

FRANKLIN COUNTY COMMON PLEAS COURT, OHIO

JASON PECK
c/o Konrad Kircher
4824 Socialville-Foster Rd.
Mason, OH 45040

Plaintiff,

v.

WILLIAM B. AIREY
1306 W. Illinois Avenue
Aurora, IL 60506

Defendant.

CASE NO.:
JUDGE
COMPLAINT; JURY DEMAND

Now comes Plaintiff, by and through counsel, and for his Complaint states as follows:

1. Plaintiff, Jason Peck ("Peck), is an adult male residing in Fort Mill, South Carolina.
2. This Court is the proper venue for these claims as many of the actions giving rise to the claims occurred in this County.
3. Defendant, William B. Airey, is a 71-year-old male and former resident of Franklin County, Ohio. Defendant currently lives in Aurora, Illinois, and has lived in the past in or about Clymer, Pennsylvania. Defendant is presently the Chief Executive Officer and Director General of Moose International and the Loyal Order of Moose.
4. For decades, Defendant held various positions with, or under the auspices of, the Loyal Order of Moose. He served as Secretary Club Manager of the Clymer, PA Lodge 670 starting in or about 1964. Defendant left that position to serve the Supreme Lodge as traveling auditor. In 1974 he became a charter member of Whitehall Ohio Lodge 1245 and served as its first governor. He progressed through the chairs of Rainbow Moose Legion No. 35 and is a past

Moose of the Degree of Service. He is also past president and former secretary of the Ohio State Moose Association. Defendant served the fraternity of the Moose as Deputy Supreme Governor and on the International Civic Affairs Committee, to which he was appointed in 1981. Defendant joined the Moose International Staff in 1983 and was promoted to Director of Membership in 1989. In 2006, Defendant was named to the positions described in paragraph 3 above.

5. In the positions described above, Defendant's activities with the Loyal Order of Moose and Moose International provided him with access to children. Since his employment with Moose International, Defendant has worked on or near the premises of the Mooseheart Child City and School, a residential school for needy children.

6. In or about 1980, when Peck was twelve years old, Defendant began grooming Peck for sexual abuse. Defendant did in fact sexually abuse, molest and exploit Peck on two occasions when Peck was a minor. On both occasions, the abuse happened when Defendant took Peck to Moose-related functions. The abuse, molestation and exploitation started in Franklin County, Ohio, and continued elsewhere, including New Orleans, Louisiana, in or about 1980.

7. Upon information and belief, in 1996 and again in 2007, Moose International investigated Defendant Airey for sexual misconduct with children, but it took no action.

8. Defendant left the State of Ohio prior to Plaintiff's civil statute of limitations having expired. Therefore, the civil statute of limitations has been tolled pursuant to R.C. 2305.15 and this lawsuit is timely.

9. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered extreme emotional and psychological injuries and will continue to suffer from such injuries in the future. Plaintiff has incurred treatment expenses, lost wages and lost earning capacity, and will continue to incur such expenses.

FIRST CAUSE OF ACTION

(Sexual Assault and Battery)

10. Defendant's actions constitute unlawful sexual assault and battery.

11. As a direct and proximate result of Defendant's conduct, Plaintiff has incurred the damages described above.

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

12. Defendant's conduct, described above, was extreme and outrageous.

13. Defendant's conduct, described above, intentionally or recklessly caused serious emotional distress to Plaintiffs.

THIRD CAUSE OF ACTION

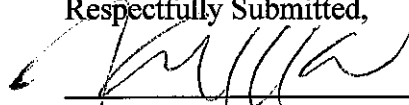
(Victim of Crime)

14. Defendant's conduct constitutes crimes.

15. Plaintiff is entitled to a civil remedy in the form of damages arising from Defendant's crimes pursuant to R.C. 2307.60.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant for compensatory damages in excess of \$25,000.00. Further, because Defendant's conduct was intentional, malicious, and/or with reckless disregard for the welfare of Plaintiff, Plaintiff respectfully demands punitive damages. Plaintiff also respectfully demands reasonable attorney fees, costs, and all other relief to which he may be lawfully entitled.

Respectfully Submitted,



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JURY DEMAND

Plaintiff hereby demands trial by jury of his peers as to all issues so triable herein.



Konrad Kircher (0059249)