

IN THE CIRCUIT COURT OF THE
TENTH JUDICIAL CIRCUIT IN AND FOR
POLK COUNTY, FLORIDA

LOUIS REED,

CASE NO.:

Plaintiff,

v.

REV. FRED RUSE,

Defendant.

_____ /

COMPLAINT

Plaintiff, LOUIS REED., by and through his undersigned counsel, hereby files this Complaint against REV. FRED RUSE, and alleges as follows:

PARTIES, VENUE AND JURISDICTION

1. This Complaint arises from the childhood sexual abuse of LOUIS REED by REV. FRED RUSE, a Catholic priest. The sexual abuse occurred in the chaplain's office at the Demilly Correctional Institution in Polk City, Florida when LOUIS REED was approximately 14 and 15 years old.

2. Plaintiff, LOUIS REED, is an adult male who is a citizen and resident of Sarasota County, Florida.

3. REV. FRED RUSE (herein referred to as "FATHER RUSE") is an adult male who is a citizen and resident of the State of Florida. He is an ordained Catholic priest of the Diocese of Orlando. FATHER RUSE suddenly retired from the active ministry in 2018.

4. Venue properly lies in this judicial circuit in that the tortious conduct that is the subject of this lawsuit occurred in Polk County, Florida.

5. This Court has jurisdiction in that this is a claim for monetary damages above the \$30,000 jurisdictional minimum of this Court, exclusive of interest, costs, and attorney's fees.

FACTUAL ALLEGATIONS

6. This is an action arising from the horrific childhood sexual abuse of LOUIS REED by FATHER RUSE on multiple occasions in approximately 2001 and 2002 while FATHER RUSE was meeting with LOUIS REED in the in the chaplain's office at the Demilly Correctional Institution in Polk City, Florida when LOUIS REED was approximately 14 to 15 years old.

7. FATHER RUSE privately met with LOUIS REED in a ministry capacity on multiple occasions in a classroom and later in the chaplain's office. FATHER RUSE initially met with LOUIS REED for communion and then began providing gifts to REED such as Harry Potter books. As REED began to place increasing trust in their relationship, RUSE used these opportunities to fondle REED's genitals and masturbate himself to ejaculation. The sexual contact then progressed to FATHER RUSE giving oral sex to REED and receiving oral sex from REED.

8. Although these encounters occurred in a secure detention center, FATHER RUSE was allowed to meet privately with REED due to RUSE's status as a clergyman.

9. At the time of the incidents, FATHER RUSE was not the facility chaplain but was instead the Pastor at a local parish, St. Matthews, in Winter Haven, Florida.

10. LOUIS REED was a child and did not have the legal capacity to consent to any sexual contact by FATHER RUSE, an ordained Catholic priest. Nevertheless, REED did not invite, induce, ratify, implicitly consent, or comply with this sexual contact. To the contrary, REED was mortified and in shock at FATHER RUSE's actions.

11. Due to LOUIS REED's tender age, his isolation in the Correctional Institution, and FATHER RUSE's status as a Catholic priest, these incidents were confusing and difficult for REED to process, particularly given that FATHER RUSE had showered him with attention and gifts.

12. It is only within the past four years that LOUIS REED recognized a causal relationship between the sexual abuse he endured from FATHER RUSE and the resulting emotional and psychological injuries he experienced on account of these incidents of sexual abuse.

COUNT I - BATTERY

Plaintiff repeats and re-alleges the allegations in Paragraphs 1 through 12 above.

13. FATHER RUSE committed a battery upon LOUIS REED when REED was a minor consisting of intentional, harmful, unwanted and offensive sexual abuse.

14. As a direct and proximate cause of the foregoing, LOUIS REED has suffered severe psychological, emotional, and physical injuries, emotional distress, mental anguish, pain and suffering and the loss of enjoyment of life.

WHEREFORE, Plaintiff, LOUIS REED demands judgment against REV. FRED RUSE, for compensatory damages, costs and such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial in this action.

CERTIFICATE RE: E-FILING AND E-SERVICE

I HEREBY CERTIFY that this Complaint was filed electronically in compliance with Florida Rules of Judicial Administration 2.515 and 2.516(e).

I FURTHER CERTIFY for purposes of service of any documents after initial process that adam@adamhorowitzlaw.com and elana@adamhorowitzlaw.com are primary.

DATED: April 27, 2020

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