

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION at LEXINGTON
CIVIL ACTION NO. 5:07-29-JMH**

BARBARA OLINGER, as Mother and
Next Friend of "A", as Minor
Child Under the Age of 18 Years,

PLAINTIFF

V.

**PLAINTIFF'S ANSWERS TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION
OF DOCUMENTS**

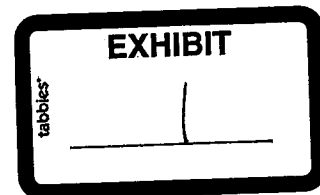
THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, and
JASON STARKS,

DEFENDANTS

Comes now the Plaintiff, Barbara Olinger, as Mother and Next Friend of
"A", a Minor Child Under the Age of 18 Years, by counsel, with her Answers to
Interrogatories as follows:

INTERROGATORY NO. 1: Please describe in detail the "sexual misconduct"
and "deviate sexual intercourse" alleged in the Complaint including, without limitation,
the events immediately preceding or leading up to it, the specific manner of sexual
misconduct or deviate intercourse, the location of the conduct, the time of the conduct,
who was present, and what was said.

RESPONSE: The Defendant, Jason Starks, performed oral sex on the Plaintiff,
"A". I am unaware of the events preceding or leading up to the incident nor the time of
the conduct. The conduct was performed in "A's" bedroom and only Jason Starks and
"A" were present in the bedroom. I do not know what was said between my son and him.



INTERROGATORY NO. 2: Please list the names, ages, and addresses of all witnesses to the alleged sexual misconduct.

RESPONSE: There were no witnesses to this act of sexual misconduct.

INTERROGATORY NO. 3: Please identify by court and by case name and number all litigation in which Plaintiff, "A", or any member of his immediate family have been a plaintiff, defendant or witness, and provide a description of the subject matter and disposition of each such litigation.

RESPONSE: Plaintiff, "A", as well as, any of his immediate family have never been a plaintiff, defendant or witness in any litigation at anytime in any court.

INTERROGATORY NO. 4: Please identify by name and address all individuals who have spoken to "A", or to whom "A" has spoken, about the alleged sexual misconduct, and set forth in detail what was said in each such conversation.

RESPONSE: "A" has spoken to Charles Addison, President of the Church in Beattyville, Kentucky, and he told him that Starks had "sucked" him. "A" has also spoken to Christina Tipton and employee at Kentucky River Community Care in Lee County, Kentucky. I do not know the details of what was said in this conversation. "A" has spoken to Julie Joy, a licensed clinical social worker from Lexington, Kentucky. I do not know the details of what was said in this conversation. "A" has spoken to his mother, Barbara Olinger whose address is Beattyville, Kentucky. "A" told his mother that Starks had "sucked" him while playing video games in his bedroom. "A" has also spoken to his grandmother, Sue Olinger, from Beattyville, Kentucky. I do not know the details of what was said in this conversation. "A" has spoken to his 1st cousin, Stephen Townsend (a

minor), from Beattyville, Kentucky. I do not know the details of what was said in this conversation.

INTERROGATORY NO. 5: Please describe all acts or omissions of The Church of Jesus Christ of Latter-day Saints (the "Church") or of COP that you allege caused harm to "A".

RESPONSE: The "Church" employed the Defendant, Jason Starks, as a missionary. The Plaintiff's, as trusting and devout members of the "Church", permitted and welcomed missionaries of the "Church" into their home and family which included Jason Starks. It was in their own home that "A" was harmed by Jason Starks, while acting as a missionary on behalf of the "Church".

INTERROGATORY NO. 6: For each category of damages that you claim, including past and future medical expenses, please set forth how such damage was sustained and how it was calculated.

RESPONSE: The total amount of past medical expenses are being gathered. The future medical expenses have not as of yet been calculated. As of this date of the proceedings it is too early to attempt to calculate them. This answer will be supplemented.

INTERROGATORY NO. 7: Please list the names and addresses of all health care providers (including mental health care providers such as psychologists, psychiatrists, and counselors) who have ever treated "A".

RESPONSE: Kentucky River Community Care, Lee County, Kentucky; Julie Joy, Licensed Clinical Social Worker, Lexington, Kentucky; St. Luke's Clinic, Campton, Kentucky; Dr. Branch, Lexington, Kentucky; Dr. Hurm, Beattyville, Kentucky; Kentucky

River Medical Center, Jackson, Kentucky; Dr. Mendoza, Jackson, Kentucky; Dr. Witcha, Jackson, Kentucky; Central Baptist Hospital, Lexington, Kentucky.

INTERROGATORY NO. 8: Please provide the name and address of all schools that "A" has attended.

RESPONSE: Beattyville Elementary, Beattyville, Kentucky.

INTERROGATORY NO. 9: If you or any member of your family has, within the last 10 years, applied for any type of government assistance program, please set forth the name of the government benefit or assistance program, when the application was made, why it was made, and whether it was granted or denied, and the reasons that it was granted or denied. This request is intended to include, without limitation, Social Security, Medicare, Medicaid, AFDC, and all similar state, federal and local programs.

RESPONSE: Application for SSI was granted in approximately 2004 for mild mental disability; Application for Food Stamps was made and granted in approximately 1999. Application for Medicare was made and granted in approximately 1995.

INTERROGATORY NO. 10: Other than Defendant Stark, has anyone (including family members) ever been investigated for allegedly abusing, assaulting, neglecting or otherwise harming "A", any of "A's" siblings, or any member of "A's" extended family? If so, please state the name and address of the individual, the name and address of the individual who was allegedly abused, assaulted, neglected or otherwise harmed, the name and address of the individual(s) and agency(ies) that investigated, and the outcome of the investigation.

RESPONSE: No

INTERROGATORY NO. 11: Please set forth all facts supporting the allegation in the Complaint that "A" has been subjected to public scorn, public ridicule and public embarrassment as a result of the alleged sexual misconduct.

RESPONSE: "A" has suffered from panic attacks after school because the cruel sexual comments made to him by his peers and/or classmates at school and on the school bus.

INTERROGATORY NO. 12: Have you or any member of your family given any written statement regarding the "sexual misconduct" or "deviant sexual intercourse" alleged in the Complaint? If so, please identify the person who interviewed or took a statement from you or your family member, the date of the statement or interview, the reason for the statement or interview, the person(s) or entity(ies) that is (are) in possession of said statement, and whether you have a copy of the statement or interview notes.

RESPONSE: I have given a statement to a worker (cannot remember their name) from the Department of Protection and Permanency and I do not have a copy of the statement. A statement was also made to Detective Ken Bradley, a Trooper with the Kentucky State Police in December, 2005. I do not have a copy of the statement.

INTERROGATORY NO. 13: Identify by name and date all conversations or interviews with any employee, agent or representative of The Church of Jesus Christ of Latter-day Saints or associated entities regarding Defendant Stark or the alleged misconduct.

RESPONSE: Charles Addison, President of the "Church" in Lee County, Kentucky, approximately 12/2005; Biemhall, Missionary President, Louisville, Kentucky.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Please provide copies of all documents referred to in, relied upon for, or reflective of, your Answers to the above Interrogatories.

RESPONSE: Copies of all documents that we have are attached. Those copies which are requested and not attached will be supplemented.

REQUEST NO. 2: Please provide copies of all documents in your possession, custody or control that in any way relate to any complaint made about the alleged abuse to Church or COP officials, law enforcement agencies, or others. This request is intended to include, without limitation, all documents relating to the criminal investigation and prosecution involving Defendant Stark.

RESPONSE: There are no documents in my possession at this time.

REQUEST NO. 3: Please provide all medical records, including mental health or counseling records, relating to the minor referred to as "A". This request is intended to include both medical records and medical bills.

RESPONSE: Medical records and medical bill will be supplemented when they are received.

REQUEST NO. 4: Please provide all documents in your possession, custody or control that in any way relate to or refer to Defendant Stark.

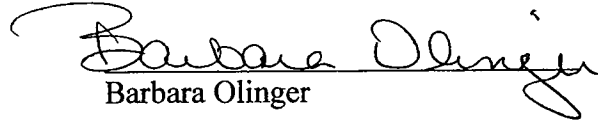
RESPONSE: I have no documents in my possession, custody or control that relate to or refer to Defendant Stark. If any are located, I will supplement this answer.

REQUEST NO. 5: Please execute the attached medical authorization for release of all medical information of "A".

RESPONSE: Attached.

VERIFICATION

The answers set forth above are within my personal knowledge and are true and correct to the best of my knowledge.

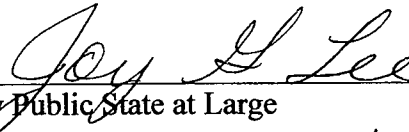

Barbara Olinger

Commonwealth of Kentucky)

County of Breathitt)

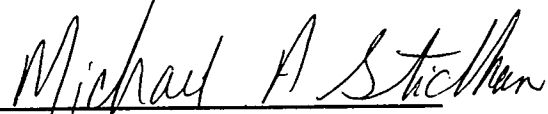
SUBSCRIBED and sworn to before me Barbara Olinger, this the 12th

day of June, 2007.


Notary Public State at Large

My commission expires: 2/5/2008

Respectfully, submitted,



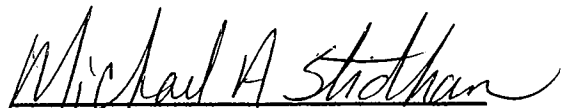
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was this 2th day of June, 2007
mailed via first class U.S. Mail, to:

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