

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE and JOHN DOE,

Plaintiffs,

-against-

**LOUIS LEONELLI, COMMUNITY
OF FRANCISCAN FRIARS OF THE
RENEWAL, SAINT ADALBERT'S
CHURCH, SAINT ANTHONY
SHELTER FOR RENEWAL, SAINT
CRISPIN'S FRIARY, and
ARCHDIOCESE OF NEW YORK,**

Defendants.

Civil Action No. 22- cv- 3732

COMPLAINT

**JURY TRIAL
REQUESTED.**

COMPLAINT

1. Plaintiffs, Jane Doe and John Doe¹ (hereinafter “Mrs. Doe,” “Mr. Doe,” or “Mrs. and Mr. Doe”), by and through undersigned counsel, for their Complaint against Defendants Louis Leonelli (“Leonelli”), Community of Franciscan Friars of the Renewal (“Community”), Saint Adalbert’s Church (“Church”), Saint Anthony Shelter for Renewal (“Shelter”), Saint Crispin’s Friary (“Friary”), and the Archdiocese of New York (“Archdiocese”),

¹ Simultaneously with this Complaint, Plaintiffs are filing a motion to proceed by pseudonym.

respectfully allege upon knowledge as to themselves and their acts, and upon information and belief as to all other matters, the following:

PRELIMINARY STATEMENT

2. In flagrant abuse of his office as an ordained priest of the Defendants Community, Church, Shelter, Friary, and Archdiocese, and in contempt of the rights, dignity, reasonable expectations, and reliance of Plaintiffs Mrs. Doe and Mr. Doe, and clearly in violation of his public oath to refrain from such conduct, Defendant Leonelli on multiple occasions sexually abused² Mrs. Doe, a lifetime Roman Catholic parishioner and at the time of the abuse a volunteer worker for the Defendants Community, Church, Shelter, Friary, and Archdiocese. The Defendants Community, Church, Shelter, Friary, and Archdiocese either were aware of Defendant Leonelli's propensity for such misconduct, or they failed to properly supervise Defendant Leonelli as a member of the Church. In this way they failed to protect Mrs. Doe and Mr. Doe from the most damaging and humiliating experience of their lives.

² See NY Penal L § 130.65 (Sexual Abuse in the First Degree); NY Penal L §§ 130.166, 130.167 & 130.70 (Aggravate Sexual Abuse); *see also* NY Penal L § 130.52 (Forcible Touching).

JURISDICTION

3. The Court's diversity jurisdiction over this action arises under 28 U.S.C. § 1332. Plaintiffs bring their claims under the Gender-Motivated Violence Act of 2001, New York City Code §§ 8-101 & 8-901 *et seq.*, and New York common law. Their claims for damages exceed \$75,000.00.

4. Venue is proper in the Southern District of New York under 28 U.S.C. § 1391, as a substantial part of the events giving rise to the claims occurred in this District, and on information and belief all defendants reside in this District.

PARTIES

5. Plaintiff Mrs. Doe is a dual national, holding citizenship in the United States and French Republic. Plaintiff Mr. Doe is a French citizen. They are both permanent residents of France.

6. Upon information and belief, Defendant Leonelli is a citizen of New York State and resides in New York City.

7. Upon information and belief, Defendants Community, Church, Shelter, Friary, and Archdiocese are organizations operating and regularly doing business in New York State and New York City.

FACTUAL BACKGROUND

8. Plaintiff Mrs. Doe has been a dedicated member of the Roman Catholic Church her entire life. She deeply respects its history; she follows its tenets; and she is dedicated to its mission. She strongly believes in its mission to alleviate suffering and poverty. Mr. Doe is a more recent convert. Following his wife's dedication to the church, he was baptized in the church and, until the events described herein, gave his time, energy, faith, trust, and resources to the church.

9. While living in New York, Mrs. Doe volunteered to work in the Community's Lay Associate Program, working in charitable projects supervised and administered by the Defendants, including the homeless shelter program located at Saint Adalbert's Church in the Bronx, which, during the relevant time, was run on a day-to-day basis by Defendant Leonelli. While working for the Defendants on the premises of the Shelter and Friary, Mrs. Doe met Defendant Leonelli, a Franciscan priest and employee of the Defendants, and she worked under his supervision.

10. On information and belief, St. Anthony Shelter is operated by the Community of Franciscan Friars for the Renewal. St. Adalbert's Church and St. Crispin's Friary are organized and operate within the Community; and the Community, Church, Friary, and Shelter are all located in the City of New York. At the relevant times, on information and belief, all Defendants'

activities fell under the supervision, control, and direction of the Archdiocese.

11. Mrs. Doe formally became a Community Lay Associate in 2012 and continued to work for the Community's Shelter project. Shortly after, Defendant Leonelli, based on Mrs. Doe's gender, started to "groom" Mrs. Doe for sexual abuse, at first doing things that, though inappropriate, were not overtly sexual. For example, he said "I love you" to her frequently, and, indeed, he did so with steadily increasing frequency over time. He also started touching her inappropriately, for example provocatively stroking her face while he administered communion to her. Other examples include but are not limited to the following: On the pretext of giving her spiritual counseling, he sought to persuade her to divorce her husband by asking "Why are you married to [Mr. Doe]?" Once, while she was discussing changes in the management of lay volunteers, he sat next to her and started to play with the buckle of her bra. At another time, while Leonelli ostensibly was giving Mrs. Doe "spiritual direction," he told her that she was "the woman [he] was looking for his whole life."

12. Leonelli's misconduct escalated. While hugging Mrs. Doe in greeting he positioned himself in order to press his erect penis against her. On numerous occasions, when he caught her alone in the basement of Saint Adalbert's Church, he would kiss her, or try to kiss her, and then quickly

walk away. When out of view of surveillance cameras at the shelter, he would grab her forcefully and kiss her, using his tongue. Once during confession, he hugged and kissed her, and then put his hands under her skirt.

13. In mid-2015, he called her into his office at the Saint Anthony's shelter where he suddenly assaulted her and sexually abused her by grabbing her genitals and, without her consent, penetrating her with his finger. He then pulled away, told her sarcastically to "go back to your husband," and fled the office, leaving Mrs. Doe in shock and unable to move.
14. Mrs. Doe felt powerless to respond, because Defendant Leonelli was not only her spiritual advisor but also her supervisor in the Lay Associate program, and, in addition, an authority in the Roman Catholic Church in which she had invested her trust. She was frightened of a confrontation with him or with the church. She feared ostracism from the Catholic Church, was extremely reluctant to create a scandal for the Church, and afraid of spreading the emotional and psychological injury to her husband and family.
15. Leonelli played on these fears, and then he threatened worse consequences. After the first sexual abuse and assault in the Shelter office, she told him that she had resolved to report him to his supervisor. His response was to tell her: "If you talk, you are going to disappoint many people. You will be

responsible for many people to leave the Church.” Then, he directly threatened her by stating: “You need to think of the protection of your family.” Thus, by these and other threats, Leonelli deterred Mrs. Doe from reporting the sexual abuse.

16. Following these threats, his sexual harassment and pressuring continued, to the point where it had become as routine as it was blatant. Once, for example, just before she was to teach a cooking class at the Shelter, Leonelli came up to her and said, “If we were together, I would make love to you on the stove.”
17. Some months later, in the Fall of 2015, while working in the kitchen of St Crispin's friary, Defendant Leonelli again assaulted and sexually abused her by grabbing her and, without her consent, penetrating her genitals with his finger, leaving her shocked, paralyzed, and distraught. Shortly after that, she left the Franciscan Lay Associate program. Leonelli continued to threaten Mrs. Doe, telling her to worry about “repercussions to your family and your own reputation” if she reported him. Later, she and Mr. Doe returned to France with her family.
18. In 2021, Mrs. Doe began seeing two psychotherapists working in the Catholic dioceses in France. She gradually became able to start talking about Defendant Leonelli’s sexual abuse. She decided to report Leonelli’s misconduct to Church authorities, including alerting Defendant Leonelli’s

supervisor within the Community. Leonelli's supervisor acknowledged receiving Mrs. Doe's description of Leonelli's behavior and responded by writing that: "This is dreadful and I am sickened by his behavior! It is terrible what happened to you." And further, "My apologies to you, [Mr. Doe], and the children, this behavior is scandalous. We will begin to try to repair the damage and prevent it from happening again."

19. Mrs. Doe was physically harmed by Leonelli's conduct, and both Mrs. and Mr. Doe suffered and continue to suffer from extensive psychological and emotional injuries and loss of consortium due to their experiences with the Defendants.

20. On information and belief, Mrs. Doe was not the only woman to have suffered sexual abuse and violence at Defendant Leonelli's hands. Indeed, Leonelli admitted to Mrs. Doe that he had violated his oath in a previous affair with at least one other married woman, and that had resulted in the divorce of that woman from her husband.

CAUSES OF ACTION AND PRAYERS FOR RELIEF

As for the First Cause of Action

(violations of the NYC Victims of Gender-Motivated Violence Act):

Plaintiffs restate and reallege ¶¶ 1- 20.

21. Defendant Leonelli violated the Victims of Gender-Motivated Violence Act by pursuing a campaign of sexual harassment and assault, based on Mrs.

Doe's gender, including the sexual abuse and forcible touching of Mrs. Doe and threats to her family's safety. Leonelli's behavior caused both Plaintiffs to suffer extensive psychological and emotional harms, including loss of consortium, all of which were the reasonably foreseeable consequences of Leonelli's conduct.

**As for the Second Cause of Action
(respondeat superior—NYC Victims of Gender-Motivated
Violence Act):**

Plaintiffs restate and reallege ¶¶ 1-21.

22. Defendants Community, Church, Shelter, Friary, and Archdiocese authorized, endorsed, ratified, and knew or should have known of Defendant Leonelli's misconduct. As Leonelli's employers and supervisors, Defendants Community, Church, Shelter, Friary, and Archdiocese are liable for all of Defendant Leonelli's injurious acts committed against the Plaintiffs in the course of their employment of him and for their benefit, in violation of the Victims of Gender-Motivated Violence Act, including Leonelli's threats against Plaintiffs and their family.

**As for the Third Cause of Action
(negligent hiring and supervision):**

Plaintiffs restate and reallege ¶¶ 1-22.

23. Defendants Community, Church, Shelter, Friary, and Archdiocese hired, retained, promoted, and invested Leonelli as a priest in the Franciscan

Community, giving him authority over Defendants' employees and lay volunteers, as well as over other parishioners. Their failure to supervise Leonelli was so egregious that Leonelli was able to pursue patently predatory campaigns against the Plaintiffs, and on information and belief against others, without necessary oversight, or appropriate control, or any corrective discipline.

WHEREFORE, Plaintiffs Jane Doe and John Doe pray for an award of money damages in an amount in excess of \$75,000, against Defendants Louis Leonelli, Community Franciscan Friars of the Renewal, Saint Adalbert's Church, Saint Anthony Shelter for Renewal, Saint Crispin's Friary, and Archdiocese of New York, for injuries suffered due to Defendants' acts and omissions. Plaintiff also prays for the award of appropriate interest on damages, for the taxation of its costs of litigation against the Defendants, and for the award of other fees (including attorney's fees), charges, and other legal relief as is necessary and appropriate.

A JURY TRIAL IS DEMANDED ON ALL CLAIMS.

Respectfully submitted,



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