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

DIANE LACKEY,)	
)	0201-00733
Plaintiff,)	SECOND AMENDED
)	COMPLAINT
v)	
)	
PETER DEPAOLI, RHONDA EARLE and)	
NORTHWEST FAMILY MINISTRIES, an)	NOT SUBJECT TO MANDATORY
OREGON NONPROFIT CORPORATION)	ARBITRATION
)	
Defendant.)	

For her claim for Relief (Negligence), plaintiff alleges the following:

1.

At all times herein mentioned, the defendant Northwest Family Ministries (hereafter, "NWFM" was an Oregon nonprofit corporation engaged in the ownership, supervision, management, and staffing of a professional counseling center in Aloha, Oregon.

2.

At all times mentioned, said defendant, acting through licensed professional counselors, engaged in the diagnosis and treatment of alleged physical, sexual, and ritualistic abuse.

3.

At all times mentioned, said defendant, acting through licensed professional counselors, engaged in the diagnosis and treatment of alleged illnesses known as "dissociative disorders", or "multiple personality disorder", as well as "ritual abuse".

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3a.

At all times mentioned, the diagnosis and treatment of “dissociative disorder”, “multiple personality disorder”, and “ritual abuse”, as well as methodology involved in “memory retrieval”, had been discredited within the mental health field as unscientific treatments which were known to have caused many patients to develop false beliefs that they were victims of abuse which never occurred.

4.

At all times mentioned, defendant Peter DePaoli was a licensed, professional counselor employed by the defendant who engaged in the diagnosis and treatment of the aforementioned dissociative disorders, multiple personality disorders, and “ritual abuse”.

5.

At all times mentioned, defendant DePaoli was acting within the course, scope, and authority of his employment with NWFM.

6.

At all times mentioned, Rhonda Earle was also a professional counsel employed by the defendant, and who engaged in the diagnosis and treatment of the aforementioned dissociative disorders, multiple personality disorders, and “ritual abuse”.

7.

At all times mentioned, Earle was acting within the course, scope, and authority of her employment with NWFM.

8.

At all times mentioned, DePaoli and Earle knew, or reasonably should have known, that these alleged mental disorders had been widely discredited throughout the mental health field, and the very diagnosis and treatment methods associated with them were known to cause serious trauma to patients and to their families and associates.

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9.

Plaintiff was a patient of the defendants from April through December of 2001.

10.

Throughout their counselor-patient relationship with plaintiff, Paoli and Earle utilized hypnosis, hypnotic suggestion, and other unscientific methods in their "therapy" of the plaintiff.

11.

This therapy caused plaintiff to falsely believe that she suffered from dissociative disorder, or multiple personality disorder, as a result of false memories of physical, sexual, and ritual abuse which she developed as a result of this therapy.

12.

This therapy further caused plaintiff to falsely believe that she had been sexually, physically, and emotionally molested and abused and satanically abused by members of her family and the Masonic Temple.

13.

Defendants were negligent in their diagnosis, treatment, and therapy of the plaintiff in one or more of the following particulars:

a In failing to provide the plaintiff with adequate warnings and information about the known risks and dangers of their therapeutic techniques, of the diagnosis and treatment of MPD, and of the memory retrieval work they performed upon her, when it was reasonably foreseeable that such techniques, diagnosis, and treatment would create false memories that would cause serious emotional and psychological harm;

b. In failing to conduct adequate and appropriate mental and emotional status examinations;

c. In misdiagnosing plaintiff as a victim of sexual and ritual abuse for which there was no credible basis;

1 d. In failing to reevaluate her treatment plan when it became evident that their techniques
2 were worsening plaintiff's condition;

3 e. In "validating" her emerging "memories" of abuse when they were patently improbable
4 and lacked any reliable corroboration;

5 f. In failing to refer plaintiff to competent mental health professionals;

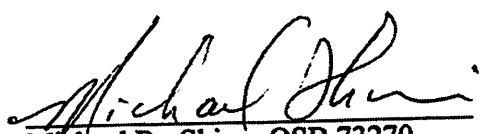
6 g. In utilizing discredited and unscientific methodology which they knew, or reasonably
7 should have known, was reasonably likely to cause serious damage to the plaintiff.

8 14.

9 As a result of defendants' negligence, plaintiff developed false memories of being abused
10 by family members and the Masonic Temple; her psychological, emotional, and spiritual well
11 being deteriorated; she became paranoid and delusional; her relationships with family and friends
12 were damaged; she suffered from fear and terror of being "demonized", assaulted, and raped; she
13 became suicidal; she developed severe false memories of having been raped for over a year; she
14 became depressed, dysfunctional, and unable to manage her business; she became severely
15 emotionally distressed to the point she was suicidal, and she suffered serious damage to her
16 reputation, and a loss of earning capacity, all to her non-economic damage in the sum of
17 \$4,750,000.
18

19 WHEREFORE, Plaintiff prays for judgment against the defendants, and each of them, in
20 the sum of \$4,750,000, and for her costs and disbursements herein.

21 DATED THIS 18th day of December, 2002.

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23
24 
25 Michael R. Shinn, OSB 73270
26 Attorney for Plaintiff