



CLERK OF THE COURT

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DISTRICT COURT
CLARK COUNTY, NEVADA

11 TIM COONCE, an Individual,)
12)
13 Plaintiff,)
14 v.)

Case No. : A - 1 1 - 6 3 7 0 1 1 - C
Dept. No.: XXIV

15 FRANCISCAN FRIARS OF CALIFORNIA,)
16 INC., a California Corporation; THE ROMAN)
17 CATHOLIC BISHOP OF LAS VEGAS AND)
18 HIS SUCCESSORS, A CORPORATION)
19 SOLE, a Nevada Corporation f/k/a DIOCESE)
20 OF RENO-LAS VEGAS and its Predecessors)
21 and Successors; THE ROMAN CATHOLIC)
22 BISHOP OF RENO AND HIS)
23 SUCCESSORS, A CORPORATION SOLE, a)
24 Nevada Corporation, f/k/a DIOCESE OF)
25 RENO-LAS VEGAS and its Predecessors and)
26 Successors; SAINT CHRISTOPHER)
27 ELEMENTARY SCHOOL, an Entity of)
28 Unknown Status; SAINT CHRISTOPHER)
CATHOLIC CHURCH, an Entity of Unknown)
Status; TOM THING, an Individual; and)
DOES 1 through 100, inclusive,)

COMPLAINT

[ARBITRATION EXEMPTION CLAIMED:

- 1) PROBABLE JURY AWARD IN EXCESS OF \$50,000; AND**
- 2) SIGNIFICANT ISSUES OF PUBLIC POLICY]**

Defendants.)

24 Plaintiff, Tim Coonce, by and through his counsel, Norman A. Ryan, Esq., Ryan M. Venci,
25 Esq. and Sarah K. Suter, Esq. of the law offices of RYAN MERCALDO & WORTHINGTON LLP
26 avers and alleges as follows:

PARTIES

1. Plaintiff, Tim Coonce, is an adult male over the age of 38. Plaintiff was a minor

1 warning to the St. John's community of the danger he posed. As a result, Fr. Krumm was able to
2 continue his criminal conduct against at least one young Nevada boy. Fr. Krumm began grooming
3 the 11 year-old boy in approximately 1983, taking a strong interest in the boy and earning his trust
4 first by befriending the boy's family, and then by baptizing him in approximately 1985 and becoming
5 his godfather. The boy served as Fr. Krumm's personal altar boy for over two years, assisting Fr.
6 Krumm both at St. John's in Overton and at St. John in Las Vegas in performing weddings and
7 baptisms.

8 28. Unfortunately, Krumm's paternal conduct was really a self-serving attempt to render
9 the boy vulnerable to abuse. Krumm sexually abused him at a cabin used by the Franciscans on Mt.
10 Charleston in Nevada. At the cabin Krumm induced the boy to drink and then sexually abused him
11 once the boy was too intoxicated to resist. After the abuse Krumm would force the boy to sleep
12 naked with him in the same bed or sleeping bag. Krumm also took the boy on trips with him out of
13 Nevada to other locations where the Franciscans conduct their ministry, such as Santa Barbara and
14 San Francisco. At these locations the boy served as Krumm's altar boy, only to be subjected to
15 further sexual abuse by Krumm later that night.

16 Prior Sexual Abuse by Br. Tom Thing

17 29. Plaintiff is the most recent Nevada victim to have reported Franciscan childhood
18 sexual abuse. However, he was not the first victim of the Perpetrator, Br. Tom Thing. Before the
19 Franciscans transferred Br. Thing to Las Vegas, Thing was assigned in Santa Barbara, a location
20 where he abused at least one boy. Beginning at least as early as 1979 if not earlier, the Franciscans
21 allowed Thing to work and travel with the Santa Barbara Boys Choir. One former choir member
22 recalls Thing traveling to Europe with the choir, and waking up one morning to find his (the choir
23 member's) pants and underwear around his ankles and Thing sleeping next to him in the bed.

24 Additionally, despite the fact he was not assigned to the Franciscan seminary in Santa
25 Barbara, St. Anthony's, the Franciscans allowed Thing to fraternize with the students, boys who
26 were between the ages of thirteen and eighteen. The Franciscans allowed Br. Thing to develop
27 inappropriate relationships with the seminarians, and to take them off campus to a variety of
28 locations around Santa Barbara. He also was observed openly engaging in inappropriate physical

1 contact with seminarians with whom he became particularly close. Eventually, most likely in the
2 summer of 1984, Thing sexually abused a seminarian on a camping trip. The Franciscans quickly
3 transferred Thing out of Santa Barbara shortly after Thing molested the boy in his (the victim's)
4 sleeping bag. The victim recalls that prior to the abuse Thing was something of a fixture in the
5 Catholic community. However, not long after the abuse Thing suddenly vanished without any
6 explanation. Shortly thereafter the Franciscans transferred Thing to Las Vegas without any warning
7 to the community. Thing resurfaced at Defendant St. Christopher's School in Las Vegas, most likely
8 during the 1984-85 school year, and subjected an unknown number of children in the unsuspecting
9 community to his criminal conduct. At least one of his victims was Plaintiff.

10 **Br. Thing's Grooming and Sexual Abuse of Plaintiff in Nevada and California**

11 30. Plaintiff was raised in a devout Roman Catholic family. His grandparents were
12 members of the 3rd Order of St. Francis, and his family attended mass on a weekly basis. As a result
13 of this upbringing he held Roman Catholic priests, and Franciscans in particular, in very high regard.
14 He recalls feeling priests spoke with the voice of God.

15 31. Like so many clergy abuse victims, Plaintiff also was the product of a broken home,
16 his father having left the family when Plaintiff was three years-old. Br. Thing recognized Plaintiff's
17 resulting need for paternal attention and affection, and exploited that need for his own sexual
18 gratification. Plaintiff met Br. Thing at school at St. Christopher's where Thing was a staff member,
19 most likely during the 1984-85 school year when Plaintiff was in the 7th grade. Plaintiff understood
20 Thing to be a priest because of the brown Franciscan habit he wore on campus. This status, coupled
21 with Thing's active exploitation of Plaintiff's need for paternal affection, enabled Thing quickly to
22 earn Plaintiff's complete trust, and soon created an emotional dependence in Plaintiff for Thing's
23 attention. Br. Thing utilized this dependence to manipulate Plaintiff and induce Plaintiff to submit to
24 sexual abuse. Specifically, after successfully creating the emotional dependency in Plaintiff, Thing
25 would become cold and distant, rendering the boy desperate for Thing's approval and affection.
26 Thing then would provide this paternal approval and affection to Plaintiff, but ultimately began
27 abusing Plaintiff in this context. In so doing Thing created a situation where his more subtle sexual
28 abuse became reassuring and validating to Plaintiff, confirming for Plaintiff that Thing still cared