

I HEREBY CERTIFY THAT THE FOREGOING IS A COMPLETE AND EXACT COPY OF THE ORIGINAL THEREOF

Attorneys for

Plaintiff

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

DESIREE YOUNG, an individual,  Plaintiff,  v.  TERRI HORMAN, a.k.a. TERRI MOULTON, a.k.a. TERRI MOULTON HORMAN, an individual,  Defendant.	Case No. 1206-06956  COMPLAINT FOR INJUNCTIVE RELIEF AND FOR DAMAGES ARISING FROM INTENTIONAL TORTS  Amount of Prayer: \$10,000,000 ORS 21.160(1)(e) Filing Fee: \$1,005.00 Demand for Jury Trial  <i>Not Subject to Mandatory Arbitration</i>
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Plaintiff alleges:

INTRODUCTION

1.

On June 4, 2010, Terri Horman took her seven year old stepson, Kyron Horman, from her home to Skyline Elementary School, located in Multnomah County. Although Terri Horman and Kyron Horman were seen together at Skyline Elementary School, Kyron disappeared from Skyline Elementary School on June 4<sup>th</sup>, and has not been seen again. Desiree Young, Kyron's mother, brings this claim against Terri Horman, asserting that Terri Horman is responsible for the disappearance of Kyron. Ms. Young claims that Terri Horman intentionally interfered with her parental rights, and that Terri Horman

1 intentionally inflicted severe emotional distress. Ms. Young seeks the return of her son,  
2 and seeks compensatory damages.

3 PARTIES

4 2.

5 Desiree Young is the mother of Kyron Horman. Ms. Young, who was divorced  
6 from Kyron's father, Kaine Horman, in 2003, shared joint legal custody of their son,  
7 Kyron Horman.

8 3.

9 Terri Horman (a.k.a. Terri Moulton, a.k.a. Terri Moulton Horman) married Kaine  
10 Horman in April of 2007. On June 4, 2010, she was living with Kaine and Kyron  
11 Horman.

12 FIRST CLAIM FOR RELIEF

13 INJUNCTIVE RELIEF TO COMPEL THE RETURN OF KYRON HORMAN

14 4.

15 Plaintiff realleges and incorporates paragraphs 1-3, above.

16 5.

17 On June 4, 2010, Terri Horman, acting alone or in concert with others,  
18 intentionally kidnapped Kyron Horman from Skyline Elementary School. Kyron has not  
19 been seen or heard from by either of his parents since prior to Terri Horman taking Kyron  
20 to school that morning.

21 6.

22 At all times pertinent, Terri Horman knew that Desiree Young shared legal  
23 custody of Kyron with Kaine Horman. The actions of Terri Horman intentionally  
24 deprived plaintiff of her parental rights.

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26 //

1 7.

2 Assuming that Kyron is alive, plaintiff is entitled to the return of her son. If Kyron  
3 is dead, plaintiff is entitled to the return of his remains.

4 8.

5 Terri Horman knows whether Kyron is alive or dead, and knows his present  
6 whereabouts or the location of his remains.

7 9.

8 Plaintiff is suffering ongoing fear, anxiety and grief on a daily basis, and has no  
9 other adequate remedy except for the issuance of an injunction compelling Terri Horman  
10 to return Kyron to his parents, or, alternatively, if Kyron is dead, an injunction  
11 compelling Terri Horman to reveal the whereabouts of Kyron's body so that his parents  
12 may properly care for his remains.

13 SECOND CLAIM FOR RELIEF

14 INTENTIONAL INTERFERENCE WITH PARENTAL RELATIONSHIP

15 10.

16 Plaintiff realleges and incorporates paragraphs 1-3, and 5-6, above.

17 11.

18 As a direct result of Terri Horman's criminal misconduct, plaintiff has been  
19 deprived of the lawful custody of her son, and has suffered continuing and unrelenting  
20 fear, anxiety and grief, to her general damage in the sum of \$5,000,000.

21 12.

22 Plaintiff reserves the right to amend her complaint and allege a claim for punitive  
23 damages pursuant to ORS 31.725.

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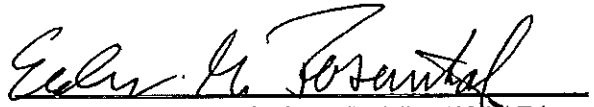


1 ON HER SECOND CLAIM FOR RELIEF, for damages in the sum of \$5,000,000,  
2 and for her costs and disbursements necessarily incurred herein;

3 ON HER THIRD CLAIM FOR RELIEF, for damages in the sum of \$5,000,000,  
4 and for her costs and disbursements necessarily incurred herein.

5  
6 DATED this 1<sup>st</sup> day of June, 2012.

7 ROSENTHAL GREENE & DEVLIN, P.C.

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10 Elden M. Rosenthal, OSB No. 722174  
11 Of Attorneys for Plaintiffs  
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