

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Personal Injury

\_\_\_\_\_  
Doe 20,

Court File No.:

Plaintiff,

v.

**COMPLAINT**

Fr. Michael Jerome Keating,

Defendant.  
\_\_\_\_\_

Plaintiff, for her cause of action against Defendant, alleges that:

**PARTIES**

1. Plaintiff Doe 20 (hereinafter "Plaintiff") is an adult female resident of Minnesota. The identity of Plaintiff has been disclosed under separate cover to Defendant. Plaintiff was a minor at the time of all sexual abuse and all sexual exploitation alleged herein.

2. At all times material, Defendant Fr. Michael Jerome Keating (hereinafter "Keating") was an adult male resident of the State of Minnesota.

**FACTS**

3. In approximately 1997 to 2000, Keating engaged in multiple instances of unpermitted, harmful, and offensive sexual contact with Plaintiff, while she was a minor.

4. Upon information and belief, Keating was a seminarian in St. Paul, Minnesota during the instances of sexual contact with Plaintiff.

5. Upon information and belief, Keating was ordained a priest of the Archdiocese of St. Paul and Minneapolis on May 25, 2002.

6. Upon information and belief, Keating worked as a priest at St. John the Baptist in

New Brighton, Minnesota from 2003 to 2005.

7. Plaintiff reported the abuse to Archdiocesan officials including Archbishop Harry Flynn, then Vicar General Rev. Kevin McDonough, then Chancellor of Civil Affairs Andrew Eisenzimmer, Greta Sawyer and the Clergy Review Board in 2006.

8. Upon information and belief, Keating joined the faculty at the University of St. Thomas in St. Paul, Minnesota in 2006 where he is currently tenured.

9. As a direct result of the sexual abuse, Plaintiff has suffered and will continue to suffer great pain of mind and body, severe and permanent emotional distress, embarrassment, loss of self-esteem, humiliation and psychological injuries, was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling.

**COUNT I: DEFENDANT KEATING -  
SEXUAL BATTERY**

10. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth under this count and further alleges:

11. In and around 1997 to 2000, Keating inflicted unpermitted, harmful, and offensive sexual contact upon the person of Plaintiff.

12. Plaintiff did not consent to the harmful bodily contact.

13. As a direct result of Keating's harmful sexual conduct, Plaintiff has suffered and continues to suffer from the injuries alleged herein.

**PRAYER FOR RELIEF**

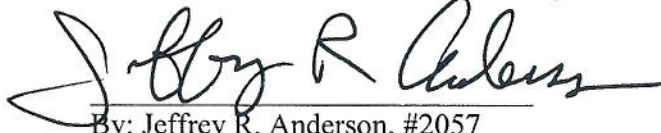
14. Plaintiff demands judgment against Defendant in an amount in excess of \$50,000.00, plus costs, disbursements, reasonable attorney's fees, interest, and such other and

further relief as the court deems just and equitable.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Dated: 10/17/13

JEFF ANDERSON & ASSOCIATES, P.A.



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Attorneys for Plaintiff

**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorney fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in this pleading are asserted.

