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7 JANE ROE 3 and JANE ROE 7.

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Superior Court of California
County of Fresno
By: E. Meyer, Deputy

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF FRESNO**

10 ****

11 JANE ROE 3, an individual; JANE ROE 7,) Case No.: **22CECG04041**
12 an individual;)

13 Plaintiffs,)

14 v.)

15 DEFENDANT DOE 1, Local Church, a)
California non-profit religious corporation;)
16 DEFENDANT DOE 2, National Church, a)
foreign non-profit religious corporation;)
17 DEFENDANT DOE 3, District Church, a)
California non-profit religious corporation;)
18 DEFENDANT DOE 4, an individual;)
19 DEFENDANT DOE 5, an individual;)
20 DEFENDANT DOE 8, an individual;)
DEFENDANT DOE 11, an individual;)
21 DEFENDANT DOE 12, an individual;)
DEFENDANT DOE 13, an individual; and)
22 DOES 14 through 100, inclusive;)

23 Defendants.)
24

COMPLAINT FOR DAMAGES:

1. **NEGLIGENCE**
2. **CLAIM FOR CHILDHOOD SEXUAL ASSAULT**
(California Civil Code § 340.1)
3. **NEGLIGENT SUPERVISION/ FAILURE TO WARN**
4. **NEGLIGENT HIRING/RETENTION**
5. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
6. **BREACH OF STATUTORY DUTY**
(California Civil Code § 51.7)

25 Based upon information and belief available to Plaintiffs, JANE ROE 3 and JANE ROE
26 7, at all times relevant to the filing of this Complaint, Plaintiffs allege against Defendants DOE
27 1, Local Church, a California non-profit religious corporation; DOE 2, National Church, a
28 foreign nonprofit religious corporation; DOE 3, District Church, a California non-profit religious

1 corporation; DEFENDANT DOE 4, an individual; DEFENDANT DOE 5, an individual;
2 DEFENDANT DOE 16, an individual; DEFENDANT DOE 17, an individual; DEFENDANT
3 DOE 18, an individual; and DOES 14 through 100, inclusive, as follows:

4 **NATURE OF THE ACTION**

5 1. Between approximately 1986 and 1991, Plaintiff JANE ROE 3 was a minor
6 child and member, congregant, and student of Defendants DOE 1, Local Church, DOE 2,
7 National Church, and DOE 3, District Church, in Riverdale, California. Plaintiff JANE ROE 3
8 was groomed for a sexual relationship by Defendant DOE 8. Defendant DOE 8, a Sunday school
9 teacher at DOE 1, Local Church, initiated a pattern of grooming which culminated with sexual
10 assaults of JANE ROE 3.

11 2. Between approximately 1987 and 2000, Plaintiff JANE ROE 7 was a minor
12 child and member, congregant, and student of Defendants DOE 1, Local Church, DOE 2,
13 National Church, and DOE 3, District Church, in Riverdale, California. Plaintiff JANE ROE 7
14 was groomed for a sexual relationship a various time when she was in the age of minority by
15 Defendants DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13. Defendant DOE 8, a Sunday
16 school teacher at DOE 1, Local Church, initiated a pattern of grooming which culminated with
17 the sexual assault of JANE ROE 7. At approximately the same time, Defendant DOE 5, a music
18 director, photography director, choir director, and youth choir tour chaperone of DOE 1, Local
19 Church, DOE 11, a camp counselor at DOE 1, Local Church, and Defendant DOE 4, as a teacher
20 at Academy, church elder, camp counselor and associate pastor at DOE 1, Local Church,
21 engaged in a pattern of grooming and sexually assaulting JANE ROE 7. Further, DOE 12 and
22 DOE 13, a married couple that worked for and volunteered at DOE 1, Local Church, sexually
23 assaulted JANE ROE 7 while she attended a church event.

24 3. At all relevant times, Defendant DOE 4 was as a teacher at Academy, church
25 elder, camp counselor and associate pastor at DOE 1, Local Church. Despite the fact that
26 Defendants DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, knew
27 or should have known that Defendant DOE 4 was a danger to children, in that he was likely to
28

1 use his positions within the organization to groom and sexually assault children, they failed to
2 take reasonable steps to protect JANE ROE 7 and other children from that danger.

3 4. At all relevant times, Defendant DOE 5 was a music director, photography
4 director, choir director, and youth choir chaperone at Defendant DOE 1, Local Church. Despite
5 the fact that Defendants DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
6 Church, knew or should have known that Defendant DOE 5 was a danger to children, in that he
7 was likely use his positions within the organization to groom and sexually assault children, they
8 failed to take reasonable steps to protect JANE ROE 7 and other children from that danger.

9 5. At all relevant times, Defendant DOE 8 was a Sunday school teacher and bus
10 driver at Defendant DOE 1, Local Church. Despite the fact that Defendants DOE 1, Local
11 Church, DOE 2, National Church, and DOE 3, District Church, knew or should have known that
12 Defendant DOE 8 was a danger to children, in that he was likely use his positions within the
13 organization to groom and sexually assault children, they failed to take reasonable steps to
14 protect JANE ROE 3 and JANE ROE 7, and other children from that danger.

15 6. At all relevant times, Defendant DOE 11 was a camp counselor at Defendant
16 DOE 1, Local Church. Despite the fact that Defendants DOE 1, Local Church, DOE 2, National
17 Church, and DOE 3, District Church, knew or should have known that Defendant DOE 11 was a
18 danger to children, in that he was likely use his positions within the organization to groom and
19 sexually assault children, they failed to take reasonable steps to protect JANE ROE 7 and other
20 children from that danger.

21 7. At all relevant times, Defendant DOE 12 was a Sunday school teacher at
22 Defendant DOE 1, Local Church. Despite the fact that Defendants DOE 1, Local Church, DOE
23 2, National Church, and DOE 3, District Church, knew or should have known that Defendant
24 DOE 12 was a danger to children, in that he was likely use her positions within the organization
25 to groom and sexually assault children, they failed to take reasonable steps to protect JANE ROE
26 7 and other children from that danger.

27 8. At all relevant times, Defendant DOE 13 was a volunteer at Defendant DOE 1,
28 Local Church. Despite the fact that Defendants DOE 1, Local Church, DOE 2, National Church,

1 and DOE 3, District Church, knew or should have known that Defendant DOE 13 was a danger
2 to children, in that he was likely use his positions within the organization to groom and sexually
3 assault children, they failed to take reasonable steps to protect JANE ROE 7 and other children
4 from that danger.

5 **PARTIES**

6 9. Plaintiff, JANE ROE 3 (“ROE 3”), is an adult female currently residing within
7 the State of California. ROE 3 was a minor throughout the period of child sexual assault alleged
8 herein. At the time of filing this Complaint for childhood sexual assault ROE 3 is over the age of
9 40 years old. At all times relevant, ROE 3 resided in Fresno County, California. ROE 3 attended
10 Defendant DOE 1, Local Church, (“Local Church”) as a congregant of the church and attended
11 school at DOE 1, Local Church, doing business as Academy (“Academy”) located on the
12 premises of DOE 1, Local Church. ROE 3 brings this Complaint pursuant to Code of Civil
13 Procedure Section 340.1, as amended by Assembly Bill 218, for the childhood sexual assault she
14 suffered due to DOE Defendants negligence and malfeasance. Thus, Plaintiff’s claim for
15 damages suffered as a result of childhood sexual assault is timely, as it is filed within three years
16 of January 1, 2020.

17 10. Plaintiff, JANE ROE 7 (“ROE 7”), is an adult female currently residing in
18 within the State of California. ROE 7 was a minor throughout the period of childhood sexual
19 assault alleged herein. At the time of filing this Complaint for childhood sexual assault ROE 7 is
20 under the age of 40 years old. At all times relevant, ROE 7 resided in Fresno County, California.
21 ROE 7 attended Defendant DOE 1, Local Church, as a congregant of the church and attended
22 school at DOE 1, Local Church, Academy located on the premises of DOE 1, Local Church.
23 ROE 7 brings this Complaint pursuant to Code of Civil Procedure Section 340.1.

24 11. At all relevant times, Defendant DOE 1, Local Church, (“Local Church”) was
25 and is a California non-profit religious corporation authorized to conduct business and is
26 conducting business in the State of California, with its principal place of business in the County
27 of Fresno, California. At all times relevant, DOE 1, Local Church, had responsibility for church
28 operations in Riverdale, California.

1 12. At all relevant times, Defendant DOE 2, National Church, ("National Church")
2 was and is a foreign non-profit religious corporation with its principal place of business in the
3 State of Missouri. At all times relevant, DOE 2, National Church, organized, administered and
4 directed the congregational affairs of church members in the United States. At all times relevant
5 DOE 2, National Church, owned, operated, managed, and/or controlled local churches and
6 schools throughout the United States, including DOE 1, Local Church, in Riverdale, California.

7 13. At all relevant times, Defendant DOE 3, District Church, ("District Church")
8 was and is a California non-profit religious corporation authorized to conduct business and is
9 conducting business in the State of California, with its principal place of business in Irvine,
10 California. At all times relevant, DOE 3, District Church, organized, administered and directed
11 the congregational affairs of church members in the State of California. At all times relevant
12 DOE 2, National Church, owned, operated, managed, and/or controlled local churches and
13 schools throughout California, including DOE 1, Local Church, in Riverdale, California.

14 14. At all relevant times, Defendant DOE 4, an individual ("DOE 4"), is and was an
15 adult male who, at all times relevant, was associated with, supervised, directed and controlled by
16 DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church. While supervised,
17 directed and controlled by DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
18 Church, DOE 4 committed the acts of childhood sexual assault alleged herein as an employee of
19 DOE 1, Local Church, and a teacher at Academy located on the premises of DOE 1, Local
20 Church, and in his capacity as pastor at DOE 1, Local Church.

21 15. At all relevant times, Defendant DOE 5 ("DOE 5"), an individual, was and is an
22 adult male who was associated with, supervised, directed and controlled by DOE 1, Local
23 Church, DOE 2, National Church, and DOE 3, District Church. While supervised, directed and
24 controlled by DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 5
25 committed the wrongful acts alleged herein as an employee, music director, photography
26 director, choir director and youth choir tour chaperone of DOE 1, Local Church.

27 16. At all relevant times, Defendant DOE 8 ("DOE 8"), an individual, was and is an
28 adult male who was associated with, supervised, directed and controlled by DOE 1, Local

1 Church, DOE 2, National Church, and DOE 3, District Church. While supervised, directed and
2 controlled by DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 5
3 committed the acts of wrongful sexual abuse alleged herein as an employee, bus driver, and
4 Sunday school teacher of DOE 1, Local Church.

5 17. At all relevant times, Defendant DOE 11 (“DOE 11”), an individual, was and is
6 an adult male who was associated with, supervised, directed and controlled by DOE 1, Local
7 Church, DOE 2, National Church, and DOE 3, District Church. While supervised, directed and
8 controlled by DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 11
9 committed the acts of wrongful sexual conduct alleged herein as a camp counselor at DOE 1,
10 Local Church.

11 18. At all relevant times, Defendant DOE 12 (“DOE 12”), an individual, was and is
12 an adult female who was associated with, supervised, directed and controlled by DOE 1, Local
13 Church, DOE 2, National Church, and DOE 3, District Church. While supervised, directed and
14 controlled by DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 11
15 committed the acts of wrongful sexual conduct alleged herein as an employee and Sunday school
16 teacher of DOE 1, Local Church.

17 19. At all relevant times, Defendant DOE 13 (“DOE 13”), an individual, was and is
18 an adult male who was associated with, supervised, directed and controlled by DOE 1, Local
19 Church, DOE 2, National Church, and DOE 3, District Church. While supervised, directed and
20 controlled by DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 11
21 committed the acts of wrongful sexual conduct alleged herein as an agent of DOE 1, Local
22 Church.

23 20. At all relevant times DOE 2, National Church, was the owner of DOE 1, Local
24 Church, and held itself out to the public as the owner or controller of DOE 1, Local Church.

25 21. At all relevant times DOE 2, National Church, through its agents, servants, and
26 employees, managed, maintained, operated, and controlled DOE 1, Local Church.

27 22. At all relevant times DOE 2, National Church, through its agents, servants, and
28 employees, managed, maintained, operated, and controlled DOE 1, Local Church, and held out

1 to the public its agents, servants, and employees as those who managed, maintained, operated,
2 and controlled DOE 1, Local Church.

3 23. At all relevant times DOE 2, National Church, was responsible for and did the
4 hiring and staffing at DOE 1, Local Church.

5 24. At all relevant times DOE 2, National Church, was responsible for and did the
6 recruitment and staffing of volunteers at DOE 1, Local Church.

7 25. At all relevant times DOE 3, District Church, was the owner of DOE 1, Local
8 Church, and held itself out to the public as the owner or controller of DOE 1, Local Church.

9 26. At all relevant times DOE 3, District Church, through its agents, servants, and
10 employees, managed, maintained, operated, and controlled DOE 1, Local Church.

11 27. At all relevant times DOE 3, District Church, through its agents, servants, and
12 employees, managed, maintained, operated, and controlled DOE 1, Local Church, and held out
13 to the public its agents, servants, and employees as those who managed, maintained, operated,
14 and controlled DOE 1, Local Church.

15 28. At all relevant times DOE 3, District Church, was responsible for and did the
16 hiring and staffing at DOE 1, Local Church.

17 29. At all relevant times DOE 3, District Church, was responsible for and did the
18 recruitment and staffing of volunteers at DOE 1, Local Church.

19 30. At all relevant times DOE 4 was on the staff of, acted as an agent of, and served
20 as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church.

21 31. At all relevant times DOE 4 was acting in the course and scope of his
22 employment with DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church.

23 32. At all relevant times DOE 2, National Church, and DOE 3, District Church,
24 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
25 4 and the services of those who managed and supervised DOE 4.

26 33. At all relevant times DOE 4 was employed by DOE 1, Local Church, DOE 2,
27 National Church, and DOE 3, District Church, he used his positions as a teacher at Academy and
28 as pastor of DOE 1, Local Church, to groom and sexually assault ROE 7.

1 34. To the extent DOE 1, Local Church, was a different entity, corporation, or
2 organization during the period of time during which DOE 4 used his positions as a teacher at
3 Academy and as pastor of DOE 1, Local Church, to groom and sexually assault ROE 7, such
4 entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this
5 lawsuit and is identified in the Complaint as DOE 1, Local Church.

6 35. To the extent DOE 1, Local Church, is a successor to a different entity,
7 corporation, or organization which existed during the period of time during which DOE 4 used
8 his positions as a teacher at Academy, church elder, camp counselor and associate pastor at DOE
9 1, Local Church, to groom and to sexually assault ROE 7, such predecessor entity, corporation,
10 or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
11 identified in the Complaint as DOE 1, Local Church.

12 36. To the extent DOE 2, National Church, was a different entity, corporation, or
13 organization during the period of time during which DOE 4 used his positions as a teacher at
14 Academy and as pastor of DOE 1, Local Church, to groom and to sexually assault ROE 7, such
15 entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this
16 lawsuit and is identified in the Complaint as DOE 2, National Church.

17 37. To the extent DOE 2, National Church, is a successor to a different entity,
18 corporation, or organization which existed during the period of time during which DOE 4 used
19 his positions as a teacher at Academy and as pastor of DOE 1, Local Church, to groom and to
20 sexually assault ROE 7 and such predecessor entity, corporation, or organization is hereby on
21 notice that it is intended to be a defendant in this lawsuit and is identified in the Complaint as
22 DOE 2, National Church.

23 38. To the extent DOE 3, District Church, was a different entity, corporation, or
24 organization during the period of time during which DOE 4 used his positions as a teacher at
25 Academy and as pastor of DOE 1, Local Church, to groom and to sexually assault ROE 7, such
26 entity, corporation, or organization is hereby on notice that it is intended to be a defendant in this
27 lawsuit and is identified in the Complaint as DOE 3, District Church.

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1 39. To the extent DOE 3, District Church, is a successor to a different entity,
2 corporation, or organization which existed during the period of time during which DOE 4 used
3 his positions as a teacher at Academy, church elder, camp counselor and associate pastor at DOE
4 1, Local Church, to groom and to sexually assault ROE 7, such predecessor entity, corporation,
5 or organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
6 identified in the Complaint as DOE 3, District Church.

7 40. At all relevant times DOE 5 was on the staff of, acted as an agent of, and/or
8 served as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
9 Church.

10 41. At all relevant times DOE 5 was acting in the course and scope of his
11 employment or agency with DOE 1, Local Church, DOE 2, National Church, and DOE 3,
12 District Church.

13 42. At all relevant times DOE 2, National Church, and DOE 3, District Church,
14 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
15 5 and the services of those who managed and supervised DOE 5.

16 43. At all relevant times DOE 5 was employed by DOE 1, Local Church, DOE 2,
17 National Church, and DOE 3, District Church, he used his positions as an employee, music
18 director, photography director, choir director and youth choir tour chaperone of DOE 1, Local
19 Church.

20 44. To the extent DOE 1, Local Church, was a different entity, corporation, or
21 organization during the period of time during which DOE 5 used his positions as an employee,
22 music director, photography director, choir director and youth choir tour chaperone of DOE 1,
23 Local Church, to groom and sexually assault ROE 7, such entity, corporation, or organization is
24 hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
25 Complaint as DOE 1, Local Church.

26 45. To the extent DOE 1, Local Church, is a successor to a different entity,
27 corporation, or organization which existed during the period of time during which DOE 5 used
28 his positions as an employee, music director, photography director, choir director and youth

1 choir tour chaperone of DOE 1, Local Church, to groom and to sexually assault ROE 7, such
2 predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
3 defendant in this lawsuit and is identified in the Complaint as DOE 1, Local Church.

4 46. To the extent DOE 2, National Church, was a different entity, corporation, or
5 organization during the period of time during which DOE 5 used his positions as an employee,
6 music director, photography director, choir director and youth choir tour chaperone of DOE 1,
7 Local Church, to groom and to sexually assault ROE 7, such entity, corporation, or organization
8 is hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
9 Complaint as DOE 2, National Church.

10 47. To the extent DOE 2, National Church, is a successor to a different entity,
11 corporation, or organization which existed during the period of time during which DOE 5 used
12 his positions as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, to
13 groom and to sexually assault ROE 7 and such predecessor entity, corporation, or organization is
14 hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
15 Complaint as DOE 2, National Church.

16 48. To the extent DOE 3, District Church, was a different entity, corporation, or
17 organization during the period of time during which DOE 5 use his positions as an employee,
18 music director, photography director, choir director and youth choir tour chaperone of DOE 1,
19 Local Church, to groom and to sexually assault ROE 7, such entity, corporation, or organization
20 is hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
21 Complaint as DOE 3, District Church.

22 49. To the extent DOE 3, District Church, is a successor to a different entity,
23 corporation, or organization which existed during the period of time during which DOE 5 used
24 his positions as an employee, music director, photography director, choir director and youth
25 choir tour chaperone of DOE 1, Local Church, to groom and to sexually assault ROE 7, such
26 predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
27 defendant in this lawsuit and is identified in the Complaint as DOE 3, District Church.

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1 50. At all relevant times DOE 8 was on the staff of, acted as an agent of, and/or
2 served as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
3 Church.

4 51. At all relevant times DOE 8 was acting in the course and scope of his
5 employment or agency with DOE 1, Local Church, DOE 2, National Church, and DOE 3,
6 District Church.

7 52. At all relevant times DOE 2, National Church, and DOE 3, District Church,
8 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
9 8 and the services of those who managed and supervised DOE 8.

10 53. At all relevant times DOE 8 was employed by DOE 1, Local Church, DOE 2,
11 National Church, and DOE 3, District Church, he used his positions as Sunday school bus driver
12 and Sunday school teacher at of DOE 1, Local Church.

13 54. To the extent DOE 1, Local Church, was a different entity, corporation, or
14 organization during the period of time during which DOE 8 used his positions as Sunday school
15 bus driver and Sunday school teacher at DOE 1, Local Church, to groom and sexually assault
16 ROE 3 and ROE 7, such entity, corporation, or organization is hereby on notice that it is intended
17 to be a defendant in this lawsuit and is identified in the Complaint as DOE 1, Local Church.

18 55. To the extent DOE 1, Local Church, is a successor to a different entity,
19 corporation, or organization which existed during the period of time during which DOE 8 used
20 his positions as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, to
21 groom and to sexually assault ROE 3 and ROE 7, such predecessor entity, corporation, or
22 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
23 identified in the Complaint as DOE 1, Local Church.

24 56. To the extent DOE 2, National Church, was a different entity, corporation, or
25 organization during the period of time during which DOE 8 used his positions as Sunday school
26 bus driver and Sunday school teacher at DOE 1, Local Church, to groom and to sexually assault
27 ROE 3 and ROE 7, such entity, corporation, or organization is hereby on notice that it is intended
28 to be a defendant in this lawsuit and is identified in the Complaint as DOE 2, National Church.

1 57. To the extent DOE 2, National Church, is a successor to a different entity,
2 corporation, or organization which existed during the period of time during which DOE 8 used
3 his positions as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, to
4 groom and to sexually assault ROE 3 and ROE 7 and such predecessor entity, corporation, or
5 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
6 identified in the Complaint as DOE 2, National Church.

7 58. To the extent DOE 3, District Church, was a different entity, corporation, or
8 organization during the period of time during which DOE 8 use his positions as Sunday school
9 bus driver and Sunday school teacher at DOE 1, Local Church, to groom and to sexually assault
10 ROE 3 and ROE 7, such entity, corporation, or organization is hereby on notice that it is intended
11 to be a defendant in this lawsuit and is identified in the Complaint as DOE 3, District Church.

12 59. To the extent DOE 3, District Church, is a successor to a different entity,
13 corporation, or organization which existed during the period of time during which DOE 8 used
14 his positions as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, to
15 groom and to sexually assault ROE 3 and ROE 7, such predecessor entity, corporation, or
16 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
17 identified in the Complaint as DOE 3, District Church.

18 60. At all relevant times DOE 11 was on the staff of, acted as an agent of, and/or
19 served as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
20 Church.

21 61. At all relevant times DOE 11 was acting in the course and scope of his
22 employment or agency with DOE 1, Local Church, DOE 2, National Church, and DOE 3,
23 District Church.

24 62. At all relevant times DOE 2, National Church, and DOE 3, District Church,
25 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
26 11 and the services of those who managed and supervised DOE 11.

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1 63. At all relevant times DOE 11 was employed by DOE 1, Local Church, DOE 2,
2 National Church, and DOE 3, District Church, he used his positions as an agent and in his
3 capacity as a camp counselor at DOE 1, Local Church.

4 64. To the extent DOE 1, Local Church, was a different entity, corporation, or
5 organization during the period of time during which DOE 11 used his positions as an agent and
6 in his capacity as a camp counselor at DOE 1, Local Church, to groom and sexually assault ROE
7 7, such entity, corporation, or organization is hereby on notice that it is intended to be a
8 defendant in this lawsuit and is identified in the Complaint as DOE 1, Local Church.

9 65. To the extent DOE 1, Local Church, is a successor to a different entity,
10 corporation, or organization which existed during the period of time during which DOE 11 used
11 his positions as an agent and in his capacity as a camp counselor at DOE 1, Local Church, to
12 groom and to sexually assault ROE 7, such predecessor entity, corporation, or organization is
13 hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
14 Complaint as DOE 1, Local Church.

15 66. To the extent DOE 2, National Church, was a different entity, corporation, or
16 organization during the period of time during which DOE 11 used his positions as an agent and
17 in his capacity as a camp counselor at DOE 1, Local Church, to groom and to sexually assault
18 ROE 7, such entity, corporation, or organization is hereby on notice that it is intended to be a
19 defendant in this lawsuit and is identified in the Complaint as DOE 2, National Church.

20 67. To the extent DOE 2, National Church, is a successor to a different entity,
21 corporation, or organization which existed during the period of time during which DOE 11 used
22 his positions as an agent and in his capacity as a camp counselor at DOE 1, Local Church, to
23 groom and to sexually assault ROE 7 and such predecessor entity, corporation, or organization is
24 hereby on notice that it is intended to be a defendant in this lawsuit and is identified in the
25 Complaint as DOE 2, National Church.

26 68. To the extent DOE 3, District Church, was a different entity, corporation, or
27 organization during the period of time during which DOE 11 use her positions as an agent and in
28 his capacity as a camp counselor at DOE 1, Local Church, to groom and sexually assault ROE 7,

1 such entity, corporation, or organization is hereby on notice that it is intended to be a defendant
2 in this lawsuit and is identified in the Complaint as DOE 3, District Church.

3 69. To the extent DOE 3, District Church, is a successor to a different entity,
4 corporation, or organization which existed during the period of time during which DOE 11 used
5 his positions as an agent and in his capacity as a camp counselor at DOE 1, Local Church, to
6 sexually assault ROE 7, such predecessor entity, corporation, or organization is hereby on notice
7 that it is intended to be a defendant in this lawsuit and is identified in the Complaint as DOE 3,
8 District Church.

9 70. At all relevant times DOE 12 was on the staff of, acted as an agent of, and/or
10 served as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
11 Church.

12 71. At all relevant times DOE 13 was acting in the course and scope of his
13 employment or agent of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
14 Church.

15 72. At all relevant times DOE 2, National Church, and DOE 3, District Church,
16 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
17 12 and the services of those who managed and supervised DOE 12.

18 73. At all relevant times DOE 12 was employed by DOE 1, Local Church, DOE 2,
19 National Church, and DOE 3, District Church, he used her positions as Sunday school teacher at
20 of DOE 1, Local Church.

21 74. To the extent DOE 1, Local Church, was a different entity, corporation, or
22 organization during the period of time during which DOE 12 used her position as Sunday school
23 teacher at DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
24 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
25 identified in the Complaint as DOE 1, Local Church.

26 75. To the extent DOE 1, Local Church, is a successor to a different entity,
27 corporation, or organization which existed during the period of time during which DOE 12 used
28 her positions as a Sunday school teacher at DOE 1, Local Church, to sexually assault ROE 7,

1 such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
2 defendant in this lawsuit and is identified in the Complaint as DOE 1, Local Church.

3 76. To the extent DOE 2, National Church, was a different entity, corporation, or
4 organization during the period of time during which DOE 12 used her positions as a Sunday
5 school teacher at DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
6 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
7 identified in the Complaint as DOE 2, National Church.

8 77. To the extent DOE 2, National Church, is a successor to a different entity,
9 corporation, or organization which existed during the period of time during which DOE 12 used
10 her position as Sunday school teacher at DOE 1, Local Church, to sexually assault ROE 7 and
11 such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
12 defendant in this lawsuit and is identified in the Complaint as DOE 2, National Church.

13 78. To the extent DOE 3, District Church, was a different entity, corporation, or
14 organization during the period of time during which DOE 12 use her positions as a Sunday
15 school teacher at DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
16 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
17 identified in the Complaint as DOE 3, District Church.

18 79. To the extent DOE 3, District Church, is a successor to a different entity,
19 corporation, or organization which existed during the period of time during which DOE 12 used
20 her position as a Sunday school teacher at DOE 1, Local Church, to sexually assault ROE 7, such
21 predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
22 defendant in this lawsuit and is identified in the Complaint as DOE 3, District Church.

23 80. At all relevant times DOE 13 was on the staff of, acted as an agent of, and/or
24 served as an employee of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District
25 Church.

26 81. At all relevant times DOE 13 was acting in the course and scope of his
27 employment or agency with DOE 1, Local Church, DOE 2, National Church, and DOE 3,
28 District Church.

1 82. At all relevant times DOE 2, National Church, and DOE 3, District Church,
2 materially benefited from the operation of DOE 1, Local Church, including the services of DOE
3 13 and the services of those who managed and supervised DOE 13.

4 83. At all relevant times DOE 13 was employed by DOE 1, Local Church, DOE 2,
5 National Church, and DOE 3, District Church, he used his positions as an agent of DOE 1, Local
6 Church.

7 84. To the extent DOE 1, Local Church, was a different entity, corporation, or
8 organization during the period of time during which DOE 13 used his positions as a church elder
9 and agent of DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
10 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
11 identified in the Complaint as DOE 1, Local Church.

12 85. To the extent DOE 1, Local Church, is a successor to a different entity,
13 corporation, or organization which existed during the period of time during which DOE 13 used
14 his positions as a church elder and agent of DOE 1, Local Church, to sexually assault ROE 7,
15 such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
16 defendant in this lawsuit and is identified in the Complaint as DOE 1, Local Church.

17 86. To the extent DOE 2, National Church, was a different entity, corporation, or
18 organization during the period of time during which DOE 13 used his position as a church elder
19 and agent of DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
20 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
21 identified in the Complaint as DOE 2, National Church.

22 87. To the extent DOE 2, National Church, is a successor to a different entity,
23 corporation, or organization which existed during the period of time during which DOE 13 used
24 his position as a church elder and agent of DOE 1, Local Church, to sexually assault ROE 7 and
25 such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
26 defendant in this lawsuit and is identified in the Complaint as DOE 2, National Church.

27 88. To the extent DOE 3, District Church, was a different entity, corporation, or
28 organization during the period of time during which DOE 13 use his positions as a church elder

1 and agent of DOE 1, Local Church, to sexually assault ROE 7, such entity, corporation, or
2 organization is hereby on notice that it is intended to be a defendant in this lawsuit and is
3 identified in the Complaint as DOE 3, District Church.

4 89. To the extent DOE 3, District Church, is a successor to a different entity,
5 corporation, or organization which existed during the period of time during which DOE 13 used
6 his positions as a church elder and agent of DOE 1, Local Church, to sexually assault ROE 7,
7 such predecessor entity, corporation, or organization is hereby on notice that it is intended to be a
8 defendant in this lawsuit and is identified in the Complaint as DOE 3, District Church.

9 90. Despite a mandatory reporting obligation, DOE 1, Local Church, DOE 2,
10 National Church, and DOE 3, District Church, their directors, employees, agents, pastors and
11 teachers knew of or reasonably suspected the sexual abuse, and did not report the abuse to law
12 enforcement.

13 91. Defendant DOES 14 through 100, inclusive, are individuals and/or business or
14 corporate entities incorporated in and/or doing business in California whose true names and
15 capacities are unknown to Plaintiffs who therefore sues such defendants by such fictitious names,
16 and who will amend the Complaint to show the true names and capacities of each such DOE
17 Defendant when ascertained. Each such Defendant DOE is legally responsible in some manner
18 for the events, happenings and/or tortious and unlawful conduct that caused the injuries and
19 damages alleged in this Complaint. Defendants DOE 1, Local Church, DOE 2, National Church,
20 DOE 3, District Church, DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 and DOES 14
21 through 100, are sometimes hereinafter referred to collectively as the "Defendants".

22 92. Each Defendant is the agent, servant and/or employee of other Defendants, and
23 each Defendant was acting within the course and scope of his, her or its authority as an agent,
24 servant and/or employee of the other Defendants. Defendants, and each of them, are individuals,
25 corporations, partnerships and other entities which engaged in, joined in and conspired with the
26 other wrong doers in carrying out the tortious and unlawful activities described in this
27 Complaint.

28 //

BACKGROUND FACTS APPLICABLE TO ALL COUNTS

93. Plaintiffs are informed and believes, and upon such information and belief hereby allege the following:

94. Defendant DOE 1, Local Church, is located in Riverdale, County of Fresno, California, and at all times relevant is and was a member church of Defendants, DOE 2, National Church, and DOE 3, District Church.

95. At all times relevant to this Complaint, Defendants operated a church in Riverdale, California, and invited the participation of the public, including ROE 3 and ROE 7, into the church community. As part of the church community, minors were invited to participate in youth group activities, attend the Academy for their schooling, participate in volunteer events and participate in DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, sponsored youth choir tours. Additionally, members were invited to participate in other church activities including mission trips, Sunday school, bible study, and church retreats.

96. At all times relevant to this Complaint, Plaintiffs, ROE 3 and ROE 7, attended DOE 1, Local Church, as a congregant, and attended Academy located on the premises of DOE 1, Local Church, as a student.

97. At all times relevant to this Complaint, DOE 4 acted in the capacity as a teacher at Academy, church elder, camp counselor and associate pastor at DOE 1, Local Church.

98. At all times relevant to this Complaint, DOE 5 acted in the capacity as a music director, choir director, youth choir tour chaperone, and teacher of at DOE 1, Local Church.

99. At all times relevant to this Complaint, DOE 8 acted in the capacity as a church elder and was a Sunday school teacher at DOE 1, Local Church.

100. At all times relevant to this Complaint, DOE 11 acted in the capacity as an agent and in his capacity as a camp counselor at DOE 1, Local Church.

101. At all times relevant to this Complaint, DOE 12 acted in the capacity as a church elder and was a Sunday school teacher at DOE 1, Local Church.

102. At all times relevant to this Complaint, DOE 13 acted in the capacity as a church elder and agent of DOE 1, Local Church.

1 103. At all times relevant to this Complaint, DOE 1, Local Church, DOE 2, National
2 Church, DOE 3, District Church, DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13
3 facilitated activities, including but not limited to, bible study, church and Academy functions,
4 chaperoning events including, sports activities, choir activities, interstate travel, Sunday school
5 and driving the Sunday school bus for DOE 1, Local Church. DOE 4's, DOE 5's, DOE 8's, DOE
6 11's, DOE 12's and DOE 13's positions and responsibilities within DOE 1, Local Church, were
7 evident to all church attendees as DOE 1, Local Church, would advertise DOE 4's, DOE 5's,
8 DOE 8's, DOE 11's, DOE 12's and DOE 13's involvement with various activities through
9 announcements and flyers, and through the operation of the Academy. At the time of the
10 childhood sexual assault Defendants DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13
11 were employed by and acted as agents of DOE 1, Local Church, and by Academy, and were
12 under it's the direct supervision, employ and control of DOE 1, Local Church, DOE 2, National
13 Church, DOE 3, District Church, and DOES 14 through 100.

14 104. During all times relevant to this complaint, DOE 4 was employed by or acted as
15 an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent of
16 DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
17 their direct supervision and employment as a teacher and associate pastor at DOE 1, Local
18 Church.

19 105. During all times relevant to this complaint, DOE 5 was employed by or acted as
20 an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent of
21 DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
22 their direct supervision and employment, a music director, photography director, choir director,
23 and youth choir tour chaperone of DOE 1, Local Church.

24 106. During all times relevant to this complaint, DOE 8 was employed by or acted as
25 an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent of
26 DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
27 their direct supervision and employment as a Sunday school bus driver and Sunday school
28 teacher at DOE 1, Local Church.

1 107. During all times relevant to this complaint, DOE 11 was employed by or acted
2 as an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent
3 of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
4 their direct supervision and employment as an agent and in his capacity as a camp counselor at
5 DOE 1, Local Church.

6 108. During all times relevant to this complaint, DOE 12 was employed by or acted
7 as an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent
8 of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
9 their direct supervision and employment as a Sunday school teacher at DOE 1, Local Church.

10 109. During all times relevant to this complaint, DOE 13 was employed by or acted
11 as an agent of DOE 1, Local Church, and Academy, and was employed by and acted as an agent
12 of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, and was under
13 their direct supervision and employment as a teacher at Academy, church elder, camp counselor
14 and associate pastor at DOE 1, Local Church.

15 110. At the time of the childhood sexual assaults alleged herein ROE 3 belonged to
16 DOE 1, Local Church, and regularly attended services and events sponsored by DOE 1, Local
17 Church. At all relevant times, ROE 3 attended school at Academy located on the premises of
18 DOE 1, Local Church, and was a congregant of DOE 1, Local Church, where DOE 8 was a
19 Sunday school teacher. DOE 1, Local Church, was operated and controlled by senior pastors
20 who performed duties to control, operate, supervise and direct staff and volunteers at both DOE
21 1, Local Church, and Academy.

22 111. At the time of the childhood sexual assaults alleged herein ROE 7 belonged to
23 DOE 1, Local Church, and regularly attended DOE 1, Local Church, services and events
24 sponsored by that congregation. At all relevant times, ROE 7 attended school at Academy
25 located on the premises of DOE 1, Local Church, where DOE 4 Church, was a teacher at
26 Academy, church elder, camp counselor and associate pastor at DOE 1, Local Church; DOE 5,
27 was an employee, music director, photography director, choir director and youth choir tour
28 chaperone of DOE 1, Local Church; DOE 8 was as Sunday school bus driver and Sunday school

1 teacher at DOE 1, Local Church. DOE 11 was a camp counselor at Defendant DOE 1, Local
2 Church. DOE 12 was a Sunday school teacher at Defendant DOE 1, Local Church. DOE 13 was
3 an agent of Defendant DOE 1, Local Church.

4 **JANE ROE 7**

5 **ABUSE BY DOE 5**

6 112. Between approximately 1997 and 2000, when ROE 7 was a minor, she was
7 groomed and sexually assaulted by DOE 5. Plaintiff ROE 7 was a member, congregant, and
8 student at DOE 1, Local Church, and between approximately the ages of 13 to 15 years old DOE
9 5 groomed and sexually abused her in his capacity as employee, music director, photography
10 director, choir director and youth choir tour chaperone of DOE 1, Local Church.

11 113. Based on the representations of DOE 1, Local Church, DOE 2, National
12 Church, and DOE 3, District Church, that DOE 5 was safe and trustworthy, ROE 7 and her
13 parents allowed her to be under the supervision of, and in the care, custody, and control of
14 Defendants including when ROE 7 was sexually abused by DOE 5.

15 114. In order to sexually abuse ROE 7 and other children, DOE 5 exploited the trust
16 and authority vested in him by the Defendants by grooming ROE 7 to gain her trust and to obtain
17 control over her.

18 115. Commencing in 1997, when ROE 7 was in seventh grade, DOE 5, in his
19 capacity as employee, music director, photography director, choir director and youth choir tour
20 chaperone of DOE 1, Local Church, began grooming ROE 7 for the purposes of initiating an
21 inappropriate sexual relationship.

22 116. DOE 5 initiated a pattern of wrongful sexual assaults when ROE 7 was
23 approximately 12 years old. From 1997 to 2000, DOE 5 inappropriately exposed himself to ROE
24 7 at Academy, and wrongfully touched and groped ROE 7 during church sponsored activities at
25 DOE 1, Local Church.

26 117. While on the premises of DOE 1, Local Church, DOE 5 intentionally and
27 wrongfully groped ROE 7's breasts over her shirt while giving her a hug.

28 //

1 118. Approximately one week after DOE 5 initially touched ROE 7’s breasts, DOE 5
2 hugged ROE 7 again during a church choir event at DOE 1, Local Church. While DOE 5 was
3 hugging ROE 7, he reached under ROE 7’s skirt and squeezed her buttocks.

4 119. Shortly thereafter, ROE 7 informed the Wilma Spencer, a pastor and wife of the
5 head pastor of DOE 1, Local Church, about DOE 5’s wrongful sexual touching. ROE 7 described
6 to Wilma Spencer DOE 5’s wrongful sexual act of squeezed her buttocks. Wilma Spencer told
7 ROE 7 that the church would handle the situation, to ROE 7’s knowledge Wilma Spencer did not
8 report or reprimand DOE 5 for his sexual assault.

9 120. In or around ROE 7’s eighth-grade year at the Academy, she walked into an
10 unlocked restroom at Academy, located on the premises of DOE 1, Local Church, and observed
11 DOE 5 masturbating. Upon DOE 5 noticing ROE 7 at the open door, DOE 5 left his genitals
12 exposed and invited DOE 5 into the restroom to watch him masturbate. ROE 7 was shocked,
13 embarrassed and disguised by DOE 5’s conduct and proposition.

14 121. DOE 1, Local Church, was and is very active in the network of churches
15 associated with DOE 2, National Church, and DOE 3, District Church. DOE 1, Local Church,
16 would arrange for the church's youth choir, comprised of minor church members, to tour the
17 country and perform at DOE 2, National Church, and DOE 3, District Church, affiliated
18 churches. DOE 5 would accompany the DOE 1, Local Church, choir as a chaperone.

19 122. When DOE 7 was a freshman in high school she accompanied the DOE 1,
20 Local Church, youth choir on tour. While on tour the choir performed at Walt Disney World
21 Resort in Orlando, Florida. ROE 7 inadvertently left her choir uniform at home, so she was not
22 permitted to sing during some of the performances while on tour. While the youth choir was
23 performing on stage at Walt Disney World Resort, ROE 7 was cleaning the dressing/rehearsal
24 room with a minor male youth choir member who was also not performing with the choir.
25 Believing they were alone ROE 7 and the male youth choir member began kissing and “fooling
26 around”. DOE 5 entered the dressing/rehearsal room interrupting the two minors. DOE 5 told
27 ROE 7 and the minor male choir member that ROE 7 needed to take care of him because she had
28 gotten him aroused and that ROE 7 was not allowed to say no. Thereafter, DOE 5 remained in

1 the dressing/rehearsal room and watched the two minor DOE 1, Local Church, youth choir
2 members as they had sexual relations. ROE 7 did not want to have sexual relations with the
3 minor male choir member but was compelled to by DOE 5. Following the experience in the
4 dressing/rehearsal room ROE 7 felt shame and disgust. The experience and words of DOE 5
5 diminished ROE 7's belief of her own self-worth as a woman.

6 123. During the time that DOE 5 was an employee of and serving Defendants, each
7 Defendant had a duty to use reasonable care to prevent DOE 5 from using the tasks, premises,
8 and instrumentalities of his position with the Defendants to target, groom, and sexually abuse
9 children, including ROE 7.

10 124. The childhood sexual assault of ROE 7 by DOE 5 occurred using the tasks,
11 premises, or instrumentalities that the Defendants entrusted to DOE 5, including the church
12 grounds and school bathrooms, located on the premises of DOE 1, Local Church.

13 125. DOE 5's sexual assault of ROE 7 occurred during activities that were sponsored
14 by, or were a direct result of activities sponsored by DOE 1, Local Church, DOE 2, National
15 Church, and DOE 3, District Church, including at or during school and church sponsored
16 activities.

17 126. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
18 through their respective agents, servants, and employees, held DOE 5 out to the public, to
19 Plaintiff, and to Plaintiff's parents, as their agent and employee.

20 127. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
21 through their respective agents, servants, and employees, held DOE 5 out to the public, to
22 Plaintiff, and to Plaintiff's parents, as having been vetted, screened, and approved by them as
23 someone who was safe and could be trusted with children.

24 128. Plaintiff ROE 7 and Plaintiff's parents reasonably relied upon the acts and
25 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
26 through their respective agents, servants, and employees, and reasonably believed that DOE 5
27 was an agent or employee of the Defendants who was vetted, screened, and approved by it and
28 who was safe and could be trusted with children.

1 129. Plaintiff ROE 7 and Plaintiff’s parents trusted DOE 5 because DOE 1, Local
2 Church, DOE 2, National Church, and DOE 3, District Church, held him out as someone who
3 was safe and could be trusted with the supervision, care, custody, and control of children,
4 including Plaintiff ROE 7.

5 130. Plaintiff ROE 7 and Plaintiff’s parents believed that DOE 1, Local Church,
6 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
7 parent of ordinary prudence in comparable circumstances when the Defendants assumed
8 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
9 danger of being sexually abused.

10 131. DOE 5’s sexual abuse of ROE 7 was unlawful sexual molestation under
11 California law, including California Code of Civil Procedure Section 340.1.

12 132. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
13 3, District Church, through their agents, servants, and employees, knew or should have known
14 that DOE 5 was a danger to children, in that he was likely to sexually abuse them.

15 133. It was reasonably foreseeable to Defendants, through their agents, servants, and
16 employees, that DOE 5’s sexual abuse of children would likely result in injury to others,
17 including the sexual abuse of ROE 7 and other children by DOE 5.

18 134. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
19 through their agents, servants, and employees, knew or should have known that DOE 5 was
20 sexually abusing children at DOE 1, Local Church, including ROE 7.

21 135. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
22 through their respective agents, servants, and employees, consciously and recklessly disregarded
23 their knowledge that DOE 5 would use his positions with the Defendants to sexually abuse
24 children, including Plaintiff ROE 7.

25 136. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
26 through their respective agents, servants, and employees, acted in concert with each other and/or
27 with DOE 5 to conceal the danger that DOE 5 posed to children, including ROE 7, so that DOE
28 5 could continue serving the church despite their knowledge of that danger.

1 137. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
2 through their respective agents, servants, and employees, acted in concert with each other and/or
3 with DOE 5 to enable DOE 5 to sexually abuse children, including Plaintiff.

4 138. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
5 through their respective agents, servants, and employees, knew that their negligent, reckless, and
6 outrageous conduct would inflict severe emotional and psychological distress, as well as
7 personal physical injury on others, including Plaintiff ROE 7.

8 139. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
9 through their respective agents, servants, and employees, concealed the sexual abuse of children
10 by pastors, teachers, school administrators, volunteers, and others, including DOE 5, in order to
11 conceal their own bad acts in failing to protect children from being abused, to protect their
12 reputations, and to prevent victims of such sexual abuse from coming forward during the
13 extremely limited statute of limitations prior to the enactment of the recent legislative
14 amendment that allows Plaintiff to pursue this claim now, despite knowing that these pastors,
15 religious persons, teachers, school administrators, and other personnel would continue to molest
16 children, and continue to intentionally dissuade victims and their families from coming forward.

17 140. As a result of the above-described conduct, Plaintiff ROE 7 has suffered, and
18 will continue to suffer great pain of mind and body, shock, emotional distress, physical
19 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
20 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
21 will continue to be prevented from performing daily activities and obtaining the full enjoyment
22 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
23 to incur expenses for medical and psychological treatment, therapy, and counsel.

24 **ABUSE BY DOE 8**

25 141. When ROE 7 was a minor, she was groomed and sexually abused by DOE 8.

26 142. From approximately 1987 to 1997, when ROE 7 was a minor, DOE 8 sexually
27 assaulted ROE 7 in his capacity as a Sunday school bus driver and Sunday school teacher at
28

1 DOE 1, Local Church. During this time, ROE 7 was a member, congregant, and student at DOE
2 1, Local Church.

3 143. DOE 8 began a pattern of grooming and sexually abusing ROE 7 when ROE 7
4 was 3 years. DOE 8 continued this pattern of grooming and sexually assaulting ROE 7 for more
5 than a decade while ROE 7 remained a minor and DOE 8 was a Sunday school bus driver and
6 Sunday school teacher at DOE 1, Local Church.

7 144. Based on the representations of DOE 1, Local Church, DOE 2, National Church
8 and DOE 3, District Church, that DOE 8 was safe and trustworthy, ROE 7 and her parents
9 allowed her to be under the supervision, and in the care, custody, and control of Defendants,
10 including DOE 8, when ROE 7 was groomed and sexually abused by DOE 8.

11 145. DOE 8 exposed his genitals to ROE 7 while DOE 8 was acting in his capacity
12 as a camp counselor for DOE 1, Local Church. DOE 8 exposed himself to ROE 7 and began
13 walking toward her with his exposed genitals, ROE 7 managed to leave the situation and find
14 another adult working at the camp. She told this adult about DOE 8's actions.

15 146. DOE 8 would often perform sex acts on himself in presence of ROE 7. When
16 ROE 7 was approximately 9 years old DOE 8 performed sex acts on himself in the presence of
17 ROE 7 and on multiple occasions DOE 8 would incorporate ROE 7 in those acts and force her
18 participation committing acts of wrongful sexual assault.

19 147. When ROE 7 was approximately 12 years old DOE 8 forced her to commit a
20 wrongful sexual act upon him until she became physically ill and vomited.

21 148. DOE 8's wrongful sexual conduct with ROE 7 was witnessed by other family
22 members, congregants and agents of the DOE 1, Local Church. DOE 8's wrongful sexual assault
23 of ROE 7 never reported to law enforcement and DOE 8 was allowed to remain a Sunday school
24 bus driver and Sunday school teacher at DOE 1, Local Church.

25 149. During the time that DOE 8 was working for and serving the Defendants, each
26 Defendant had a duty to use reasonable care to prevent DOE 8 from using the tasks, premises,
27 and instrumentalities of his position with the Defendants to target, groom, and sexually abuse
28 children, including ROE 7.

1 150. The sexual abuse of ROE 7 by DOE 8 occurred using the tasks, premises, or
2 instrumentalities that the Defendants entrusted to DOE 8, including the church grounds and
3 school bathrooms, located on the premises of DOE 1, Local Church.

4 151. DOE 8's sexual abuse of ROE 7 occurred during activities that were sponsored
5 by, or were a direct result of activities sponsored by DOE 1, Local Church, DOE 2, National
6 Church, and DOE 3, District Church, including at or during school and church sponsored
7 activities.

8 152. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
9 through their respective agents, servants, and employees, held DOE 8 out to the public, to
10 Plaintiff, and to Plaintiff's parents, as their agent and employee.

11 153. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
12 through their respective agents, servants, and employees, held DOE 8 out to the public, to
13 Plaintiff, and to Plaintiff's parents, as having been vetted, screened, and approved by them as
14 someone who was safe and could be trusted with children.

15 154. Plaintiff ROE 7 and Plaintiff's parents reasonably relied upon the acts and
16 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
17 through their respective agents, servants, and employees, and reasonably believed that DOE 8
18 was an agent or employee of the Defendants who was vetted, screened, and approved by it and
19 who was safe and could be trusted with children.

20 155. Plaintiff ROE 7 and Plaintiff's parents trusted DOE 8 because DOE 1, Local
21 Church, DOE 2, National Church, and DOE 3, District Church, held him out as someone who
22 was safe and could be trusted with the supervision, care, custody, and control of children,
23 including Plaintiff ROE 7.

24 156. Plaintiff ROE 7 and Plaintiff's parents believed that DOE 1, Local Church,
25 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
26 parent of ordinary prudence in comparable circumstances when the Defendants assumed
27 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
28 danger of being sexually abused.

1 157. DOE 8's sexual abuse of ROE 7 was unlawful sexual molestation under
2 California law, including California Code of Civil Procedure Section 340.1.

3 158. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
4 3, District Church, through their agents, servants, and employees, knew or should have known
5 that DOE 8 was a danger to children, in that he was likely to sexually abuse them.

6 159. It was reasonably foreseeable to Defendants, through their agents, servants, and
7 employees, that DOE 8's sexual abuse of children would likely result in injury to others,
8 including the sexual abuse of ROE 7 and other children by DOE 8.

9 160. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
10 through their agents, servants, and employees, knew or should have known that DOE 8 was
11 sexually abusing children at DOE 1, Local Church, including ROE 7.

12 161. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
13 through their respective agents, servants, and employees, consciously and recklessly disregarded
14 their knowledge that DOE 8 would use his positions with the Defendants to sexually abuse
15 children, including Plaintiff ROE 7.

16 162. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
17 through their respective agents, servants, and employees, acted in concert with each other and/or
18 with DOE 8 to conceal the danger that DOE 8 posed to children, including ROE 7, so that DOE
19 8 could continue serving the church despite their knowledge of that danger.

20 163. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
21 through their respective agents, servants, and employees, acted in concert with each other and/or
22 with DOE 8 to enable DOE 8 to sexually abuse children, including Plaintiff.

23 164. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
24 through their respective agents, servants, and employees, knew that their negligent, reckless, and
25 outrageous conduct would inflict severe emotional and psychological distress, as well as
26 personal physical injury on others, including Plaintiff ROE 7.

27 165. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
28 through their respective agents, servants, and employees, concealed the sexual abuse of children

1 by pastors, teachers, school administrators, volunteers, and others, including DOE 8, in order to
2 conceal their own bad acts in failing to protect children from being abused, to protect their
3 reputations, and to prevent victims of such sexual abuse from coming forward during the
4 extremely limited statute of limitations prior to the enactment of the recent legislative
5 amendment that allows Plaintiff to pursue this claim now, despite knowing that these pastors,
6 religious persons, teachers, school administrators, and other personnel would continue to molest
7 children, and continue to intentionally dissuade victims and their families from coming forward.

8 166. As a result of the above-described conduct, Plaintiff ROE 7 has suffered, and
9 will continue to suffer great pain of mind and body, shock, emotional distress, physical
10 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
11 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
12 will continue to be prevented from performing daily activities and obtaining the full enjoyment
13 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
14 to incur expenses for medical and psychological treatment, therapy, and counsel.

15 **ABUSE BY DOE 11**

16 167. When ROE 7 was a minor, she was groomed and a victim of childhood sexual
17 assault perpetrated by DOE 11.

18 168. Between approximately 1993 to 1997, when ROE 7 was a minor, DOE 11
19 sexually assaulted ROE 7 in his capacity as an agent and organizer of church sponsored activities
20 and functions for different groups of children, including events at children's ministry, Christian
21 camp, and Sunday school at DOE 1, Local Church. During this time, ROE 7 was a member,
22 congregant, and student at DOE 1, Local Church.

23 169. DOE 11 was involved in coordinating children's activities for DOE 1, Local
24 Church. He organized and put on church sponsored activities and functions for different groups
25 of children, including events at children's ministry, Christian camp, and Sunday school.

26 170. DOE 11 began an inappropriate pattern of behavior in approximately 1993, On
27 several occasions, while DOE 11 was acting in his capacity as a camp leader for DOE 1, Local
28 Church, DOE 11 would watch ROE 7 use the restroom at the campground. He would often

1 instruct ROE 7 to leave the toilet stall door open and DOE 11 would stand near the opening of
2 the stall and watch ROE 7.

3 171. On multiple occasions DOE 11 would stand in the doorway of the toilet stall at
4 Christian camp, expose himself to ROE 7, and masturbate in her presence while she utilized the
5 restroom.

6 172. On multiple occasions when ROE 7 was approximately 8-10 years old she
7 suffered from childhood incontinence, DOE 11 would collect her soiled underwear from her bag,
8 smell them and masturbate in ROE 7's presence.

9 173. In or around 1997, while attending a Christian camp outing sponsored by DOE
10 1, Local Church, ROE 7 was groped and sexually assaulted by DOE 11. ROE 7's leg was in a
11 cast which limited her mobility on the uneven terrain and hills at the camp. Adult males working
12 for DOE 1, Local Church, as camp counselors or coordinators would often pick DOE 7 up to
13 transport her to different areas of the camp, including the restroom. On multiple occasions DOE
14 11 committed acts of sexual assault as he carried ROE 7 to the restroom. When DOE 11
15 transported ROE 7 to the restroom his hand groped her buttocks and genitals. During these
16 occasions DOE 11 attempted to penetrate ROE 7 with his fingers through her underwear.

17 174. During the time that DOE 11 was working for and serving Defendants, each
18 Defendant had a duty to use reasonable care to prevent DOE 11 from using the tasks, premises,
19 and instrumentalities of his position with the Defendants to target, groom, and sexually abuse
20 children, including ROE 7.

21 175. The sexual assault of ROE 7 by DOE 11 occurred using the tasks, premises, or
22 instrumentalities that the Defendants entrusted to DOE 11, including the church grounds and
23 school bathrooms, located on the premises of DOE 1, Local Church.

24 176. DOE 11's sexual abuse of ROE 7 occurred during activities that were sponsored
25 by, or were a direct result of activities sponsored by DOE 1, Local Church, DOE 2, National
26 Church, and DOE 3, District Church, including at or during school and church sponsored
27 activities.

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1 177. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
2 through their respective agents, servants, and employees, held DOE 11 out to the public, to
3 Plaintiff, and to Plaintiff’s parents, as their agent and employee.

4 178. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
5 through their respective agents, servants, and employees, held DOE 11 out to the public, to
6 Plaintiff, and to Plaintiff’s parents, as having been vetted, screened, and approved by them as
7 someone who was safe and could be trusted with children.

8 179. Plaintiff ROE 7 and Plaintiff’s parents reasonably relied upon the acts and
9 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
10 through their respective agents, servants, and employees, and reasonably believed that DOE 11
11 was an agent or employee of the Defendants who was vetted, screened, and approved by it and
12 who was safe and could be trusted with children.

13 180. Plaintiff ROE 7 and Plaintiff’s parents trusted DOE 11 because DOE 1, Local
14 Church, DOE 2, National Church, and DOE 3, District Church, held him out as someone who
15 was safe and could be trusted with the supervision, care, custody, and control of children,
16 including Plaintiff ROE 7.

17 181. Plaintiff ROE 7 and Plaintiff’s parents believed that DOE 1, Local Church,
18 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
19 parent of ordinary prudence in comparable circumstances when the Defendants assumed
20 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
21 danger of being sexually abused.

22 182. DOE 11’s sexual abuse of ROE 7 was unlawful sexual molestation under
23 California law, including California Code of Civil Procedure Section 340.1.

24 183. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
25 3, District Church, through their agents, servants, and employees, knew or should have known
26 that DOE 11 was a danger to children, in that he was likely to sexually abuse them.

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1 184. It was reasonably foreseeable to Defendants, through their agents, servants, and
2 employees, that DOE 11's sexual abuse of children would likely result in injury to others,
3 including the sexual abuse of ROE 7 and other children by DOE 11.

4 185. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
5 through their agents, servants, and employees, knew or should have known that DOE 11 was
6 sexually abusing children at DOE 1, Local Church, including ROE 7.

7 186. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
8 through their respective agents, servants, and employees, consciously and recklessly disregarded
9 their knowledge that DOE 1 would use his positions with the Defendants to sexually abuse
10 children, including Plaintiff ROE 7.

11 187. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
12 through their respective agents, servants, and employees, acted in concert with each other and/or
13 with DOE 11 to conceal the danger that DOE 11 posed to children, including ROE 7, so that
14 DOE 11 could continue serving the church despite their knowledge of that danger.

15 188. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
16 through their respective agents, servants, and employees, acted in concert with each other and/or
17 with DOE 11 to enable DOE 11 to sexually abuse children, including Plaintiff.

18 189. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
19 through their respective agents, servants, and employees, knew that their negligent, reckless, and
20 outrageous conduct would inflict severe emotional and psychological distress, as well as
21 personal physical injury on others, including Plaintiff ROE 7.

22 190. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
23 through their respective agents, servants, and employees, concealed the sexual abuse of children
24 by pastors, teachers, school administrators, volunteers, and others, including DOE 11, in order to
25 conceal their own bad acts in failing to protect children from being abused, to protect their
26 reputations, and to prevent victims of such sexual abuse from coming forward during the
27 extremely limited statute of limitations prior to the enactment of the recent legislative
28 amendment that allows Plaintiff to pursue this claim now, despite knowing that these pastors,

1 religious persons, teachers, school administrators, and other personnel would continue to molest
2 children, and continue to intentionally dissuade victims and their families from coming forward.

3 191. As a result of the above-described conduct, Plaintiff ROE 7 has suffered, and
4 will continue to suffer great pain of mind and body, shock, emotional distress, physical
5 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
6 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
7 will continue to be prevented from performing daily activities and obtaining the full enjoyment
8 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
9 to incur expenses for medical and psychological treatment, therapy, and counsel.

10 **ABUSE BY DOE 4**

11 192. When ROE 7 was a minor, she was a victim of childhood sexual assault
12 perpetrated by DOE 4.

13 193. In or around approximately 1997, when ROE 7 was a minor, DOE 4 indecently
14 exposed himself to her while he was acting in his capacity as a teacher at Academy, church elder,
15 camp counselor and associate pastor at DOE 1, Local Church.

16 194. Based on the representations of DOE 1, Local Church, DOE 2, National
17 Church, and DOE 3, District Church, that DOE 4 was safe and trustworthy, ROE 7 and her
18 parents allowed her to be under the supervision of, and in the care, custody, and control of
19 Defendants, including during church sponsored camp trips, when DOE 4 exposed himself to
20 ROE 7.

21 195. DOE 4 exposed himself to ROE 7 when she was approximately 12 years old.
22 While on a church sponsored camping trip, sponsored by and through DOE 1, Local Church,
23 ROE 7 came upon DOE 4 masturbating behind a tree near the campground pool while young
24 female congregants and adult women congregants were swimming in the pool. DOE 4 was
25 facing the pool while he masturbating. When DOE 4 turned around and realized ROE 7 was
26 looking at him, he continued to masturbate while staring at ROE 7 until he saw the look of shock
27 and disgust on ROE 7's face. Thereafter, he covered his genitals and told ROE 7 that he was
28 urinating, in attempt to dissuade ROE 7 from reporting what she had observed.

1 196. This act of indecent exposure by DOE 4 occurred while DOE 4 was acting in
2 his capacity as a teacher at Academy, church elder, camp counselor and associate pastor at DOE
3 1, Local Church, and while on a camping trip sponsored by DOE 1, Local Church, DOE 2,
4 National Church, and DOE 3, District Church.

5 197. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
6 through their respective agents, servants, and employees, held DOE 4 out to the public, to
7 Plaintiff, and to Plaintiff's parents, as their agent and employee.

8 198. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
9 through their respective agents, servants, and employees, held DOE 4 out to the public, to
10 Plaintiff, and to Plaintiff's parents, as having been vetted, screened, and approved by them as
11 someone who was safe and could be trusted with children.

12 199. Plaintiff ROE 7 and Plaintiff's parents reasonably relied upon the acts and
13 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
14 through their respective agents, servants, and employees, and reasonably believed that DOE 4
15 was an agent or employee of the Defendants who was vetted, screened, and approved by it and
16 who was safe and could be trusted with children.

17 200. Plaintiff ROE 7 and Plaintiff's parents trusted DOE 4 because DOE 1, Local
18 Church, DOE 2, National Church, and DOE 3, District Church, held him out as someone who
19 was safe and could be trusted with the supervision, care, custody, and control of children,
20 including Plaintiff ROE 7.

21 201. Plaintiff ROE 7 and Plaintiff's parents believed that DOE 1, Local Church,
22 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
23 parent of ordinary prudence in comparable circumstances when the Defendants assumed
24 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
25 danger of being sexually assaulted.

26 202. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
27 3, District Church, through their agents, servants, and employees, knew or should have known
28 that DOE 4 was a danger to children.

1 203. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
2 through their respective agents, servants, and employees, knew that their negligent, reckless, and
3 outrageous conduct would inflict emotional and psychological distress on others, including
4 Plaintiff ROE 7.

5 204. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
6 through their respective agents, servants, and employees, concealed the sexual abuse of children
7 by pastors, teachers, school administrators, volunteers, and others, including DOE 4, in order to
8 conceal their own bad acts in failing to protect children from being abused, to protect their
9 reputations, and to prevent victims of such sexual abuse from coming forward during the limited
10 statute of limitations, despite knowing that these pastors, other religious persons, teachers, school
11 administrators, and other persons would continue to molest children, and continue to
12 intentionally dissuade victims and their families from coming forward.

13 205. As a result of the above-described conduct, Plaintiff ROE 7 has suffered, and
14 will continue to suffer great pain of mind and body, shock, emotional distress, physical
15 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
16 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
17 will continue to be prevented from performing daily activities and obtaining the full enjoyment
18 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
19 to incur expenses for medical and psychological treatment, therapy, and counseling.

20 **ABUSE BY DOE 12 & DOE 13**

21 206. When ROE 7 was a minor, she was a victim of childhood sexual assault
22 perpetrated by DOE 12 and DOE 13.

23 207. Between approximately 1992 to 1993, when ROE 7 was a minor, DOE 12 and
24 DOE 13 initiated a pattern of grooming and sexually assaulting ROE 7, which culminated in
25 DOE 12 and DOE 13 sexually assaulting ROE 7 in 1993, when she was approximately 9 years
26 old.

27 208. DOE 12 was a Sunday school teacher at DOE 1, Local Church and volunteered
28 with the children’s ministry at DOE 1, Local Church. DOE 13, the husband of DOE 12, was a

1 former Sunday school teacher at DOE 1, Local Church, and continued to volunteer at and be an
2 agent of DOE 1, Local Church.

3 209. DOE 12 assisted DOE 13 in performing wrongful sexual assaults on ROE 7
4 while DOE 12 was acting in her capacity as a Sunday school teacher at DOE 1, Local Church,
5 and while DOE 13 was acting in his capacity as an agent at DOE 1, Local Church.

6 210. As part of DOE 12's position with DOE 1, Local Church, she monitored and
7 controlled the closet of extra clothes located at DOE 1, Local Church.

8 211. When ROE 7 was approximately 9 years old, she would occasionally have
9 incontinence that would require her to change her underwear and other clothing while attending
10 Sunday school at DOE 1, Local Church. DOE 12, acting in her capacity as a Sunday school
11 teacher and closet monitor at DOE 1, Local Church, was in charge of assisting ROE 7 with
12 changing her clothes. Although ROE 7 did need assistance in obtaining new clothes from the
13 closet, she did not require physical assistance with changing her clothes, including her
14 underwear.

15 212. On multiple occasions when ROE 7 had an episode of incontinence that
16 required a change of clothes, DOE 12 and DOE 13 would insist on physically changing ROE 7's
17 clothes. DOE 12 would hold down ROE 7 by the shoulders, so that ROE 7 was lying on the floor
18 while DOE 13 undressed her, removing her underwear. Thereafter, DOE 13 would smell ROE
19 7's underwear and wrongfully touch ROE 7's genitals. On multiple occasions DOE 13 digitally
20 penetrated ROE 7 with his fingers. Following the incidents of childhood sexual assault DOE 13
21 would retain ROE 7's underwear.

22 213. During the time that DOE 12 and DOE 13 were working for and serving the
23 Defendants, each Defendant had a duty to use reasonable care to prevent DOE 12 and DOE 13
24 from using the tasks, premises, and instrumentalities of his position with the Defendants to
25 target, groom, and sexually abuse children, including ROE 7.

26 214. The sexual abuse of ROE 7 by DOE 12 and DOE 13 occurred using the tasks,
27 premises, or instrumentalities that the Defendants entrusted to DOE 12 and DOE 13, including
28 the church grounds and school bathrooms, located on the premises of DOE 1, Local Church.

1 215. DOE 12’s and DOE 13’s sexual assault of ROE 7 occurred during activities that
2 were sponsored by, or were a direct result of activities sponsored by DOE 1, Local Church, DOE
3 2, National Church, and DOE 3, District Church, including at or during school and church
4 sponsored activities.

5 216. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
6 through their respective agents, servants, and employees, held DOE 12 and DOE 13 out to the
7 public, to Plaintiff, and to Plaintiff’s parents, as their agent and employee.

8 217. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
9 through their respective agents, servants, and employees, held DOE 12 and DOE 13 out to the
10 public, to Plaintiff, and to Plaintiff’s parents, as having been vetted, screened, and approved by
11 them as someone who was safe and could be trusted with children.

12 218. Plaintiff ROE 7 and Plaintiff’s parents reasonably relied upon the acts and
13 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
14 through their respective agents, servants, and employees, and reasonably believed that DOE 12
15 and DOE 13 were an agent or employee of the Defendants who was vetted, screened, and
16 approved by it and who was safe and could be trusted with children.

17 219. Plaintiff ROE 7 and Plaintiff’s parents trusted DOE 12 and DOE 13 because
18 DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church, held them out as
19 people who were safe and could be trusted with the supervision, care, custody, and control of
20 children, including Plaintiff ROE 7.

21 220. Plaintiff ROE 7 and Plaintiff’s parents believed that DOE 1, Local Church,
22 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
23 parent of ordinary prudence in comparable circumstances when the Defendants assumed
24 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
25 danger of being sexually abused.

26 221. DOE 12’s and DOE 13’s sexual assault of ROE 7 was unlawful sexual
27 molestation under California law, including California Code of Civil Procedure Section 340.1.

28 //

1 222. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
2 3, District Church, through their agents, servants, and employees, knew or should have known
3 that DOE 12 and DOE 13 were a danger to children, in that they were likely to sexually abuse
4 them.

5 223. It was reasonably foreseeable to Defendants, through their agents, servants, and
6 employees, that DOE 12's and DOE 13's sexual abuse of children would likely result in injury to
7 others, including the sexual abuse of ROE 7 and other children by DOE 12 and DOE 13.

8 224. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
9 through their agents, servants, and employees, knew or should have known that DOE 12 and
10 DOE 13 were sexually abusing children at DOE 1, Local Church, including ROE 7.

11 225. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
12 through their respective agents, servants, and employees, consciously and recklessly disregarded
13 their knowledge that DOE 12 and DOE 13 would use their positions with the Defendants to
14 sexually abuse children, including Plaintiff ROE 7.

15 226. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
16 through their respective agents, servants, and employees, acted in concert with each other and/or
17 with DOE 12 and DOE 13 to conceal the danger that DOE 12 and DOE 13 posed to children,
18 including ROE 7, so that DOE 12 and DOE 13 could continue serving the church despite their
19 knowledge of that danger.

20 227. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
21 through their respective agents, servants, and employees, acted in concert with each other and/or
22 with DOE 12 and DOE 13 to enable DOE 12 and DOE 13 to sexually abuse children, including
23 Plaintiff.

24 228. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
25 through their respective agents, servants, and employees, knew that their negligent, reckless, and
26 outrageous conduct would inflict severe emotional and psychological distress, as well as
27 personal physical injury on others, including Plaintiff ROE 7.

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1 229. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
2 through their respective agents, servants, and employees, concealed the sexual abuse of children
3 by pastors, teachers, school administrators, volunteers, and others, including DOE 12 and DOE
4 13, in order to conceal their own bad acts in failing to protect children from being abused, to
5 protect their reputations, and to prevent victims of such sexual abuse from coming forward
6 during the extremely limited statute of limitations prior to the enactment of the recent legislative
7 amendment that allows Plaintiff to pursue this claim now, despite knowing that these pastors,
8 religious persons, teachers, school administrators, and other personnel would continue to molest
9 children, and continue to intentionally dissuade victims and their families from coming forward.

10 230. As a result of the above-described conduct, Plaintiff ROE 7 has suffered, and
11 will continue to suffer great pain of mind and body, shock, emotional distress, physical
12 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
13 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
14 will continue to be prevented from performing daily activities and obtaining the full enjoyment
15 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
16 to incur expenses for medical and psychological treatment, therapy, and counsel.

17 **JANE ROE 3**

18 **ABUSE BY DOE 8**

19 231. When ROE 3 was a minor, she was groomed and sexually abused by DOE 8.

20 232. In or around approximately 1986 to 1991, when ROE 3 was a minor, DOE 8
21 sexually assaulted ROE 3 in his capacity as an agent of and Sunday school teacher at DOE 1,
22 Local Church. During this time, ROE 3 was a member, congregant, and student at DOE 1, Local
23 Church.

24 233. DOE 8 began a pattern of grooming and sexually assaulting ROE 3 when ROE
25 3 was 7 years old. DOE 8 continued this pattern of grooming and sexually assaulting ROE 3 until
26 1988 while ROE 3 remained a minor and DOE 8 was a Sunday school teacher at DOE 1, Local
27 Church.

28 //

1 234. Based on the representations of DOE 1, Local Church, DOE 2, National Church
2 and DOE 3, District Church, that DOE 8 was safe and trustworthy, ROE 3 and her parents
3 allowed her to be under the supervision, and in the care, custody, and control of Defendants,
4 including DOE 8, when ROE 3 was groomed and sexually abused by DOE 8.

5 235. After DOE 1, Local Church, youth choir DOE 8 accompanied ROE 3 and her
6 family to their residence, where the children began playing games. ROE 3 was in the backyard of
7 her parent’s residence on the porch looking at a large oak tree when DOE 8 approached from
8 behind. DOE 8 put his arm around ROE 3 and embraced her, thereafter RDE 8 kissed ROE 3.
9 As DOE 8 embraced and kissed ROE 3 his right hand moved down ROE 3’s chest and he began
10 to grope her chest rubbing her nipples above her shirt. DOE 8 took ROE 3’s hand and forced her
11 to grasp his aroused genitals.

12 236. ROE 3 confused, scared and disgusted as to what was occurring was unable to
13 break away from DOE 8’s grasp. ROE 3 was wearing a skirt and DOE 8 began moving his hand
14 up ROE 3’s leg under the skirt, when a minor family member of ROE 3 peered out the residence
15 back window and made a statement that interrupted DOE 8’s sexual assault of ROE 3.
16 Thereafter, DOE 8 fled the residence of ROE 3.

17 237. ROE 3 and her family were actives congregant of DOE 1, Local Church, as well
18 as a student at Academy. On one occasion minor congregants and students of Academy were
19 playing a game of hide and seek on the premises of DOE 1, Local Church. ROE 3 was hiding
20 behind a portable trailer on the premises of DOE 1, Local Church, when DOE 8 approached and
21 told her to come with him. ROE 3 followed DOE 8 behind a structure on the premises of DOE 1,
22 Local Church, were no other minor congregants or students of Academy were present. DOE 8
23 instructed ROE 3 to lay on ground on her back and be quiet because he had a surprise.
24 Thereafter, DOE 8 lifted ROE 3’s skirt, removed her underwear and orally copulated ROE 3.
25 Further, during this instance of childhood sexual assault DOE 8 digitally penetrated ROE 3.

26 238. In or around 1991, DOE 8 was assigned to be ROE 3’s Sunday school teacher.
27 An adult female congregant saw the look ROE 3’s face of fear and disgust when DOE 8 entered
28 the Sunday school room. The adult female congregant pulled ROE 3 aside and asked her if DOE

1 8 had kissed her too. ROE 3 answered in the affirmative. Shortly thereafter, ROE 3 was called
2 into the office of Wilma Spencer, the principal of Academy, pastor at DOE 1, Local Church, and
3 wife of the head pastor of DOE 1, Local Church. Alone in the principal’s office, Wilma Spencer
4 asked ROE 3 if she had a problem with DOE 8. ROE 3 informed Wilma Spencer of the wrongful
5 sexual acts that DOE 8 had committed. Wilma Spencer began to blame ROE 3 for the childhood
6 sexual assaults, stating that ROE 3 had wanted the sexual assaults to happen, that the sexual
7 assaults were ROE 3’s fault, and shamed ROE 3 for enticing DOE 8 into committing the
8 wrongful sexual acts. ROE 3 was berated by Wilma Spencer in the principal’s office for a
9 prolonged period of time until in order to embarrass, shame and emotionally abuse her into
10 maintaining her silence.

11 239. As a result of the shame, abuse and sexual trauma ROE 3 has suppressed
12 additional instances of childhood sexual assault committed by DOE 8, while he was a Sunday
13 school teacher and Sunday school bus driver at DOE 1, Local Church.

14 240. DOE 8’s wrongful sexual conduct with ROE 3 was witnessed by other family
15 members, congregants and agents of the DOE 1, Local Church. DOE 8’s wrongful sexual assault
16 of ROE 3 never reported to law enforcement and DOE 8 was allowed to remain a Sunday school
17 bus driver and Sunday school teacher at DOE 1, Local Church.

18 241. During the time that DOE 8 was working for and serving the Defendants, each
19 Defendant had a duty to use reasonable care to prevent DOE 8 from using the tasks, premises,
20 and instrumentalities of his position with the Defendants to target, groom, and sexually abuse
21 children, including ROE 3.

22 242. The sexual abuse of ROE 3 by DOE 8 occurred using the tasks, premises, or
23 instrumentalities that the Defendants entrusted to DOE 8, including the church grounds and
24 school bathrooms, located on the premises of DOE 1, Local Church.

25 243. DOE 8’s sexual abuse of ROE 3 occurred during activities that were sponsored
26 by, or were a direct result of activities sponsored by DOE 1, Local Church, DOE 2, National
27 Church, and DOE 3, District Church, including at or during school and church sponsored
28 activities.

1 244. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
2 through their respective agents, servants, and employees, held DOE 8 out to the public, to
3 Plaintiff, and to Plaintiff’s parents, as their agent and employee.

4 245. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
5 through their respective agents, servants, and employees, held DOE 8 out to the public, to
6 Plaintiff, and to Plaintiff’s parents, as having been vetted, screened, and approved by them as
7 someone who was safe and could be trusted with children.

8 246. Plaintiff ROE 3 and Plaintiff’s parents reasonably relied upon the acts and
9 representations of DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
10 through their respective agents, servants, and employees, and reasonably believed that DOE 8
11 was an agent or employee of the Defendants who was vetted, screened, and approved by it and
12 who was safe and could be trusted with children.

13 247. Plaintiff ROE 3 and Plaintiff’s parents trusted DOE 8 because DOE 1, Local
14 Church, DOE 2, National Church, and DOE 3, District Church, held him out as someone who
15 was safe and could be trusted with the supervision, care, custody, and control of children,
16 including Plaintiff ROE 3.

17 248. Plaintiff ROE 3 and Plaintiff’s parents believed that DOE 1, Local Church,
18 DOE 2, National Church, and DOE 3, District Church, would exercise such care as would a
19 parent of ordinary prudence in comparable circumstances when the Defendants assumed
20 supervision, care, custody, and control of minor Plaintiff, including protecting Plaintiff from the
21 danger of being sexually abused.

22 249. DOE 8’s sexual abuse of ROE 3 was unlawful sexual molestation under
23 California law, including California Code of Civil Procedure Section 340.1.

24 250. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
25 3, District Church, through their agents, servants, and employees, knew or should have known
26 that DOE 8 was a danger to children, in that he was likely to sexually abuse them.

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1 251. It was reasonably foreseeable to Defendants, through their agents, servants, and
2 employees, that DOE 8’s sexual abuse of children would likely result in injury to others,
3 including the sexual abuse of ROE 3 and other children by DOE 8.

4 252. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
5 through their agents, servants, and employees, knew or should have known that DOE 8 was
6 sexually abusing children at DOE 1, Local Church, including ROE 3.

7 253. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
8 through their respective agents, servants, and employees, consciously and recklessly disregarded
9 their knowledge that DOE 8 would use his positions with the Defendants to sexually abuse
10 children, including Plaintiff ROE 3.

11 254. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
12 through their respective agents, servants, and employees, acted in concert with each other and/or
13 with DOE 8 to conceal the danger that DOE 8 posed to children, including ROE 3, so that DOE
14 8 could continue serving the church despite their knowledge of that danger.

15 255. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
16 through their respective agents, servants, and employees, acted in concert with each other and/or
17 with DOE 8 to enable DOE 8 to sexually abuse children, including Plaintiff.

18 256. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
19 through their respective agents, servants, and employees, knew that their negligent, reckless, and
20 outrageous conduct would inflict severe emotional and psychological distress, as well as
21 personal physical injury on others, including Plaintiff ROE 3.

22 257. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
23 through their respective agents, servants, and employees, concealed the sexual abuse of children
24 by pastors, teachers, school administrators, volunteers, and others, including DOE 8, in order to
25 conceal their own bad acts in failing to protect children from being abused, to protect their
26 reputations, and to prevent victims of such sexual abuse from coming forward during the
27 extremely limited statute of limitations prior to the enactment of the recent legislative
28 amendment that allows Plaintiff to pursue this claim now, despite knowing that these pastors,

1 religious persons, teachers, school administrators, and other personnel would continue to molest
2 children, and continue to intentionally dissuade victims and their families from coming forward.

3 258. As a result of the above-described conduct, Plaintiff ROE 3 has suffered, and
4 will continue to suffer great pain of mind and body, shock, emotional distress, physical
5 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
6 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
7 will continue to be prevented from performing daily activities and obtaining the full enjoyment
8 of life; will sustain loss of earnings and earning capacity; and/or has incurred and will continue
9 to incur expenses for medical and psychological treatment, therapy, and counsel.

10 **DOE 1, DOE 2 and DOE 3**

11 259. DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's sexual abuse
12 of ROE 3 and ROE 7 was unlawful sexual molestation under California law, including California
13 Code of Civil Procedure Section 340.1.

14 260. At all relevant times DOE 1, Local Church, DOE 2, National Church, and DOE
15 3, District Church, through their agents, servants, and employees, knew or should have known
16 that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 were dangers to children, in that
17 they were likely to sexually abuse them.

18 261. It was reasonably foreseeable to Defendants, through their agents, servants, and
19 employees, that DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's sexual abuse
20 of children would likely result in injury to others, including the sexual abuse of ROE 3 and ROE
21 7, and other children by DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13.

22 262. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
23 through their agents, servants, and employees, knew or should have known that DOE 4, DOE 5,
24 DOE 8, DOE 11, DOE 12 and DOE 13 were sexually abusing children at DOE 1, Local Church,
25 including ROE 3 and ROE 7.

26 263. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
27 through their respective agents, servants, and employees, consciously and recklessly disregarded
28

1 their knowledge that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 would use their
2 positions with the Defendants to sexually abuse children, including Plaintiffs ROE 3 and ROE 7.

3 264. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
4 through their respective agents, servants, and employees, acted in concert with each other and/or
5 with DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 to conceal the danger that DOE 4,
6 DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 posed to children, including ROE 3 and ROE 7,
7 so that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 could continue serving the church
8 despite their knowledge of that danger.

9 265. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
10 through their respective agents, servants, and employees, acted in concert with each other and/or
11 with DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 to enable DOE 4, DOE 5, DOE 8,
12 DOE 11, DOE 12 and DOE 13 to sexually abuse children, including Plaintiffs ROE 3 and ROE
13 7.

14 266. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
15 through their respective agents, servants, and employees, knew that their negligent, reckless, and
16 outrageous conduct would inflict severe emotional and psychological distress, as well as
17 personal mental and physical injury on others, including Plaintiffs ROE 3 and ROE 7.

18 267. DOE 1, Local Church, DOE 2, National Church, and DOE 3, District Church,
19 through their respective agents, servants, and employees, concealed the sexual abuse of children
20 by pastors, teachers, school administrators, volunteers, and others, in order to conceal their own
21 bad acts in failing to protect children from being abused, to protect their reputations, and to
22 prevent victims of such sexual abuse from coming forward during the extremely limited statute
23 of limitations prior to the enactment of the recent legislative amendment that allows Plaintiffs to
24 pursue their claims now, despite knowing that those pastors, other religious persons, teachers,
25 school administrators, and other persons would continue to molest children.

26 268. As a result of the above-described conduct, Plaintiffs ROE 3 and ROE 7 has
27 suffered, and will continue to suffer great pain of mind and body, shock, emotional distress,
28 physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,

1 humiliation, and loss of enjoyment of life; has suffered and continues to suffer spiritually; was
2 prevented and will continue to be prevented from performing Plaintiff's daily activities and
3 obtaining the full enjoyment of life; will sustain loss of earnings and earning capacity; and/or has
4 incurred and will continue to incur expenses for medical and psychological treatment, therapy,
5 and counseling.

6 **FIRST CAUSE OF ACTION**

7 **(Negligence)**

8 **AGAINST ALL DEFENDANTS**

9 269. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

10 270. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
11 Church, DOE 4, individually, DOE 5, individually, DOE 8, individually, DOE 11, individually,
12 DOE 12, individually, DOE 13, individually and DOES 14 through 100, had a duty to protect the
13 minor Plaintiffs while they were entrusted to their care by Plaintiffs' parents. Plaintiffs' care,
14 welfare, and/or physical custody were temporarily entrusted to Defendants. Defendants
15 voluntarily accepted the entrusted care of Plaintiffs. As such, Defendants owed Plaintiff, a minor
16 child, a special duty of care, in addition to a duty of ordinary care, and owed Plaintiffs the higher
17 duty of care that adults dealing with children owe to protect them from harm.

18 271. All Defendants had a duty to control DOE 4, DOE 5, DOE 8, DOE 11, DOE 12
19 and DOE 13 and to prevent them from sexually assaulting and molesting children. Defendants
20 were aware, prior to the conclusion of the sexual abuse of Plaintiffs listed herein, of DOE 4's,
21 DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's dangerous and exploitive propensities.
22 Defendants were also aware that they had the ability to place restrictions on DOE 4's, DOE 5's,
23 DOE 8's, DOE 11's, DOE 12's and DOE 13's access to children, give warnings to the
24 congregation, and otherwise control DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and
25 DOE 13's conduct. Defendants therefore assumed a duty to prevent DOE 4, DOE 5, DOE 8,
26 DOE 11, DOE 12 and DOE 13 from sexually assaulting and molesting children. Defendants also
27 had a duty to report known or suspected child abuse or neglect by DOE 4, DOE 5, DOE 8, DOE
28 11, DOE 12 and DOE 13 to law enforcement.

1 272. Defendants had a special duty to investigate and not employ DOE 4 in his
2 position as a teacher at Academy, church elder, camp counselor and associate pastor at DOE 1,
3 Local Church; or DOE 5 as a music director, photography director, choir director, and your choir
4 tour chaperone of DOE 1, Local Church; or DOE 8 as an employee, Sunday school bus driver
5 and Sunday school teacher at DOE 1, Local Church; or DOE 11 as a camp counselor and
6 chaperone at DOE 1, Local Church; or DOE 12 as a Sunday school teacher at DOE 1, Local
7 Church; or DOE 13 as an agent of DOE 1, Local Church. Defendants knew that DOE 4, DOE 5,
8 DOE 8, DOE 11, DOE 12, and DOE 13 were likely to harm others in light of the work entrusted
9 to them.

10 273. Defendants, by and through their agents, servants and employees, knew or
11 reasonably should have known of DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE
12 13's dangerous and exploitive propensities and/or that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12
13 and DOE 13 were unfit agents. It was foreseeable that if Defendants did not adequately exercise
14 or provide the duty of care owed to children in their care, including but not limited to Plaintiffs,
15 the children entrusted to Defendants' care would be vulnerable to sexual abuse by DOE 4, DOE
16 5, DOE 8, DOE 11, DOE 12 and DOE 13.

17 274. Defendants breached their duty of care to the minor Plaintiffs by allowing,
18 enabling and permitting DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 to have access
19 to Plaintiffs; by failing to investigate or otherwise confirm or deny such facts about DOE 4, DOE
20 5, DOE 8, DOE 11, DOE 12 and DOE 13; by failing to tell or concealing from Plaintiffs,
21 Plaintiffs' parents, guardians, or law enforcement officials that DOE 4, DOE 5, DOE 8, DOE 11,
22 DOE 12 and DOE 13 were or may have been sexually abusing Plaintiffs; by failing to tell or
23 concealing from Plaintiffs' parents, guardians, or law enforcement officials that Plaintiffs were
24 or may have been sexually abused after Defendants knew or had reason to know that DOE 4,
25 DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 may have sexually abused Plaintiffs, thereby
26 creating the circumstance where Plaintiffs were less likely to receive medical/mental health care
27 and treatment, thus exacerbating the harm done to Plaintiffs; by holding out DOE 4, DOE 5,
28 DOE 8, DOE 11, DOE 12 and DOE 13 to the Plaintiffs and their parents or guardians as being in

1 good standing and trustworthy; and/or by failing to report known child abuse of Plaintiffs by
2 DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 to law enforcement. Defendants cloaked
3 within the facade of normalcy Defendants' and/or DOE 4's, DOE 5's, DOE 8's, DOE 11' s, DOE
4 12's and DOE 13's contact and/or actions with Plaintiffs and/or with other minors who were
5 victims of DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13, and/or disguised the nature of
6 the sexual abuse and contact.

7 275. As a result of the above-described conduct, Plaintiffs have suffered, and
8 continue to suffer great pain of mind and body, shock, emotional distress, physical
9 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
10 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
11 will continue to be prevented from performing Plaintiffs daily activities and obtaining the full
12 enjoyment of life; will sustain loss of earnings and earning capacity; and/or has incurred and will
13 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

14 **SECOND CAUSE OF ACTION**

15 **(Claim for Childhood Sexual Assault Pursuant to C.C.P. § 340.1)**

16 **AGAINST ALL DEFENDANTS**

17 276. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

18 277. Between approximately 1986 and 1991, DOE 8 engaged in grooming and
19 unpermitted, harmful, and offensive sexual conduct and contact upon the person of Plaintiff ROE
20 3.

21 278. Between approximately 1987 and 1998, when DOE 4, DOE 5, DOE 8, DOE 11,
22 DOE 12 and DOE 13 engaged in grooming and unpermitted, harmful, and offensive sexual
23 conduct and contact upon the person of Plaintiff ROE 7.

24 279. Said conduct was undertaken while DOE 4, DOE 5, DOE 8, DOE 11, DOE 12
25 and DOE 13 were agents, managing agents, employees, and/or servants of the Defendants, DOE
26 1, Local Church, DOE 2, National Church, DOE 3, District Church, and DOES 14 through 100,
27 and while DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 were acting in the course and
28 scope of their employment, agency, and/or service with the Defendants.

1 280. Said conduct of DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 were
2 known to and ratified by the Defendants.

3 281. Each Defendant had a duty to take reasonable steps to protect Plaintiffs, ROE 3
4 and ROE 7, minor females, from foreseeable harm when she was in their care, custody, and
5 control.

6 282. During the time that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13
7 were working for and serving the Defendants, each Defendant had a duty to use reasonable care
8 to prevent DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 from using the tasks,
9 premises, and instrumentalities of their positions with Defendants to target, groom, and sexually
10 abuse children, including Plaintiffs, ROE 3 and ROE 7.

11 283. Each Defendant breached the foregoing duties by failing to use reasonable care
12 to protect Plaintiffs ROE 3 and ROE 7 from DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE
13 13, and allowed DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 to groom and to
14 sexually assault the minor females.

15 284. As a direct and proximate result of the above-described conduct Plaintiffs ROE
16 3 and ROE 7 suffered and will continue to suffer, great pain of mind and body, shock, emotional
17 distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem,
18 disgrace, humiliation, and loss of enjoyment of life, and Plaintiffs were prevented from
19 performing daily activities and obtaining the full enjoyment of life.

20 285. Between approximately 1985 and 1991, DOE 8 engage in unpermitted, harmful,
21 and offensive sexual conduct and contact upon the person of Plaintiff ROE 3, Defendants DOE
22 1, Local Church, DOE 2, National Church, DOE 3, District Church, and DOES 14 through 100,
23 ratified or approved of that sexual contact.

24 286. Between approximately 1987 and 1998, DOE 4, DOE 5, DOE 8, DOE 11, DOE
25 12 and DOE 13 engaged in grooming and unpermitted, harmful, and offensive sexual conduct
26 and contact upon the person of Plaintiff ROE 7, Defendants DOE 1, Local Church, DOE 2,
27 National Church, DOE 3, District Church, and DOES 14 through 100, ratified or approved of
28 that sexual contact.

1 287. Defendant DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 were aided
2 in committing the harmful and offensive touching of Plaintiffs by their status as agents of
3 Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, and
4 DOES 14 through 100.

5 288. Without DOE 4's position as a teacher at Academy, church elder, camp
6 counselor and associate pastor at DOE 1, Local Church, DOE 4 could not have accomplished the
7 childhood sexual assault of ROE 7. Without DOE 5's position as employee, music director,
8 photography director, choir director and youth choir tour chaperone of DOE 1, Local Church,
9 DOE 5 could not have accomplished the childhood sexual assault of ROE 7. Without DOE 8's
10 position as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, DOE 8
11 could not have accomplished the childhood sexual assault of ROE 3 and ROE 7. Without DOE
12 8's position Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, DOE
13 8 could not have accomplished the childhood sexual assault of ROE 7. Without DOE 11's
14 position as a camp counselor at Defendant DOE 1, Local Church, DOE 11 could not have
15 accomplished the childhood sexual assault of ROE 7. Without DOE 12's position as a Sunday
16 school teacher at Defendant DOE 1, Local Church, DOE 12 could not have accomplished the
17 childhood sexual assault of ROE 7. Without DOE 13's positions as an agent at Defendant DOE
18 1, Local Church, DOE 13 could not have accomplished the childhood sexual assault of ROE 7.

19 289. As a result of the above-described conduct, Plaintiffs have suffered, and
20 continues to suffer great pain of mind and body, shock, emotional distress, physical
21 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
22 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
23 will continue to be prevented from performing Plaintiffs daily activities and obtaining the full
24 enjoyment of life; will sustain loss of earnings and earning capacity; and/or has incurred and will
25 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

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THIRD CAUSE OF ACTION

(Negligent Supervision/Failure to Warn)

AGAINST DOE 1, DOE 2, DOE 3 and DOES 14 through 100

290. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

291. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, and DOES 14 through 100, had a duty to provide reasonable supervision of DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13; to use reasonable care in investigating Defendants DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13; and to provide adequate warning to Plaintiffs, Plaintiffs' parents and other minor congregants of DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's dangerous propensities and unfitness.

292. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, and DOES 14 through 100, by and through their agents, servants and employees, knew or reasonably should have known of DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's dangerous and exploitive propensities and/or that DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 were unfit agents. Despite such knowledge, Defendants negligently failed to supervise DOE 5 in his position of trust and authority as employee, music director, photography director, choir director and youth choir tour chaperone of DOE 1, Local Church, where he was able to commit the wrongful acts against Plaintiff ROE 7. Despite such knowledge, Defendants negligently failed to supervise DOE 8 in his position of trust and authority as Sunday school bus driver and Sunday school teacher at DOE 1, Local Church, where he was able to commit the wrongful acts against Plaintiffs ROE 3 and ROE 7. Despite such knowledge, Defendants negligently failed to supervise DOE 4 in his position as a teacher at Academy, church elder, camp counselor and associate pastor at DOE 1, Local Church, where he was able to commit the wrongful acts against Plaintiff ROE 7. Despite such knowledge, Defendants negligently failed to supervise DOE 11 in his position of trust and authority as a camp counselor and coordinator of children's activities at DOE 1, Local Church, where he was able to commit the wrongful acts against Plaintiff ROE 7. Despite such knowledge, Defendants negligently failed to supervise DOE 12 in her position of trust and authority as Sunday school

1 teacher at DOE 1, Local Church, where he was able to commit the wrongful acts against Plaintiff
2 ROE 7. Despite such knowledge, Defendants negligently failed to supervise DOE 13 in his
3 position of trust and authority as an agent of Defendant DOE 1, Local Church, where he was able
4 to commit the wrongful acts against Plaintiff ROE 7.

5 DOE 5 in his position as employee, music director, photography director, choir director
6 and youth choir tour chaperone of DOE 1, Local Church, where he was able to commit the acts
7 of childhood sexual assault on Plaintiff, ROE 7. DOE 8 in his position as Sunday school bus
8 driver and Sunday school teacher at DOE 1, Local Church, where he was able to commit the acts
9 of childhood sexual assault on Plaintiffs, ROE 3 and ROE 7. DOE 11 in his position as a camp
10 counselor and coordinator of children’s activities at DOE 1, Local Church, where he was able to
11 commit the acts of childhood sexual assault on Plaintiff, ROE 7. DOE 4 in his position as a
12 teacher at Academy, church elder, camp counselor and associate pastor at DOE 1, Local Church,
13 where he was able to commit the acts of childhood sexual assault on Plaintiff, ROE 7. DOE 12 in
14 her position as a Sunday school teacher at DOE 1, Local Church, where he was able to commit
15 the wrongful acts against Plaintiff, ROE 7. DOE 13’s positions as an agent of Defendant DOE 1,
16 Local Church, DOE 13 could not have accomplished the childhood sexual assault of ROE 7.

17 293. Defendants failed to provide reasonable supervision of DOE 4, DOE 5, DOE 8,
18 DOE 11, DOE 12 and DOE 13, failed to use reasonable care in investigating DOE 4, DOE 5,
19 DOE 8, DOE 11, DOE 12 and DOE 13, and failed to provide adequate warning to Plaintiffs and
20 Plaintiffs’ families of DOE 4’s, DOE 5’s, DOE 8’s, DOE 11’s, DOE 12’s and DOE 13’s
21 dangerous propensities and unfitness. Defendants further failed to take reasonable measures to
22 prevent future sexual abuse.

23 294. As a result of the above-described conduct, Plaintiffs have suffered, and
24 continues to suffer great pain of mind and body, shock, emotional distress, physical
25 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
26 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
27 will continue to be prevented from performing Plaintiffs daily activities and obtaining the full
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1 enjoyment of life; will sustain loss of earnings and earning capacity; and/or has incurred and will
2 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

3 **FOURTH CAUSE OF ACTION**

4 **(Negligent Hiring/Retention)**

5 **AGAINST DOE 1, DOE 2, DOE 3 and DOES 14 through 100**

6 295. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

7 296. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
8 Church, and DOES 14 through 100, had a duty to not hire and/or retain Defendants DOE 4, DOE
9 5, DOE 8, DOE 11, DOE 12 and DOE 13, and other employees, agents, volunteers, and other
10 representatives, given Defendants DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE
11 13's dangerous and exploitive propensities.

12 297. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
13 Church, and DOES 14 through 100, by and through their agents, servants and employees, knew
14 or reasonably should have known of DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and
15 DOE 13's dangerous and exploitive propensities and/or that DOE 4, DOE 5, DOE 8, DOE 11,
16 DOE 12 and DOE 13 were unfit agents.

17 Despite such knowledge, Defendants negligently hired and/or retained: DOE 4 in his
18 position of trust and authority as a teacher at Academy, church elder, camp counselor and
19 associate pastor at DOE 1, Local Church, where he was able to commit the acts of childhood
20 sexual assault on Plaintiff, ROE 7; DOE 5 in his position of trust and authority as employee,
21 music director, photography director, choir director and youth choir tour chaperone of DOE 1,
22 Local Church, where he was able to commit the acts of childhood sexual assault on Plaintiff,
23 ROE 7; DOE 8 in his position of trust and authority as Sunday school bus driver and Sunday
24 school teacher at DOE 1, Local Church, where he was able to commit the acts of childhood
25 sexual assault on Plaintiffs, ROE 3 and ROE 7; DOE 11 in his position of trust and authority as a
26 camp counselor at DOE 1, Local Church, where he was able to commit the acts of childhood
27 sexual assault on Plaintiff, ROE 7; DOE 12 in her position as a Sunday school teacher at DOE 1,
28 Local Church, where he was able to commit the acts of childhood sexual assault on Plaintiff,

1 ROE 7; DOE 13 in his position positions as an agent of Defendant DOE 1, Local Church, where
2 he was able to commit the acts of childhood sexual assault on Plaintiff, ROE 7. Defendants failed
3 to use reasonable care in investigating DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13
4 and failed to provide adequate warning to Plaintiffs and Plaintiffs' parents of DOE 4's, DOE 5's,
5 DOE 8's, DOE 11's, DOE 12's and DOE 13's dangerous propensities and unfitness. Defendants
6 further failed to take reasonable measures to prevent future sexual abuse.

7 298. As a result of the above-described conduct, Plaintiffs have suffered, and
8 continues to suffer great pain of mind and body, shock, emotional distress, physical
9 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
10 and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and
11 will continue to be prevented from performing Plaintiffs daily activities and obtaining the full
12 enjoyment of life; will sustain loss of earnings and earning capacity; and/or has incurred and will
13 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

14 **FIFTH CAUSE OF ACTION**

15 **(Intentional Infliction of Emotional Distress)**

16 **AGAINST ALL DEFENDANTS**

17 299. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

18 300. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
19 Church, and DOES 14 through 100, conduct was extreme and outrageous and was intentional or
20 done recklessly.

21 301. Defendants DOE 4's, DOE 5's, DOE 8's, DOE 11's, DOE 12's and DOE 13's
22 conduct in sexually assaulting Plaintiffs was extreme and outrageous and was intentional.

23 302. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
24 Church, and DOES 14 through 100, ratified or approved of the extreme and outrageous conduct
25 of Defendants DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13.

26 303. As a result of Defendants' conduct, Plaintiffs experienced and continues to
27 experience severe emotional distress resulting in mental and bodily harm.

28 //

1 304. As a result of the above-described conduct, Plaintiffs have suffered, and
2 continues to suffer physical injury, shock, emotional distress, physical manifestations of
3 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
4 enjoyment of life; has suffered and continues to suffer spiritually; was prevented and will
5 continue to be prevented from performing Plaintiffs daily activities and obtaining the full
6 enjoyment of life; will sustain loss of earnings and earning capacity; and/or has incurred and will
7 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

8 **SIXTH CAUSE OF ACTION**

9 **(Breach Of Statutory Duty – California Civil Code § 51.7)**

10 **AGAINST ALL DEFENDANTS**

11 305. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

12 306. Pursuant to California Civil Code § 51.7(a), Plaintiffs have the right to be free
13 from any violence, or intimidation by threat of violence, committed against their person on
14 account of his gender. DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13 had a statutory
15 duty to not perpetrate violence or the threat of violence upon Plaintiffs. Defendants repeatedly
16 breached that duty as alleged in the facts above.

17 307. Defendants, DOE 1, Local Church, DOE 2, National Church, DOE 3, District
18 Church, and DOES 14 through 100, ratified or approved of the violence against them committed
19 by Defendants DOE 4, DOE 5, DOE 8, DOE 11, DOE 12 and DOE 13.

20 308. At all material times, Plaintiffs were a person within the jurisdiction of this
21 State and, at all material times, Defendants were required to comply with the laws of this State,
22 including, but not limited to, California Civil Code § 51.7.

23 309. As a result of the above-described conduct, Plaintiffs suffered, and continues to
24 suffer physical injury, shock, emotional distress, physical manifestations of emotional distress,
25 embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has
26 suffered and continues to suffer spiritually; was prevented and will continue to be prevented
27 from performing Plaintiffs daily activities and obtaining the full enjoyment of life; will sustain
28


1 loss of earnings and earning capacity; and/or has incurred and will continue to incur expenses for
2 medical and psychological treatment, therapy and counseling.

3 **WHEREFORE**, Plaintiffs pray for a jury trial and for judgment against Defendants,
4 DOE 1, Local Church, DOE 2, National Church, DOE 3, District Church, DOE 4, DOE 5, DOE
5 8, DOE 11, DOE 12 and DOE 13 and DOES 14 through 100, and each of them, as follows:

- 6 1. General damages in an amount to be shown according to proof at the time of
7 trial;
- 8 2. Special damages including medical and psychological care expenses in an
9 amount to be shown according to proof at the time of trial;
- 10 3. Treble damages, pursuant to CCP § 340.1(b);
- 11 4. Costs of suit incurred herein;
- 12 5. For punitive damages;
- 13 6. For prejudgment and post-judgment interest as may be allowed; and
- 14 7. Such other and further relief as this Court deems just and proper.

15 DATED: December 16, 2022

16 DIAS HALL INC.
17 A Professional Corporation

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19 _____
20 STEVEN S. DIAS,
21 Attorney for Plaintiffs,
22 JANE ROE 3 and ROE 7
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