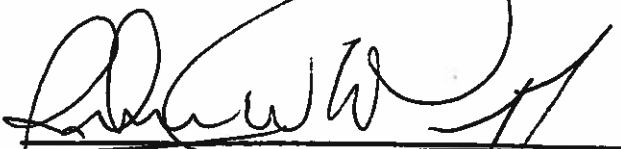




I declare, under penalty of perjury, that this Notice and Acknowledgment of Receipt of Summons and Complaint was mailed on



Signature

2-19-91

Date of Signature

**ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND COMPLAINT**

I declare, under penalty of perjury, that I received a copy of the summons and of the complaint in the above-captioned matter at

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Relationship to Entity/  
Authority to Receive Service  
of Process

\_\_\_\_\_  
Date of Signature

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED  
U. S. DISTRICT COURT  
DISTRICT OF NEBRASKA

91 FEB 28 AM 11:42-21

PAUL BONACCI,

Plaintiff,

vs.

THE CATHOLIC ARCHBISHOP  
OF OMAHA, et al.,

Defendants.

CV. 91-3037

NORBERT H. EBEL  
CLERK *hu*

ANSWER OF DEFENDANTS  
CITY OF OMAHA, MICHAEL HOCH  
AND KENNETH BOVASSO

COME NOW the respective defendants City of Omaha, Michael Hoch and Kenneth Bovasso, and for their individual answers to the Amended Complaint of Paul Bonacci filed herein, state, allege and aver as follows:

1. Defendants admit so much of paragraph 7 of plaintiff's Amended Complaint as alleges that Michael Hoch is employed by the City of Omaha as a police officer.

2. Defendants admit so much of paragraph 8 of plaintiff's Amended Complaint as alleges that Kenneth Bovasso is employed by the City of Omaha as a police officer.

3. Defendants admit so much of paragraph 10 as alleges that the City of Omaha is a municipal corporation duly organized and existing under the laws of the State of Nebraska.

4. Defendants deny each and every other allegation of plaintiff's Amended Complaint except those constituting admissions against plaintiff's interest.

AFFIRMATIVE DEFENSES

5. Plaintiff has failed to state a claim upon which relief can be granted.

6. Plaintiff's claims which are premised upon acts which allegedly occurred on or prior to February 1, 1987 are barred in time by the statute of limitations.

7. The individually named defendants Hoch and Bovasso are entitled to qualified immunity from liability and from suit.

8. Plaintiff lacks capacity to sue. In support of this allegation defendants show the Court that: (a) plaintiff suffers from Multiple Personality Disorder; (b) many of the incidents alleged in the Amended Complaint were perpetrated upon personalities other than the plaintiff; (c) the plaintiff, in the personality of Paul Bonacci does not have personal knowledge or understanding of many events alleged in the Amended Complaint. See attachments to plaintiff's Amended Complaint.

9. Plaintiff has failed to allege, with the requisite degree of particularity, any overt act committed by the defendants City, Bovasso, or Hoch, in furtherance of a conspiracy.

10. Plaintiff has failed to clearly establish, as required by Fed. R. Civ. Pro. 8a, that defendants Bovasso and Hoch are connected to the alleged wrongful acts; and he has failed to establish the basis upon which relief is sought against these defendants.

WHEREFORE, the answering defendants pray that the Amended Complaint of Paul Bonacci be dismissed as to each of them and

that they each have and recover their costs expended herein.

CITY OF OMAHA, MICHAEL HOCH  
and KENNETH BOVASSO, Defendants

By Wendy Hahn  
JAMES E. BELLOWS, #11261  
Deputy City Attorney  
WENDY E. HAHN, #17695  
Assistant City Attorney  
804 Omaha/Douglas Civic Center  
1819 Farnam Street  
Omaha, Nebraska 68183  
Telephone: 402/444-5115

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing ANSWER was sent by regular United States mail, postage prepaid, on this 26<sup>th</sup> day of February, 1991, to:

Mr. Allen Daubman  
Attorney at Law  
One Pacific Place  
Suite 800  
1125 South 103rd Street  
Omaha, Nebraska 68124

Mr. Lyle Koenig  
147 No. 4th  
P.O. Box 48  
Hebron (Mayer), NE 68370

John DeCamp  
DeCamp Legal Services P.C.  
521 S. 14th St.  
Suite 300  
Lincoln, NE 68508

Mr. Michael O'Brien  
Attorney at Law  
318 South 19th St.  
Omaha, Nebraska 68102

Mr. Tyler Gaines  
Attorney at Law  
10050 Regency Circle  
Suite 200  
Omaha, NE 68114

Mr. David Peterson  
Attorney at Law  
1500 Woodmen Tower  
Omaha, Nebraska 68102

C. E. Heaney  
13006 Regency Parkway Drive  
Omaha, Nebraska 68114

Steve Seline & Tory Bishop  
Attorneys at Law  
1650 Farnam Street  
Omaha, Nebraska 68102

Mr. Ed Hotz  
Attorney at Law  
10250 Regency Circle  
Suite 100  
Omaha, Nebraska 68114

Don Stenberg, Attorney General  
ATTN: Susan Ugai, Asst. Atty. Gen.  
2115 State Capitol  
Lincoln, NE 68509

Mr. Ed Warin  
800 Commercial Federal Tower  
2120 South 72nd Street  
Omaha, Nebraska 68124

Wendy HAT

5881C

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

FILED  
U. S. DISTRICT COURT  
DISTRICT OF NEBRASKA

91 FEB 11 PM 3:05

NORBERT H. EBEL  
CLERK

-6

Bonacc'

Plaintiff

vs.

Catholic Arch Bishop et al

Defendant

PRAECIPE

Case No. CV 91-3037

SUMMONS ISSUED  
THIS DATE

To the Clerk of said Court: please issue summons & attach  
complaint to following Defendants:

- IAN PELT
- WADMAN
- DOUGLAS COUNTY GRAND JURY
- FLANAGAN
- KINH
- CITRON
- Baer
- ANDERSON
- HOCH
- BOUSSO

- JL Brandeis & Sons, Inc
- Omaha W. Herald Co
- NEB Psychological Assol.
- CATHOLIC ARCH Bishop of Om
- Omaha Public Schools
- City of Omaha

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Attorney's Name  
DECAMP LEHAL  
Address

Attorney for PL

521 S. 14 Lincoln 68502  
477-3974

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED 242  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA SD  
99 FEB 22 AM 8:15

PAUL A. BONACCI, )  
 ) 4:CV91-3037  
 )  
 )  
 Plaintiff, )  
 )  
 )  
 vs. )  
 ) FINAL JUDGMENT  
 ) MEMORIALIZING DISPOSITION  
 ) OF ALL CLAIMS, EXCEPT THOSE  
 ) AGAINST LAWRENCE E. KING  
 )  
 )  
 THE CATHOLIC ARCHBISHOP OF )  
 OMAHA, et al., )  
 )  
 )  
 Defendants. )

GARY D. MCFARLAND  
CLERK

IT IS ORDERED that judgment be entered for all defendants, except Lawrence E. King, on the following bases:

1. the Catholic Archbishop of Omaha—failure to state a claim upon which relief can be granted in the second amended complaint, as found regarding the first amended complaint in the court's memorandum and order dated July 18, 1991, filing 53;
2. Peter Citron—dismissed by order, filing 229, on motion of the plaintiff;
3. Harold Anderson—dismissed by order, filing 166, at the request of the plaintiff;
4. Robert Wadman—dismissed by order, filing 203, on motion for summary judgment;
5. Michael Hoch—dismissed by order, filing 218, on motion for summary judgment;
6. Kenneth Bovasso—dismissed by agreement of the parties, filing 194;
7. The City of Omaha—dismissed by order, filing 218, on motion for summary judgment;
8. The Douglas County Grand Jury—no service of process accomplished;
9. Michael Flannagan—dismissed for failure to state a claim upon which relief may be granted in the second amended complaint, as was found regarding the first amended complaint by order, filing 52;
10. Samuel Van Pelt—dismissed by order, filing 52, relating to the first amended complaint for prosecutorial immunity, which is equally applicable to the allegations of the second amended complaint;

Copies mailed on 2/22/99



11. The Omaha Public School District—dismissed by order, filing 64, granting the motion for summary judgment;
12. The Omaha World Herald—dismissed by order, filing 53, granting the motion to dismiss;
13. J. L. Brandeis & Sons, Inc.—dismissed by order, filing 195, on motion for summary judgment and omission of that defendant from the second amended complaint;
14. Alan Baer—dismissed by order , filing 196, on motion for summary judgment; and
15. Nebraska Psychological Associates, f/k/a Nebraska Psychiatric Institute, a non-profit corporation—omitted from second amended complaint, filing 139.

Dated February 19, 1999.

BY THE COURT

  
United States Senior District Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED 240  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
99 FEB 22 AM 8:14 SD

PAUL A. BONACCI,

Plaintiff,

vs.

LAWRENCE E. KING,

Defendant.

4:CV91-3037 GARY D. MCFARLAND  
CLERK

MEMORANDUM OF DECISION

On February 27, 1998, I found that default judgment should be entered against the defendant Lawrence E. King in favor of the plaintiff, Paul A. Bonacci. A trial on the issue of the damages due the plaintiff by that defendant was had on February 5, 1999.

Two counts are alleged against the defendant King in the complaint. Count V alleges a conspiracy with public officers to deprive the plaintiff of his civil rights, designed to continue to subject the plaintiff to emotional abuse and to prevent him from informing authorities of criminal conduct. Count VIII charges battery, false imprisonment, infliction of emotional distress, negligence and conspiracy to deprive the plaintiff of civil rights. Between December 1980 and 1988, the complaint alleges, the defendant King continually subjected the plaintiff to repeated sexual assaults, false imprisonments, infliction of extreme emotional distress, organized and directed satanic rituals, forced the plaintiff to "scavenge" for children to be a part of the defendant King's sexual abuse and pornography ring, forced the plaintiff to engage in numerous sexual contacts with the defendant King and others and participate in deviate sexual games and masochistic orgies with other minor children. The defendant King's default has made those allegations true as to him. The issue now is the relief to be granted monetarily.

The now uncontradicted evidence is that the plaintiff has suffered much. He has suffered burns, broken fingers, beatings of the head and face and other indignities by the wrongful actions of the defendant King. In addition to the misery of going through the experiences just related over a period of eight years, the plaintiff has suffered the lingering results to the present time. He is a victim of multiple personality disorder, involving as many as fourteen distinct personalities aside from his primary personality. He has given up a desired military career and received threats on his life. He suffers from sleeplessness, has bad dreams, has difficulty in holding a job, is fearful that others are following him, fears getting killed, has depressing flashbacks, and is verbally violent on occasion, all in connection with the multiple personality disorder and caused by the wrongful activities of the defendant King.

Almost certainly the defendant King has little remaining financial resources, but a fair judgment to compensate the plaintiff is necessary. For the sixteen years since the abuse of the plaintiff began I conclude that a fair compensation for the damages he has suffered is \$800,000. A punitive award also is justified, but the amount needs to be limited because of the small effect

Copies mailed on 2/22/99

that such a judgment would have on the defendant King, given his financial condition and his presence now in prison. I deem a punitive award of \$200,000 to be adequate.

Dated February 19, 1999.

BY THE COURT

A handwritten signature in cursive script, appearing to read "Warren R. Gibson", written over a horizontal line.

United States Senior District Judge

99 FEB -5 PM 2:18  
GARY D. McFARLAND  
CLERK

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

PAUL A. BONACCI, )  
)  
) Plaintiff, )  
)  
) vs. )  
)  
) CATHOLIC ARCHBISHOP, et al. )  
)  
) Defendants. )

Case No. 4:91CV3037

LIST OF WITNESSES

Deputy: Colleen Beran  
Reporter: Gary Latimer  
Hearing Date: 2/5/99

FOR PLAINTIFF:

Name

Date

Name	Date
Noreen Natalie Gosch	2/5/99
Russell Eric Nelson	2/5/99
Paul Anthony Bonacci	2/5/99
Denise Ann Bonacci	2/5/99

FOR DEFENDANT:

Name	Date

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEBRASKA

FILED  
U. S. DISTRICT COURT  
DISTRICT OF NEBRASKA

99 FEB -5 PM 2:1

GARY D. McFARLA  
CLERK

PAUL A. BONACCI, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CATHOLIC ARCHBISHOP, et al. )  
 )  
 Defendants. )

LIST OF EXHIBITS

Case Number: 4:91CV3037  
Courtroom Deputy: Colleen Beran  
Court Reporter: Gary Latimer

Hearing Date: February 5, 1999

EXHIBIT NO.			DESCRIPTION	OFF	OBJ	RCVD	NOT RCVD	DATE
PLF	DFT	3 PTY						
1			Bag containing 11 tapes	X		X		2/5/99
2			Picture of Russell Nelson	X		X		2/5/99
3			Picture of Larry King and pals in New York	X		X		2/5/99
4			Picture of Larry King	X		X		2/5/99
5			Picture of Larry King's mansion	X		X		2/5/99
6			Picture of limousine at airport	X		X		2/5/99
7			Book: <u>The Franklin Cover- up</u>	X		X		2/5/99

238

99 JAN 25 AM 10:58 235

GARY D. MCFARLAND  
CLERK *RS*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

<b>PAUL A. BONACCI,</b>	)	<b>4:CV91-3037</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>MOTION TO CONTINUE</b>
	)	
<b>LAWRENCE E. KING,</b>	)	
	)	
<b>Defendant.</b>	)	

COMES NOW the Plaintiff, Paul A. Bonacci, by and through his attorney, John W. DeCamp, of DeCamp Legal Services, P.C., and herewith applies for a continuance of the hearing in the above-captioned case for the following reasons, to wit:

1. Hearing for the above-captioned matter has been set for Friday, February 5, 1999, at 9:00 a.m., in Courtroom #4, United States Courthouse, Lincoln, Nebraska.
2. Counsel for Plaintiff plans to introduce various exhibits and the testimony of various witnesses at the above-mentioned hearing. However, at least two such witnesses, Mr. Rusty Nelson and Ms. Alisha Owen, will not be able to attend the hearing, as they are currently incarcerated. Mr. Nelson's and Ms. Owen's testimony at the hearing is crucial to Plaintiff's case, and Mr. Nelson is in possession or control of photographs crucial to the Plaintiff's case.
3. Counsel for Plaintiff requires additional time within which to arrange for the appearance of Mr. Nelson, Ms. Owen, and other witnesses and exhibits.

WHEREFORE, the Plaintiff prays for a continuance in the above-captioned case,  
until the 6<sup>th</sup> day of May, 1999, or until the next most available court term.

Dated this 25<sup>th</sup> day of January, 1999.

**PAUL A. BONACCI, Plaintiff**

By: 

John W. DeCamp, Neb. Bar # 10951

DeCAMP LEGAL SERVICES, P.C.

Attorneys for Plaintiff

414 South 11th Street

Lincoln, Nebraska 68508

(402) 477-3974

(402) 477-4487 fax

**CERTIFICATE OF SERVICE**

On January 25, 1999, a copy of this Motion to Continue was served upon the  
following by United States certified mail, postage prepaid:

Mr. Lawrence E. King  
Pris. I.D. # 12834-047  
FCI Florence  
P.O. Box 6000  
Florence, Colorado 81226

I certify under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Date

  
JOHN W. DeCAMP, Attorney for Plaintiff