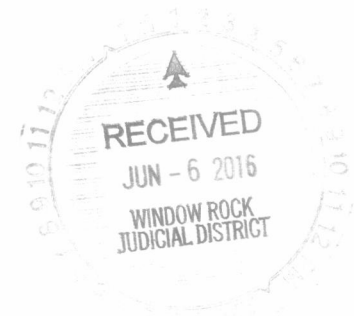


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NAVAJO NATION DISTRICT COURT  
DISTRICT OF WINDOW ROCK, ARIZONA

LK, )  
 )  
 )  
 Plaintiff, )  
 )  
 )  
 vs. )  
 )  
 )  
 THE CORPORATION OF THE PRESIDENT )  
 OF THE CHURCH OF JESUS CHRIST OF )  
 LATTER-DAY SAINTS, a Utah corporation; )  
 LDS FAMILY SERVICES, a Utah corporation, )  
 )  
 Defendants. )  
 )  
 )  
 )

Case No. WR-CV-75-14

FIRST COMPLAINT FOR  
PERSONAL INJURY

Plaintiff, through counsel, and based upon information and belief available at the time of the filing of this Complaint, brings this Complaint under Navajo Law for damages resulting from injuries suffered by Plaintiff as a result of Defendants' negligence and other misconduct described herein.

**I. JURISDICTION AND VENUE**

1. At the time of the events described in this Complaint, all parties resided on and/or maintained continuous and systematic contacts with the Navajo Nation.

2. This Court has civil, personal and subject-matter jurisdiction over the Defendants based upon the consensual relationships between the Defendants and the Navajo Nation.

3. This Court has civil, personal and subject-matter jurisdiction over the Defendants

because the conduct of the Defendants described herein threatens the health, welfare and cultural well-being of the Navajo Nation.

## **II. PARTIES**

4. Plaintiff LK is an adult male who is an enrolled member of the Navajo Nation, and resided within the boundaries of the Navajo Nation at the inception of the events set forth in this complaint. Plaintiff was a minor at the time of the sexual abuse alleged herein. During the relevant time period, Plaintiff was a resident of the Navajo Nation where he was taken from the Navajo Nation by the Defendants and placed with foster families in Utah. There, Plaintiff was sexually abused. The name used by Plaintiff in this Complaint is not the real name of Plaintiff, but is a fictitious name used to protect the privacy of Plaintiff, a victim of childhood sexual abuse.

5. Defendant Corporation of the President of the Church of Jesus Christ of Latter-day Saints, is a corporation duly organized and operating pursuant to the laws of Utah (hereinafter "COP"). COP operates church meetinghouses within the Navajo Nation and in tens of thousands of other locations worldwide and is one of the corporate entities through which the LDS Church conducts its affairs. At all relevant times, the COP conducted continuous and systemic activities within the Navajo Nation.

6. Defendant LDS Family Services is a nonprofit Utah corporation owned and operated by the COP. At all relevant times, LDS Family Services was acting as the agent of Defendant COP. Upon information and belief, LDS Family Services formerly operated under the name "LDS Social Services." From approximately 1947 to the mid 1990's, LDS Family Services operated a program known as the "Indian Placement Program" or the "Lamanite Placement Program" (hereinafter the "LPP"). At all relevant times, Plaintiff was sexually abused while he was participating in the LPP and while he was in the care and custody of the Defendants. At all relevant times, LDS Family Services, in association with the other Defendant COP, conducted continuous and systemic activities within the Navajo Nation.

7. Defendants COP, and LDS Family Services, will be referred to collectively