

RETURN DATE: OCTOBER 17, 2023	:	SUPERIOR COURT
JANE DOE, PPA MARY DOE	:	J.D. OF HARTFORD
V.	:	AT HARTFORD
THE BRIDGE FAMILY CENTER, INC.	:	SEPTEMBER 20, 2023

COMPLAINT

FIRST COUNT (Negligence)

1. At all times mentioned herein, the plaintiff, Mary Doe, is the mother of the minor plaintiff, Jane Doe, and she brings this action on her behalf.

2. At all times mentioned herein, Jane Doe was a fourteen (14) year old girl who was residing in the Town of Harwinton in the State of Connecticut.

3. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, was a corporation established under Connecticut law with a principal business address in West Hartford, Connecticut.

4. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, was acting through its officers, agents, servants and/or employees.

5. At all times mentioned herein, the defendant, The Bridge Family Center, Incorporated, operated a group temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut.

6. As of April 2023 and for some time prior thereto, The Bridge Family Center, Incorporated had a contract with the State of Connecticut/Department of Children and Families to provide residences, temporary shelter, and residential services to various children in its care and custody, including at the temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut.

7. As of April 2023, Jane Doe was residing at the group temporary shelter facility located at 25 Plymouth Road, in Harwinton, Connecticut, having been placed there by the State of Connecticut Department of Children and Families.

8. Upon information and belief, Jane Doe resided at the defendant's facility located at 25 Plymouth Road, in Harwinton, Connecticut from approximately April 25, 2023 to approximately June 26, 2023.

9. During her period of residency at the defendant's Harwinton facility, Jane Doe was physically assaulted while at the facility and she suffered physical injuries as a result of the physical assault.

10. During her period of residency at the defendant's Harwinton facility, Jane Doe, a minor child who was committed to the care and custody of the defendant, was not provided with proper care and supervision and these failures led to her being exposed to other inappropriate activities at the defendant's facility which activities included the sexual assault of minors and other illegal activities.

11. During her period of residency at the defendant's Harwinton facility, Jane Doe, a minor child who was committed to the care and custody of the defendant, was allowed to freely leave the defendant's facility on her own volition and this caused her to become exposed to various dangers and other illegal activities.

12. The injuries, harms, and losses suffered by the minor plaintiff enumerated herein occurred because the defendant was negligent in that it:

- a. failed to properly supervise the minor residents of its facility, including the minor plaintiff;
- b. failed to properly follow the support plan that it had, or should have had, in place for the minor plaintiff;
- c. failed to properly supervise the agents, servants and/or employees that were assigned to work at the Harwinton facility with residents, including the minor plaintiff;
- d. failed to properly train the agents, servants and/or employees that were assigned to work at the Harwinton facility with residents;
- e. failed to provide the minor plaintiff with twenty-four hour a day/seven day a week supervision; and
- f. failed to properly equip the defendant's Harwinton facility with adequate security equipment and/or staff.

13. The defendant's conduct, as described above, created an unreasonable risk of injury to the minor plaintiff, Jane Doe.

14. It was reasonably foreseeable that the defendant's negligence would result in injuries to its residents, including the minor plaintiff, Jane Doe.

15. As a result of the defendant's negligence, the minor plaintiff, Jane Doe sustained the following injuries, harms, and losses:

- a. a physical assault and physical injuries;
- b. exposure to illegal activities, including sexual assault;
- c. great fear, distress, guilt, shame, and humiliation; and
- d. an aggravation of her existing emotional and psychological condition.

16. As a further result of the defendant's negligence, the plaintiff will never enjoy the health and wellbeing she did prior to becoming a resident at the defendant's facility, and her ability to enjoy the full spectrum of life's activities has been impaired.

SECOND COUNT (Breach of Special Duty to Children)

1-13. Paragraphs 1 through 13 of the First Count are hereby incorporated and made Paragraphs 1 through 13 of the Second Count as if fully set forth herein.

14. As agents, servants and/or employees of a group residential home for children, those agents, servants and/or employees had unique access to minor children who were young adolescents with significant learning and/or emotional disabilities.

15. The defendant knew that its agents, servants and/or employees, would develop especially close relationships with the residents, including Jane Doe, and knew that a unique degree of trust and confidence would likely develop between its agents, servants and/or employees and its residents, including Jane Doe.

16. At all times that Jane Doe was a resident of the Harwinton facility and services were being provided by the defendant to Jane Doe, she was entrusted to the custody and care of the defendant.

17. The injuries hereinafter set forth suffered by the minor plaintiff were the proximate and foreseeable result of the breach of a special affirmative duty owed to Jane Doe by the defendant, acting through its agents, servants and/or employees, in one or more of the following ways:

- a. In that it failed to make proper inquiry or to take action to investigate whether its agents, servants and/or employees were following proper protocols;
- b. In that it failed to act affirmatively and proactively monitor and supervise its agents, servants and/or employees in order to prevent injury to the residents, including Jane Doe;
- c. In that it failed to act affirmatively and proactively to establish protocols, rules, and/or guidelines concerning appropriate and safe interactions with the residents; and


- d. In that it failed to act affirmatively and proactively to take steps to initiate and maintain policies that encouraged residents to make a report about inappropriate activities involving other residents.

18-19. Paragraphs 15 through 16 of the First Count are hereby incorporated and made Paragraphs 18 through 19 of the Second Count as if fully set forth herein,

WHEREFORE, the plaintiff claims damages in accordance with the attached Claim for Relief. Hereof, fail not, but of this writ, with your doings thereon, make due service and return according to law.

Dated at Hartford, Connecticut this 20th day of September, 2023.

THE PLAINTIFF,
JANE DOE PPA MARY DOE

BY: 
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CLAIM FOR RELIEF

The plaintiff in the above-captioned matter hereby claims:

1. Money damages which are in excess of \$15,000.00, exclusive of interests and costs;
2. Punitive damages; and
3. Such further legal or equitable relief as the court may deem necessary or appropriate.

THE PLAINTIFF,
JANE DOE PPA MARY DOE

BY: 

 TIMOTHY L. O'KEEFE
 Kenny, O'Keefe & Usseglio, P.C.