

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

JANE COE, JANE POE, JANE ROE, and
JANE VOE, A.A., A.B., A.C., A.D., A.E.,
A.F., A.G., A.H., A.I., A.J., A.K., F.W. as
Guardian Ad Litem for A.L., A.M., A.N., A.O.,
A.P., A.Q., A.R., A.S., A.T., A.U., A.V., A.W.,
A.X., A.Y., A.Z., B.A., B.B., B.C., B.D., B.E.,
B.G., B.H., B.I. as Conservator for B.J., B.K.,
B.L., B.M., B.N., B.O., B.P., B.Q., B.R., B.S.,
B.T., B.U., B.V., B.W., B.X., B.Y., B.Z., C.A.,
C.B., C.C., C.D., C.E., C.F., C.G., C.H., G.M. as
Guardian Ad Litem for C.I., C.J., C.K., C.L.,
C.M., C.N., C.O., C.P., C.Q., C.R., C.S., C.T.,
C.U., C.V., C.W., C.X., C.Y., C.Z., D.A., E.C.
as Guardian Ad Litem for D.B., D.C., D.D.,
D.E., D.F., D.G., D.H., D.I., D.J., D.K., D.L.,
D.M., D.O., D.Q., D.R., D.S., D.T., D.U., M.S.
as Guardian Ad Litem for D.V., D.W., D.X.,
R.B. as Guardian Ad Litem for D.Y, D.Z, E.A.,
E.B., E.C, E.D. S.K. as Guardian Ad Litem for
E.E., E.F., R.M., T.M. as Guardian Ad Litem
for L.M., T.M. as Guardian Ad Litem for
M.M.; T.M. as Guardian Ad Litem for F.M.;

Plaintiffs,

vs.

DAVID FARLEY, M.D., an individual; WEST
LINN FAMILY HEALTH CENTER, P.C., an
Oregon Professional Corporation; LEGACY
MERIDIAN PARK HOSPITAL, an Oregon
Nonprofit Corporation; PROVIDENCE
HEALTH & SERVICES OREGON, an
Oregon Nonprofit Corporation doing business
as Providence Willamette Falls Medical Center

Defendants.

Case No. 20CV37412

THIRD AMENDED COMPLAINT AND
DEMAND FOR JURY TRIAL
(Intentional Infliction of Emotional Distress;
Negligence; Fraud/Fraudulent Concealment;
Assault and Battery)

PRAYER: \$ 570,000,000
(Filing Fee Pursuant to ORS 21.160(1)(e))

CLAIM NOT SUBJECT TO MANDATORY
ARBITRATION
(Pursuant to UTCR 13.060)

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INTRODUCTION

1.

At all material times, Defendant DAVID FARLEY, M.D., (hereinafter referred to as “FARLEY”), violated his position of trust, authority, and confidence by repeatedly sexually assaulting Plaintiffs while they were patients of Defendants WEST LINN FAMILY HEALTH CENTER (hereinafter referred to as “FAMILY HEALTH”), and/or LEGACY MERIDIAN PARK HOSPITAL (“LEGACY”), and/or PROVIDENCE HEALTH & SERVICES – OREGON, doing business as Providence Willamette Falls Medical Center, (“PROVIDENCE”).

2.

FARLEY sexually abused Plaintiffs on multiple occasions by engaging in acts that include, but are not limited to:

- a) Forcing Plaintiffs to strip naked;
- b) Forcing his fingers inside of the Plaintiffs’ vaginas;
- c) Photographing Plaintiffs’ breasts and genitalia on his personal cell phone;
- d) Insisting on breaking the Plaintiffs’ hymens to “ensure sex was more pleasurable”;
- e) Performing “membrane sweeps” of the Plaintiffs without their consent;
- f) Fondling Plaintiffs’ bare breasts with his ungloved hands under the guise of conducting a “breast examination”;
- g) Digitally penetrating Plaintiffs vaginas without permission under the guise of conducting a “pelvic examination,” sometimes without gloves;
- h) Making derogatory and sexually harassing comments about the Plaintiffs’ vaginas;
- i) Insisting on medically unnecessary pelvic examinations and breast examinations;
- j) Performing ungloved rectal examinations on Plaintiffs; or

1 k) Forcing Plaintiffs to endure painful and medically unnecessary treatment.

2 3.

3 FARLEY engaged in sexual misconduct with over 100 of his patients, including
4 Plaintiffs, for no legitimate medical purpose and for no other reason than to satisfy his own
5 prurient sexual desires. FARLEY repeatedly violated his role as a physician all while Defendants
6 FAMILY HEALTH, LEGACY, and PROVIDENCE, knew or should have known that he was an
7 unfit doctor and should not have been in contact with patients.

8 **PARTIES**

9 **PLAINTIFFS**

10 4.

11 All plaintiffs proceed under pseudonyms to protect their identities as survivors of sexual
12 abuse, which occurred at the hands of FARLEY while plaintiffs were residents of the State of
13 Oregon.

14 5.

15 Minor Plaintiff A.L. proceeds by and through her Guardian Ad Litem, F.W.

16 6.

17 Plaintiff B.J. proceeds by and through her Conservator, B.I.

18 7.

19 Minor Plaintiff C.I. proceeds by and through her Guardian Ad Litem, G.M.

20 8.

21 Minor Plaintiff D.B. proceeds by and through her Guardian Ad Litem, E.C.

22 9.

23 Minor Plaintiff D.V. proceeds by and through her Guardian Ad Litem, M.S.

1 10.

2 Minor Plaintiff D.Y. proceeds by and through her Guardian Ad Litem, R.B.

3 11.

4 Minor Plaintiff E.E. proceeds by and through her Guardian Ad Litem, S.K.

5 12.

6 Minor Plaintiffs L.M., M.M., and F.M., proceed by and through their Guardian Ad Litem,
7 T.M.

8 **DEFENDANTS**

9 13.

10 Defendant DAVID FARLEY, M.D. (“FARLEY”) was at all times mentioned herein an
11 individual residing in the State of Oregon during the period of time during which the sexual
12 abuse, harassment, and molestation alleged herein took place, and is currently a citizen of the
13 State of Idaho. Upon information and belief, FARLEY received his medical degree in 1986, and
14 following completion of his residency, opened WEST LINN FAMILY HEALTH CENTER, P.C.
15 on or around March 24, 1993.

16 14.

17 Defendant WEST LINN FAMILY HEALTH CENTER, P.C. (“FAMILY HEALTH”) at
18 all times mentioned herein was and is an Oregon corporation, having its principal place of
19 business in the State of Oregon, County of Clackamas. FARLEY was an agent, apparent agent,
20 servant, and/or employee of FAMILY HEALTH during the sexual abuse of all Plaintiffs, thus,
21 FAMILY HEALTH is vicariously liable for his misconduct.
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9 Defendant LEGACY MERIDIAN PARK MEDICAL CENTER (“LEGACY”) is and was
10 at all times mentioned herein an Oregon corporation, having its principal place of business in the
11 State of Oregon, County of Clackamas, and its registered agent in the State of Oregon, County of
12 Multnomah. FARLEY was an agent, apparent agent, servant, and/or employee, of LEGACY
13 during the sexual abuse of those Plaintiffs who treated with FARLEY at LEGACY; thus,
14 LEGACY is vicariously liable for his misconduct engaged in with those Plaintiffs.

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17 16.

18 Defendant PROVIDENCE HEALTH & SERVICES – OREGON (“PROVIDENCE”),
19 doing business as Providence Willamette Falls Medical Center, is and was at all times mentioned
20 herein an Oregon corporation, having its principal place of business in the State of Washington,
21 County of King. FARLEY was an agent, apparent agent, servant, and/or employee of
22 PROVIDENCE during the sexual abuse of those Plaintiffs who treated with FARLEY at
23 PROVIDENCE thus, PROVIDENCE is vicariously liable for his misconduct engaged in with
24 those Plaintiffs.

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FAMILY HEALTH, LEGACY, and PROVIDENCE are collectively referred to herein as
the “Clinic Defendants.” Further, FARLEY and the Clinic Defendants are collectively referred to
herein as “Defendants” and/or “All Defendants.”

JURISDICTION AND VENUE

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24 18.

Jurisdiction is proper in the State of Oregon pursuant to ORS 14.030 because the
wrongful conduct giving rise to the causes of action in this lawsuit occurred in this state. Venue

1 is proper in the Circuit Court for Multnomah County pursuant to ORS 14.080(2) because one or
2 more of the defendants resides in the County of Multnomah.

3 **FACTUAL ALLEGATIONS REGARDING CLINIC DEFENDANTS**

4 **CLINIC DEFENDANTS HAD RIGHT TO CONTROL FARLEY**

5 19.

6 FARLEY was hired, retained, and held out by the Clinic Defendants to provide medical
7 care and treatment to Plaintiffs, many of whom were very young women, sexually inexperienced,
8 and members of the conservative Mormon faith, who had never received any gynecological
9 treatment before. FARLEY held a leadership position within the church as well as being a trusted
10 medical professional. It was through this position of trust and confidence that FARLEY
11 exploited Plaintiffs, in perpetrating his sexual abuse, molestation and harassment upon Plaintiffs.
12 All of the sexually abusive and harassing conduct alleged herein was done for FARLEY's sexual
13 gratification.

14 20.

15 FARLEY was hired, employed, and retained by the Clinic Defendants and was under
16 their direct supervision, management, agency, and control. FARLEY's employment duties
17 included providing medical care to the patients of the Clinic Defendants.

18 21.

19 As patients of the Clinic Defendants, Plaintiffs were under FARLEY's direct supervision,
20 control, and care, which created a special, confidential, and fiduciary relationship between
21 Plaintiffs and FARLEY. Because of such relationship, FARLEY owed Plaintiffs a duty of care.
22 Additionally, as the employers and supervisors of FARLEY with knowledge that he was in
23 contact with and providing medical care to patients, the Clinic Defendants were also in a special,
24

1 confidential, and fiduciary relationship with those Plaintiffs whom sought treatment with Clinic
2 Defendants, owing Plaintiffs a duty of care.

3 22.

4 By employing FARLEY and assigning patients, the Clinic Defendants represented to its
5 patients, and the community, that FARLEY was safe, trustworthy, and of high moral and ethical
6 repute, such that patients need not worry about having FARLEY interact with, and provide care
7 to, those patients.

8 23.

9 In his capacity as a physician with the Clinic Defendants, FARLEY was given custody
10 and supervision of patients, including Plaintiffs. FARLEY used this position to coerce patients to
11 concede to his prurient sexual demands, using his authority and position of trust to exploit them
12 physically, sexually, and emotionally.

13 24.

14 As patients of the Clinic Defendants, Plaintiffs came into contact with Defendant
15 FARLEY, and reasonably believed that FARLEY was an employee of Clinic Defendants.
16 FARLEY used the guise of medical care and treatment to normalize intimate, inappropriate, and
17 sexually abusive contact with Plaintiffs.

18 25.

19 FARLEY's sexual abuse and harassment of Plaintiffs was done for FARLEY's personal
20 sexual gratification, and it annoyed, disturbed, irritated, and offended Plaintiffs as it would have
21 a reasonable person. Plaintiffs did not consent to the sexual abuse and harassment by FARLEY.
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26.

During the period, Plaintiffs were being sexually abused and harassed by FARLEY; Defendants had the authority and ability to prevent such abuse by removing FARLEY from his position as a physician at the Clinic Defendants. They failed to do so, allowing the abuse to occur and to continue unabated.

CONCEALMENT AND MISHANDLING OF SEX ABUSE COMPLAINTS

27.

The Clinic Defendants knew or should have known that FARLEY had engaged in unlawful sexually abusive conduct in the past and/or was continuing to engage in such conduct. The Clinic Defendants had a duty to disclose these facts to Plaintiffs and others, but negligently and/or intentionally suppressed, concealed or failed to disclose this information. The duty to disclose this information arose from Clinic Defendants' status as mandatory reporters of sexual abuse, and by the special, trusting, confidential, fiduciary relationship between the Clinic Defendants and Plaintiffs.

Specific instances putting Clinic Defendants on notice of FARLEY's sexual abuse include, but are not limited to:

1. PROVIDENCE was made aware that FARLEY was performing pelvic examinations on minors as early as 2012;
2. PROVIDENCE staff witnessed abusive and/or unnecessary medical procedures as early as 2003;
3. PROVIDENCE suspended and/or revoked FARLEY's surgical privileges as early as 2017, but he was allowed to return to medical duties thereafter;

1 30.

2 The Clinic Defendants knew, or should have known, of FARLEY's propensity and
3 disposition to engage in sexual misconduct with young patients before he sexually abused and
4 molested Plaintiffs, and knew of the probability that he would molest patients with whom he
5 came into contact, including but not limited to Plaintiffs.

6 31.

7 The Clinic Defendants failed to implement reasonable safeguards to avoid acts of
8 unlawful sexual conduct by FARLEY in the future, including avoiding placement of FARLEY in
9 a position where contact and interaction with vulnerable patients is an inherent function. The
10 Clinic Defendants ignored and suppressed the past sexual misconduct FARLEY had engaged in.

11 32.

12 The Clinic Defendants were apprised, knew or should have known, and/or were put on
13 notice of FARLEY's past sexual abuse of patients, past complaints and/or investigations, and his
14 propensity and disposition to engage in such unlawful activity and unlawful sexual activity with
15 patients, such that the Clinic Defendants knew or should have known that FARLEY would
16 commit wrongful sexual acts with patients, including Plaintiffs. Based on the complaints that
17 Clinic Defendants received from patients about FARLEY's sexually abusive behavior and/or
18 misconduct, Clinic Defendants did, or in the exercise of reasonable diligence, should have
19 documented these complaints in FARLEY's employment records, Clinic Defendants should have
20 reported the behavior to authorities, and Clinic Defendants should have been triggered to conduct
21 internal investigations of FARLEY's sexually abusive behavior with patients. Based upon those
22 complaints, the Clinic Defendants knew and/or should have known of FARLEY's history of
23 sexual abuse, past claims and/or past investigations, and his propensity and disposition to engage

1 in unlawful activity and unlawful sexual activity with patients, such that Defendants knew or
2 should have known that FARLEY would commit wrongful sexual acts with those patients,
3 including Plaintiffs.

4 Because of the relationship between Plaintiffs and the Clinic Defendants, Defendants had
5 an obligation and duty under the law not to hide material facts and information about FARLEY's
6 past, and his deviant sexual behavior and propensities. Additionally, the Clinic Defendants had
7 an affirmative duty to inform, warn, and institute appropriate protective measures to safeguard
8 patients who were reasonably likely to come in contact with FARLEY. The Clinic Defendants
9 willfully refused to notify, give adequate warning, and implement appropriate safeguards,
10 thereby creating the peril that ultimately damaged Plaintiffs.

11 33.

12 As part of the Clinic Defendants' conspiratorial and fraudulent attempt to hide
13 FARLEY's propensity to sexually abuse and molest patients, and prior sexual misconduct with
14 patients, from public scrutiny and criminal investigation, the Clinic Defendants implemented
15 various measures designed to conceal FARLEY's conduct including:

- 16 a) Permitting FARLEY to remain in a position of authority and trust after the Clinic
17 Defendants knew or should have known that he molested his young patients;
- 18 b) Placing FARLEY in a separate and secluded environment, at the Clinic Defendants,
19 which granted him unfettered access and control over patients even when he was
20 purporting to conduct extremely sensitive medical treatment, thereby allowing
21 FARLEY to physically and sexually interact with patients, including Plaintiffs;
- 22 c) Failing to disclose and actively concealing FARLEY's prior record of misconduct,
23 sexual abuse, harassment and molestation and his propensity to commit such acts

1 towards patients in the Clinic Defendants from their patients, the public at large, and
2 law enforcement;

3 d) Allowing FARLEY to have unfettered and un-controlled access to patients, including
4 the Plaintiffs;

5 e) Holding out FARLEY to Plaintiffs, other patients at the Clinic Defendants, and the
6 public at large as a trustworthy and honest person of high ethical and moral repute
7 who was capable and worthy of being granted unsupervised access to the patients of
8 the Clinic Defendants;

9 f) Failing to investigate or otherwise confirm or deny such facts about FARLEY,
10 including prior complaints, claims and investigations for sexual abuse;

11 g) Failing to inform, and actively concealing from Plaintiffs and law enforcement
12 officials the fact that Plaintiffs and others were or may have been sexually abused,
13 harassed and molested, after the Clinic Defendants knew or should have known
14 FARLEY may have sexually abused Plaintiffs or others, thereby enabling Plaintiffs to
15 continue to be endangered and sexually abused, harassed, molested, and/or creating
16 the circumstance where Plaintiffs and others were less likely to receive proper
17 medical treatment, thus exacerbating the harm to Plaintiffs;

18 h) Holding out FARLEY to Plaintiffs and to the community as being in good standing
19 and trustworthy;

20 i) Cloaking FARLEY's prior sexual misconduct with patients within the facade of
21 normalcy, thereby disguising the nature of his sexual abuse and contact with young
22 patients;

- 1 j) Failing to take reasonable steps and to implement reasonable safeguards to avoid acts
2 of unlawful sexual conduct by FARLEY such as avoiding placement of FARLEY in
3 functions or environments in which his intimate contact with young patients was
4 inherent; and
- 5 k) Failing to put in place a system or procedure to supervise or monitor physicians,
6 chaperones, and agents to insure they do not molest or abuse patients in Defendants'
7 care, and that they further report all reasonable suspicions of sexual assault and
8 battery to law enforcement pursuant to Oregon law.

9 34.

10 By his position within the Clinic Defendants' facilities, FARLEY attained a position of
11 influence over Plaintiffs. The Clinic Defendants' conduct created a situation of peril that was not,
12 and could not, be appreciated by Plaintiffs. By virtue of the Clinic Defendants' conspiratorial and
13 fraudulent conduct, and in keeping with their intent to fail to disclose and hide FARLEY's past
14 and present conduct from the community, the public at large, and law enforcement, the Clinic
15 Defendants allowed FARLEY to remain in a position of influence where his unsupervised or
16 negligently supervised conduct with patients made the molestation and abuse of those
17 individuals, including the Plaintiffs, possible.

18 **BREACH OF DUTIES TO THE PLAINTIFFS AND THE PUBLIC**

19 35.

20 As is set forth herein, Defendants have failed to uphold numerous mandatory duties
21 required of them by state and federal law, as well as their own internal written policies and
22 procedures, including but not limited to:

- 23 a) Report reasonable suspicions of sexual abuse to law enforcement.

- b) Use reasonable care to protect participants and members from known or foreseeable dangers;
- c) Protect participants and members and staff, and provide adequate supervision;
- d) Ensure that any direction given to participants and members is lawful, and that adults act fairly, responsibly and respectfully towards participants and members;
- e) Properly train staff so that they are aware of their individual responsibility for creating and maintaining a safe environment;
- f) Review the criminal history of applicants and current employees;
- g) Provide diligent supervision over patients;
- h) Act promptly and diligently and not ignore or minimize problems; and
- i) Report suspected incidents of sexual abuse.

36.

Despite having a duty to do so, the Clinic Defendants failed to adequately train and supervise all staff to create a positive and safe environment, specifically including training to perceive, report, and stop inappropriate sexual conduct by other members of the staff, specifically including FARLEY and patients. In particular, the Clinic Defendants employed chaperones who were responsible for ensuring that FARLEY did not sexually abuse his patients during examinations and deliberately flouted this duty. Chaperones would routinely comply with FARLEY's request to leave the examination room, thereby allowing FARLEY unfettered access to sexually abuse his patients. In other cases, chaperones would deliberately look away from FARLEY while he was sexually abusing his patients. Moreover, the Clinic Defendant's chaperones failed to report or investigate myriad complaints from patients that FARLEY had sexually abused them over the years.

1 37.

2 The Clinic Defendants failed to enforce their own rules and regulations designed to
3 protect the health and safety of its patients. Further, they failed to adopt and implement safety
4 measures, policies, and procedures designed to protect patients, such as Plaintiffs from the
5 sexually exploitive and abusive acts of their agents and employees such as FARLEY.

6 38.

7 This failure was a part of the Clinic Defendants' conspiratorial plan and arrangement to
8 conceal FARLEY's wrongful acts, avoid and inhibit detection, block public disclosure, avoid
9 scandal, avoid the disclosure of their tolerance of patient sexual molestation and abuse, preserve
10 a false appearance of propriety, protect the reputation of the Clinic Defendants, and avoid
11 investigation and action by public authorities, including law enforcement. Such actions fostered
12 an environment where sexual abuse could continue to occur.

13 39.

14 Unless otherwise specified, all abuse occurred at FAMILY HEALTH.

15 **FACTUAL ALLEGATIONS REGARDING PLAINTIFFS**

16 **PLAINTIFF JANE COE**

17 40.

18 In or around 2007, JANE COE ("COE") began receiving medical treatment from
19 FARLEY at FAMILY HEALTH. Between the years of approximately 2007 through
20 approximately 2009, COE was forced to submit to FARLEY's sexual abuse and harassment on
21 at least five separate occasions while seeking medical treatment.
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At all times material hereto, COE was a patient of FARLEY, and FAMILY HEALTH. FARLEY used his position of trust and authority over COE to sexually abuse her in the following ways:

- a) In or around May 2007, COE, who was approximately 15 years old, made an appointment with FARLEY. During this appointment, FARLEY performed an ungloved rectal examination on COE, under the guise of seeking to relieve COE’s constipation;
- b) On another occasion in May 2007, Plaintiff made an appointment with FARLEY, during which he insisted on performing both a pelvic and breast examination. During the “pelvic examination,” FARLEY forced his ungloved fingers inside of COE’s vagina, causing her immense physical pain. During the purported “breast examination,” FARLEY instructed COE to lie down and fondled her breast underneath her medical gown for several minutes;
- c) In or around July 2009, COE made an appointment with FARLEY, during which time he insisted on inserting an IUD and instructed her to return in 4 days so that he could “use an ultrasound wand to determine whether the IUD was in the right position.” Thereafter, FARLEY instructed COE to return again so he could “check the IUD strings.” FARLEY did not wear gloves while conducting any of these examinations; and
- d) In or around August 2009, during an appointment with FARLEY, FARLEY suggested that he “break [COE’s] hymen prior to marrying her husband.” FARLEY told COE that “all women get it done,” and disclosed the name of another patient

1 whose hymen he recently broke who was a member of COE's church. FARLEY
2 insisted on performing the procedure despite COE's reluctance, stating that it would
3 "ensure sex was more pleasurable" for COE. FARLEY proceeded to digitally
4 penetrate COE's vagina, moving his fingers around her vagina until he broke COE's
5 hymen.

6 42.

7 At the time, COE, in reasonable reliance upon FAMILY HEALTH's representations that
8 FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was
9 medically necessary. It was not until in or around August 2020, when FARLEY's sexually
10 abusive nature was publicly revealed, that COE realized that FARLEY's conduct was sexual
11 assault.

12 **PLAINTIFF JANE POE**

13 43.

14 In or around 2003, Plaintiff JANE POE ("POE"), made an appointment with FARLEY in
15 order to obtain clearance for her sports medical examination to participate in middle school
16 basketball and was forced to submit to FARLEY's sexual abuse and harassment.

17 44.

18 At all times material hereto, POE was a patient of Defendants FARLEY and FAMILY
19 HEALTH. FARLEY used his position of trust and authority over POE to sexually abuse her in
20 the following ways:

- 21 a) In or around 2003, upon arriving at her appointment for her sports medical
22 examination, POE was instructed to remove all of her clothes and change into a
23 medical gown. During this appointment, FARLEY insisted on performing both breast
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1 and pelvic examinations on POE, despite the fact that she was only 13 years old. POE
2 declined both the pelvic and breast examinations. FARLEY then told POE and her
3 mother about one of his teenage patients who had contracted a disease that could have
4 been prevented if he had been permitted to conduct pelvic and breast examinations of
5 the patient. POE and her mother still refused to allow FARLEY to conduct either a
6 breast or pelvic examination of POE. Thereafter, FARLEY refused to sign off on
7 POE's sports medical release unless she submitted to a breast examination. POE then
8 reluctantly laid down with her breasts exposed, and FARLEY conducted an ungloved
9 "examination" of POE's breasts, causing POE to suffer embarrassment, shame, and
10 humiliation.

11 45.

12 At the time, POE, in reasonable reliance upon FAMILY HEALTH's active concealment
13 of FARLEY's serial sexual abuse and its representations that FARLEY was a trustworthy
14 medical professional, believed that FARLEY's conduct was medically necessary. It was not until
15 in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that
16 POE realized that FARLEY's conduct was sexual assault.

17 **PLAINTIFF JANE ROE**

18 46.

19 In or around 2015, Plaintiff JANE ROE ("ROE") began receiving medical treatment from
20 FARLEY. From in or around 2015 through in or around September 2019, ROE was forced to
21 submit to FARLEY's sexual abuse and harassment on at least 10 separate occasions while
22 seeking treatment.

At all times material hereto, ROE was a patient of Defendants FARLEY, FAMILY HEALTH, and LEGACY. FARLEY used his position of trust and authority over ROE to sexually abuse her in the following ways:

- a) Between in or around October 2016 through in or around September 2019, ROE was a patient of FARLEY. During this time period, FARLEY digitally penetrated ROE's vagina on 11 separate occasions, including 4 pap smears and 2 cervical checks.
- b) In or around August 2017, while ROE was 36 weeks pregnant, she made an appointment with FARLEY at FAMILY HEALTH for a prenatal check. During this examination, FARLEY, without ROE's knowledge or consent, performed "membrane sweeping" on ROE by inserting his fingers into her vagina.
- c) In or around August of 2017, after giving birth to her child at LEGACY, FARLEY inserted his hand into the Plaintiff's vagina and began forcibly pulling out handfuls of her placenta before it detached from ROE's body naturally. This was done, based upon information and therefore belief, for FARLEY's sexual gratification and had no legitimate medical purpose.
- d) In or around October 2017, ROE made an appointment with FARLEY at FAMILY HEALTH for her six week postpartum examination. During this appointment, he performed a full pelvic examination, with digital penetration. He further performed an ungloved examination of ROE's breast, and advised her to return in four months. When ROE returned, in or around February 2018, FARLEY again insisted on performing a pelvic examination. Additionally, FARLEY performed another ungloved "breast examination" on ROE.

- 1 e) In or around February 2019, ROE made an appointment with FARLEY for her annual
2 well woman examination. During this examination, FARLEY again insisted on
3 performing another pelvic examination on ROE. He again performed another ungloved
4 “breast examination” on ROE.
- 5 f) In September 2019, Plaintiff presented to FARLEY’s office for a follow-up pap smear.
6 Notably, this was the only examination ROE had with FARLEY wherein a nurse
7 chaperone was present. During this appointment, under the guise of conducting a “pelvic
8 examination,” FARLEY forced his ungloved fingers inside of ROE’s vagina, while
9 making inappropriate comments such as, “Okay, everything feels really good.”
10 Moreover, FARLEY made numerous unsolicited comments regarding scarring on ROE’s
11 vagina, all while touching ROE’s labia with his ungloved hand. Plaintiff ROE is now
12 informed and believes, and on this basis alleges, that FARLEY’s wholly inappropriate
13 comments about her vagina were designed to shame, coerce, humiliate and control ROE
14 so that she would be silenced, and so that she would suffer psychological pain and
15 emotional distress. Following the examination, while ROE was naked, covered only by
16 the medical gown, FARLEY approached her and gave her a hug, causing ROE to feel
17 extreme mortification, embarrassment, and emotional distress.

18 48.

19 At the time, ROE, in reasonable reliance upon FAMILY HEALTH and LEGACY’s
20 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
21 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
22 sexually abusive nature was publicly revealed, that ROE realized that FARLEY’s conduct was
23 sexual assault.

1 **PLAINTIFF JANE VOE**

2 49.

3 In or around July 2015, Plaintiff JANE VOE (“VOE”) began receiving medical treatment
4 from FARLEY. From in or around July 2015 through in or around April 2018, VOE was forced
5 to submit to FARLEY’s sexual abuse and harassment on at least seven separate occasions while
6 seeking medical treatment.

7 50.

8 At all times material hereto, VOE was a patient of FARLEY, FAMILY HEALTH, and
9 PROVIDENCE. FARLEY used his position of trust and authority over VOE to sexually abuse
10 her in the following ways:

- 11 a) In or around August 2016, while VOE was pregnant with her third child, she made an
12 appointment with FARLEY at FAMILY HEALTH for a prenatal check. During this
13 examination, FARLEY, without VOE’s knowledge or consent, performed
14 “membrane sweeping” on VOE by inserting his fingers inside of VOE’s vagina.
- 15 b) In or around August 2016, VOE, who was in severe physical pain, requested an
16 appointment with FARLEY. FARLEY instructed VOE to come to his home for
17 additional “membrane sweeping.” At his home, FARLEY instructed Plaintiff to strip
18 naked and lie on a towel on FARLEY’s bed while he performed the procedure.
19 FARLEY moved his fingers in and around VOE’s vagina for several minutes, causing
20 her severe pain, under the guise of performing “membrane sweeping.”
- 21 c) Immediately following the delivery of VOE’s child at PROVIDENCE, FARLEY
22 began delivering VOE’s placenta by aggressively pulling on her umbilical cord,
23 causing VOE severe pain.

- 1 d) During the two-week well check of VOE's child, FARLEY, without any warning or
2 consent, and without gloves, began fondling and squeezing VOE's breast while she
3 was breastfeeding her child.
- 4 e) On or around October 2016, at VOE's eight-week postpartum examination, FARLEY
5 performed an ungloved "breast examination" and "pelvic examination" on VOE,
6 despite having no medically valid reason to do so.
- 7 f) In or around March 2017, VOE presented for an annual well woman examination.
8 FARLEY insisted on performing another ungloved "breast examination" and a
9 "pelvic examination" on VOE, despite having just performed these "examinations"
10 five months prior. During the purported "pelvic examination," FARLEY digitally
11 penetrated VOE's vagina.
- 12 g) In or around April 2018, VOE again presented for an annual well woman
13 examination. VOE advised FARLEY and his staff that she did not want to undergo a
14 pelvic examination at this visit. FARLEY became visibly angry with VOE and began
15 telling her of another patient who had skipped one annual examination and died of
16 cervical cancer. As the result of immense pressure and out of fear for her health, VOE
17 reluctantly allowed FARLEY to perform a pelvic and breast examination. During the
18 purported breast examination, FARLEY did not wear gloves. FARLEY did not
19 lubricate the speculum used during the "pelvic examination" and aggressively
20 inserted it into VOE's vagina, causing immense physical pain. Following the
21 examination, while Plaintiff was naked, covered only by the medical gown, FARLEY
22 approached VOE and gave her a hug, causing VOE to feel extreme mortification,
23
24

- 1 c) In or around 2017, FARLEY conducted an unnecessary and ungloved digitally
2 penetrative vaginal exam, followed immediately by an unnecessary and ungloved
3 digitally penetrative rectal exam at FAMILY HEALTH, after which Farley hugged
4 A.A. and kissed her on the cheek while she remained undressed;
- 5 d) In or around 2016, when A.A. was pregnant with her second child, FARLEY
6 performed numerous unnecessary and ungloved penetrative pelvic exams and
7 membrane sweeps at FAMILY HEALTH;
- 8 e) Under the guise of medical treatment FARLEY conducted numerous unnecessary and
9 ungloved vaginal exams, including repeated visits to check IUD placement.

10 54.

11 At the time, Plaintiff A.A., in reasonable reliance upon FAMILY HEALTH and
12 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
13 believed that FARLEY's conduct was medically necessary. It was not until in or around August
14 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.A.
15 realized that FARLEY's conduct was sexual abuse.

16 **PLAINTIFF A.B.**

17 55.

18 In or around 1992, A.B. began receiving medical treatment from FARLEY at FAMILY
19 HEALTH, which continued until approximately 2007. From approximately 1999 to 2002, A.B.
20 was forced to submit to FARLEY's sexual abuse and harassment while seeking medical
21 treatment.

1 56.

2 At all times material hereto, A.B. was a patient of FARLEY and FAMILY HEALTH.
3 FARLEY used his position of trust and authority over A.B, to sexually abuse her in the following
4 ways:

- 5 a) In or around 2000, when A.B. was about 16 years old, FARLEY began conducting
6 unnecessary and ungloved digitally penetrative vaginal exams on A.B., often
7 commenting upon A.B.'s sexual activity in an inappropriate way;
- 8 b) In or around 1999, when A.B. was approximately 15 years old, FARLEY began
9 conducting unnecessary ungloved breast exams, and in so doing, commented upon
10 A.B.'s breasts while making eye contact with her.

11 57.

12 At the time, Plaintiff A.B., in reasonable reliance upon FAMILY HEALTH's
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
15 sexually abusive nature was publicly revealed, that Plaintiff A.B. realized that FARLEY's
16 conduct was sexual abuse.

17 **PLAINTIFF A.C.**

18 58.

19 In or around 1993, A.C. began receiving medical treatment from FARLEY at FAMILY
20 HEALTH, which continued until 2001. From approximately 1998 through 2001, A.C. was
21 forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.
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59.

At all times material hereto, A.C. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.C., to sexually abuse her in the following ways:

- a) When A.C. was in high school, she presented for a sports physical, during which FARLEY began conducting unnecessary and ungloved digitally penetrative vaginal exams on A.C.;
- b) FARLEY used A.C.'s medical condition to schedule more frequent visits, at most of which he required A.C. to strip completely nude and don a gown, regardless of the reason she presented to FARLEY.

At the time, Plaintiff A.C., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.C. realized that FARLEY's conduct was sexual abuse.

PLAINTIFF A.D.

60.

In or around 2001, A.D. received medical treatment from FARLEY at FAMILY HEALTH. At that time, A.D. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

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61.

At all times material hereto, A.D. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.D., to sexually abuse her in the following ways:

- a) At age 8, A.D. presented for a physical. FARLEY instructed A.D.'s mother to leave the room, and A.D. to lay in the fetal position. Once A.D.'s mother left the room, FARLEY inserted his ungloved fingers into A.D.'s vagina.

62.

At the time, Plaintiff A.D. in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.D. realized that FARLEY's conduct was sexual abuse.

PLAINTIFF A.E.

63.

In or around 2009, A.E. began receiving pelvic exams from FARLEY at FAMILY HEALTH, which continued until approximately 2017. During this time, A.E. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

64.

At all times material hereto, A.E. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.E., to sexually abuse her in the following ways:

- 1 a) When A.E. was around fifteen years old, FARLEY required her to submit to an
2 ungloned vaginal exam as a prerequisite to prescribing birth control. In so doing,
3 FARLEY broke A.E.'s hymen; thereafter conducting unnecessary and ungloned
4 digitally penetrative vaginal exams on A.E., regardless of the reason for A.E.'s visit;
- 5 b) At nearly each subsequent visit, FARLEY required A.E. to submit to ungloned breast
6 and vaginal exams, regardless of the reason for A.E.'s visit.

7 65.

8 At the time, Plaintiff A.E., in reasonable reliance upon FAMILY HEALTH's
9 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
10 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
11 sexually abusive nature was publicly revealed, that Plaintiff A.E. realized that FARLEY's
12 conduct was sexual abuse.

13 **PLAINTIFF A.F.**

14 66.

15 In or around 2018, A.F. began receiving medical treatment from FARLEY, which
16 continued until approximately 2020. During this time, A.F. was forced to submit to FARLEY's
17 sexual abuse and harassment while seeking medical treatment.

18 67.

19 At all times material hereto, A.F. was a patient of FARLEY, FAMILY HEALTH, and
20 PROVIDENCE. FARLEY used his position of trust and authority over A.F. to sexually abuse
21 her in the following ways:

- 22 a) By filming the placement of A.F.'s IUD on a cellular phone, resulting in nearly an
23 hour of close-up footage of A.F.'s labia and vagina;

- 1 b) FARLEY insisted on performing ungloved breast exams on A.H. beginning when she
2 was in approximately 5th grade;
- 3 c) When A.H. was 16, FARLEY diagnosed A.H. with HPV, a condition that he claimed
4 required her to submit to more frequent digitally penetrative exams. It was later
5 revealed that A.H. did not suffer from that condition;
- 6 d) FARLEY insisted on performing exams without a chaperone, inciting guilt in A.H.
7 when she asked for one;
- 8 e) In 2004, FARLEY diagnosed A.H. with an ovarian cyst in order to convince her to
9 come to his home, where he laid down a towel on his bed, asked her to undress, and
10 proceeded to perform a digitally penetrative ungloved pelvic exam;
- 11 f) FARLEY performed unnecessary invasive and painful membrane sweeps during each
12 of A.H.'s three pregnancies between 2007 and 2012 at PROVIDENCE;
- 13 g) FARLEY repeatedly left A.H. breasts exposed for the duration of her exams; and
14 h) FARLEY embraced A.H. while A.H. wore only a medical gown.

15 74.

16 At the time, Plaintiff A.H., in reasonable reliance upon FAMILY HEALTH and
17 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
18 believed that FARLEY's conduct was medically necessary. It was not until 2020 that Plaintiff
19 A.H. realized that FARLEY's conduct was sexual abuse.

20 **PLAINTIFF A.I.**

21 75.

22 In or around 1990, A.I. began receiving medical treatment from FARLEY at FAMILY
23 HEALTH, which continued until approximately 2014. From approximately 1999 through 2012,
24

1 A.I. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical
2 treatment.

3 76.

4 At all times material hereto, A.I. was a patient of FARLEY and FAMILY HEALTH.
5 FARLEY used his position of trust and authority over A.I., to sexually abuse her in the following
6 ways:

- 7 a) Beginning when A.I. was a teenager, FARLEY insisted on performing semi-annual
8 ungloned digitally penetrative ungloned pelvic exams;
- 9 b) Beginning when A.I. was a teenager, FARLEY insisted on performing semi-annual
10 ungloned breast exams, which were conducted in a way that indicated FARLEY was
11 deriving sexual gratification.

12 77.

13 At the time, Plaintiff A.I., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff A.I. realized that FARLEY's
17 conduct was sexual abuse.

18 **PLAINTIFF A.J.**

19 78.

20 In or around 1997, A.J. began receiving medical treatment from FARLEY at FAMILY
21 HEALTH, which continued until 2020. From approximately 2004 through 2011, A.J. was forced
22 to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.
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79.

At all times material hereto, A.J. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.J., to sexually abuse her in the following ways:

- a) FARLEY insisted on ungloved digitally penetrative pelvic exams every four to six months between the ages of 10 and 12;
- b) FARLEY insisted on breaking A.J.'s hymen to facilitate the digitally penetrative pelvic exams;
- c) FARLEY insisted on yearly ungloved digitally penetrative pelvic exams from approximately age 12 to 17;
- d) FARLEY conducted yearly ungloved breast exams beginning at approximately age 12 until age 17;
- e) FARLEY embraced A.J. at the beginning and end of each visit while A.J. was wearing only a medical gown.

80.

At the time, Plaintiff A.J., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.J. realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF A.K.**

2 81.

3 In or around 1993, A.K. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2007. In approximately 1993, and again in approximately 2007,
5 A.K. was forced to submit to FARLEY’s sexual abuse and harassment while seeking medical
6 treatment.

7 82.

8 At all times material hereto, A.K. was a patient of FARLEY and FAMILY HEALTH.
9 FARLEY used his position of trust and authority over A.K., to sexually abuse her in the
10 following ways:

- 11 a) When A.K. was approximately 12, FARLEY performed a digitally penetrative pelvic
12 exam;
- 13 b) When A.K. was approximately 12, FARLEY performed a breast exam;
- 14 c) Just months following the initial pelvic exam, A.K. had her first period. Because of
15 this, FARLEY insisted on a second digitally penetrative pelvic exam, during which he
16 removed his gloves and attempted to sexually stimulate A.K. while making comments
17 such as “that feels nice” and “that’s good”;
- 18 d) During A.K.’s pregnancy, FARLEY performed numerous ungloved digitally
19 penetrative pelvic exams, causing A.K. to bleed. After each exam, FARLEY would
20 prescribe A.K. opiates to cope with the pain of his exams.

21 83.

22 At the time, Plaintiff A.K., in reasonable reliance upon FAMILY HEALTH’s
23 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
24

1 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
2 sexually abusive nature was publicly revealed, that Plaintiff A.K. realized that FARLEY's
3 conduct was sexual abuse.

4 **MINOR PLAINTIFF A.L.**

5 84.

6 In or around 2016, A.L. began receiving medical treatment from FARLEY at FAMILY
7 HEALTH, which continued until 2020. During this time, A.L. was forced to submit to
8 FARLEY's sexual abuse and harassment while seeking medical treatment.

9 85.

10 At all times material hereto, A.L. was a patient of FARLEY and FAMILY HEALTH.
11 FARLEY used his position of trust and authority over A.L., to sexually abuse her in the
12 following ways:

- 13 a) Beginning at infancy, FARLEY performed ungloved vaginal exams upon A.L.,
14 resulting in approximately fifteen instances of abuse.

15 86.

16 At the time, Plaintiff A.L., in reasonable reliance upon FAMILY HEALTH's
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
19 sexually abusive nature was publicly revealed, that Plaintiff A.L. realized that FARLEY's
20 conduct was sexual abuse.

1 **PLAINTIFF A.M.**

2 87.

3 In or around 2006, A.M. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2010. From approximately 2008 through 2009, A.M. was
5 forced to submit to FARLEY’s sexual abuse and harassment while seeking medical treatment.

6 88.

7 At all times material hereto, A.M. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over A.M., to sexually abuse her in the
9 following ways:

- 10 a) When A.M. was approximately 15, FARLEY insisted on breaking A.M.’s hymen in
11 order to prescribe birth control and because it “would make sex better”;
- 12 b) When A.M. was 14, FARLEY performed an ungloved breast examination without a
13 chaperone in the room.

14 89.

15 At the time, Plaintiff A.M., in reasonable reliance upon FAMILY HEALTH’s
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
18 sexually abusive nature was publicly revealed, that Plaintiff A.M. realized that FARLEY’s
19 conduct was sexual abuse.

1 **PLAINTIFF A.N.**

2 90.

3 In or around 2009, A.N. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH. In approximately 2014, and again in approximately 2018, A.N. was forced to submit
5 to FARLEY’s sexual abuse and harassment while seeking medical treatment.

6 91.

7 At all times material hereto, A.N. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over A.N., to sexually abuse her in the
9 following ways:

- 10 a) When A.N. was approximately 18, FARLEY conducted an ungloved digitally
11 penetrative pelvic exam;
- 12 b) FARLEY insisted on breaking A.N.’s hymen after placing an IUD;
- 13 c) FARLEY conducted ungloved breast exams when A.N. was a minor.

14 92.

15 At the time, Plaintiff A.N., in reasonable reliance upon FAMILY HEALTH’s
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
18 sexually abusive nature was publicly revealed, that Plaintiff A.N. realized that FARLEY’s
19 conduct was sexual abuse.

1 **PLAINTIFF A.O.**

2 93.

3 In or around 2006, A.O. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2019. During this time, A.O. was forced to submit to
5 FARLEY's sexual abuse and harassment while seeking medical treatment.

6 94.

7 At all times material hereto, A.O. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over A.O., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted semi-annual ungloved digitally penetrative pelvic exams
11 beginning at approximately age 14;
- 12 b) In about 2013, FARLEY conducted a breast exam, groping at A.O.'s breasts and
13 nipples;
- 14 c) FARLEY conditioned medical treatment upon A.O.'s submission to pelvic and breast
15 exams.

16 95.

17 At the time, Plaintiff A.O., in reasonable reliance upon FAMILY HEALTH's
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff A.O. realized that FARLEY's
21 conduct was sexual abuse.

1 **PLAINTIFF A.P.**

2 96.

3 In or around 1994, A.P. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until approximately 2008. During this time, A.P. was forced to
5 submit to FARLEY’s sexual abuse and harassment while seeking medical treatment.

6 97.

7 At all times material hereto, A.P. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over A.P., to sexually abuse her in the
9 following ways:

- 10 a) When A.P. was 11 or 12 years old, FARLEY unbuttoned her pants and put his
11 ungloved hand into her underwear and between her legs to “check for pubic hair;” in
12 so doing palpated her vulva several times;
- 13 b) When A.P. was 11 or 12 years old, FARLEY groped her breasts under the guise of
14 checking her “breast development”;
- 15 c) When A.P. was 24, FARLEY insisted on performing an unnecessary pelvic exam
16 during an unrelated medical appointment.

17 98.

18 At the time, Plaintiff A.P., in reasonable reliance upon FAMILY HEALTH’s
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
20 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
21 sexually abusive nature was publicly revealed, that Plaintiff A.P. realized that FARLEY’s
22 conduct was sexual abuse.

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PLAINTIFF A.Q.

99.

In or around 1994, A.Q. began receiving medical treatment from FARLEY at FAMILY HEALTH, which continued until approximately 2020. From approximately 1995 through 2003, A.Q. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

100.

At all times material hereto, A.Q. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.Q., to sexually abuse her in the following ways:

- a) When A.Q. was 14 years old, she accompanied her sister, A.P., to A.P.'s appointment in FARLEY's office. During that occurrence, FARLEY unbuttoned A.P.'s pants and put his ungloved hand into her underwear and between her legs to "check for pubic hair." When he finished with A.P., he called A.Q. to the exam table, even though it was not her appointment. He then proceeded to unbutton A.Q.'s pants, and place his hand over and palpate her labia to "check what stage of puberty she was at."
- b) FARLEY recommended that A.Q. have an IUD placed for birth control. After FARLEY placed the IUD, he insisted on repeat pelvic examinations to "check the strings" of the IUD.

101.

At the time, Plaintiff A.Q., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's

1 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
2 sexually abusive nature was publicly revealed, that Plaintiff A.Q. realized that FARLEY's
3 conduct was sexual abuse.

4 **PLAINTIFF A.R.**

5 102.

6 In or around 1991, A.R. began receiving medical treatment from FARLEY at FAMILY
7 HEALTH, which continued until approximately 2004. From approximately 1996 through 2004,
8 A.R. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical
9 treatment.

10 103.

11 At all times material hereto, A.R. was a patient of FARLEY and FAMILY HEALTH.
12 FARLEY used his position of trust and authority over A.R., to sexually abuse her in the
13 following ways:

- 14 a) When A.R. was a minor, FARLEY performed numerous ungloved digitally
15 penetrative pelvic exams;
- 16 b) When A.R. was a minor, FARLEY performed numerous ungloved breast exams;
- 17 c) Around the age of 13, A.R. began to experience anxiety any time she had to go in to
18 see FARLEY for a pelvic exam. FARLEY continued to perform the exams with the
19 same frequency, but began to give A.R. one Ativan to take home, with the instruction
20 that she was to take the pill ten minutes before the next pelvic exam appointment.

21 104.

22 At the time, Plaintiff A.R., in reasonable reliance upon FAMILY HEALTH's
23 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
24

1 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
2 sexually abusive nature was publicly revealed, that Plaintiff A.R. realized that FARLEY's
3 conduct was sexual abuse.

4 **PLAINTIFF A.S.**

5 105.

6 In or around 1996, A.S. began receiving medical treatment from FARLEY at FAMILY
7 HEALTH, which continued until approximately 2013. During this time, A.S. was forced to
8 submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

9 106.

10 At all times material hereto, A.S. was a patient of FARLEY and FAMILY HEALTH.
11 FARLEY used his position of trust and authority over A.S., to sexually abuse her in the
12 following ways:

- 13 a) FARLEY conducted vaginal exams of A.S. at the age of 6, which continued at
14 each appointment thereafter;
- 15 b) FARLEY conducted ungloved breast exams on A.S. at the age of 11 or 12;
- 16 c) FARLEY began performing ungloved, digitally penetrative pelvic exams on A.S.
17 when she was approximately 15;
- 18 d) FARLEY switched A.S.'s appointment from another doctor to FARLEY, so that
19 he could perform an ungloved breast and pelvic exam;
- 20 e) FARLEY insisted on embracing A.S. while she wore only a medical gown.

21 107.

22 At the time, Plaintiff, A.S., in reasonable reliance upon FAMILY HEALTH's
23 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
24

1 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
2 sexually abusive nature was publicly revealed, that Plaintiff A.S. realized that FARLEY's
3 conduct was sexual abuse.

4 **PLAINTIFF A.T.**

5 108.

6 In or around 2010, A.T. began receiving medical treatment from FARLEY, which
7 continued until approximately 2020. From approximately 2011 through approximately 2020,
8 A.T. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical
9 treatment.

10 109.

11 At all times material hereto, A.T. was a patient of FARLEY, FAMILY HEALTH, and
12 PROVIDENCE. FARLEY used his position of trust and authority over A.T. to sexually abuse
13 her in the following ways:

- 14 a) Under the guise of medical treatment FARLEY conducted numerous unnecessary and
15 ungloved breast exams;
- 16 b) Under the guise of medical treatment FARLEY conducted dozens of unnecessary
17 digitally penetrative pelvic exams;
- 18 c) FARLEY coerced A.T. to come to his apartment, where he performed a pelvic exam
19 on his bed;
- 20 d) FARLEY delivered A.T.'s second child at PROVIDENCE in 2015. After delivery, he
21 performed an invasive pelvic examination of A.T., forcing his whole arm into her
22 vagina and causing bleeding, to the obvious concern of nurses in the room.
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110.

At the time, Plaintiff A.T., in reasonable reliance upon FAMILY HEALTH and PROVIDENCE's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.T. realized that FARLEY's conduct was sexual abuse.

PLAINTIFF A.U.

111.

In or around 2018, A.U. began receiving medical treatment from FARLEY at FAMILY HEALTH, which continued through approximately 2020. During this time, A.U. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

112.

At all times material hereto, A.U. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over A.U. to sexually abuse her in the following ways:

- a) When A.U. indicated that she preferred a female practitioner, FARLEY insisted on seeing her, noting, "I was the first person to see you naked;"
- b) In or around 2018, FARLEY coerced A.U. into an unnecessary digitally penetrative pelvic exam by claiming that another young patient had died of cancer which could have been detected by pelvic exam;
- c) In or around 2019, FARLEY coerced A.U. into an unnecessary IUD placement in order to justify further pelvic exams;

- 1 d) After insertion of the IUD, FARLEY conducted numerous unnecessary pelvic exams,
2 repeatedly claiming he needed to “check the strings” of the IUD;
3 e) Between 2019 and 2020, FARLEY contacted A.U. on her personal cell phone and
4 coerced her into numerous unnecessary digitally penetrative pelvic exams;
5 f) FARLEY frequently insisted on embracing A.U. during treatment; and
6 g) Under the guise of medical treatment, FARLEY conducted numerous unnecessary
7 and ungloved breast exams.

8 113.

9 At the time, Plaintiff A.U., in reasonable reliance upon FAMILY HEALTH’s
10 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
11 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
12 sexually abusive nature was publicly revealed, that Plaintiff A.U. realized that FARLEY’s
13 conduct was sexual abuse.

14 **PLAINTIFF A.V.**

15 114.

16 In or around 2000, A.V. began receiving medical treatment from FARLEY at FAMILY
17 HEALTH, which continued until approximately 2020. In 2011, A.V. was forced to submit to
18 FARLEY’s sexual abuse and harassment while seeking medical treatment.

19 115.

20 At all times material hereto, A.V. was a patient of FARLEY and FAMILY HEALTH.
21 FARLEY used his position of trust and authority over A.V., to sexually abuse her in the
22 following ways:
23
24

1 a) A.V. presented to FARLEY for an annual physical. Instead, FARLEY proceeded with
2 an unconsented, ungloved breast and digitally penetrative pelvic exam.

3 116.

4 At the time, Plaintiff A.V., in reasonable reliance upon FAMILY HEALTH's
5 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
6 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
7 sexually abusive nature was publicly revealed, that Plaintiff A.V. realized that FARLEY's
8 conduct was sexual abuse.

9
10 **PLAINTIFF A.W.**

11 117.

12 In or around 2008, A.W. began receiving medical treatment from FARLEY at FAMILY
13 HEALTH, which continued until 2020. During this time, A.W. was forced to submit to
14 FARLEY's sexual abuse and harassment while seeking medical treatment.

15 118.

16 At all times material hereto, A.W. was a patient of Defendants FARLEY and FAMILY
17 HEALTH. FARLEY used his position of trust and authority over A.W., to sexually abuse her in
18 the following ways:

- 19 a) FARLEY conditioned prescription of necessary medication upon performance of
20 digitally penetrative pelvic exams and breast exams, even though the medication was
21 unrelated to A.W.'s gynecological health;
- 22 b) During digitally penetrative pelvic exams, FARLEY would make sexually
23 inappropriate comments to A.W., such as "you are so tight like a teenage virgin;"

- 1 c) FARLEY broke A.W.'s hymen without medical justification;
- 2 d) FARLEY performed an episiotomy to "make exams easier;"
- 3 e) FARLEY repeatedly embraced A.W. at the end of exams, while A.W. was wearing
- 4 only a medical gown;
- 5 f) FARLEY induced A.W.'s compliance by offering free "treatment" when A.W. did
- 6 not have health insurance.

7 119.

8 At the time, Plaintiff A.W., in reasonable reliance upon FAMILY HEALTH's

9 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's

10 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's

11 sexually abusive nature was publicly revealed, that Plaintiff A.W. realized that FARLEY's

12 conduct was sexual abuse.

13 **PLAINTIFF A.X.**

14 120.

15 In or around 2016, A.X. began receiving medical treatment from FARLEY at FAMILY

16 HEALTH, which continued until 2020. During this time, A.X. was forced to submit to

17 FARLEY's sexual abuse and harassment while seeking medical treatment.

18 121.

19 At all times material hereto, A.X. was a patient of FARLEY and FAMILY HEALTH..

20 FARLEY used his position of trust and authority over A.X., to sexually abuse her in the

21 following ways:

- 22 a) FARLEY performed approximately seven digitally penetrative pelvic exams in a four
- 23 year span;
- 24

- 1 b) FARLEY performed approximately seven ungloved breast exams in a four year span;
2 c) At the beginning and end of each appointment, FARLEY insisted on embracing A.X.
3 while A.X. wore nothing but a medical gown.

4 122.

5 At the time, Plaintiff A.X., in reasonable reliance upon FAMILY HEALTH's
6 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
7 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
8 sexually abusive nature was publicly revealed, that Plaintiff A.X. realized that FARLEY's
9 conduct was sexual abuse.

10 **PLAINTIFF A.Y.**

11 123.

12 In or around 1990, A.Y. began receiving medical treatment from FARLEY, which
13 continued until 2020. During this time, A.Y. was forced to submit to FARLEY's sexual abuse
14 and harassment while seeking medical treatment.

15 124.

16 At all times material hereto, A.Y. was a patient of FARLEY, FAMILY HEALTH, and
17 PROVIDENCE. FARLEY used his position of trust and authority over A.Y., to sexually abuse
18 her in the following ways:

- 19 a) FARLEY performed numerous ungloved breast exams beginning when A.Y. was an
20 early teen;
21 b) FARLEY conducted numerous digitally penetrative pelvic exams;
22 c) FARLEY unnecessarily conducted membrane sweeps during each of A.Y.'s
23 pregnancies without consent;

- 1 d) FARLEY made harassing and inappropriate comments about A.Y.'s vagina during
2 the delivery of her child at PROVIDENCE;
- 3 e) FARLEY ended several appointments by embracing A.Y. when she was wearing
4 nothing but a medical gown.

5 125.

6 At the time, Plaintiff A.Y., in reasonable reliance upon FAMILY HEALTH and
7 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
8 believed that FARLEY's conduct was medically necessary. It was not until in or around August
9 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff A.Y.
10 realized that FARLEY's conduct was sexual abuse.

11 **PLAINTIFF A.Z.**

12 126.

13 In or around 2018, A.Z. began receiving medical treatment from FARLEY at FAMILY
14 HEALTH, which continued until 2020. During this time, A.Z. was forced to submit to
15 FARLEY's sexual abuse and harassment while seeking medical treatment.

16 127.

17 At all times material hereto, A.Z. was a patient of FARLEY and FAMILY HEALTH.
18 FARLEY used his position of trust and authority over A.Z., to sexually abuse her in the
19 following ways:

- 20 a) FARLEY conducted unnecessary ungloved pelvic and breast exams upon A.Z.
21 without the presence of chaperones; and
- 22 b) FARLEY embraced A.Z. while she donned only a medical gown.
- 23
- 24

1 128.

2 At the time, Plaintiff, A.Z., in reasonable reliance upon FAMILY HEALTH's
3 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
4 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
5 sexually abusive nature was publicly revealed, that Plaintiff A.Z. realized that FARLEY's
6 conduct was sexual abuse.

7 **PLAINTIFF B.A.**

8 129.

9 In or around 2008, B.A. began receiving medical treatment from FARLEY at FAMILY
10 HEALTH, which continued until 2011. During this time, B.A. was forced to submit to
11 FARLEY's sexual abuse and harassment while seeking medical treatment.

12 130.

13 At all times material hereto, B.A. was a patient of FARLEY and FAMILY HEALTH.
14 FARLEY used his position of trust and authority over B.A., to sexually abuse her in the
15 following ways:

- 16 a) FARLEY conducted unnecessary ungloved pelvic and/or breast exams upon B.A;
17 and
18 b) FARLEY made inappropriate comments to B.A. while performing pelvic and
19 breast examinations.

20 131.

21 At the time, Plaintiff, B.A., in reasonable reliance upon FAMILY HEALTH's
22 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
23 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
24

1 sexually abusive nature was publicly revealed, that Plaintiff B.A. realized that FARLEY's
2 conduct was sexual abuse.

3 **PLAINTIFF B.B.**

4 132.

5 In or around 1998, B.B. began receiving medical treatment from FARLEY at FAMILY
6 HEALTH, which continued until 2020. In 2020, B.B. was forced to submit to FARLEY's sexual
7 abuse and harassment while seeking medical treatment.

8 133.

9 At all times material hereto, B.B. was a patient of FARLEY and FAMILY HEALTH.
10 FARLEY used his position of trust and authority over B.B., to sexually abuse her in the
11 following ways:

- 12 a) FARLEY conducted an ungloved and unnecessary breast and pelvic exam on
13 B.B.;
- 14 b) FARLEY stared at B.B.'s breasts after completing a breast exam; and
- 15 c) FARLEY insisted on embracing B.B. while she donned only a medical gown.

16 134.

17 At the time, Plaintiff, B.B., in reasonable reliance upon FAMILY HEALTH's,
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff B.B. realized that FARLEY's
21 conduct was sexual abuse.

1 **PLAINTIFF B.C.**

2 135.

3 In or around 2004, B.C. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2012. In approximately 2008, B.C. was forced to submit to
5 FARLEY's sexual abuse and harassment while seeking medical treatment.

6 136.

7 At all times material hereto, B.C. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.C., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted an ungloved breast and pelvic exam on B.C. during a sports
11 physical when B.C. was approximately 12 years old, without a chaperone in the
12 room.

13 137.

14 At the time, Plaintiff, B.C., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff B.C. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF B.D.**

2 138.

3 In or around 1988, B.D. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 1991. During this time, B.D. was forced to submit to
5 FARLEY's sexual abuse and harassment while seeking medical treatment.

6 139.

7 At all times material hereto, B.D. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.D., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved breast examinations upon B.D.

11 140.

12 At the time, Plaintiff, B.D., in reasonable reliance upon FAMILY HEALTH's
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
15 sexually abusive nature was publicly revealed, that Plaintiff B.D. realized that FARLEY's
16 conduct was sexual abuse.

1 **PLAINTIFF B.E.**

2 141.

3 In or around 2004, B.E. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH. In approximately 2009 or 2010, B.E. was forced to submit to FARLEY's sexual
5 abuse and harassment while seeking medical treatment.

6 142.

7 At all times material hereto, B.E. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.E., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted an unnecessary ungloved breast examination upon B.E.

11 143.

12 At the time, Plaintiff, B.E., in reasonable reliance upon FAMILY HEALTH's
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
15 sexually abusive nature was publicly revealed, that Plaintiff B.E. realized that FARLEY's
16 conduct was sexual abuse.

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PLAINTIFF B.G.

144.

In or around 2014, B.G. began receiving medical treatment from FARLEY at FAMILY HEALTH, which continued until 2018. During this time, B.G. was forced to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

145.

At all times material hereto, B.G. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over B.G., to sexually abuse her in the following ways:

- a) FARLEY conducted unnecessary ungloved pelvic examinations on B.G.;
- b) FARLEY made inappropriate comments to B.G. while conducting exams;
- c) FARLEY insisted on embracing B.G. while she donned only a medical gown;
- d) FARLEY offered B.G. free medical exams when he was no longer covered under her insurance plan so that he could continue to perform unnecessary breast and pelvic exams.

146.

At the time, Plaintiff, B.G., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff B.G. realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF B.H.**

2 147.

3 In or around 1994, B.H. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2008. Between approximately 2003 and 2008, B.H. was forced
5 to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

6 148.

7 At all times material hereto, B.H. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.H., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic examinations on B.H. without
11 a chaperone present;
12 b) FARLEY made inappropriate comments to B.H. while conducting exams.

13 149.

14 At the time, Plaintiff, B.H., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff B.H. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF B.J.**

2 150.

3 B.J. is a developmentally disabled adult. In or around 2013, B.J. required a physical to
4 gain access to a specialized home for children. For this exam, she presented to FARLEY at
5 FAMILY HEALTH and was forced to submit to FARLEY's sexual abuse and harassment.

6 151.

7 At all times material hereto, B.J. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.J., to sexually abuse her in the following
9 ways:

- 10 a) FARLEY refused to allow B.J.'s guardian into the examination room and forced
11 B.J. to undergo an unnecessary breast exam. During the exam, B.J. was in
12 extreme pain and pleaded with FARLEY to stop, but he refused.

13 152.

14 At the time, Plaintiff, B.J., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff B.J. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF B.K.**

2 153.

3 In or around 1993, B.K. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2005. Between approximately 1993 and 2000, B.K. was forced
5 to submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

6 154.

7 At all times material hereto, B.K. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.K., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic and breast examinations on
11 B.K. without a chaperone present;
12 b) FARLEY used scare tactics to coerce B.K. into repeated pelvic and breast
13 examinations.

14 155.

15 At the time, Plaintiff, B.K., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff B.K. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF B.L.**

2 156.

3 In or around 2016, B.L. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH. During this time, B.L. was forced to submit to FARLEY's sexual abuse and
5 harassment while seeking medical treatment.

6 157.

7 At all times material hereto, B.L. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.L., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY rubbed B.L.'s back, instructing her to remove all over her clothes under
11 her gown;
- 12 b) Without consent, FARLEY pulled down B.L.'s gown, exposing her breasts; B.L.
13 declined and pulled her gown back over her breasts, but FARLEY persisted, and
14 pulled the gown back and began fondling her breasts;
- 15 c) FARLEY instructed B.L. to lay down, and manually spread her legs open. She
16 resisted, but FARLEY physically pulled her legs open and began to conduct a
17 vaginal exam.

18 158.

19 At the time, Plaintiff, B.L., in reasonable reliance upon FAMILY HEALTH's
20 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
21 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
22 sexually abusive nature was publicly revealed, that Plaintiff B.L. realized that FARLEY's
23 conduct was sexual abuse.

1 **PLAINTIFF B.M.**

2 159.

3 In or around 2010, B.M. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH. From approximately 2010 to 2014, B.M. was forced to submit to FARLEY's sexual
5 abuse and harassment while seeking medical treatment.

6 160.

7 At all times material hereto, B.M. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.M., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY forced B.M. to undergo unnecessary ungloved breast and pelvic exams
11 without chaperones present; and
12 b) FARLEY coerced B.M. into undergoing extremely painful and unnecessary
13 membrane sweeps.

14 161.

15 At the time, Plaintiff, B.M., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff B.M. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF B.N.**

2 162.

3 In or around 1999, B.N. began receiving medical treatment from FARLEY, which
4 continued until 2020. During this time, B.N. was forced to submit to FARLEY's sexual abuse
5 and harassment while seeking medical treatment.

6 163.

7 At all times material hereto, B.N. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over B.N., to sexually abuse
9 her in the following ways:

- 10 a) FARLEY forced B.N. to undergo unnecessary ungloved breast and pelvic exams;
11 and
12 b) FARLEY coerced B.N. into undergoing extremely painful and unnecessary
13 membrane sweeps at FAMILY HEALTH.

14 164.

15 At the time, Plaintiff, B.N., in reasonable reliance upon FAMILY HEALTH and
16 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
17 believed that FARLEY's conduct was medically necessary. It was not until in or around August
18 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff B.N.
19 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF B.O.**

2 165.

3 In or around 1996, B.O. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until approximately 2012. During this time, B.O. was forced to
5 submit to FARLEY’s sexual abuse and harassment while seeking medical treatment.

6 166.

7 At all times material hereto, B.O. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.O., to sexually abuse her in the
9 following ways:

- 10 a) B.O. presented to FAMILY HEALTH to see Liberty Robinson, PA, in 2007.

11 Instead, FARLEY entered the room, and asked B.O.’s mother to leave. He then
12 insisted that B.O. undergo a breast and pelvic exam, and offered her something
13 “to calm her down.” B.O. then fled the office, and FAMILY HEALTH called to
14 apologize.

15 167.

16 At the time, Plaintiff, B.O., in reasonable reliance upon FAMILY HEALTH’s
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
19 sexually abusive nature was publicly revealed, that Plaintiff B.O. realized that FARLEY’s
20 conduct was sexual abuse.

1 **PLAINTIFF B.P.**

2 168.

3 Prior to treating with FARLEY, B.P. had a full hysterectomy. In or around 2009, B.P.
4 began receiving medical treatment from FARLEY at FAMILY HEALTH, which continued until
5 approximately 2020. During this time, B.P. was forced to submit to FARLEY's sexual abuse and
6 harassment while seeking medical treatment.

7 169.

8 At all times material hereto, B.P. was a patient of FARLEY and FAMILY HEALTH.
9 FARLEY used his position of trust and authority over B.P., to sexually abuse her in the
10 following ways:

- 11 a) FARLEY performed unnecessary and ungloved pelvic examinations on B.P.;
- 12 b) FARLEY performed numerous unnecessary and ungloved breast examinations on
13 B.P.;
- 14 c) FARLEY conditioned delivery of prescription medication upon B.P.'s submission to
15 pelvic and breast examinations.

16 170.

17 At the time, Plaintiff, B.P., in reasonable reliance upon FAMILY HEALTH's
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff B.P. realized that FARLEY's
21 conduct was sexual abuse.

1 **PLAINTIFF B.Q.**

2 171.

3 In or around 1999, B.Q. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until approximately 2020. During this time, B.Q. was forced to
5 submit to FARLEY's sexual abuse and harassment while seeking medical treatment.

6 172.

7 At all times material hereto, B.Q. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.Q., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic and breast exams without a
11 chaperone present;
- 12 b) On three occasions, FARLEY attempted to sexually stimulate B.Q. during pelvic
13 examinations;
- 14 c) FARLEY conditioned prescription of necessary medication on B.Q.'s submission
15 to pelvic and breast examinations.

16 173.

17 At the time, Plaintiff, B.Q., in reasonable reliance upon FAMILY HEALTH's
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff B.Q. realized that FARLEY's
21 conduct was sexual abuse.

1 **PLAINTIFF B.R.**

2 174.

3 B.R. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2020.
4 During this time, B.R. was forced to submit to FARLEY's sexual abuse and harassment.

5 175.

6 At all times material hereto, B.R. was a patient of FARLEY and FAMILY HEALTH.
7 FARLEY used his position of trust and authority over B.R., to sexually abuse her in the
8 following ways:

- 9 a) FARLEY conducted unnecessary ungloved pelvic and breast exams without a
10 chaperone present.

11 176.

12 At the time, Plaintiff, B.R., in reasonable reliance upon FAMILY HEALTH's
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
15 sexually abusive nature was publicly revealed, that Plaintiff B.R. realized that FARLEY's
16 conduct was sexual abuse.

1 **PLAINTIFF B.S.**

2 177.

3 In or around 1992, B.S. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2000. Between approximately 1993 and 1998,
5 B.S. was forced to submit to FARLEY's sexual abuse and harassment.

6 178.

7 At all times material hereto, B.S. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.S., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic, breast, and rectal exams
11 without a chaperone present; and
12 b) FARLEY coerced B.S. into unnecessary membrane sweeps at FAMILY
13 HEALTH.

14 179.

15 At the time, Plaintiff, B.S., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff B.S. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF B.T.**

2 180.

3 In or around 1996, B.T. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2020. During this time, B.T. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 181.

7 At all times material hereto, B.T. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over B.S., to sexually abuse
9 her in the following ways:

- 10 a) FARLEY conducted unnecessary pelvic exams.

11 182.

12 At the time, Plaintiff, B.T., in reasonable reliance upon FAMILY HEALTH and
13 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
14 believed that FARLEY's conduct was medically necessary. It was not until in or around August
15 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff B.T.
16 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF B.U.**

2 183.

3 In or around 1989, B.U. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2002. In approximately 1994 to 1996, B.U. was
5 forced to submit to FARLEY's sexual abuse and harassment.

6 184.

7 At all times material hereto, B.U. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.U., to sexually abuse her in the
9 following ways:

- 10 a) B.U. presented to FARLEY for a sports physical when she was approximately 10-
11 12 years old. FARLEY insisted on performing a breast and exterior vaginal
12 examination as part of the sports physical.

13 185.

14 At the time, Plaintiff, B.U., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff B.U. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF B.V.**

2 186.

3 In or around 1990, B.V. began receiving medical treatment from FARLEY, which
4 continued to approximately 2012. During this time, B.V. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 187.

7 At all times material hereto, B.V. was a patient of FARLEY, FAMILY HEALTH, and
8 LEGACY. FARLEY used his position of trust and authority over B.V., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY performed unnecessary ungloved pelvic, breast, and/or rectal exams
11 upon B.V., often without a chaperone present;
- 12 b) FARLEY performed unconsented and unnecessary membrane sweeps upon B.V.
13 during each pregnancy, one resulting in an eight week premature labor of her son;
- 14 c) FARLEY groped B.V.'s vagina under the guise of perineal massage; and
- 15 d) FARLEY performed an unnecessary and incredibly painful placental removal
16 upon B.V. at LEGACY in 1992 in the presence of LEGACY staff.

17 188.

18 At the time, Plaintiff, B.V., in reasonable reliance upon FAMILY HEALTH an
19 LEGACY's representations that FARLEY was a trustworthy medical professional, believed that
20 FARLEY's conduct was medically necessary. It was not until in or around August 2020, when
21 FARLEY's sexually abusive nature was publicly revealed, that Plaintiff B.V. realized that
22 FARLEY's conduct was sexual abuse.

1 **PLAINTIFF B.W.**

2 189.

3 In or around 1990, B.W. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2020. Between approximately 2014 and 2020,
5 B.W. was forced to submit to FARLEY’s sexual abuse and harassment.

6 190.

7 At all times material hereto, B.W. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.W., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY performed unnecessary ungloved breast and/or pelvic exams on B.W
11 without the presence of a chaperone;
- 12 b) FARLEY insisted on embracing B.W. while she wore only a medical gown;
- 13 c) FARLEY coerced B.W into repeat pelvic exams by threatening B.W. with the
14 risk of cervical cancer.

15 191.

16 At the time, Plaintiff, B.W., in reasonable reliance upon FAMILY HEALTH’s that
17 FARLEY was a trustworthy medical professional, believed that FARLEY’s conduct was
18 medically necessary. It was not until in or around August 2020, when FARLEY’s sexually
19 abusive nature was publicly revealed, that Plaintiff B.W. realized that FARLEY’s conduct was
20 sexual abuse.

1 **PLAINTIFF B.X.**

2 192.

3 In or around 2005, B.X. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2011. During this time, B.X. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 193.

7 At all times material hereto, B.X. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.X., to sexually abuse her in the
9 following ways:

- 10 a) B.X. was referred to FARLEY because of his position within the Mormon
11 Church. He began treating her for unrelated issues, but quickly insisted on
12 performing unnecessary and ungloved breast and pelvic examinations, breaking
13 her hymen in the course of these examinations;
- 14 b) FARLEY placed an IUD so forcefully that B.X. needed to be carried from the
15 office by her husband; and
- 16 c) FARLEY embraced and kissed B.X. on the cheek during several exams.

17 194.

18 At the time, Plaintiff, B.X., in reasonable reliance upon FAMILY HEALTH's
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
20 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
21 sexually abusive nature was publicly revealed, that Plaintiff B.X. realized that FARLEY's
22 conduct was sexual abuse.

1 **PLAINTIFF B.Y.**

2 195.

3 In or around 2004, B.Y. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2020. During this time, B.Y. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 196.

7 At all times material hereto, B.Y. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.Y., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY performed unnecessary breast and pelvic examinations;
11 b) FARLEY embraced B.Y. while she wore only a medical gown.

12 197.

13 At the time, Plaintiff, B.Y., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff B.Y. realized that FARLEY's
17 conduct was sexual abuse.

1 **PLAINTIFF B.Z.**

2 198.

3 In or around 1991, B.Z. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2013. In approximately 2001, B.Z. was forced to
5 submit to FARLEY's sexual abuse and harassment.

6 199.

7 At all times material hereto, B.Z. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over B.Z., to sexually abuse her in the
9 following ways:

- 10 a) When B.Z. was in high school, she presented for her first physical. She undressed
11 and donned a gown. FARLEY came in without a nurse and began rubbing her
12 upper thigh. B.Z. requested a female nurse to perform the physical, but FARLEY
13 refused, and proceeded to perform a breast and pelvic exam.

14 200.

15 At the time, Plaintiff, B.Z., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff B.Z. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF C.A.**

2 201.

3 In or around 1993, C.A. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to approximately 2013. Between approximately 2006 and 2013,
5 C.A. was forced to submit to FARLEY’s sexual abuse and harassment.

6 202.

7 At all times material hereto, C.A. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.A., to sexually abuse her in the
9 following ways:

- 10 a) When C.A. was approximately 13 years old, FARLEY performed an unnecessary
11 and unchaperoned pelvic examination during which he stimulated C.A.’s clitoris;
12 b) At that same appointment, FARLEY performed an unnecessary and ungloved
13 breast examination which involved painful groping of C.A.’s breasts;
14 c) FARLEY continued to perform unnecessary pelvic and breast examinations upon
15 C.A. during the course of treatment;
16 d) FARLEY performed an unnecessary hymenectomy upon C.A., explaining that her
17 wedding night would be “messy” if she did not have the procedure.

18 203.

19 At the time, Plaintiff, C.A., in reasonable reliance upon FAMILY HEALTH’s
20 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
21 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
22 sexually abusive nature was publicly revealed, that Plaintiff C.A. realized that FARLEY’s
23 conduct was sexual abuse.

1 **PLAINTIFF C.B.**

2 204.

3 In or around 2018, C.B. began receiving medical treatment from FARLEY, which
4 continued to 2019. During this time, C.B. was forced to submit to FARLEY's sexual abuse and
5 harassment.

6 205.

7 At all times material hereto, C.B. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over C.B., to sexually abuse
9 her in the following ways:

- 10 a) FARLEY performed unnecessary pelvic examinations upon C.B.;
- 11 b) FARLEY performed an unnecessary membrane sweep upon C.B.;
- 12 c) During delivery in 2019 at PROVIDENCE, FARLEY performed an extremely
13 invasive and painful cervical exam which drew concern of a nurse in the room;
- 14 d) FARLEY pressed his genitals against C.B. during exams; and
- 15 e) FARLEY insisted on embracing C.B. while she wore only a medical gown.

16 206.

17 At the time, Plaintiff, C.B., in reasonable reliance upon FAMILY HEALTH and
18 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
19 believed that FARLEY's conduct was medically necessary. It was not until in or around August
20 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.B.
21 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF C.C.**

2 207.

3 In or around 2002, C.C. began receiving medical treatment from FARLEY, which
4 continued to 2018. During this time, C.C. was forced to submit to FARLEY's sexual abuse and
5 harassment.

6 208.

7 At all times material hereto, C.C. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.C., to sexually abuse her in the
9 following ways:

- 10 a) When C.C. was in sixth grade, she presented to FARLEY for a sports physical so
11 that she could play middle school basketball. There was no chaperone in the
12 room. FARLEY told C.C. to undress, and proceeded to perform an unnecessary
13 breast and pelvic exam; and
14 b) FARLEY performed unnecessary pelvic and breast exams upon C.C.

15 209.

16 At the time, Plaintiff, C.C., in reasonable reliance upon FAMILY HEALTH's
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
19 sexually abusive nature was publicly revealed, that Plaintiff C.C. realized that FARLEY's
20 conduct was sexual abuse.

1 **PLAINTIFF C.D.**

2 In or around 1995, C.D. began receiving medical treatment from FARLEY at FAMILY
3 HEALTH, which continued to 2005. During this time, C.D. was forced to submit to FARLEY’s
4 sexual abuse and harassment.

5 210.

6 At all times material hereto, C.D. was a patient of FARLEY, FAMILY HEALTH, and
7 PROVIDENCE. FARLEY used his position of trust and authority over C.D., to sexually abuse
8 her in the following ways:

- 9 a) While FARLEY’s license was suspended, he continued to see patients at
10 FAMILY HEALTH. During one such visit, FARLEY photographed C.D.’s
11 breasts on his personal cell phone, claiming that the photographs were for a study
12 on development; after the appointment, FARLEY noted that C.D. had recently
13 had a bikini wax, and asked her to come back when she reached “full growth” so
14 that he could photograph her genitals;
- 15 b) FARLEY required C.D. to demonstrate finding her IUD strings with a “student”
16 present without medical need; and
- 17 c) FARLEY performed unnecessary breast and pelvic examinations on C.D.

18 211.

19 At the time, Plaintiff, C.D., in reasonable reliance upon Defendants FAMILY HEALTH’s
20 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
21 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
22 sexually abusive nature was publicly revealed, that Plaintiff C.D. realized that FARLEY’s
23 conduct was sexual abuse.

1 **PLAINTIFF C.E.**

2 212.

3 In or around 1998, C.E. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2009. Between 2000 and 2004, C.E. was forced to submit to
5 FARLEY's sexual abuse and harassment.

6 213.

7 At all times material hereto, C.E. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over C.E., to sexually abuse
9 her in the following ways:

- 10 a) Beginning at approximately age 13, FARLEY began performing unnecessary and
11 ungloved breast and pelvic examinations upon C.E. without a chaperone present,
12 which continued annually thereafter;
- 13 b) FARLEY insisted on embracing C.E. when she wore only a medical gown; and
- 14 c) FARLEY manipulated C.E.'s vagina using a warming light.

15 214.

16 At the time, Plaintiff, C.E., in reasonable reliance upon FAMILY HEALTH and
17 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
18 believed that FARLEY's conduct was medically necessary. It was not until in or around August
19 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.E.
20 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF C.F.**

2 215.

3 In or around 2002, C.F. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH. Between approximately 2012 and 2020, C.F. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 216.

7 At all times material hereto, C.F. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.F., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY performed unnecessary pelvic and breast examinations upon C.F.
11 beginning when she was 13 years old, often without a chaperone; and
12 b) FARLEY photographed C.F.'s breasts on his personal cell phone.

13 217.

14 At the time, Plaintiff, C.F., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff C.F. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF C.G.**

2 218.

3 In or around 2002, C.G. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2020. During this time, C.G. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 219.

7 At all times material hereto, C.G. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.G., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY performed unnecessary pelvic and breast examinations upon C.G. often
11 without a chaperone present.

12 220.

13 At the time, Plaintiff, C.G., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff C.G. realized that FARLEY's
17 conduct was sexual abuse.

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PLAINTIFF C.H.

221.

In or around 2008, C.H. began receiving medical treatment from FARLEY at FAMILY HEALTH, which continued to 2013. During this time, C.H. was forced to submit to FARLEY's sexual abuse and harassment.

222.

At all times material hereto, C.H. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over C.H., to sexually abuse her in the following ways:

- a) FARLEY performed unnecessary ungloved pelvic and breast examinations upon C.H., often without a chaperone; and
- b) FARLEY insisted on embracing C.H. while wearing only a medical gown.

223.

At the time, Plaintiff, C.H., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.H. realized that FARLEY's conduct was sexual abuse.

1 **MINOR PLAINTIFF C.I.**

2 224.

3 In or around 2016, C.I. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2020. During this time, C.I. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 225.

7 At all times material hereto, C.I. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.I., to sexually abuse her in the following
9 ways:

- 10 a) FARLEY performed pelvic examinations upon C.I. beginning at age 13;
11 b) FARLEY photographed C.I.'s breasts with his personal cell phone;
12 c) FARLEY performed an unnecessary surgical procedure on C.I.'s breast; and
13 d) FARLEY summoned C.I. to his home for a "follow up," during which he asked
14 her to disrobe and proceeded with a breast exam.

15 226.

16 At the time, Plaintiff, C.I., in reasonable reliance upon FAMILY HEALTH'S
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
19 sexually abusive nature was publicly revealed, that Plaintiff C.I. realized that FARLEY's
20 conduct was sexual abuse.

1 **PLAINTIFF C.J.**

2 227.

3 In or around 1997, C.J. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2009. Between approximately 2002 and 2006, C.J. was forced to
5 submit to FARLEY's sexual abuse and harassment.

6 228.

7 At all times material hereto, C.J. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.J., to sexually abuse her in the following
9 ways:

- 10 a) During a sports physical which occurred when C.J. was approximately 12 years
11 old, FARLEY and performed an ungloved breast and pubic examination without a
12 chaperone present;
- 13 b) FARLEY used scare tactics to coerce C.J. to consent to repeated ungloved and
14 unnecessary breast and pelvic examinations without a chaperone present; and
- 15 c) FARLEY insisted on embracing C.J. while she wore only a medical gown.

16 229.

17 At the time, Plaintiff, C.J., in reasonable reliance upon FAMILY HEALTH's
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff C.J. realized that FARLEY's
21 conduct was sexual abuse.

1 **PLAINTIFF C.K.**

2 230.

3 In or around 2008, C.K. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2020. During this time, C.K. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 231.

7 At all times material hereto, C.K. was a patient of FARLEY and FAMILY HEALTH..
8 FARLEY used his position of trust and authority over C.K., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY coerced C.K. into unnecessary, ungloved, and unchaperoned pelvic and
11 breast exams with the threat of cervical cancer and the offer of free treatment
12 when her insurance no longer covered the exams.

13 232.

14 At the time, Plaintiff, C.K., in reasonable reliance upon FAMILY HEALTH'S
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff C.K. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF C.L.**

2 233.

3 In or around 1998, C.L. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2019. Between approximately 2005 and 2019, C.L. was forced to
5 submit to FARLEY's sexual abuse and harassment.

6 234.

7 At all times material hereto, C.L. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.L., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began annual ungloved and unnecessary pelvic and examinations when
11 C.L. was 13, often without a chaperone present; and
12 b) FARLEY insisted on embracing C.L. while she wore only a medical gown.

13 235.

14 At the time, Plaintiff, C.L., in reasonable reliance upon FAMILY HEALTH'S
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
17 sexually abusive nature was publicly revealed, that Plaintiff C.L. realized that FARLEY's
18 conduct was sexual abuse.

1 **PLAINTIFF C.M.**

2 236.

3 In or around 2017, C.M. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued to 2020. During this time, C.M. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 237.

7 At all times material hereto, C.M. was a patient of FARLEY and FAMILY HEALTH. .
8 FARLEY used his position of trust and authority over C.M., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY scheduled C.M.'s first appointment on a weekend, with no other staff in
11 the office. He proceeded to conduct an ungloved and unnecessary pelvic and
12 breast exam, during which he stimulated her clitoris;
- 13 b) FARLEY conducted a repeat pelvic and breast exam on a weekend with no other
14 staff present, again stimulating C.M.'s clitoris; and
- 15 c) FARLEY insisted on embracing C.M while she wore only a medical gown.

16 238.

17 At the time, Plaintiff, C.M., in reasonable reliance upon FAMILY HEALTH's
18 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
19 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
20 sexually abusive nature was publicly revealed, that Plaintiff C.M. realized that FARLEY's
21 conduct was sexual abuse.

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PLAINTIFF C.N.

239.

In or around 2007, C.N. presented to FARLEY for sports physical at FAMILY HEALTH. During this exam, C.N. was forced to submit to FARLEY's sexual abuse and harassment.

240.

At all times material hereto, C.N. was a patient of Defendants FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over C.N., to sexually abuse her in the following ways:

- a) FARLEY instructed C.N. to disrobe, and proceeded to squeeze and pinch C.N.'s breasts without gloves. He then instructed C.N. to put her legs in the stirrups and began to touch her vagina, calling out the various parts of her anatomy and stimulating her clitoris;
- b) FARLEY then asked if C.N. would prefer that a nurse be present. C.N. responded affirmatively and a nurse joined near the end of the pelvic exam. As FARLEY finished the pelvic exam, the nurse instructed C.N. to "close her eyes and go to her happy place;"
- c) FARLEY explained the exam by stating that "if this were the 1700's C.N. would be of normal childbearing age, and that it would be perfectly normal for her to be married, having sex, and making babies;"
- d) FARLEY then asked C.N. if it was okay if he proceeded to snip her hymen, but she refused.

1 241.

2 At the time, Plaintiff, C.N., in reasonable reliance upon FAMILY HEALTH's
3 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
4 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
5 sexually abusive nature was publicly revealed, that Plaintiff C.N. realized that FARLEY's
6 conduct was sexual abuse.

7 **PLAINTIFF C.O.**

8 242.

9 In or around 1997, C.O. began receiving medical treatment from FARLEY at FAMILY
10 HEALTH, which continued until 2002. Between approximately 1997 and 2000, C.O. was forced
11 to submit to FARLEY's sexual abuse and harassment.

12 243.

13 At all times material hereto, C.O. was a patient of FARLEY and FAMILY HEALTH.
14 FARLEY used his position of trust and authority over C.O., to sexually abuse her in the
15 following ways:

- 16 a) C.O. presented to FARLEY for a physical when she was 14 years old. FARLEY
17 asked C.O.'s father and a nurse to leave the room. FARLEY instructed C.O. to
18 disrobe, and conducted ungloved and unnecessary breast and pelvic exam. During
19 the exam, FARLEY was breathing heavily and did not use any lubricant,
20 commenting that C.O. was already "wet." FARLEY then asked, in suggestive
21 manner, if C.O. had ever inserted anything into her vagina; and
22
23
24

1 d) FARLEY made inappropriate comments to C.P. after the above delivery at
2 PROVIDENCE; and

3 e) FARLEY conducted unnecessary and ungloved breast exams upon C.P.

4 247.

5 At the time, Plaintiff, C.P., in reasonable reliance upon FAMILY HEALTH and
6 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
7 believed that FARLEY's conduct was medically necessary. It was not until in or around August
8 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.P.
9 realized that FARLEY's conduct was sexual abuse.

10 **PLAINTIFF C.Q.**

11 248.

12 In or around 1995, C.Q. began receiving medical treatment from FARLEY at FAMILY
13 HEALTH, which continued until 2020. During this time, C.Q. was forced to submit to
14 FARLEY's sexual abuse and harassment.

15 249.

16 At all times material hereto, C.Q. was a patient of FARLEY and FAMILY HEALTH.
17 FARLEY used his position of trust and authority over C.Q., to sexually abuse her in the
18 following ways:

19 a) FARLEY conducted unnecessary and ungloved breast, pelvic, and rectal exams
20 upon C.Q.

21 250.

22 At the time, Plaintiff, C.Q., in reasonable reliance upon FAMILY HEALTH's
23 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
24

1 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
2 sexually abusive nature was publicly revealed, that Plaintiff C.Q. realized that FARLEY's
3 conduct was sexual abuse.

4 **PLAINTIFF C.R.**

5 251.

6 In or around 2005, C.R. began receiving medical treatment from FARLEY at FAMILY
7 HEALTH, which continued until 2011. During this time, C.R. was forced to submit to
8 FARLEY's sexual abuse and harassment.

9 252.

10 At all times material hereto, C.R. was a patient of FARLEY and FAMILY HEALTH.
11 FARLEY used his position of trust and authority over C.R., to sexually abuse her in the
12 following ways:

- 13 a) FARLEY conducted unnecessary and ungloved and pelvic exams at 15 or 16
14 years of age and continued annually thereafter;
- 15 b) FARLEY failed to have chaperones present for several exams; and
- 16 c) FARLEY insisted on embracing C.R. while she wore only a medical gown.

17 253.

18 At the time, Plaintiff, C.R., in reasonable reliance upon FAMILY HEALTH's
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
20 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
21 sexually abusive nature was publicly revealed, that Plaintiff C.R. realized that FARLEY's
22 conduct was sexual abuse.

1 **PLAINTIFF C.S.**

2 254.

3 In or around 2005, C.S. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2011. During this time, C.S. was forced to submit to
5 FARLEY's sexual abuse and harassment.

6 255.

7 At all times material hereto, C.S. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.S., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began conducting unnecessary and ungloved breast exams when C.S.
11 was 16 and unnecessary pelvic exams when C.S. was 18, without the presence of
12 a chaperone;
- 13 b) FARLEY prescribed C.S. with an unrelated medication that required a three
14 month refill. At each three month interval, FARLEY insisted on a pelvic and
15 breast exam; and
- 16 c) FARLEY insisted on still more frequent pelvic exams when C.S. became sexually
17 active. C.S. complained to the nursing staff at FAMILY HEALTH, who
18 responded that "they don't make the rules."

19 256.

20 At the time, Plaintiff, C.S., in reasonable reliance upon Defendant FAMILY HEALTH's
21 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
22 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
23

1 sexually abusive nature was publicly revealed, that Plaintiff C.S. realized that FARLEY's
2 conduct was sexual abuse.

3 **PLAINTIFF C.T.**

4 257.

5 In or around 2016, C.T. began receiving medical treatment from FARLEY, which
6 continued until 2020. During this time, C.T. was forced to submit to FARLEY's sexual abuse
7 and harassment.

8 258.

9 At all times material hereto, C.T. was a patient of FARLEY, FAMILY HEALTH, and
10 PROVIDENCE. FARLEY used his position of trust and authority over C.T., to sexually abuse
11 her in the following ways:

- 12 a) FARLEY performed unnecessary ungloved pelvic and breast exams upon C.T.;
- 13 b) FARLEY photographed C.T.'s bare breasts with his personal cell phone;
- 14 c) FARLEY conducted a membrane sweep on C.T. at FAMILY HEALTH despite
15 her explicit refusal to undergo the procedure; and
- 16 d) FARLEY insisted on embracing C.T. while she wore only a medical gown.

17 259.

18 At the time, Plaintiff, C.T., in reasonable reliance upon Defendants FAMILY HEALTH
19 and PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
20 believed that FARLEY's conduct was medically necessary. It was not until in or around August
21 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.T.
22 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF C.U.**

2 260.

3 In or around 2016, C.U. began receiving medical treatment from FARLEY at FAMILY
4 HEALTH, which continued until 2020. During this time, C.U. was forced to submit to
5 FARLEY's sexual abuse and harassment.

6 261.

7 At all times material hereto, C.U. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.U., to sexually abuse her in the
9 following ways:

- 10 a) When C.U. was fourteen, she presented to FARLEY with unrelated medical
11 issues. FARLEY insisted on a physical, during which he performed an exam of
12 C.U.'s vagina and an ungloved breast examination;
- 13 b) FARLEY conditioned necessary medication upon repeated unnecessary breast
14 and pelvic exams; and
- 15 c) FARLEY coerced C.U. into repeated unnecessary pelvic exams using scare
16 tactics; and
- 17 d) FARLEY groomed C.U. into trusting him, telling her that he "loved" her.

18 262.

19 At the time, Plaintiff, C.U., in reasonable reliance upon FAMILY HEALTH's
20 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
21 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
22 sexually abusive nature was publicly revealed, that Plaintiff C.U. realized that FARLEY's
23 conduct was sexual abuse.

1 **PLAINTIFF C.V.**

2 263.

3 C.V. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1999,
4 which continued until 2018. Between 2012 and 2018, C.V. was forced to submit to FARLEY's
5 sexual abuse and harassment.

6 264.

7 At all times material hereto, C.V. was a patient of FARLEY, FAMILY HEALTH, and
8 LEGACY. FARLEY used his position of trust and authority over C.V., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY began unnecessary pelvic and breast exams when C.V. was
11 approximately 12 years old, and continuing semi-annually until C.V. stopped
12 treating with FARLEY;
- 13 b) FARLEY insisted upon embracing C.V. while she wore only a medical gown;
- 14 c) FARLEY harassed C.V. into coming in for more frequently pelvic exams via text
15 message, beginning when C.V. was a minor; and
- 16 d) FARLEY coerced C.V. into repeated unnecessary pelvic exams using scare
17 tactics.

18 265.

19 At the time, Plaintiff, C.V., in reasonable reliance upon FAMILY HEALTH and
20 LEGACY'S representations that FARLEY was a trustworthy medical professional, believed that
21 FARLEY's conduct was medically necessary. It was not until in or around August 2020, when
22 FARLEY's sexually abusive nature was publicly revealed, that Plaintiff C.V. realized that
23 FARLEY's conduct was sexual abuse.

1 **PLAINTIFF C.W.**

2 266.

3 C.W. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2007
4 which continued until 2014. During this time, C.W. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 267.

7 At all times material hereto, C.W. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.W., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began unnecessary and ungloved pelvic and breast exams when C.W.
11 was approximately 16 years old, often without a chaperone; and
12 b) FARLEY attempted to coerce C.W. into allowing him to perform an unnecessary
13 hymenectomy.

14 268.

15 At the time, Plaintiff, C.W., in reasonable reliance upon FAMILY HEALTH'S
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff C.W. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF C.X.**

2 269.

3 C.X. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1996
4 which continued until approximately 2009. In approximately 2008 or 2009, C.X. was forced to
5 submit to FARLEY's sexual abuse and harassment.

6 270.

7 At all times material hereto, C.X. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.X., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began unnecessary, ungloved, and unchaperoned breast exams when
11 C.X. was approximately 14 years old.

12 271.

13 At the time, Plaintiff, C.X., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff C.X. realized that FARLEY's
17 conduct was sexual abuse.

1 **PLAINTIFF C.Y.**

2 272.

3 C.Y. began receiving medical treatment from FARLEY at FAMILY HEALTH in
4 approximately 2000, which continued until 2020. From approximately 2015 to 2020, C.Y. was
5 forced to submit to FARLEY's sexual abuse and harassment.

6 273.

7 At all times material hereto, C.Y. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.Y., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began unnecessary, ungloved, and unchaperoned pelvic exams when
11 C.Y. was approximately 16 years old, using scare tactics to justify the need for the
12 exams;
- 13 b) After placing an IUD, FARLEY insisted on more frequent pelvic exams, which
14 only stopped because C.Y.'s insurance declined to cover the exams.

15 274.

16 At the time, Plaintiff, C.Y., in reasonable reliance upon FAMILY HEALTH's
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
19 sexually abusive nature was publicly revealed, that Plaintiff C.Y. realized that FARLEY's
20 conduct was sexual abuse.

1 **PLAINTIFF C.Z.**

2 275.

3 C.Z. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2003
4 which continued until approximately 2008. From approximately 2005 to 2008, C.Z. was forced
5 to submit to FARLEY's sexual abuse and harassment.

6 276.

7 At all times material hereto, C.Z. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over C.Z., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began unnecessary, ungloved, and unchaperoned pelvic exams when
11 C.Z. was approximately 15 years old;
- 12 b) FARLEY conditioned unrelated medical treatment on repeat pelvic and breast
13 examinations.

14 277.

15 At the time, Plaintiff, C.Z., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff C.Z. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF D.A.**

2 278.

3 D.A. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1996
4 and continued until 2020. During this time, D.A. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 279.

7 At all times material hereto, D.A. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.A., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY performed unnecessary ungloved breast and/or pelvic exams upon
11 D.A., often without a chaperone present.

12 280.

13 At the time, Plaintiff, D.A., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff D.A. realized that FARLEY's
17 conduct was sexual abuse.

1 **MINOR PLAINTIFF D.B.**

2 281.

3 D.B. presented to FARLEY at FAMILY HEALTH for a sports physical in 2018, during
4 which she was forced to submit to FARLEY's sexual abuse and harassment.

5 282.

6 At all times material hereto, D.B was a patient of Defendants FARLEY and FAMILY
7 HEALTH. FARLEY used his position of trust and authority over D.B., to sexually abuse her in
8 the following ways:

- 9 a) FARLEY instructed D.B. to strip naked and lay on the examination table. He
10 proceeded to conduct an ungloved, unchaperoned and unnecessary pelvic and
11 breast examination upon D.B.

12 283.

13 At the time, Plaintiff, D.B., in reasonable reliance upon Defendant FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff D.B. realized that FARLEY's
17 conduct was sexual abuse.

1 **PLAINTIFF D.C.**

2 284.

3 D.C. began receiving medical treatment from FARLEY at a very young age, which
4 continued until 2020. Between approximately 2008 and 2020, D.C. was forced to submit to
5 FARLEY's sexual abuse and harassment.

6 285.

7 At all times material hereto, D.C. was a patient of FARLEY, FAMILY HEALTH, and
8 LEGACY. FARLEY used his position of trust and authority over D.C., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY began unnecessary, ungloved and unchaperoned pelvic examinations
11 when D.C. was approximately 14 years old;
- 12 b) FARLEY used scare tactics to coerce D.C. into repeated pelvic examinations
13 and/or hymenectomies;
- 14 c) FARLEY performed repeated hymenectomies upon D.C.

15 286.

16 At the time, Plaintiff, D.C., in reasonable reliance upon FAMILY HEALTH and
17 LEGACY'S representations that FARLEY was a trustworthy medical professional, believed that
18 FARLEY's conduct was medically necessary. It was not until in or around August 2020, when
19 FARLEY's sexually abusive nature was publicly revealed, that Plaintiff D.C. realized that
20 FARLEY's conduct was sexual abuse.

1 **PLAINTIFF D.D.**

2 287.

3 D.D. began receiving medical treatment from FARLEY at FAMILY HEALTH at a very
4 young age, which continued until 1998.. Between approximately 1993 and 1998, D.D. was
5 forced to submit to FARLEY’s sexual abuse and harassment.

6 288.

7 At all times material hereto, D.D was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.D., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY began unnecessary, ungloved breast examinations when D.D was
11 approximately 10 years old;
- 12 b) FARLEY prescribed D.D. unnecessary hormone therapy at approximately 13
13 years of age to initiate D.D.’s menstrual cycle and promptly began ungloved
14 pelvic examinations thereafter;
- 15 c) FARLEY embraced D.D. with apology after her first pelvic exam at 13 years old;
16 and
- 17 d) FARLEY used scare tactics to coerce D.D. into unnecessary breast and pelvic
18 examinations.

19 289.

20 At the time, Plaintiff, D.D., in reasonable reliance upon FAMILY HEALTH’s
21 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
22 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
23

1 sexually abusive nature was publicly revealed, that Plaintiff D.D. realized that FARLEY's
2 conduct was sexual abuse.

3 **PLAINTIFF D.E.**

4 290.

5 D.E. began receiving medical treatment from FARLEY at FAMILY HEALTH at a very
6 young age, which continued until 2020. Between approximately 1997 and 2020, D.E. was forced
7 to submit to FARLEY's sexual abuse and harassment.

8 291.

9 At all times material hereto, D.E. was a patient of FARLEY and FAMILY HEALTH.
10 FARLEY used his position of trust and authority over D.E., to sexually abuse her in the
11 following ways:

- 12 a) D.E. presented to FARLEY at age 13 for a sports physical, during which
13 FARLEY instructed D.E. to strip nude and bend over in front of him, thereafter
14 FARLEY proceeded to conduct an ungloved breast and pelvic examination upon
15 D.E.;
- 16 b) FARLEY began annual ungloved breast and pelvic examinations on D.E. at age
17 14, which were often unchaperoned;
- 18 c) During said examinations, FARLEY groped D.E. in a sexually suggestive
19 manner;
- 20 d) FARLEY performed unconsented tests and examinations upon D.E.

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292.

At the time, Plaintiff, D.E., in reasonable reliance upon FAMILY HEALTH's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff D.E. realized that FARLEY's conduct was sexual abuse.

PLAINTIFF D.F.

293.

D.F. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2008, which continued until 2018. During that time, D.F. was forced to submit to FARLEY's sexual abuse and harassment.

294.

At all times material hereto, D.F. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over D.F., to sexually abuse her in the following ways:

- a) FARLEY performed unnecessary ungloved pelvic and/or breast examinations upon D.F.
- b) During said examinations, FARLEY groped D.F. in a sexually suggestive manner and made inappropriate comments to D.F.; and
- c) FARLEY insisted on allowing other WLFHC personnel to observe D.F. perform a self IUD check without D.F.'s consent.

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295.

At the time, Plaintiff, D.F., in reasonable reliance upon FAMILY HEALTH'S representations that FARLEY was a trustworthy medical professional, believed that FARLEY'S conduct was medically necessary. It was not until in or around August 2020, when FARLEY'S sexually abusive nature was publicly revealed, that Plaintiff D.F. realized that FARLEY'S conduct was sexual abuse.

PLAINTIFF D.G.

296.

D.G. began receiving medical treatment from FARLEY in 2013, which continued until 2020. During this time, D.G. was forced to submit to FARLEY'S sexual abuse and harassment.

297.

At all times material hereto, D.G. was a patient of FARLEY, FAMILY HEALTH, and PROVIDENCE. FARLEY used his position of trust and authority over D.G., to sexually abuse her in the following ways:

- a) In 2020, FARLEY photographed D.G.'s breasts on his personal cell phone under the guise of a "study" on development;
- b) FARLEY conducted unnecessary ungloved pelvic exams on D.G without a chaperone present; and
- c) FARLEY conducted an unnecessary and incredibly painful membrane sweep upon D.G. at FAMILY HEALTH.

298.

At the time, Plaintiff, D.G., in reasonable reliance upon FAMILY HEALTH and PROVIDENCE'S representations that FARLEY was a trustworthy medical professional,

1 believed that FARLEY's conduct was medically necessary. It was not until in or around August
2 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff D.G.
3 realized that FARLEY's conduct was sexual abuse.

4 **PLAINTIFF D.H.**

5 299.

6 D.H. began receiving medical treatment from FARLEY at FAMILY HEALTH at birth,
7 which continued until 2019. Between approximately 2013 and 2019, D.H. was forced to submit
8 to FARLEY's sexual abuse and harassment.

9 300.

10 At all times material hereto, D.H. was a patient of FARLEY and FAMILY HEALTH.
11 FARLEY used his position of trust and authority over D.H., to sexually abuse her in the
12 following ways:

- 13 a) FARLEY conducted unnecessary pelvic and breast exams on D.H without a
14 chaperone present and/or without wearing gloves;
- 15 b) FARLEY coerced D.H. into undergoing a hymenectomy to allow for more
16 pleasurable sex;
- 17 c) FARLEY made inappropriate comments to D.H. during the course of pelvic
18 exams;
- 19 d) FARLEY insisted on hugging D.H. while D.H. wore only a medical gown.

20 301.

21 At the time, Plaintiff, D.H., in reasonable reliance upon FAMILY HEALTH's
22 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
23 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
24

1 sexually abusive nature was publicly revealed, that Plaintiff D.H. realized that FARLEY's
2 conduct was sexual abuse.

3 **PLAINTIFF D.I.**

4 302.

5 D.I. began receiving medical treatment from FARLEY at FAMILY HEALTH at a very
6 young age, which continued until 2019. Between 2008 and 2019, D.I. was forced to submit to
7 FARLEY's sexual abuse and harassment.

8 303.

9 At all times material hereto, D.I. was a patient of FARLEY and FAMILY HEALTH.
10 FARLEY used his position of trust and authority over D.I. to sexually abuse her in the following
11 ways:

- 12 a) Starting at age 15, FARLEY conducted unnecessary pelvic and breast exams on
13 D.I. without a chaperone present and/or without wearing gloves.

14 304.

15 At the time, Plaintiff, D.I., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff D.I. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF D.J.**

2 305.

3 D.J. received medical treatment from FARLEY at FAMILY HEALTH from 2016 to
4 2019. During this time, D.J. was forced to submit to FARLEY's sexual abuse and harassment.

5 306.

6 At all times material hereto, D.J. was a patient of FARLEY and FAMILY HEALTH.
7 FARLEY used his position of trust and authority over D.J. to sexually abuse her in the following
8 ways:

- 9 a) FARLEY coerced and harassed D.J. into submitting to unnecessary pelvic and
10 breast exams.

11 307.

12 At the time, Plaintiff, D.J., in reasonable reliance upon FAMILY HEALTH's
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
15 sexually abusive nature was publicly revealed, that Plaintiff D.J. realized that FARLEY's
16 conduct was sexual abuse.

1 **PLAINTIFF D.K.**

2 308.

3 D.K. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2016,
4 which continued until 2019. During this time, D.K. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 309.

7 At all times material hereto, D.K. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.K., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted numerous unnecessary and ungloved pelvic and/or breast
11 exams upon D.K. without a chaperone present, coercing her into repeated
12 treatment by chastising her for her sexual behavior and/or disparaging other
13 medical providers she intended to consult;
- 14 b) FARLEY instructed D.K. to bend over while only in her gown under the guise of
15 a scoliosis exam;
- 16 c) During said exams, FARLEY behaved in such a way as to indicate he was
17 deriving sexual pleasure from the exam;
- 18 d) FARLEY insisted on conducting pelvic exams even when D.K. presented for
19 issues totally unrelated to her sexual or feminine health.

20 310.

21 At the time, Plaintiff, D.K., in reasonable reliance upon FAMILY HEALTH's
22 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
23 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
24

1 sexually abusive nature was publicly revealed, that Plaintiff D.K. realized that FARLEY's
2 conduct was sexual abuse.

3 **PLAINTIFF D.L.**

4 311.

5 D.L. began receiving medical treatment from FARLEY in 2007, which continued until
6 2011. During this time, D.L. was forced to submit to FARLEY's sexual abuse and harassment.

7 312.

8 At all times material hereto, D.L. was a patient of FARLEY, FAMILY HEALTH,
9 PROVIDENCE, and LEGACY. FARLEY used his position of trust and authority over D.L., to
10 sexually abuse her in the following ways:

- 11 a) FARLEY conducted numerous unnecessary and ungloved pelvic and/or breast
12 exams upon D.L.; and
13 b) FARLEY insisted on embracing D.L. while she wore only a medical gown during
14 treatment at FAMILY HEALTH and PROVIDENCE.

15 313.

16 At the time, Plaintiff, D.L., in reasonable reliance upon FAMILY HEALTH,
17 PROVIDENCE, and LEGACY's representations that FARLEY was a trustworthy medical
18 professional, believed that FARLEY's conduct was medically necessary. It was not until in or
19 around August 2020, when FARLEY's sexually abusive nature was publicly revealed, that
20 Plaintiff D.L. realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF D.M.**

2 314.

3 D.M. began receiving medical treatment from FARLEY at FAMILY HEALTH at a very
4 young age, which continued until 2009. Between approximately 2007 and 2009, D.M. was
5 forced to submit to FARLEY's sexual abuse and harassment.

6 315.

7 At all times material hereto, D.M. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.M., to sexually abuse her in the
9 following ways:

- 10 a) Beginning at age 13, FARLEY conducted numerous unnecessary and ungloved
11 pelvic and/or breast exams upon D.M. without a chaperone present.

12 316.

13 At the time, Plaintiff, D.M., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff D.M. realized that FARLEY's
17 conduct was sexual abuse.

1 **PLAINTIFF D.O.**

2 317.

3 D.O. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1990,
4 which continued until 2019. Between approximately 1996 and 2017, D.O. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 318.

7 At all times material hereto, D.O. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.O., to sexually abuse her in the
9 following ways:

- 10 a) In 1996, D.O. presented for a sports physical at age 13. FARLEY used this
11 opportunity to perform unnecessary and ungloved pelvic and breast exams;
12 b) FARLEY performed numerous unnecessary and ungloved pelvic and breast
13 exams upon D.O., using scare tactics to coerce her into the exams.

14 319.

15 At the time, Plaintiff, D.O., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff D.O. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF D.Q.**

2 320.

3 D.Q. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2004,
4 which continued until 2016. During this time, D.Q. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 321.

7 At all times material hereto, D.Q. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.Q., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary and ungloved pelvic and breast exams upon
11 D.Q. without a chaperone present; and
12 b) During the course of said exams, FARLEY would inappropriately comment upon
13 D.Q.'s vagina, noting that it was "tight" and "young" and commenting that she
14 must not have had many sexual partners.

15 322.

16 At the time, Plaintiff, D.Q., in reasonable reliance upon FAMILY HEALTH's
17 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
18 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
19 sexually abusive nature was publicly revealed, that Plaintiff D.Q. realized that FARLEY's
20 conduct was sexual abuse.

1 **PLAINTIFF D.R.**

2 323.

3 D.R. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2016,
4 which continued until 2019. During this time, D.R. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 324.

7 At all times material hereto, D.R. was a patient of Defendants FARLEY and FAMILY
8 HEALTH. FARLEY used his position of trust and authority over D.R. to sexually abuse her in
9 the following ways:

- 10 a) FARLEY conducted unnecessary and ungloved pelvic and/or breast exams upon
11 D.R. without a chaperone present; and
12 b) FARLEY coerced D.R. into repeated exams by claiming that she had cervical
13 cancer, though FARLEY never referred D.R. to an oncologist;
14 c) FARLEY manipulated D.R. into repeated exams by using her religious beliefs
15 against her, commenting upon her sexual history, suggesting she had cancer as
16 retribution for a sinful life.

17 325.

18 At the time, Plaintiff, D.R., in reasonable reliance upon FAMILY HEALTH's
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
20 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
21 sexually abusive nature was publicly revealed, that Plaintiff D.R. realized that FARLEY's
22 conduct was sexual abuse.

1 **PLAINTIFF D.S.**

2 326.

3 D.S. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1999,
4 which continued until 2020. Between approximately 2003 and 2020, D.S. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 327.

7 At all times material hereto, D.S. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.S., to sexually abuse her in the
9 following ways:

- 10 a) D.S. presented for a sports physical at age 9, during which FARLEY instructed
11 D.S. to strip to her underwear and bend over in front of him, while he placed his
12 hands along her bare hips and thighs;
- 13 b) D.S. presented for a sports physical at age 11, during which FARLEY instructed
14 her to remove her clothes, and he proceeded with a breast exam;
- 15 c) FARLEY began conducting unchaperoned pelvic exams upon D.S. at age 13,
16 which continued until she was 18.

17 328.

18 At the time, Plaintiff, D.S., in reasonable reliance upon FAMILY HEALTH's
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
20 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
21 sexually abusive nature was publicly revealed, that Plaintiff D.S. realized that FARLEY's
22 conduct was sexual abuse.

1 **PLAINTIFF D.T.**

2 329.

3 D.T. began receiving medical treatment from FARLEY at FAMILY HEALTH in 1997,
4 which continued until 2020. During this time, D.T. was forced to submit to FARLEY's sexual
5 abuse and harassment.

6 330.

7 At all times material hereto, D.T. was a patient of Defendants FARLEY and FAMILY
8 HEALTH. FARLEY used his position of trust and authority over D.T., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic and breast examinations upon
11 D.T.;
- 12 b) FARLEY coerced D.T. into allowing him to take photos of her bare breasts with
13 his personal cell phone under the guise of a phony study on development.

14 331.

15 At the time, Plaintiff, D.T., in reasonable reliance upon FAMILY HEALTH's
16 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
17 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
18 sexually abusive nature was publicly revealed, that Plaintiff D.T. realized that FARLEY's
19 conduct was sexual abuse.

1 **PLAINTIFF D.U.**

2 332.

3 D.U. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2006,
4 which continued until 2017. Between approximately 2013 and 2017, D.U. was forced to submit
5 to FARLEY's sexual abuse and harassment.

6 333.

7 At all times material hereto, D.U. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.U. to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic examinations upon D.U.; and
11 b) FARLEY conducted unnecessary and painful membrane sweeps upon D.U.

12 334.

13 At the time, Plaintiff, D.U., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
16 sexually abusive nature was publicly revealed, that Plaintiff D.U. realized that FARLEY's
17 conduct was sexual abuse.

1 **MINOR PLAINTIFF D.V.**

2 335.

3 D.V. began receiving medical treatment from FARLEY at FAMILY HEALTH in 2007,
4 which continued until 2017. During this time, D.V. was forced to submit to FARLEY’s sexual
5 abuse and harassment.

6 336.

7 At all times material hereto, D.V. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over D.V., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY unnecessarily fondled D.V.’s genitals on numerous occasions.

11 337.

12 At the time, Plaintiff, D.V., in reasonable reliance upon FAMILY HEALTH’s
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
14 conduct was medically necessary. It was not until in or around August 2020, when FARLEY’s
15 sexually abusive nature was publicly revealed, that Plaintiff D.V. realized that FARLEY’s
16 conduct was sexual abuse.

1 **PLAINTIFF D.W.**

2 338.

3 D.W. began receiving medical treatment from FARLEY in approximately 1986, which
4 continued until 2016. During this time, D.W. was forced to submit to FARLEY's sexual abuse
5 and harassment.

6 339.

7 At all times material hereto, D.W. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over D.W., to sexually abuse
9 her in the following ways:

- 10 a) FARLEY conducted numerous unnecessary and ungloved breast and pelvic
11 examinations upon D.W. without a chaperone present;
- 12 b) FARLEY conducted unnecessary and incredibly painful membrane sweeps upon
13 D.W. at FAMILY HEALTH; and
- 14 c) FARLEY unnecessarily fondled D.W.'s breasts and genitals during examinations.

15 340.

16 At the time, Plaintiff, D.W., in reasonable reliance upon FAMILY HEALTH and
17 PROVIDENCE'S representations that FARLEY was a trustworthy medical professional,
18 believed that FARLEY's conduct was medically necessary. It was not until in or around August
19 2020, when FARLEY's sexually abusive nature was publicly revealed, that Plaintiff D.W.
20 realized that FARLEY's conduct was sexual abuse.

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PLAINTIFF D.X.

341.

D.X. began receiving medical treatment from FARLEY at FAMILY HEALTH in approximately 2019. During this time, D.X. was forced to submit to FARLEY’s sexual abuse and harassment.

342.

At all times material hereto, D.X. was a patient of FARLEY and FAMILY HEALTH. FARLEY used his position of trust and authority over D.X., to sexually abuse her in the following ways:

- a) In August of 2019, D.X. presented to FAMILY HEALTH to go over the results of a blood lab. FARLEY entered the room and briefly discussed the results. He then instructed D.X. to remove her clothes and don a gown. FARLEY proceeded with an unnecessary and ungloved pelvic and breast examination without a chaperone present;
- b) In the course of said examination, FARLEY groped D.X.’s breasts, nipples, and vagina with his ungloved hands; and
- c) Shortly after D.X. left, FARLEY called her and insisted she come back so that he could “check her heart.” D.X. returned, and FARLEY again instructed her to remove her clothes and don a gown. FARLEY proceeded to pull D.X.’s gown down, exposing her breasts. Using his bare hands, he placed EKG leads on her breasts, which remained exposed for the procedure.

1 343.

2 At the time, Plaintiff, D.X., in reasonable reliance upon FAMILY HEALTH's
3 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
4 conduct was medically necessary. It was not until in or around August 2020, when FARLEY's
5 sexually abusive nature was publicly revealed, that Plaintiff D.X. realized that FARLEY's
6 conduct was sexual abuse.

7 **MINOR PLAINTIFF D.Y.**

8 344.

9 D.Y. began receiving medical treatment from FARLEY at FAMILY HEALTH in
10 approximately 2013, which continued until 2020. In 2020, D.Y. was forced to submit to
11 FARLEY's sexual abuse and harassment.

12 345.

13 At all times material hereto, D.Y. was a patient of FARLEY and FAMILY HEALTH.
14 FARLEY used his position of trust and authority over D.Y., to sexually abuse her in the
15 following ways:

- 16 a) D.Y. presented for symptoms consistent with a urinary tract infection. FARLEY
17 insisted on accompanying D.Y. and her mother to the bathroom for a urine
18 sample. While D.Y. attempted to produce a sample, FARLEY knelt down in front
19 of her on the toilet, at eye level with her vagina. FARLEY proceeded to use his
20 ungloved hands to spread D.Y.'s labia, claiming that such was necessary to ensure
21 a "clean" sample.

1 346.

2 At the time, Plaintiff, D.Y., in reasonable reliance upon FAMILY HEALTH's that
3 FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was
4 medically necessary. It was not until in or around January 2021, when FARLEY's sexually
5 abusive nature was publicly revealed, that Plaintiff D.Y. realized that FARLEY's conduct was
6 sexual abuse.

7
8 **PLAINTIFF D.Z.**

9 347.

10 D.Z. began receiving medical treatment from FARLEY at FAMILY HEALTH in
11 approximately 2010, which continued until 2020. During this time, D.Z. was forced to submit to
12 FARLEY's sexual abuse and harassment.

13 348.

14 At all times material hereto, D.Z. was a patient of FARLEY, FAMILY HEALTH, and
15 PROVIDENCE. FARLEY used his position of trust and authority over D.Z., to sexually abuse
16 her in the following ways:

- 17
- 18 a) FARLEY conducted unnecessary pelvic examinations upon D.Z.;
 - 19 b) FARLEY conducted unnecessary ungloved breast examinations upon D.Z.;
 - 20 c) FARLEY forced D.Z. to demonstrate finding her own IUD strings in front of him.

21 349.

22 At the time, Plaintiff, D.Z., in reasonable reliance upon FAMILY HEALTH and
23 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,

1 believed that FARLEY's conduct was medically necessary. It was not until in or around August
2 2020, that Plaintiff D.Z. realized that FARLEY's conduct was sexual abuse.

3
4 **PLAINTIFF E.A.**

5 350.

6 E.A. began receiving medical treatment from FARLEY at FAMILY HEALTH in
7 approximately 2001, which continued until 2020. Between approximately 2016 and 2020, E.A.
8 was forced to submit to FARLEY's sexual abuse and harassment.

9 351.

10 At all times material hereto, E.A. was a patient of FARLEY, FAMILY HEALTH, and
11 PROVIDENCE. FARLEY used his position of trust and authority over E.A., to sexually abuse
12 her in the following ways:

- 13 a) FARLEY conducted unnecessary pelvic examinations upon E.A.;
- 14 b) FARLEY conducted unnecessary ungloved breast examinations upon E.A.;
- 15 c) FARLEY coerced E.A. into allowing him to photograph her vagina.

16 352.

17 At the time, Plaintiff, E.A., in reasonable reliance upon FAMILY HEALTH and
18 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
19 believed that FARLEY's conduct was medically necessary. It was not until in or around August
20 2020, that Plaintiff E.A. realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF E.B.**

2 353.

3 E.B. began receiving medical treatment from FARLEY at FAMILY HEALTH in
4 approximately 1992, which continued until 2020. Between approximately 2004 and 2020, E.B.
5 was forced to submit to FARLEY's sexual abuse and harassment.

6 354.

7 At all times material hereto, E.B. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over E.B., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary pelvic examinations upon E.B.;
- 11 b) FARLEY conducted unnecessary ungloved breast examinations upon E.B.

12 355.

13 At the time, Plaintiff, E.B., in reasonable reliance upon FAMILY HEALTH's
14 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
15 conduct was medically necessary. It was not until in or around August 2020, that Plaintiff E.B.
16 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF E.C.**

2 356.

3 E.C. began receiving medical treatment from FARLEY at FAMILY HEALTH in
4 approximately 1997, which continued until 2020. Between approximately 2010 and 2020, E.C.
5 was forced to submit to FARLEY’s sexual abuse and harassment.

6 357.

7 At all times material hereto, E.C. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over E.C., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary pelvic examinations upon E.C.

11 358.

12 At the time, Plaintiff, E.C., in reasonable reliance upon FAMILY HEALTH’s
13 representations that FARLEY was a trustworthy medical professional, believed that FARLEY’s
14 conduct was medically necessary. It was not until in or around August 2020, that Plaintiff E.C.
15 realized that FARLEY’s conduct was sexual abuse.

1 **PLAINTIFF E.D.**

2 359.

3 E.D. began receiving medical treatment from FARLEY at FAMILY HEALTH in
4 approximately 2002. During this time, E.D. was forced to submit to FARLEY's sexual abuse and
5 harassment.

6 360.

7 At all times material hereto, E.D. was a patient of FARLEY and FAMILY HEALTH.
8 FARLEY used his position of trust and authority over E.D., to sexually abuse her in the
9 following ways:

- 10 a) FARLEY conducted unnecessary ungloved pelvic examinations upon E.D., often
11 without chaperones;
- 12 b) FARLEY conducted unnecessary ungloved breast examinations upon E.D., often
13 without chaperones;
- 14 c) FARLEY inserted E.D.'s IUD under anesthesia, leaving her on the examination
15 table fully exposed to FARLEY for approximately 1-2 hours before she was able
16 to move.

17 361.

18 At the time, Plaintiff, E.D., in reasonable reliance upon FAMILY HEALTH's
19 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
20 conduct was medically necessary. It was not until in or around August 2020, that Plaintiff E.D.
21 realized that FARLEY's conduct was sexual abuse.

1 **MINOR PLAINTIFF E.E.**

2 362.

3 E.E. began receiving medical treatment from FARLEY at FAMILY HEALTH in
4 approximately 2003, which continued until 2020. In approximately 2014 or 2015, E.E. was
5 forced to submit to FARLEY's sexual abuse and harassment.

6 363.

7 At all times material hereto, E.E. was a patient of Defendants FARLEY and FAMILY
8 HEALTH. FARLEY used his position of trust and authority over E.E., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY conducted an unnecessary and ungloved pelvic examination upon E.E.
11 when she was approximately 11 years old, in front of her mother and three minor
12 siblings.

13 364.

14 At the time, Plaintiff, E.E., in reasonable reliance upon FAMILY HEALTH's
15 representations that FARLEY was a trustworthy medical professional, believed that FARLEY's
16 conduct was medically necessary. It was not until in or around August 2020, that Plaintiff E.E.
17 realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF E.F.**

2 365.

3 E.F. began receiving medical treatment from FARLEY in approximately 1993, which
4 continued until 2020. During this time, E.F. was forced to submit to FARLEY's sexual abuse
5 and harassment.

6 366.

7 At all times material hereto, E.F. was a patient of FARLEY, FAMILY HEALTH, and
8 PROVIDENCE. FARLEY used his position of trust and authority over E.F., to sexually abuse
9 her in the following ways:

- 10 a) FARLEY conducted unnecessary and ungloved pelvic and breast examinations
11 upon E.F.;
- 12 b) FARLEY made sexually suggestive comments to E.F.

13 367.

14 At the time, Plaintiff, E.F., in reasonable reliance upon FAMILY HEALTH and
15 PROVIDENCE's representations that FARLEY was a trustworthy medical professional,
16 believed that FARLEY's conduct was medically necessary. It was not until in or around August
17 2020, that Plaintiff E.F. realized that FARLEY's conduct was sexual abuse.

1 **PLAINTIFF R.M.**

2 368.

3 R.M. began receiving medical treatment from FARLEY in approximately 2010, which
4 continued until 2016. During this time, R.M. was forced to submit to FARLEY’s sexual abuse
5 and harassment.

6 369.

7 At all times material hereto, R.M. was a patient of FARLEY, FAMILY HEALTH, and
8 LEGACY. FARLEY used his position of trust and authority over R.M., to sexually abuse her in
9 the following ways:

- 10 a) FARLEY conducted unnecessary and ungloved pelvic and breast examinations
11 upon R.M. at LEGACY.

12 370.

13 At the time, Plaintiff, R.M., in reasonable reliance upon FAMILY HEALTH and
14 LEGACY’s representations that FARLEY was a trustworthy medical professional, believed that
15 FARLEY’s conduct was medically necessary. It was not until in or around August 2020, that
16 Plaintiff R.M. realized that FARLEY’s conduct was sexual abuse.

1 **MINOR PLAINTIFF L.M.**

2 371.

3 L.M. began receiving medical treatment from FARLEY in 2011, which continued until
4 2020. During this time, L.M. was forced to submit to FARLEY's sexual abuse and harassment.

5 372.

6 At all times material hereto, L.M. was a patient of FARLEY, FAMILY HEALTH, and
7 LEGACY. FARLEY used his position of trust and authority over L.M., to sexually abuse her in
8 the following ways:

- 9 a) FARLEY unnecessarily fondled L.M.'s genitals.

10 373.

11 At the time, Plaintiff, L.M., in reasonable reliance upon FAMILY HEALTH and
12 LEGACY's representations that FARLEY was a trustworthy medical professional, believed that
13 FARLEY's conduct was medically necessary. It was not until in or around August 2020, that
14 Plaintiff L.M. realized that FARLEY's conduct was sexual abuse.

15 **MINOR PLAINTIFF M.M.**

16 374.

17 M.M. began receiving medical treatment from FARLEY in 2013, which continued until
18 2020. During this time, M.M. was forced to submit to FARLEY's sexual abuse and harassment.

19 375.

20 At all times material hereto, M.M. was a patient of FARLEY, FAMILY HEALTH, and
21 LEGACY. FARLEY used his position of trust and authority over M.M., to sexually abuse her in
22 the following ways:

- 23 a) FARLEY unnecessarily fondled M.M.'s genitals.

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376.

At the time, Plaintiff, M.M., in reasonable reliance upon FAMILY HEALTH and LEGACY's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 2020, that Plaintiff M.M. realized that FARLEY's conduct was sexual abuse.

MINOR PLAINTIFF F.M.

377.

F.M. began receiving medical treatment from FARLEY in approximately 2016, which continued until 2020. During this time, F.M. was forced to submit to FARLEY's sexual abuse and harassment.

378.

At all times material hereto, F.M. was a patient of FARLEY, FAMILY HEALTH, and LEGACY. FARLEY used his position of trust and authority over F.M., to sexually abuse her in the following ways:

- a) FARLEY unnecessarily fondled F.M.'s genitals.

379.

At the time, Plaintiff, F.M., in reasonable reliance upon FAMILY HEALTH and LEGACY's representations that FARLEY was a trustworthy medical professional, believed that FARLEY's conduct was medically necessary. It was not until in or around August 202, that Plaintiff F.M. realized that FARLEY's conduct was sexual abuse.

1 **DAMAGES**

2 380.

3 As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
4 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
5 distress including embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
6 enjoyment of life that have prevented and will continue to prevent Plaintiffs from performing
7 daily activities and obtaining the full enjoyment of life. Plaintiffs have had difficulty in
8 meaningfully interacting with others, including those in positions of authority over Plaintiffs
9 including physicians, supervisors, and superiors at work. Plaintiffs have been limited in their
10 ability to meaningfully interact with others due to the trauma of this molestation and abuse. This
11 inability to interact creates conflict with Plaintiffs’ values of trust and confidence in others, and
12 has caused Plaintiffs substantial emotional distress, anxiety, nervousness and fear. Plaintiffs have
13 suffered and will continue to suffer immensely, including, but not limited to, encountering issues
14 with a lack of trust, various negative psychological and emotional sequelae, depressive
15 symptoms, eating disorders, anxiety, and nervousness. Further, Defendants’ conduct has so
16 deeply traumatized Plaintiffs, and damaged Plaintiffs’ trust in health care professionals, that
17 Plaintiffs have avoided seeking necessary medical treatment, to the detriment of their health and
18 physical well-being. Plaintiffs seek recovery for noneconomic losses in an amount the jury
19 deems fair and not exceeding \$5,000,000.00 per plaintiff.

20 381.

21 Defendants were health practitioners engaged in conduct regulated by the license,
22 registration or certificate issued by the Oregon Medical Board or other appropriate governing
23 body and were acting within the scope of practice for which the license, registration or certificate

1 was issued and without malice. In subjecting Plaintiffs to the wrongful treatment herein
2 described, Defendants acted willfully and maliciously with the intent to harm Plaintiffs, and in
3 conscious disregard of Plaintiffs' rights, so as to constitute malice and/or oppression. These
4 willful, malicious, and/or oppressive acts, as alleged herein, were ratified by the officers,
5 directors, and/or managing agents of the Defendants. Plaintiffs give notice that they will move
6 for leave to amend this complaint for recovery of punitive damages against Defendants in an
7 amount the jury deems fair pursuant to ORS 31.725.

8 382.

9 Each Defendant was responsible in some manner or capacity for the occurrences herein
10 alleged, and that Plaintiffs' damages were proximately caused by all said Defendants.

11 **FIRST CAUSE OF ACTION**

12 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

13 **(Against All Defendants)**

14 383.

15 Plaintiffs re-allege and incorporate by reference herein each and every allegation
16 contained herein above as though fully set forth and brought in this cause of action.

17 384.

18 Defendants' conduct toward Plaintiffs, as described herein, was an extraordinary
19 transgression of the bounds of socially tolerable behavior.

20 385.

21 A reasonable person would not expect or tolerate the sexual harassment, molestation and
22 abuse of Plaintiffs by FARLEY, and Defendants' knowledge and callous indifference thereof.

1 Plaintiffs had great trust, faith and confidence in Defendants, which, by virtue of Defendants'
2 wrongful conduct, turned to fear.

3 386.

4 A reasonable person would not expect or tolerate Defendants' putting FARLEY, who
5 was known to Defendants to have physically and sexually abused other patients, in a position of
6 care of Plaintiffs and other patients, which enabled FARLEY to have access to female patients so
7 that he could commit wrongful sexual acts, including the conduct described herein.

8 387.

9 A reasonable person would not expect or tolerate the Defendants and their agents to be
10 incapable of supervising and/or stopping participants and members of Defendants, including
11 FARLEY, from committing wrongful sexual acts with other patients, including Plaintiffs, or to
12 supervise FARLEY.

13 388.

14 Defendants' conduct described herein was intentional and malicious and done for the
15 purpose of causing or with the substantial certainty that Plaintiffs would suffer humiliation,
16 mental anguish, and emotional and physical distress.

17 389.

18 As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
19 severe emotional distress and other damages as described more thoroughly herein.

1 **SECOND CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(Against FAMILY HEALTH (all plaintiffs); against PROVIDENCE (all plaintiffs abused**
4 **after 2003) against LEGACY (all plaintiffs abused after 1992))**

5 390.

6 Plaintiffs re-allege and incorporate by reference herein each and every allegation
7 contained herein above as though fully set forth and brought in this cause of action.

8 391.

9 The Clinic Defendants were put on notice and they knew and/or should have known that
10 Defendant FARLEY had previously engaged, and was continuing to engage, in unlawful sexual
11 conduct in his capacity as a physician for his own personal sexual gratification, and that it was
12 foreseeable that he was engaging, and/or would engage, in illicit sexual activities with Plaintiffs,
13 and others, under the cloak of the authority, confidence, and trust, bestowed upon him through
14 the Clinic Defendants.

15 392.

16 The Clinic Defendants were aware or should have been aware of how vulnerable medical
17 patients were to sexual harassment, molestation, and abuse by physicians and other persons of
18 authority within the Clinic Defendants' entities.

19 393.

20 The Clinic Defendants' conduct in failing to report FARLEY breached their duties to
21 those whom came under his care, including Plaintiffs.

1 394.

2 The negligent or grossly negligent acts and omissions of the Clinic Defendants were a
3 substantial factor in the cause of the Plaintiffs' damages as alleged in this Complaint.

4 395.

5 As a result of the above-described negligent or grossly negligent conduct, Plaintiffs have
6 suffered and continue to suffer damages as described more thoroughly herein.

7 **THIRD CAUSE OF ACTION**

8 **NEGLIGENT SUPERVISION/CREDENTIALING**

9 **(All Plaintiffs Against Those Clinic Defendants With Which A Patient-Provider
10 Relationship Was Established)**

11 396.

12 Plaintiffs re-alleges and incorporates by reference herein each and every allegation
13 contained herein above as though fully set forth and brought in this cause of action.

14 397.

15 By virtue of Plaintiffs' special relationships with those Clinic Defendants at which they
16 treated, and the Clinic Defendants' relation to Defendant FARLEY, the Clinic Defendants owed
17 their patient-Plaintiffs a duty to act reasonably in hiring, training, supervising, and retaining
18 Defendant FARLEY.

19 398.

20 The Clinic Defendants had special duties to protect the Plaintiffs when their care,
21 welfare, and physical custody were entrusted to the Clinic Defendants' care, which the Clinic
22 Defendants voluntarily accepted. As such, the Clinic Defendants owed Plaintiffs a special duty
23 of care that medical professionals dealing with vulnerable medical patients owe to protect them

1 from harm. The duty to warn, educate, and protect arose from the special, trusting, confidential,
2 and fiduciary relationship between the Clinic Defendants and Plaintiffs.

3 399.

4 The Clinic Defendants were negligent or grossly negligent in one or more of the
5 following ways that caused Plaintiffs' damages by:

- 6 a) Failing to engage in a reasonable, meaningful, and adequate investigation of
7 Defendant FARLEY's background prior to hiring or retaining him;
- 8 b) Hiring and retaining Defendant FARLEY, given his dangerous and exploitive
9 propensities;
- 10 c) Failing to provide adequate warning to Plaintiffs and other patients of Defendant
11 FARLEY's dangerous propensities and unfitness;
- 12 d) Failing to protect, supervise, and monitor Defendant FARLEY such that he would not
13 be placed in seclusion with vulnerable medical patients, including the Plaintiffs,
14 where he was able to commit wrongful acts of sexual misconduct;
- 15 e) Placing Defendant FARLEY into a position of trust and authority as a physician and
16 authority figure over patients and then failing to adequately supervise him in that role;
- 17 f) Failing to stop him from committing wrongful sexual acts with patients, including
18 Plaintiffs;
- 19 g) Failing to take reasonable steps to ensure the safety of patients, including Plaintiff,
20 from sexual harassment, molestation, and abuse;
- 21 h) Failing to implement a reasonable system or procedure to investigate, supervise,
22 oversee, and monitor conduct of physicians and healthcare professionals, including
23 Defendant FARLEY, to prevent sexual harassment, molestation and abuse of patients;

- 1 i) Concealing from Plaintiffs, the public, and law enforcement that Defendant FARLEY
2 had a documented history of sexually harassing and assaulting women; and
3 j) Representing expressly and implicitly to Plaintiffs and the public that their
4 physicians, including Defendant FARLEY, were not a sexual threat and was a
5 physician of high moral and ethical repute, in good standing, and trustworthy.

6 400.

7 The Clinic Defendants, by and through their respective agents, servants, and employees,
8 knew or should have known of Defendant FARLEY's dangerous and exploitive propensities and
9 that Defendant FARLEY was an unfit agent.

10 401.

11 The Clinic Defendants were put on notice and they knew and/or should have known that
12 Defendant FARLEY had previously engaged, and was continuing to engage, in unlawful sexual
13 conduct in his capacity as a physician for his own personal sexual gratification, and that it was
14 foreseeable that he was engaging, and/or would engage, in illicit sexual activities with Plaintiffs,
15 and others, under the cloak of the authority, confidence, and trust, bestowed upon him through
16 the Clinic Defendants.

17 402.

18 The Clinic Defendants were aware or should have been aware of how vulnerable medical
19 patients were to sexual harassment, molestation, and abuse by physicians and other persons of
20 authority within the Clinic Defendants' entities.

21 403.

22 The Clinic Defendants' conduct was a breach of their duties to Plaintiffs.
23
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1 404.

2 The negligent or grossly negligent acts and omissions of the Clinic Defendants were a
3 substantial factor in the cause of the Plaintiffs' damages as alleged in this Complaint.

4 405.

5 As a result of the above-described negligent or grossly negligent conduct, Plaintiffs have
6 suffered and continue to suffer damages as described more thoroughly herein.

7 **FOURTH CAUSE OF ACTION**

8 **FRAUD/CONCEALMENT**

9 **(All Plaintiffs Against Those Clinic Defendants With Which A Patient-Provider
10 Relationship Was Established)**

11 406.

12 Plaintiffs re-allege and incorporate by reference herein each and every allegation
13 contained herein above as though fully set forth and brought in this cause of action.

14 407.

15 By holding Defendant FARLEY out as an agent of the Clinic Defendants, and by
16 allowing him to undertake the medical care of patients, such as the Plaintiffs, the Defendants
17 entered into a confidential, fiduciary, and special relationship with Plaintiffs.

18 408.

19 By holding themselves out as qualified medical institutions, and by undertaking to
20 provide medical care of the Plaintiffs and others, the Defendants entered into a confidential,
21 fiduciary, and special relationship with the Plaintiffs.

22 409.

23 The special relationship between Plaintiffs and Defendants imposed a duty on Defendants
24 to disclose to the Plaintiffs all material matters of which the Defendants had knowledge. The

1 Defendants had the duty to obtain and disclose information relating to sexual misconduct of
2 Defendant FARLEY.

3 410.

4 The Defendants breached their confidential, fiduciary duty and special duties to the
5 Plaintiffs by the wrongful and negligent conduct described above and incorporated into this
6 cause of action, and in so doing, gained an advantage over the Plaintiffs in matters relating to
7 Plaintiffs' safety, security and health. In particular, in breaching such duties as alleged, the
8 Defendants were able to sustain their status as institutions of high moral repute, and preserve
9 their reputation, all at the expense of Plaintiffs' further injury and in violation of the Defendants'
10 mandatory duties.

11 411.

12 Defendants made false misrepresentations and/or suppressed and concealed facts when
13 they represented that they had no knowledge that Defendant FARLEY was a sex abuser; that
14 Defendant FARLEY had on prior occasions sexually abused patients, including the Plaintiffs;
15 that there were no other charges or complaints of unlawful or sexual misconduct against
16 Defendant FARLEY or others; and that there was no need for the Plaintiffs to take further action
17 or precaution. By holding Defendant FARLEY out as principal, medical doctor, and/or
18 privileged practitioner at their facilities, the Clinic Defendants expressly and implicitly
19 represented that Defendant FARLEY was safe and morally fit to give patients medical care.

20 412.

21 The Defendants knew that the representations were false and/or recklessly made the
22 representations without knowing if they were true or false.

1 413.

2 The Defendants intended to mislead the Plaintiffs, knew that they were misleading the
3 Plaintiffs, and/or recklessly disregarded whether they were misleading the Plaintiffs. The
4 Defendants suppressed and concealed the true facts regarding Defendant FARLEY with the
5 purpose of preventing the Plaintiffs, the Plaintiffs' families, and others, from learning that
6 Defendant FARLEY was continuing to sexually harass and abuse patients under Defendant
7 FARLEY's and the Clinic Defendants' control; inducing people, including the Plaintiffs and
8 other patients to participate and financially support the Defendants and their enterprises;
9 preventing further reports and outside investigations into Defendant FARLEY and the Clinic
10 Defendants' conduct; preventing discovery of the Clinic Defendants' own conduct; avoiding
11 damage to the reputations of the Defendants; the Defendants' power and status in the
12 community; avoiding damage to the reputation of the Clinic Defendants, or the Defendants'
13 institutions; and avoiding the civil and criminal liability of the Clinic Defendants, Defendant
14 FARLEY, and potentially others.

15 414.

16 The Plaintiffs reasonably relied on the Defendants' representations. The Plaintiffs and
17 others were misled by the Defendants' suppressions and concealment of facts and were induced
18 to act or induced not to act, exactly as intended by the Defendants. Had the Plaintiffs known the
19 true facts about Defendant FARLEY, they would have not sought the care of the Defendants, or
20 continued to financially support the Defendants' activities. They would have reported the matters
21 to the proper authorities, and to other patients so as to prevent future recurrences; they would not
22 have allowed patients, including the Plaintiffs, to attend or be under the control of the
23
24

1 Defendants; they would have undertaken their own investigations, which would have led to
2 discovery of the true facts; and they would have sought psychological counseling.

3 415.

4 Because of Plaintiffs' age, medical conditions, and because of the status of Defendant
5 FARLEY as an authority figure to Plaintiffs, Plaintiffs were vulnerable to Defendant FARLEY.
6 Defendant FARLEY sought the Plaintiffs out and was empowered by and accepted the Plaintiffs'
7 vulnerability. The Plaintiffs' vulnerability also prevented them from effectively protecting
8 themselves from the sexual advances of Defendant FARLEY.

9 416.

10 At all times mentioned herein, Defendants, with knowledge of the tortious nature of their
11 own and Defendant FARLEY's conduct, knowingly conspired and gave each other substantial
12 assistance to perpetrate the misrepresentations, fraud and deceit alleged herein—covering up the
13 past allegations of sexual misconduct lodged against Defendant FARLEY, and allowing
14 Defendant FARLEY to remain in his position as a medical provider and managing agent of the
15 Clinic Defendants, so they could maintain their reputations and continue to make a profit.

16 417.

17 The Clinic Defendants and Defendant FARLEY, in concert with each other and with the
18 intent to conceal and defraud, conspired and came to a meeting of the minds whereby they would
19 misrepresent, conceal or fail to disclose information relating to the sexual misconduct of
20 Defendant FARLEY, the inability of the Clinic Defendants to supervise or stop Defendant
21 FARLEY from sexually harassing, molesting and abusing patients, and their own failure to
22 properly investigate, supervise and monitor his conduct with patients.

1 418.

2 By so concealing, the Defendants committed at least one act in furtherance of the
3 conspiracy.

4 419.

5 Defendants acted in concert, and under their authority as a medical provider, with
6 reckless disregard for the concern of the patients in its charge, in order to further financially
7 benefit its business's growth. The Defendants acted intentionally in creating an environment that
8 harbored molesters, put its vulnerable patients at risk of harm, ignored clear warning signs and
9 their duties to report sexual abusers and molesters in their ranks, to maintain a façade of
10 normalcy, in order to maintain funding and provide further financial growth of the Clinic
11 Defendants. The safety of the patients that were entrusted to the Clinic Defendants was
12 compromised due to the Defendants' desire to maintain the status quo of the Clinic Defendants'
13 organizations and avoid any public scrutiny for their misconduct.

14 420.

15 As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
16 damages as described more thoroughly herein.

17 421.

18 In addition, when Plaintiffs finally discovered the fraud of Defendants, and continuing
19 thereafter, Plaintiffs experienced recurrences of the above-described injuries, as well as extreme
20 and severe mental anguish and emotional distress that they had been the victim of Defendants'
21 fraud; that they had not been able to help other patients being harassed because of the fraud; and
22 that they had not been able because of the fraud to receive timely medical treatment needed to
23

1 cope with the problems they had suffered and continue to suffer as a result of the sexual
2 harassment and abuse.

3 **FOURTH CAUSE OF ACTION**

4 **ASSAULT AND BATTERY**

5 **(Against Defendant Farley)**

6 422.

7 Plaintiffs re-allege and incorporate by reference herein each and every allegation
8 contained herein above as though fully set forth and brought in this cause of action.

9 423.

10 During Plaintiffs' time as patients with the Clinic Defendants, Defendant FARLEY acted
11 with the intent to cause a harmful or offensive contact with the Plaintiffs, including but not
12 limited to the numerous aforementioned instances of sexual abuse and molestation, all while
13 FARLEY acted in the course and scope of his agency/employment with the Clinic Defendants.

14 424.

15 Defendant FARLEY's actions either directly or indirectly caused a harmful or offensive
16 contact with the Plaintiffs and/or caused the Plaintiffs' apprehension that Defendant FARLEY
17 was going to cause an imminent harmful or offensive contact with the Plaintiffs and Plaintiffs
18 reasonably believed a harmful or offensive contact would occur.

19 425.

20 Because of FARLEY's position of authority over Plaintiffs, Plaintiffs' mental and
21 emotional state, and Plaintiffs' young age, Plaintiffs did not give meaningful consent to such
22 acts.

1 426.

2 As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
3 damages as described more thoroughly herein.

4 **PRAYER**

5 **WHEREFORE**, Plaintiffs pray for a jury trial and for judgment against Defendants as
6 follows:

- 7 a) For noneconomic damages in an amount the jury deems fair not exceeding
8 \$570,000,000
- 9 b) For declaratory and injunctive relief, including but not limited to court
10 supervision of the Clinic Defendants;
- 11 c) For costs and disbursements incurred herein;
- 12 d) For interest according to law; and
- 13 e) For such other and further relief as the Court may deem proper.

14 DATED this 3rd day of August, 2021.

15
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the below date, I served a true and correct copy of the foregoing

3 **Third Amended Complaint** on the following in the manner(s) described below:

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DATED this 3rd day of August, 2021.

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