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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

DIANE LACKEY,)
) CASE NO. 0303-03121
)
Plaintiff,)
) COMPLAINT
v)
)
CLIFFORD A. BAKER and DEBRA LACEY)
) NOT SUBJECT TO MANDATORY
) ARBITRATION; JURY TRIAL
Defendant.) REQUESTED

For her claim for relief (professional negligence), plaintiff alleges the following:

1.

At all times mentioned, defendant Cliff Baker was a pastor and professional counselor engaged in the practice of providing mental health counseling in Portland, Oregon.

2.

At all times mentioned, defendant Deb Lacey was a professional counselor and self-proclaimed "soul surgeon" who was engaged in the practice of providing mental health counseling in Portland, Oregon.

3.

During the years 2001 through 2002, both defendants engaged in mental health counseling with the plaintiff.

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4.

Defendants' counseling included the diagnosis and treatment of plaintiff for multiple personality disorder, "recovered memory" work, and sexual and "ritual abuse".

5.

Defendants' counseling and treatment of plaintiff included methodology which they knew, or reasonably should have known, had been widely discredited throughout the mental health field, and were known to cause serious trauma, mental illness, and false memories to patients.

6.

Defendants' counseling was negligent in one or more of the following particulars:

- a. They failed to warn plaintiff of the recognized and known hazards of their methodology;
- b. They caused and reinforced the development of false beliefs by the plaintiff that she had been ritually and sexually tortured by family members and others;
- c. They failed to conduct adequate and appropriate mental and emotional status exams;
- d. They misdiagnosed plaintiff as a victim of sexual and ritual abuse for which there was no credible basis;
- e. They reinforced and validated plaintiff's beliefs and recitation of wildly delusional histories of such abuse;
- f. They failed to refer her to competent mental health professionals;
- g. They engaged in professional work for which they had inadequate training and experience.

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7.

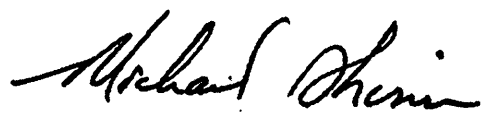
As a result of defendants' negligence, plaintiff developed and enhanced false memories of being abused by family members and members of the Masonic Lodge; her psychological, emotional, and spiritual well being deteriorated; she became increasingly paranoid and delusional; she suffered from increasing fear and terror of being "demonized"; assaulted, raped, and tortured; she became depressed, dysfunctional, and unable to manage her business; and she suffered serious damage to her reputation, and loss of earning capacity, all to her damage in the sum of \$4,750,000.

8.

As a further result of defendants' negligence, plaintiff lost earnings in the approximate sum of \$200,000.

WHEREFORE, plaintiff prays for judgment against the defendants, and each of them, for the sum of \$4,750,000 non-economic damages, \$200,000 economic damages, and for her costs and disbursements herein.

DATED THIS 6th day of March, 2003.



Michael R. Shinn, OSB# 73270
Attorney for Plaintiff