

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

KATHLEEN CHAFIN,]	DOC.	NO.
]		
Plaintiff,]		
]		
vs.]	COMPLAINT	
]		
WISCONSIN PROVINCE OF THE]		
SOCIETY OF JESUS and THE]		
CATHOLIC ARCHDIOCESE OF]		
OMAHA,]		
]		
Defendants.]		

COMES NOW the plaintiff, Kathleen Chafin, and for her Complaint states and alleges that:

1. That plaintiff, Kathleen Chafin (hereinafter “Chafin”) is and, at all pertinent times was, a resident of Omaha, Douglas County, Nebraska.
2. That defendant, Society of Jesus, Wisconsin Province (hereinafter “SOJ”), is a Wisconsin non-profit religious organization with its principal place of business in Milwaukee, Wisconsin.
3. That the defendant, The Catholic Archdiocese of Omaha (hereafter “CAO”), is a Nebraska non-profit religious organization with its principal place of business in Omaha, Douglas County, Nebraska.
4. That defendant, SOJ, maintains an organization that operates and, at all times material hereto, has operated in Douglas County, State of Nebraska as a non-profit religious entity.
5. That defendant, CAO, maintains an organization that operates and, at all times material hereto, has operated in Douglas County, State of Nebraska as a non-profit religious entity.

6. That Father Thomas A. Halley, a representative of the defendants, SOJ and CAO, and a principal actor in the actions of the defendants, at all times material hereto, operated in Douglas County, Nebraska as an agent of and for the defendants, SOJ and CAO. That the actions of Father Thomas A. Halley in effectuating the wrongful separation of Chafin from her baby boy and wrongful termination of her maternal rights were as an agent for and in conspiracy with the defendants, SOJ and CAO, and said actions are imputed to the defendants.

7. That on or about 1967 Kathleen Chafin graduated from Duchesne Academy of the Sacred Heart a private school under the auspices of defendant, CAO in Omaha, Douglas County, Nebraska. That after graduation from said school, Chafin attended St. Louis University in Missouri and in the Spring of 1968 discovered that she and her boyfriend were going to have a baby. That a test Chafin had taken at the Student Health Center came back positive for pregnancy. That shortly thereafter a nurse from the college showed up at her dorm room asking if Chafin had told her parents and if she was going to keep the baby. That this was an intrusive and insensitive visit and Chafin asked the nurse to leave. That the next day the college administration advised Chafin that her mother had called and when Chafin returned the call her mother said she had learned that Chafin was pregnant. That Chafin was then pressured to return to Omaha, Nebraska at Spring break.

8. That, upon Chafin's arrival back in Omaha, Father Hupp, parish priest at Christ the King Church of CAO, confronted Chafin and told her she could not be married in the defendant, CAO's organization and, in fact, should not be married at all. That, at that point, the defendants' adoption conspiracy began. That, ironically, the doctrine embraced and promoted by the defendants, at that time, condemned two young people in love who share an intimacy that created the miracle of birth, but applauded the adoption of such a child by a couple in the good graces of the defendants' organizations. That, at the time, the defendants' organizations profited

from such adoption conspiracy.

9. That just as Chafin and her boyfriend made plans to get married, save money and return to finish college in married housing, the defendants intervened with Father Thomas A. Halley appearing at Chafin's home and berating Chafin telling her that:

- a. She had brought shame to her family;
- b. Her giving birth out of wedlock was equal to murder;
- c. She had damned her soul;
- d. She was doomed to spend eternity in hell.

10. That Father Halley, acting as an agent for the defendants, abused his position of authority over Chafin in furtherance of the defendants' adoption conspiracy, which was a doctrine sanctioned and administered by the defendants through such agents of trust.

11. That in May of 1969 Chafin was forced by Father Halley, as an agent of the defendants, to sign a contract for room and board in housing provided by the defendants, for young unmarried girls who became pregnant. That while, in this living arrangement, as her pregnancy came to term, Chafin was forced into indentured servitude cleaning, cooking and babysitting for members of the defendants' organizations. That the end-game in this conspiracy was to provide babies for compliant couples in good standing with the defendants' organizations under a for profit adoption conspiracy scheme.

12. That when Chafin went in for her check-ups the nurses told her that the paperwork showed that she had agreed to give up her baby for adoption, well before the child was even born. That when Chafin tried to talk to her family about this, Father Halley appeared and became very angry, yelling and telling her that this was how it was done. Father Halley, as agent of the defendants, advised Chafin that, after the birth of the child, the baby would be adopted out to a member of the defendants' organizations. That Father Halley even showed Chafin paperwork and a book of hundreds of previous

adoptions he had facilitated.

13. That Chafin arranged for her grandmother to rescue her from this nightmare, but before that could happen, Chafin was drugged and tied to the birthing bed. That the baby was taken from Chafin at birth by members of the defendants' organizations before she could hold him.

14. That, after Chafin gave birth, and the baby was kidnapped she was abandoned by the defendants. That Chafin made several attempts to contact Father Halley. That only after Chafin's grandmother threatened Halley did he meet with Chafin, but came with another man who sat menacingly behind Chafin in Halley's car. That Halley again invoked the authority bestowed upon him by the defendants and told Chafin that it was too late to get her baby back, two weeks after the birth of her son.

15. That Halley again disappeared and Chafin tried numerous times to contact him. That Chafin contacted Father Ryan at Creighton Prep where she thought Halley taught. That Chafin also contacted the CAO, but received not help.

16. That As a direct and proximate cause of the defendants' adoption conspiracy and the actions of defendants' agent, Halley, Chafin attempted suicide twice.

17. That over the years Chafin attempted to contact Father Halley to no avail, making attempts through Creighton Prep, Creighton University and the CAO directly, but being rejected by each as a part of a conspiracy cover-up. That Chafin made calls in 1972 when her next son was still born, again in 1975, 1977, 1982 and many times throughout the 80's and 90's. That Chafin was stonewalled by the defendants in a conspiracy cover-up and her requests were ignored. That the defendants and each of them also conspired to cover-up and conceal facts and witnesses necessary to pursue and action against them.

18. That, finally, in April of 2015 Chafin found her son. That Chafin wrote to the defendants about her ordeal and demanded an investigation. That Father Lawler, a

representative of SOJ, set Chafin up with calls to Marjorie O’Dea, SOJ’s Director for a Safe Environment in Chicago. That Father Lawler then told Chafin that there was nothing to show that Halley had conducted the adoptions. That O’Dea sent two investigators, Rebecca La Fleur and Shirley Colvin of Hillard Heintze in Chicago, to Seattle for an independent investigation. That Chafin gave defendant, SOJ, all of her information, but has never received a report from said defendant.

19. That upon further investigation, Chafin learned that Halley had connections with a group called the Intercessors of the Lamb, which he helped found, and with which he was a member of the Board. That “The Intercessors of the Lamb” operated within the purview of defendant, CAO. That, because of its misdeeds, in 2010 the original organization was suppressed by defendant, CAO, and no longer exists. That Chafin learned that Halley had conducted many other similar adoption kidnappings involving many other women with the help and consent and as a part of the defendants’ conspiracy of adoptions.

20. That Halley conducted a CAO and SOJ sponsored adoption conspiracy scheme that shattered the lives of countless young mothers, including Chafin. That such adoption conspiracy schemes have been discovered throughout the world, all sanctioned by the defendants’ umbrella organization. That the conspiracy adoption scheme of the defendants, herein, was a part of a worldwide adoptions conspiracy.

21. That the Catholic Charities of Canada were exposed as performing such forced adoptions. That the Catholic Church of England and Wales apologized for the hurt it caused young unmarried women who were forced to give up their babies through coercion. That Australia’s Roman Catholic Church apologized for the part it played in forced adoptions in the 50's and 60's. That in 2014 Philomena Lee met with Pope Francis and asked him to open the books on Ireland’s 60,000 forced adoptions. That a movie by her name “Philomena” starring Dame Judi Dench chronicled the pain and life long pain these young mothers endured. That the United Nations has investigated the horrors of these forced adoptions. That these facts are all evidence of the adoption

conspiracy scheme perpetrated by the defendants, herein.

22. That defendants breached a duty to Chafin in the following particulars, to wit:

- a. By conspiring and conducting an adoption conspiracy scheme that kidnapped Chafin's son;
- b. By improperly and illegally using defendants' influence over Chafin to terminate her maternal rights;
- c. By conspiring to hide evidence of defendants' illegal adoption conspiracy scheme;
- d. By intentional and negligent infliction of mental and emotional harm to Chafin;
- e. By running a scheme of indentured servitude in furtherance of defendant's adoption conspiracy;
- f. By effectively "selling" Chafin's son through an elaborate conspiracy to misuse the adoption laws of the State of Nebraska;
- g. By defendants illegally misusing their tax exempt status to effectuate an adoption conspiracy to force, through coercion and threats, Chafin's relinquishment of maternal rights.
- h. By illegally engaging in a cover-up of their adoption conspiracy.

23. That nothing can replace Chafin's lost years with her son, or recompense her for having him literally stolen from her womb. That her experience has been called soul rape. That the actions of the defendants destroyed a young family and devastated a young girl. That no amount of money can heal such wounds. That Chafin's damages herein are in excess of \$3,000,000.00 for the mental, emotional, and physical pain and suffering proximately caused by the actions of the defendants.

24. That as a direct and proximate result of said adoption conspiracy perpetrated by the defendants, their intentional acts, their negligence and their breach of duty, plaintiff has experienced and continues to experience severe and permanent mental, emotional, and physical pain and suffering and will continue to experience such mental and physical pain, suffering and disability into the foreseeable future and for the

remainder of her life.

25. That as a direct and proximate result of the actions of the defendants and their agents, the plaintiff has suffered and will continue to suffer a permanent loss of quality and enjoyment of life.

26. That as a direct and proximate result of said actions of the defendants', plaintiff has incurred expenses, to date, in the approximate amount of \$50,000.00 and will incur further future medical expenses for the treatment.

WHEREFORE, plaintiff prays for special damages incurred, to date, in the amount of \$50,000.00, for future damages, for general damages, for costs and attorneys' fees expended herein, and for further relief as the court finds just and reasonable.

KATHLEEN CHAFIN, Plaintiff,

By: /s/ Benjamin E. Maxell
Benjamin E. Maxell, NE # 22689
Govier, Katskee, Suing & Maxell, PC, LLO
10404 Essex Court, Suite 100
Omaha, Nebraska 68114
Telephone: (402) 391-1697
Facsimile: (402) 391-8932
E-Mail: ben@katskee.com

ATTORNEYS FOR PLAINTIFF