

RETURN DATE: December 29, 2015 : SUPERIOR COURT
RICHARD BLITZ, TRUSTEE OF : JUDICIAL DISTRICT OF
THE RICHARD BLITZ DEFINED : LITCHFIELD
BENEFIT PENSION PLAN AND TRUST
VS. :
: AT LITCHFIELD
GLEN LOVEJOY AND :
KATHLEEN RIISKA-LOVEJOY : DECEMBER 3, 2015

COMPLAINT

FIRST COUNT (PARENTAL LIABILITY FOR INTENTIONAL ACT OF MINOR)

1. The Plaintiff, Richard Blitz, Trustee of the Richard Blitz Defined Benefit Pension Plan and Trust (the "Trust"), is an individual residing in the City of New York, New York. The Plaintiff is the Trustee of the Trust and its beneficiary.

2. The Defendant, Glen Lovejoy, is an individual having a principal place of residence in Colebrook, Connecticut.

3. The Defendant, Kathleen Riiska-Lovejoy, is an individual having a principal place of residence in Colebrook, Connecticut

4. On or about March 8, 2014, the Defendants' son, Owen Lovejoy, having a date of birth of August 20 1996 and then a minor, intentionally burned down the residential dwelling on the Plaintiff's property, said property being generally known as 102 Simons Pond Road, Colebrook, Connecticut (the "property").

5. Said action on the part of Owen Lovejoy was willful, wanton and malicious.

6. As a result of said action on the part of Owen Lovejoy, the Plaintiff suffered the following, non-exclusive damages:

- a. The total loss of the residential dwelling and the ability to use and enjoy same.
- b. The incurrence of property clean-up costs.
- c. The loss of all personal property located within the residential dwelling including all personal and family mementos, letters, photographs, slides, films and personal and business files.

7. At all times mentioned, the Defendants were the parents and natural guardians of Owen Lovejoy, and Owen Lovejoy was a member of his parents', the Defendants' household, when he willfully, wantonly and maliciously caused the severe property losses as herein set forth.

8. At all times herein mentioned, Owen Lovejoy was an unemancipated minor and the damages and losses described herein were caused by the willful or malicious acts of Owen Lovejoy, and claim is made against the Defendants as his parents and natural guardians pursuant to C.G.S. Section 52-572.

SECOND COUNT (PARENTAL LIABILITY FOR NEGLIGENCE)

1-7. Paragraphs 1-7 of the First Count are re-alleged and incorporated in paragraphs 1-7 of this, the Second Count of the Plaintiff's Complaint.

8. The Plaintiff's damages and losses were caused by the carelessness and negligence of the Defendants in one or more of the following ways:

- a. In that they failed to exercise reasonable care in controlling their minor child so as to prevent him from causing the harm to the Plaintiff's property.

- b. In that the Defendants negligently and carelessly failed to restrain their minor son, although they knew or should have known that the minor possessed a disposition and propensity to cause the damage he did to the Plaintiff's property, and the damages he caused to the Plaintiff's property was the probable consequence of such failure to restrain their son.

WHEREFORE, the Plaintiffs request:

1. Money damages;
2. Costs of suit; and
3. Such other and further relief as to equity may pertain;

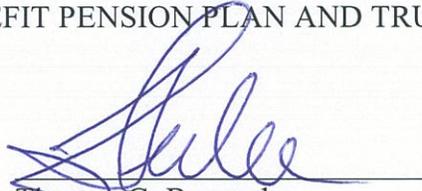
Joyce Jardin, of Simsbury, Connecticut is recognized to prosecute in the amount of \$250.00.

Hereof fail not, but of this writ, with your doings thereon, make due service and return according to the law.

Dated at Simsbury, Connecticut this 3rd day of December 2015.

PLAINTIFF, RICHARD BLITZ, TRUSTEE OF
THE RICHARD BLITZ DEFINED
BENEFIT PENSION PLAN AND TRUST

By



Thomas G. Benneche
His Attorney
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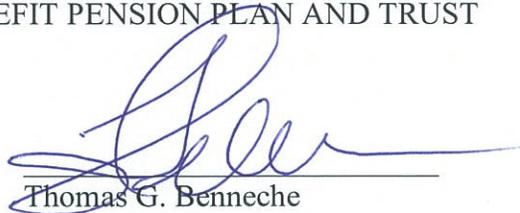
STATEMENT OF AMOUNT IN DEMAND

This action is based upon an express or implied promise to make payment and the amount, legal interest or property in demand is greater than \$15,000.00, exclusive of interest and costs.

Dated at Simsbury, Connecticut this 3rd day of December 2015.

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