afraid of any authority figure.

They have lost their individuality, their spirits are broken, and their characters ruined. Instead of independent men, they are afraid, haunted by nightmares, subject to panic attacks, and refuse to go anywhere near a beach. If a voice is raised, they dissolve in fear. They never voice an opinion of their own, fearful that it might not find approval. Even if they are troubled or sad, they mask it by saying that everything is fine. They no longer feel. If Defendants broke an occasional bad habit, they did it by breaking the lad himself.

37. Whereas Donna had raised these young men with no help from an absent, alcoholic father, and was their mainstay throughout their adolescent years, they now regard her as powerless. Defendants took them from her and she could not get them back. They became dependent on Defendants instead of their mother, and Defendants destroyed Donna's relationship with her sons. Now, they trust no one, not even God.

FIRST CAUSE OF ACTION (Negligence)

38. Defendants owed Plaintiffs a duty to screen D█████ and S█████ in order to protect them from induction into a boorish and brutal program whose rigors might foreseeably injure them. Defendants breached their duty by failing to screen the boys out of their program and, to the contrary, by admitting them into a program which they knew, or should have known, would be detrimental to them.

39. Defendants owed Plaintiffs a duty to consult some reputable psychiatrist to see whether or not the boys should even be in a sadistic program of this nature.

40. Defendants owed Plaintiffs a duty not to induct the boys into their program unless and until they had the informed consent of both parents having legal custody of the boys.

41. Defendants owed Plaintiffs a duty to employ, or at least engage, professionals qualified to address any specific needs which legitimately justified the boys' induction and retention into such a program.

42. Defendants breached their duty by inducting the boys into their demented program, by failing to engage quality professional help, and by punishing the boys as criminals instead of addressing any specific need justifying their presence at Tranquility Bay.

43. Defendants' conduct proximately caused the boys personal injury and emotional distress from and after their 1998 induction to date. Defendants conduct foreseeably and proximately caused Donna Burke grievous emotional distress over the welfare and safety of her sons and cost her many thousands of dollars to fund the benighted treatment they received, the emotional scars from which will probably last a life time.

44. Defendants' conduct was malicious, wanton, and in reckless disregard of the boys' health, safety and welfare, by reason of which they are entitled to recover punitive damages against them.

WHEREFORE, Plaintiffs pray for judgment as hereafter stated.

SECOND CAUSE OF ACTION (Negligent Child Abuse)

45. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if stated in full.

46. Defendants, while having the care, custody and control of the boys as a surrogates for their mother, had a duty to promote their health, safety, and welfare. Instead, Defendants breached their duty to the boys by isolating them and keeping them prisoner in Jamaica where:

- a. they negligently removed them from the United States without mother's consent,
- b. they negligently subjected them to conditions and circumstances likely to produce great bodily harm,
- c. they negligently inflicted upon them unjustifiable physical pain and mental suffering.
- d. They negligently caused them to suffer pain, thirst, fatigue, and confinement.
- e. they negligently caused or permitted them to be injured and infected, and
- f. they negligently caused and permitted them to be placed in such a situation that their emotional and physical health was endangered and impaired.

47. Defendants conduct proximately caused Plaintiffs personal injury and emotional distress.

48. Defendants conduct was malicious, wanton and in reckless disregard of the boys' health, safety and welfare, by reason of which they are entitled to recover punitive damages.

WHEREFORE, Plaintiffs pray for judgment as hereafter stated.

THIRD CAUSE OF ACTION (False Imprisonment)

49. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if

stated in full.

50. The boys learned upon arrival at Tranquility Bay that their mother was unaware of its purpose and program. They sought at that time to communicate with her and to leave the program, but Tranquility Bay censored their mail, restrained them from any contact with the outside world, and refused to permit their return home.

51. Tranquility Bays imprisonment of the boys without adjudication caused them serious and permanent emotional distress, and psychological injury.

52. Tranquility Bay's conduct was malicious, wanton and in reckless disregard of the boys' health, safety and welfare, by reason of which they are entitled to recover punitive damages.

WHEREFORE, S████ and D████ pray for judgment against Defendants as hereafter stated.

FOURTH CAUSE OF ACTION (Intentional Infliction of Emotional Distress)

53. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if stated in full.

54. Tranquility Bay's philosophy of tormenting and intimidating the boys, invading their privacy, depriving them of nutritious and wholesome food, proper sanitation, educational opportunities, exposing them to denigrating immoral and filthy conditions, subjecting them to imprisonment, attempting to break their will, inflicting unjust punishment, depriving them of legal rights, keeping them in isolation, depriving them of the care, comfort, support, and sustenance of their mother, and other demented conduct, caused the boys personal injury and mental and emotional distress.

55. Defendants' conduct in depriving the boys of their mother's society, companionship, and communication caused them grief, anxiety and worry.

56. Defendants' conduct was in reckless disregard of Plaintiffs' health, safety and welfare, by reason of which Plaintiffs are entitled to recover punitive damages.

WHEREFORE, Plaintiffs pray for judgment as hereafter stated.

FIFTH CAUSE OF ACTION (Breach of Fiduciary Duty)

57. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if stated in full.

58. By seeking, and obtaining physical custody of the boys from their mother, and thereafter, by placing them and retaining them in a captive and abusive environment of their own making, Defendants undertook a fiduciary duty toward the boys to protect and promote their health, safety and welfare.

59. Defendants, in the manner described above, breached their fiduciary duty as a parental surrogates, which proximately caused the boys to sustain pain, suffering, bodily injury and mental and emotional distress, and caused the boys great mental and emotional anxiety.

60. Defendants' conduct was malicious, wanton and in reckless disregard of Plaintiffs trust and of the boys' health, safety and welfare, by reason of which Plaintiffs are entitled to recover punitive damages.

WHEREFORE, Plaintiffs pray for judgment against Defendants as hereafter stated.

SIXTH CAUSE OF ACTION (RICO)

61. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if stated in full.

62. As part of a scheme and artifice to defraud, and as a means by which Defendants could obtain money from families having sons about whose associations, values, study habits, or good citizenship they were concerned, Defendants falsely represented to the boys' mother that they were adept in behavioral modification for teenagers; that inductees would have one-on-one support and guidance by trained and caring counselors; and that the program was safe, wholesome, positive, and beneficial. Defendants concealed that the program was cultist, coercive, and criminal.

63. Defendants further made these misrepresentations and indulged in these concealments not only to Donna, but to the boys, and the parents of numerous other young men inducted into Tranquility Bay.

64. None of the above stated representations was true, but instead all of the above stated representations were false, and were made to the parents of the young men inducted or kidnapped into the Tranquility Bay program with the intent and for the purpose of causing the parents to pay Defendants large amounts of money per month per boy enrolled, even though the cost for the services rendered was negligible and the services themselves were demented, dangerous, and detrimental.

65. The excessive amount charged by Defendants for the privilege of abusing D█████ and S█████ Burke, and other young men, was fraudulent in that it was both far in excess of the actual costs incurred for the abuse meted out, but was fraudulent as well in advancing the ruse that Defendants were providing a therapeutic, social, and educational experience approximating in value the monthly amount charged, including normal operating and overhead expenses.

66. Tranquility Bay always reported to Donna Burke and other parents over telephone lines that her sons were enjoying the program when in reality, Defendants knew that the respective parents' sons were being tormented and abused by Tranquility Bay so as to become no better than obedient dogs, and worse off than when they came into the program. Notwithstanding such knowledge, Defendants continued to market Tranquility Bay as a positive and wholesome experience, and paid returning survivors of the program to recruit other parents and their sons to Tranquility Bay by misrepresenting the nature and benefits of the program. Defendants made all of the above-referenced fraudulent and untrue statements knowing them to be untrue or knowing that they had no information to support the truth of their statements. This, they did for the purpose and toward the end that the parents of the enrolled and captive children would not withdraw their children from the program, but instead, would continue to pay the excessive fees charged by Tranquility Bay for keeping their children in the program.

67. All of Defendants' concealment, propounded falsities, and misrepresentations of true facts were made by telephone or by letters sent through the United States mails. All of Tranquility Bay's remittances and payments obtained by Defendants' fraudulent representations were received

through the United States mails across state lines.

68. Defendants' knowing and intentional failure to disclose material facts and their deliberate misrepresentation of material facts in conjunction with the telephone conversations and letters, checks and other remittances sent through the United States mails described above constitute repeated violations of 18 USC §1342 relating to wire fraud and 18 USC §1341 relating to mail fraud, and further constitute acts of racketeering activity as that term is defined in 18 USC §1961(1)(b).

69. Defendants are capable of holding a legal or beneficial interest in property and are persons subject to the Racketeer Influenced and Corrupt Organizations Act pursuant to 18 USC §1961(3).

70. The individual defendants were associated in fact through their management and operation of Tranquility Bay and its alter ego entities, which association in fact constituted an enterprise as the term enterprise is defined in 18 USC §1961(4).

71. During all relevant time, Tranquility Bay was an enterprise as the term enterprise is defined in 18 USC §1961(4).

72. During all relevant time, the individual defendants constituted an enterprise as the term enterprise is defined in 18 USC §1961(4).

73. The wire frauds and mail frauds perpetrated by the defendants upon the plaintiffs constituted a pattern of racketeering activity consisting of more than two acts of racketeering activity, all of which occurred after the effective date of 18 USC §1961 et seq.

74. Defendants used income derived from the above-described pattern of racketeering in the operation of their enterprises, the activities of which affected interstate commerce, in violation of 18 USC §1962(b).

75. The individual defendants acquired and maintained control of the enterprise, the activities of which affected interstate commerce, in violation of 18 USC §1962(b).

76. Defendants conducted or participated in the conduct of the enterprise through the above-described pattern of racketeering activity which enterprise's activities affected interstate commerce in violation of 18 USC §1961(c).

77. Defendants conspired with each other to violate 18 USC §1962 (a), (b), and (c) in violation of §1962(d).

78. As a direct and proximate result of the foregoing violation of 18 USC §1962 by Defendants, the Plaintiffs have sustained injury to their family and property in an undetermined amount believed to be in excess of \$500,000, plus interest.

WHEREFORE, Plaintiffs pray for judgment against Defendants as hereafter stated.

SEVENTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress)

79. Plaintiffs incorporate by this reference paragraphs 1 through 37 as if stated in full.

80. Defendant parental surrogates had a duty not to injure the boys , either physically or psychologically, but to instruct, educate, and promote their physical and psychological well-being consistent with Defendants representations to their mother and their statutory surrogate duties. Defendants, however, negligently placed the boys in their own confined environment peopled by sadistic, controlling, untrained persons of low intelligence posing as counselors who, without cause, berated, tormented, ridiculed, belittled, scolded, deprived, and demeaned the boys so as to make them a compliant supplicant of Tranquility Bay, and thereby either capture their loyalty or coerce them by fear and threats into supporting Tranquility Bays fraudulent scheme to profit from the misery it inflicted upon the boys and other minors within its control.

81. Defendants' conduct was malicious, wanton, and in reckless disregard of the boys' health, safety and welfare, by reason of which Plaintiffs are entitled to recover punitive damages.

WHEREFORE, Plaintiffs pray for judgment as follows:

FIRST CAUSE OF ACTION FOR NEGLIGENCE:

- a. Special damages according to proof.
- b. General damages according to proof
- c. Punitive damages according to proof

SECOND CAUSE OF ACTION FOR NEGLIGENT CHILD ABUSE:

- a. Special damages according to proof.
- b. General damages according to proof
- c. Punitive damages according to proof

THIRD CAUSE OF ACTION FOR FALSE IMPRISONMENT:

- a. Special damages according to proof.
- b. General damages according to proof.
- c. Punitive damages according to proof.

FOURTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

- a. Special damages according to proof.
- b. General damages according to proof.
- c. Punitive damages according to proof.

FIFTH CAUSE OF ACTION FOR BREACH OF FIDUCIARY DUTY:

- a. Special damages according to proof.
- b. General damages according to proof.
- c. Punitive damages according to proof.

SIXTH CAUSE OF ACTION FOR RICO VIOLATIONS:

- a. Special damages according to proof.
- b. General damages according to proof trebled.
- c. Punitive damages according to proof.
- d. Attorneys fees according to proof.

SEVENTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- a. Special damages according to proof.
- b. General damages according to proof.
- c. Punitive damages according to proof.

Dated: April 29, 1999
