

Assigned for all purposes to: Spring Street Courthouse, Judicial Officer: Kristin Escalante

1 IRWIN M. ZALKIN, ESQ. (#89957)
DEVIN M. STOREY, ESQ. (#234271)
2 DANIEL L. VARON. (#245318)
The Zalkin Law Firm, P.C.
3 10590 W. Ocean Air Drive, Suite 125
San Diego, CA 92130
4 Tel: 858-259-3011
Fax: 858-259-3015
5 Email: Irwin@zalkin.com
dms@zalkin.com
6 Daniel@zalkin.com

7 LYNDSLEY A. GALLAGHER, ESQ. (#284293)
Gallagher Law Group
8 30721 Russell Ranch Road, Suite 140
Westlake Village, CA 91362
9 Tel: 805-637-6882
10 Email: lyndseygallagher@lgallagherlaw.com

11 Attorneys for Plaintiffs

12
13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES**

15 Kristina Pfeifer, Individually, Shalom
16 Caples, Individually,

17 Plaintiffs,

18 v.
19

20 Defendant Doe 1, Supervisory Company, a
21 California Corporation; Doe 2, Family
22 Ministry Corporation (formerly Anaheim
23 Local Church); Doe 3, Local Church; Doe
24 4, Religious School; Doe 5, Religious
25 Leader; Doe 6, Perpetrator 1; Doe 7,
26 Perpetrator 2; Doe 8, Publishing Corp.;
27 Doe 9, Church Compound, and Does 10
28 through 100, inclusive,

Defendants.

) **Case No: 20STCV27587**

) **COMPLAINT FOR DAMAGES:**

-) **1. NEGLIGENCE;**
) **2. NEGLIGENT HIRING /**
) **RETENTION/SUPERVISION;**
) **3. NEGLIGENT FAILURE TO**
) **WARN, TRAIN OR EDUCATE;**
) **4. NEGLIGENCE PER SE;**
) **5. SEXUAL BATTERY;**
) **6. SEXUAL HARASSMENT**

) **[Demand for Jury Trial]**

1 Kalona, Iowa 52247. Defendant Supervisory Company conducts business in the
2 Counties of Los Angeles, Orange, and San Diego, State of California, and
3 Washington County, State of Iowa.

4 7. Supervisory Company was established by John Stevens in the late 1970's and
5 memorialized its association with all Fellowship churches in May of 1992. Since that
6 time, Supervisory Company has exercised spiritual and temporal authority over
7 churches in "The Fellowship." Supervisory Company exercised iron-fisted control
8 over many aspects of the operation of Fellowship churches, including, but not limited
9 to:

- 10
- 11 A. Oversight of all church publications of audio recordings, literature and videos;
 - 12 B. Oversight of the general administration of parochial schools within the
13 Fellowship and its related churches;
 - 14 C. Oversight of the spiritual ministry to the youth and children of the Fellowship and
15 its related churches;
 - 16 D. Oversight of church business administration, including supervision of corporate
17 housekeeping and records, financial accounting practices and the Fellowship's
18 compliance with applicable laws;
 - 19 E. Oversight of all property owned by any of the Fellowship Churches including the
20 proper management and stewardship of those properties;
 - 21 F. Oversight of the construction, modification or maintenance of facilities of the
22 Fellowship and its member churches;
 - 23 G. Oversight of funds contributed to by the Fellowship;
 - 24 H. Oversight and supervision of the Fellowship's trust and its trustees;
- 25
26
27
28

- 1 I. Monitoring and requiring each of the Fellowship’s churches to comply with their
2 articles of incorporation and bylaws;
3 J. Selection of directors for each church of the Fellowship;
4 K. Review and/or approval of all actions of the directors of each Fellowship church,
5 including selection of its officers; and
6 L. Selection of an advisory council for each Fellowship church.
7

- 8 8. Defendant Doe 2, Family Ministry Corporation (“Family Ministry Corp.”), is
9 registered California Corporation with its principal place of business in the city of
10 North Hills, County of Los Angeles, State of California. Family Ministry Corp.
11 “provides an overseeing Apostolic Ministry function to churches and individuals that
12 choose to voluntarily submit themselves” to the Fellowship. Family Ministry Corp.
13 “has agreed to provide spiritual and temporal direction and input to churches and
14 individuals when desired and requested by the church and individuals.”
15 9. Family Ministry Corp. provides corporate housing for the operations of the Apostolic
16 Fathering Ministry. Through the Apostolic Fathering Ministry, an unincorporated,
17 overlapping subdivision of the Supervising Company, Family Ministry Corp. asserts
18 spiritual and temporal oversight of actions by the directors and officers of
19 Supervisory Company and the Fellowship churches.
20 10. Family Ministry Corp. has the right to receive periodic financial and accounting
21 reports, including but not limited to monthly and quarterly reports; an annual written
22 report detailing Supervisory Company’s activities during the previous year; and other
23 periodic written reports in such form and at such times as required by Family
24 Ministry Corp.
25 11. Family Ministry Corp. maintains the right to be advised immediately of any crucial
26 decision that significantly affects the spiritual or temporal life of Supervisory
27 Company or any Fellowship church.
28

- 1 12. Family Ministry Corp. maintains the right to inspect and copy all books, records, and
2 documents of any kind, and to inspect the physical properties of Supervisory
3 Company or any Fellowship church.
- 4 13. Family Ministry Corp. may take any action that it deems appropriate pursuant to
5 Supervisory Company's bylaws.
- 6 14. Several other major actions, such as selecting or approving a director or officer of
7 Supervisory Company; adding or removing any Fellowship church; or incurring
8 indebtedness, among others, also require approval by Family Ministry Corp.
- 9 15. Prior to its name change in 1993, Family Ministry Corp. was known as Church of His
10 Holy Presence. Defendant Doe 6 Perpetrator 1 was the corporate President of Church
11 of His Holy Presence until 1992.
- 12 16. Defendant Doe 3, Local Church, formed in 1968, is a registered California
13 Corporation located in the City of North Hills, County of Los Angeles, California. In
14 addition to operating a church in North Hills, California, Local Church operates a
15 school in North Hills, California, referred to in this Complaint as Defendant Doe 4
16 Religious School.
- 17 17. Defendant Doe 4, Religious School is a registered corporation doing business in
18 California with its principal place of business in the city of North Hills, County of
19 Los Angeles, State of California under Defendant Doe 3, Local Church. Religious
20 School operates a Toddler, Preschool, and Pre-Kindergarten through Grade 12.
- 21 18. Defendant Doe 5, Religious Leader during all times relevant served as Senior Pastor
22 of the Fellowship, and herein is being sued in his personal capacity as well as a
23 member of Supervisory Company, the Apostolic Fathering Ministry, and the Family
24 Ministry Corp.
- 25 19. Defendant Doe 5, known for his flashy jewels, vehicles, and clothing regularly
26 demanded housekeeping, food, and other daily necessities from organizational
27 members, and often their children.
- 28

1 20. Defendant Doe 6, Perpetrator 1, during all times relevant, was a member high ranking
2 member of, and/or under the supervision of, Supervisory Company, and an influential
3 leader of the Fellowship. Defendant Doe 6, Perpetrator 1, was also under the
4 direction, supervision and control of Local Church, Religious School, and Publishing
5 Corp. at the times of the sexual molestation alleged herein. Defendant Doe 6
6 Perpetrator 1 molested both Plaintiffs when Plaintiffs were under the age of 18 and is
7 being sued in his personal capacity and as a member of the Supervisory Company and
8 Apostolic Fathering Ministry.

9 21. Defendant Doe 7, Perpetrator 2, during all times relevant was a member of
10 Supervisory Company and an influential leader of the Fellowship. Perpetrator 2 was
11 also under the direction, supervision and control of Local Church, Religious School,
12 and Publishing Corp. at the times of the sexual molestation alleged herein. Perpetrator
13 2 molested Kristina when Kristina was under the age of 18 and is being sued in his
14 personal capacity and as a member of the Supervisory Company and Apostolic
15 Fathering Ministry.

16 22. Defendant Doe 8, Publishing Corp. (“the Publishing Corp” or “the Recording
17 Studio”), was formed in 1963 and is a registered California Corporation located in the
18 city of North Hollywood, county of Los Angeles, California having its principal place
19 of business at 7321 Atoll Avenue, North Hollywood, CA 91605.

20 23. Defendant Doe 8, Publishing Corp. operates a large publishing building whose
21 purpose is to disseminate the messages of Stevens and Defendant Doe 5 to the world.
22 Perpetrator 1 is and was under the direction, supervision, and control, and was acting
23 within the course and scope of employment of the Publishing Corp. at the time of the
24 sexual molestation, harassment and abuse alleged herein.

25 24. Defendant Doe 9, Church Compound, officially formed in 1983, is a registered Iowa
26 nonprofit corporation located in Kalona, Washington county, Iowa having its
27 principal place of business at 100 Shiloh Drive, Kalona, Iowa 52247.
28

- 1 25. Defendant Doe 9, Church Compound is an expansive 240-acre compound that
2 includes a main lodge building (90,000 square feet), commercial kitchen, dining hall,
3 water tower, saw-mill, farming operation, an outdoor amphitheater, recreational
4 lakes, a cemetery, residence halls, and a maintenance building. The Church
5 Compound was constructed by volunteer manual labor including child labor in the
6 1970's. The lodge, remodeled in 1997, houses a sanctuary, library, café, "hospitality
7 rooms", dormitories, resident apartments, and administrative offices.
- 8 26. Defendant Doe 9, Church Compound hosted summer programs for children which
9 provided the Fellowship to avail itself of around-the-clock indoctrination
10 opportunities consisting mostly of intensive religious services where the Fellowship
11 leaders would preach multiple times per day on the teachings of the Fellowship.
12 Outside of these services, attendees were assigned a variety of work to be performed
13 on the Compound.
- 14 27. Defendant Does 10 through 100, inclusive, are individuals and/or business or
15 corporate entities incorporated in and/or doing business in California whose true
16 names and capacities are unknown to Plaintiffs, who therefore sue such Defendants
17 by such fictitious names, and who will amend the Complaint to show the true names
18 and capacities of each such Doe Defendant when ascertained. Each named
19 Defendant Doe is legally responsible in some manner for the events, happenings,
20 and/or tortious and unlawful conduct that caused the injuries and damages alleged in
21 this Complaint. Each Defendant is the agent, servant, and/or employee of other
22 Defendants, and each Defendant was acting within the course and scope of his, her or
23 its authority as an agent, servant, and/or employee of the other Defendants. The
24 Defendants, and each of them, are individuals, corporations, partnerships, and other
25 entities which engaged in, joined in and conspired with the other wrongdoers in
26 carrying out the tortious and unlawful activities described in this Complaint, and the
27 Defendants, and each of them, ratified the acts of the other Defendants as described in
28

1 this Complaint.

2 **BACKGROUND FACTS APPLICABLE TO ALL CAUSES OF ACTION**

3 28. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set
4 forth herein.

5 29. The first individual church of the Fellowship was founded in June of 1951 by John
6 Robert Stevens after he was terminated as a Pastor of the Assemblies of God Church
7 for preaching views that departed from Assemblies of God doctrine. In 1953,
8 Stevens founded another church in Honolulu, Hawaii. Through the 1960s and 1970s,
9 Stevens continued to expand this network of churches.

10 30. In the 1960s, Stevens began a ministry school. In 1965, he established a currently
11 operational church in what is now North Hills, California. In 1968, Stevens founded
12 a publishing company now located in North Hollywood to make his sermons more
13 widely available. Through the late 1960s and 1970s the Fellowship saw an influx of
14 members and of established churches seeking to become affiliated with Stevens. This
15 collective became known as “The Walk” or “This Walk”, which recognizes the
16 biblical view that every Christian should have a personal walk with Jesus Christ, from
17 John 1:6-7. In 1974, construction began on the Fellowship’s Church Compound in
18 Kalona, Iowa. Under Steven’s leadership the collective Fellowship was comprised of
19 more than 100 local churches.

20 31. From its inception, the organization undertook to replace the biological family unit by
21 endorsing members to refer to its leaders as “Papa” and “Mama”. Founder Stevens
22 specifically instructed members to “break bonds” with their biological families who
23 were not affiliated with the organization or who questioned its teachings. Once ties
24 were severed, these familial relations were replaced internally. Even for members
25 inside the Fellowship, minor members experienced a wide-range of biological family
26 replacement. At the direction of church leaders, some minors as young as age 3 were
27 sent to live with another family or multiple families over the course of their
28

1 upbringing. Other minors were assigned to other non-familial adult members who
2 would function as spiritual parents throughout teenage years. In some cases, this
3 would extend beyond adolescence and into young adulthood. These spiritual parents
4 would, in effect, replace the influence and authority of biological parents.

5 32. Spiritual mothers and fathers, DR's, Shepherds, members of Defendant Doe 1,
6 Supervisory Company, and members of Defendant Doe 2, Family Ministry Corp., all
7 functioned as authority figures – often replacing the role of biological parents – in a
8 minor's life. Defendant Does 1, 2, 3, 4 and 8 were all closely intertwined. As such,
9 the leaders within the Fellowship often held multiple overlapping roles. For example,
10 Defendant Doe 7 Perpetrator 2 was a Shepherd at a Los Angeles local church, was
11 assigned as DR to multiple children at various times, and was a powerful member of
12 Defendant Doe Supervisory Company. These overlapping roles provided influential
13 members with institutional power over families within the Fellowship.

14 33. Stevens died on June 4, 1983. Following Steven's death, Marilyn married Defendant
15 Doe 5, Religious Leader. Marilyn and Defendant Doe 5 assumed control over the
16 Fellowship and its many operations until Marilyn's death in 2015. Defendant Doe 5
17 abruptly resigned in 2018 when Shalom publicly announced that sex abuse had been
18 occurring in the Fellowship for decades.

19 34. Under the reign of Defendant Doe 5 and Marilyn, the Fellowship maintained an
20 organizational and doctrinal hierarchy known as "upward flow" or "divine order."
21 This organizational structure formed a pyramid, placing John Robert Stevens, and
22 later his successors Defendant Doe 5 and Marilyn, at the apex. Directly below
23 Defendant Doe 5 and Marilyn came Defendant Doe 2, Family Ministry Corp and
24 Defendant Doe 1 Supervisory Company, comprised of a selected few of Defendant
25 Doe 5's most trusted colleagues and loyalists designated as directors and officers of
26 Defendant Supervisory Company. Beneath Defendant Supervisory Company and
27 Defendant Family Ministry Corp. are directors and officers of the Fellowship
28

1 churches governed by the hierarchy of “upward flow.”.

- 2 35. At all relevant times to the tortious conduct alleged herein, Defendant Doe 5 and
3 Marilyn, until her death, were active members of Defendant Supervisory Company,
4 Defendant Family Ministry Corp., and Apostolic Fathering Ministry.
- 5 36. “Upward flow” mandated that all information regarding the local churches, its leaders
6 and congregants, was provided to Defendant Doe 5, Marilyn and Supervisory
7 Company. This allowed Defendant Doe 5 and Marilyn to maintain control of the
8 organization and to ensure the loyalty of the congregants and leadership at each of the
9 member congregations. Fellowship authority figures would retaliate against those
10 who questioned Defendant Doe 5’s ultimate authority over the organization.
- 11 37. In consultation with Defendant Doe 5 and Marilyn, Defendant Supervisory Company
12 would select a “local shepherd” or “head pastor” and the members of the governing
13 bodies of all local churches. The “local shepherd” would serve as the head of a local
14 church’s governing body of leaders. In addition to selecting the local church
15 leadership, Defendant Supervisory Company, and Defendant Doe 5 and Marilyn and
16 the power to remove all members of local church leadership. This allowed Defendant
17 Doe 1 Supervisory Company and Defendant Doe 5 to exert maximum control over
18 each local church. This was an extension of the doctrine and control originally
19 established by Stevens.
- 20 38. Further, Defendants indoctrinated members with policies to ensure utter submission
21 and authority. Expectations of members as set forth by Church leadership were
22 known as “the Word.” All important decisions in a congregant’s life, including who
23 to date or socialize with, which local church to attend, or where to live, required oral
24 or written submission to leadership at the local church or Defendant Supervisory
25 Company for approval.
- 26 39. If congregants wanted to date, marry, move, or accept a new job, one method of
27 submission was submitting a “workflow” sheet to their local Shepherd who would
28

1 then pass it on to Supervisory Company. The “workflow” form would have lines for
2 congregants to enter their name, the date, which church they attended, their personal
3 shepherd, and their DR. These forms had boxes congregants must check to identify
4 with what type of request they were making. These boxes included “Dating,”
5 “Marriage,” “Moving,” or “Job.” These forms, once submitted, were considered
6 “secretive” and could only be reviewed by shepherds and Supervisory Company. No
7 congregants saw forms that had been submitted by others.

8 40. Each church’s “local shepherd” also represented the local church at meetings with
9 Defendant Doe 5, Marilyn, and Defendant Supervisory Company, that occurred
10 multiple times a year where various decisions were made, including but not limited to
11 opening, closing, and moving local churches, as well as appointing or removing
12 leadership at local churches.

13 41. Under Defendant Doe 5 and Marilyn, the Fellowship implemented a system called
14 “shepherding” at the local churches, where the “local shepherd” and the governing
15 body of leaders would choose “Elijahs”, “Elishahs” or “Designated Relationships”
16 (“DRs”) for congregants at a local church, including minor congregants. A DR was
17 an adult congregant assigned to serve in a parental or mentoring role for the minor.
18 Minor congregants were taught that their DR was “Christ in the flesh,” meaning they
19 were that minor’s utmost authority. The minor was often required to share everything
20 about their life with the DR and the minor’s parents would have to consult with the
21 DR regarding every decision made for the minor. In some cases, the minor would be
22 required to work for the DR, including housekeeping services for the DR at the DR’s
23 request.

24 42. Individual church members were assigned a “ministry” or numerous “ministries” by
25 authority figures within the church. Some “ministries” were assigned to children at
26 very early ages. They would be indoctrinated into their assigned ministry in various
27 ways, such as pairing them with adults who were assigned to the same “ministry,” by
28

1 assigning books to read as part of the indoctrination, work in a particular Fellowship
2 enterprise, and by regulating how they interact with other church members and
3 authority figures. There were various ministries, including, but not limited to, the
4 “Entertainment Ministry” and the “Love Ministry.”

- 5 43. The hierarchy for the Fellowship mandated that members treat Fellowship higher-ups
6 with total deference. Male leaders, for example, would routinely and openly ask for,
7 and receive, back and foot rubs from minor female members as young as 12-years old
8 at Fellowship parties. Any adult male who was an elite member with the Fellowship
9 hierarchy was entitled to demand a back or foot rub from a minor female, and she had
10 to oblige.

11 **THE SEXUAL ABUSE SCANDAL**

- 12 44. On October 24, 2018, Shalom published an open letter about abuse she suffered
13 within the Fellowship. In it, she detailed sexual grooming and molestation she
14 experienced as a minor teenager and young adult at the hands of one of the
15 Supervisory Company’s most prominent leaders. She detailed alcohol-influenced
16 parties in which adult men and minor girls associated. She was exposed to sexual
17 activity by the Church leader directed toward young adult teenagers. She also
18 explained the efforts she had made to bring the abuse to light and the actions of
19 several prominent church leaders in passively ignoring the abuse, or in some cases,
20 actively covering it up. She reflected that “I want the other girls and women and men
21 and children who have been abused to know they are not alone. I am not being brave,
22 I just believe that the truth will set me free and hopefully provide a way, a safe way,
23 for others to come forth with their truth and be set free.” The response was
24 overwhelming.

- 25 45. Shalom then published a Facebook post, which went viral within the Fellowship
26 community, sparking thousands of comments. Posters related their own stories of
27 abuse within the Fellowship, others laid bare the concerns that they had about
28

1 potential child abuse, and some former Fellowship leaders admitted to covering up
2 abuse.

- 3 46. In response to this firestorm of negative commentary bringing light to the severe
4 child molestation problem that has run rampant within the Fellowship, The
5 Fellowship issued a statement conceding that individuals at the highest level of the
6 Church had engaged in sexual abuse or had failed to take action in response to
7 complaints of sexual abuse, and that policies put in place by Defendant Supervisory
8 Company, Defendant Family Ministry Corp., Defendant Local Church, and other
9 Fellowship institutions, and the resulting procedures and culture had permitted sexual
10 abuse to occur. In part, the statement said:

11 “we recognize that any such occurrence without a strong and immediate response
12 could produce a systemic problem within our church culture, so leadership practices
13 must be addressed. . . . [¶] . . . As a result, we are heartbroken over this, and we
14 deeply apologize to anyone who has been hurt by a member of our pastoral team and
15 by leaders who knew you were hurt but did not properly respond to inappropriate
16 behavior. . . [¶] . . . We know that no apology can truly make up for such hurts, and
17 that’s why we are taking decisive action. We have already removed leaders who have
18 been involved in misconduct or did not call out or sufficiently address such issues . . .
19 [¶] . . . We are also engaging outside professional advisors to investigate how such
20 situations were allowed to occur and provide us with direction to change the culture
21 that permitted this, and to develop safeguards to prevent misconduct and abuse from
22 occurring ever again. . . [¶] . . . We believe that as damaging and hurtful as these
23 revelations have been to our fellowship, this has caused us to take a serious look at
24 our policies, procedures, and leadership culture.”

- 25 47. Indicative of the Fellowship’s broken culture of tolerating inappropriately predatory
26 conduct toward minor girls is an audio publication called “Girls Turn it Off.” The
27 production was played for girls growing up in the Fellowship and explained that if
28 they were looked at, touched or treated inappropriately by a man it was their fault
because they could not control their “spirit” and incited the man to act in that way.
48. The publication featured Marilyn making such statements as “Personally, as a
woman, I’m pretty anti-woman. A woman has a manipulative ability that is a
thousand activities that she does. And I think until you realize if you are a woman,

1 before the Lord if you're really honest, that you, um, you want to get rid of that. And
2 the only thing I can say is that you pull in and you just become nothing.”

3 49. Similarly, local shepherds would minister in response to allegations of impropriety by
4 leaders that men of God are often targeted by the devil, that the congregants are not to
5 speculate about what may have occurred. The concept of forgiveness was also
6 routinely touted from the pulpit in the place of appropriate accountability for
7 perpetrators of abuse or misconduct.

8 50. Rather than persevere through the negative publicity resulting from the culture he
9 allowed to ferment during his tenure heading the Fellowship, the representative of
10 Defendant Doe 5 issued an apology and resigned in response to the sexual abuse
11 scandal. In that apology, Doe 5 again recognized that the Fellowship's culture
12 fostered an environment where abuse could occur, noting “It has become more and
13 more apparent to me through our internal process of reviewing the allegations that
14 there are deep underlying flaws that have existed within the fellowship which
15 permitted an environment where such actions could occur without correction and
16 discipline. This has led to errors in our leaders' judgment and in the mistreatment of
17 individuals that are horrific and unacceptable in any setting, let alone in what should
18 be the most sacred one.”

19 51. Through a Memorandum of Understanding (“MOU”) circulated in the latter part of
20 2018, the Fellowship sought to minimize any legal liability resulting from the
21 Church's sexual abuse scandal. The MOU allowed identified member churches in
22 the United States to break from Defendant Supervisory Company and “determine its
23 legal, spiritual and temporal structure, and to function as an independent church,
24 separate from [Supervisory Company] and the [Family Ministry Corp.]” The MOU
25 explicitly stated that it “does not apply to any other Churches that are not specifically
26 listed [in the MOU] . . . , including but not limited to churches outside of the United
27 States who are also a part of” the Fellowship.

1 52. The MOU acknowledged that due to the integral role Defendant Supervisory
2 Company and Defendant Family Ministry Corp. historically played regarding the
3 identified member churches, there would be an anticipated period of disengagement
4 called the “Transition Period” that would take approximately a year, to be fully
5 accomplished by December 31, 2019, called the “Transition Date.” Further, some
6 identified member churches would need more work than others to become fully
7 independent from Defendant Supervisory Company and Defendant Family Ministry
8 Corp.

9 53. To accomplish this independence, the MOU instructed the identified member
10 churches to “individually adopt revised articles of incorporation and bylaws that do
11 not require any legal, spiritual, or temporal oversight from either [Supervisory
12 Company] or the [Family Ministry Corp.]...no later than the Transition Date.”

13 54. The MOU also instructed identified member churches that “as soon as this MOU is
14 executed by “both [Supervisory Company] and the [identified member church], the
15 said church will be allowed to make changes to its board of directors, to appoint new
16 officers, advisory councils, and the like.”

17 **CHILD LABOR**

18 55. Central to its operations, the Fellowship maintains a sprawling Compound in Kalona,
19 Iowa. The Compound covers over 200 acres and includes a main lodge building
20 (90,000 square feet), commercial kitchen, dining hall, farming operations, a water
21 tower, factory saw-mill, an outdoor amphitheater, recreational lakes, playing fields,
22 walking trails, a cemetery, and a maintenance building. This Camp was constructed
23 of volunteer manual labor including child labor. The lodge, remodeled in 1997,
24 houses a sanctuary, library, café, “hospitality rooms”, dormitories, resident
25 apartments, and administrative offices.

26 56. Each year, the Compound hosts the Young Adult Summer Program (“YASP”) and
27 the School of Prophets (“SOP”). “YASP” initially was named for Defendant Doe 7,
28

1 Perpetrator 2 and his wife, but was later referred to simply as “YASP.” SOP was
2 open to all members of the Fellowship while YASP was reserved as a youth camp for
3 young adults ages 12 – 18.

4 57. The families of the children were fiscally responsible for air fare and entrance fees -
5 paying hundreds of dollars to the Fellowship to attend.

6 58. The children attended religious services and worked around the clock while at the
7 Compound. Often attending multiple services per day (ranging from 1.5 – 3 hours
8 each service), minors spent the remainder of their days on a work detail around the
9 compound or tending to high-demand administrative tasks. Minors were subjected to
10 heavy, sunrise to sunset manual labor, at times in 90+ degree heat (including carting,
11 cinderblocks for construction projects, maintaining gravel and paving for main
12 roadways into and throughout the compound, scrubbing toilets, trimming rose bushes
13 and operating heavy machinery).

14 59. Sometimes by the time children were told to go to bed, they were too exhausted to
15 shower, and went to bed in non-air-conditioned dormitory rooms still soaked in their
16 own sweat.

17 60. Children experienced great pressure to attend. Attendance was a form of submission
18 as well as a demonstration of spiritual commitment and loyalty.

19 61. At times, a second session of YASP occurred at either the San Diego Fellowship
20 church or one of the Los Angeles Fellowship churches where, again, children were
21 required to attend and provide labor.

22 62. At the local level, Fellowship churches, including Defendant Local Church, hosted
23 mandatory workdays for children on weekends and every day during school breaks.
24 Children younger than 6 years of age were forced to work multiple hour days for the
25 Fellowship Churches, including Defendant Local Church.

26 63. When Stevens was alive, children, as well as church members, were also put to work
27 on Stevens’ investments, using them for free labor or, in the alternative, for menial
28

1 pay. For example, children would work on a soy-bean farm or in a silver mine.

2 Children were exposed to dangerous work conditions.

3 64. At various times, some children ages 7 to 8 would work approximately 30 hours per
4 week. Assigned tasks included cooking in the kitchen and providing cleaning and
5 janitorial services. Children would also work in any Fellowship Church Department
6 that needed unskilled labor. At times, children were required to work 40 hours a
7 week, including working late on school nights.

8 65. At various times, some children would provide labor rather than attend school.

9 **PLAINTIFF KRISTINA'S ALLEGATIONS**

10 66. Kristina was born into, and raised in, the Fellowship until approximately the age of
11 13 when her family left. From a very young age, Kristina and members of her family
12 were treated like royalty because Kristina and her family were extremely close to
13 John Robert Stevens and Marilyn.

14 67. When Kristina was approximately 4 years-old, she was previously sexually molested
15 by a neighbor unrelated to the Fellowship. That incident was reported to law
16 enforcement and the perpetrator was prosecuted. When the criminal proceedings
17 concluded, Stevens told Kristina's family to move from North Hills to Irvine but,
18 actively discouraged them from seeking professional treatment for Kristina as such
19 treatment was considered by the Fellowship to be "worldly" and "satanic."

20 68. When Kristina was approximately 8 years-old, Kristina's sister married Defendant
21 Doe 6, Perpetrator 1. Perpetrator 1's mother, Marilyn, married John Robert Stevens.
22 After John Robert Stevens passed in 1983, Marilyn married Defendant Doe 5,
23 Religious Leader.

24 69. When Kristina was approximately 8 years-old, residing in Irvine, Kristina began
25 taking a bus to North Hills in order to attend Defendant Doe 4, Religious School,
26 owned and operated by Defendant Doe 3, Local Church, in North Hills. Kristina
27 attended there from approximately 3rd grade to 4th grade and again in 6th and 7th grade
28

1 before leaving the Fellowship. There were approximately 5 students in Kristina's
2 Religious School class and approximately 50-60 students enrolled schoolwide.

3 70. At all relevant times Margo Walkoe was acting Principal of Defendant Doe 4
4 Religious School. Margo Walkoe and Kristina's teachers allowed Kristina to
5 frequently miss class in order to work in Defendant Doe 3 Local Church or Defendant
6 Doe 8 Publishing Corp. without question in the presence of Defendant Doe 6
7 Perpetrator 1.

8 71. Margo Walkoe, teachers and volunteers of Defendant Doe 4 Religious School
9 attended parties hosted by the Fellowship, Doe 3 Local Church and Defendant Doe 8
10 Publishing Corp. Minor girls, including Kristina, attended these parties and both
11 served and consumed alcohol in the presence of Defendant Doe 6 Perpetrator 1.

12 72. Kristina was first served alcohol to the point of intoxication at the age of 8 by John
13 Robert Stevens and Marilyn. While underage, Kristina was served and consumed
14 alcohol at Defendant Doe 8, Publishing Corp., John Robert Steven's house, and other
15 church-affiliated houses on numerous occasions in the presence of adults, members of
16 Defendant Doe 1, Supervisory Company and Defendant Doe 6, Perpetrator 1.

17 73. When Kristina was approximately 10 or 11, while swimming in John Robert Steven's
18 pool, Stevens held Kristina under water for a dangerous period of time—almost to the
19 point of drowning. Stevens was heavily intoxicated and Marilyn jumped in to save
20 her.

21 74. From the time Kristina was approximately 8 – 12 years-old, Kristina spent every
22 waking moment dedicated, alongside her family, to the quickly prospering
23 Fellowship under John Stevens. After attending Religious School during the day, on
24 weekends or other moments in between church services, Kristina would be found at
25 any number of places while the adults worked, including, Defendant Doe 3, Local
26 Church, Defendant Doe 8, Publishing Corp., Defendant Doe 6 Perpetrator 1's house,
27 John Steven's house, and the Swards' house (another powerful family in the
28

1 Fellowship). Kristina floated from home to home throughout her childhood with little
2 adult supervision because of the faith in the Fellowship demanded by its leaders.

3 75. Parallel to the Fellowship was an equally demanding – yet highly exclusive –
4 entertainment component of the Fellowship. This included recording music in the
5 Recording Studio and rehearsing and performing shows at a wide variety of venues
6 under the direction of Defendant Doe 6, Perpetrator 1.

7 76. Despite Kristina’s history of floating from home-to-home, at 12 years-old, Kristina
8 was sent officially to live with Mary Wyatt and Dan Lubers, a married couple in the
9 Fellowship, who were designated as her “Shepherds.”

10 77. Defendant Doe 3 Local Church and Defendant Doe 8 Publishing Corp. cultivated a
11 sexually inappropriate culture to develop; Local Church and Publishing Corp. hosted
12 parties at houses owned by Local Church, Defendant Doe 2 Family Ministry Corp.
13 and Defendant Doe 8 Publishing Corp. for men in the Fellowship. Often, the parties
14 featured heavy alcohol consumption. Minor girls acted as “waitresses” and served
15 alcohol to adults on trays. Alcohol was served and condoned by all in attendance,
16 including leadership.

17 78. Defendant Doe 3 Local Church and Defendant Doe 8 Publishing Corp. perpetuated a
18 sexualized environment when members of Leadership engaged in viewing
19 pornography in the presence of minors, viewing Playboy magazines, and commenting
20 on women’s bodies inappropriately. Defendant Doe 6 Perpetrator 1’s mother, Marilyn
21 (then Marilyn Stevens), Leader of Supervising Company at all relevant times, would
22 look at pornography and Playboy magazines in the presence of Kristina and other
23 minors.

24 79. When Kristina was approximately 11 years-old, living in Irvine, she was taken to Dr.
25 Barton, member of Defendant Doe 1 Supervisory Company, in Bakersfield to receive
26 hypnotic treatments for the purpose of erasing her memory. Dr. Barton frequently
27 treated members of the Fellowship in a variety of capacities including the practice of
28

1 hypnosis. Dr. Barton was also John Robert Stevens' personal physician at the time of
2 his death in 1983.

3 **FIRST SERIES OF SEXUAL ASSAULTS OF PLAINTIFF KRISTINA**

4 80. From about age 8 to 10, Kristina was repeatedly molested and harassed by Defendant
5 Doe 6 Perpetrator 1 and Defendant Doe 7 Perpetrator 2.

6 81. When Kristina was 8, 9 and 10 years-old, Defendant Doe 6 Perpetrator 1 would
7 routinely perform "titty twisters" on Kristina by pinching her nipples and twisting
8 them. Often Perpetrator 1 and Defendant Doe 7 Perpetrator 2 would work together to
9 perform "titty twisters" on Kristina as if it were a game. For example, Perpetrators 1
10 and 2 would take turns holding Kristina down while the other performed "titty
11 twisters."

12 82. Perpetrator's 1 and 2 would perform "titty twisters" on Kristina at Local Church, the
13 Publishing Corp., Perpetrator 1's home and other places. These incidents occurred out
14 in the open in and in the presence of other adults, including members of church
15 leadership and the leadership of Supervisory Company.

16 83. When Kristina was approximately 8 years-old, she and her family traveled with John
17 Stevens, Marilyn, Perpetrator 1, Perpetrator 2 and others to the Church Compound in
18 Iowa. Perpetrator 1 and Perpetrator 2 engaged in the same aggressive game of "titty-
19 twisters" and the grabbed Kristina's buttocks on a regular basis for the duration of
20 their week-long stay.

21 84. When Kristina was 10-12 years-old, the molestation progressed from a non-
22 consensual "game" of "titty twisting" and grabbing by Perpetrator 1 and Perpetrator 2
23 to more invasive molestation of Kristina by Perpetrator 1 and Perpetrator 2.

24 85. When Kristina was approximately 10 – 12 years-old, she was cleaning the bathroom
25 of her sister and Perpetrator 1's home. While Kristina was cleaning, Perpetrator 1
26 approached Kristina, reached under her shorts, touched her thighs, and fondled her
27 buttocks and genitals with his fingers beneath her undergarments. Perpetrator 1 was
28

1 interrupted by a call from outside of the bathroom and the incident stopped.

2 Perpetrator 1 then said to Kristina, “Don’t worry, I didn’t pop your cherry.” Kristina
3 had never heard this expression before and did not know what Perpetrator 1 was
4 referring to at that time. This was the first incident of what became habitual and
5 continual molestation of Plaintiff by Defendant Doe 6 Perpetrator 1.

6 86. From about the age of 10 to 13 or 12 to 13, Defendant Doe 6 Perpetrator 1 repeatedly
7 and continuously sought Kristina out on a daily basis in order to molest her.

8 Perpetrator 1 would molest Kristina by fondling her breasts, genitalia and buttocks
9 sometimes outside of her clothing and sometimes skin-to-skin. Each incident would
10 last between several seconds to upwards of 10 minutes. Perpetrator 1 would also
11 digitally penetrate Kristina’s vagina on occasions when no one was around with the
12 exception of Defendant Doe 7 Perpetrator 2. Perpetrator 1 molested Kristina in
13 multiple locations including inside of the Defendant Doe 3 Local Church, Defendant
14 Doe 8 Publishing Corp, her sister’s house, during rehearsals, backstage during
15 performances, and other places where Kristina was in the same place as Perpetrator 1.
16 Perpetrator 1’s molestations of Kristina were habitual and continual until she reached
17 the age of 13.

18 87. At night, if Kristina were spending the night at her sister’s house, Perpetrator 1 would
19 often sneak into the room where Kristina was sleeping and fondle her breasts. This
20 would last anywhere between several seconds to several minutes.

21 88. The molestations happened so frequently, that Kristina began to see them as
22 “normal.”

23 89. When Kristina was 12 years old, Leilani, who was a minor at the time and was
24 approximately the same age as Kristina, was staying at Kristina’s sister’s house with
25 Kristina. Leilani was a performer and an integral part of Perpetrator 1’s shows.
26 Kristina and Leilani were sleeping in the front room on the floor. Perpetrator 1
27 entered the room and began to fondle her and minor Leilani’s breasts at the same
28

1 time. It seemed like Perpetrator 1 and Leilani had done this together before but, it was
2 new to Kristina. Perpetrator 1 said that he had a “boner” and wanted them to “touch
3 it.” Kristina and Leilani touched Perpetrator 1’s erect penis over his pants. This lasted
4 for a few minutes. Then Perpetrator 1 instructed Kristina and Leilani to engage in oral
5 copulation with each other while he watched. Leilani showed Kristina what to do.

6 90. In 1983 when Kristina was 13 years old, her brother witnessed Defendant Doe 6
7 Perpetrator 1 molesting Kristina and told their mother. Kristina’s mother then told her
8 therapist, J. Paris, about the abuse and Kristina’s abuse was reported to the police.

9 91. Shortly after the police report, Kristina walked down the stairs of her mother’s house
10 and heard her mother speaking on the phone with Perpetrator 1. Later that day,
11 Kristina heard her mother tell her father that Perpetrator 1 had said, “What the
12 [expletive] are you thinking? You know I could go to jail for this.” Kristina’s mother
13 responded, “good.”

14 **SECOND SERIES OF SEXUAL ASSAULTS OF PLAINTIFF KRISTINA**

15 92. From about age 8 to 10, Kristina was repeatedly molested and harassed by Defendant
16 Doe 7 Perpetrator 2.

17 93. From about the age of 10 to 13 or 12 to 13, as noted above, Perpetrator 1 repeatedly
18 and continuously molested Kristina by fondling her breasts, genitalia and buttocks,
19 sometimes outside of her clothing and sometimes skin-to-skin. Defendant Doe 7
20 Perpetrator 2, appeared to be Perpetrator 1’s best friend, and was often with
21 Perpetrator 1 when he molested Kristina. Perpetrator 2 often molested Kristina in the
22 same manner. Perpetrator 2 digitally penetrated Kristina on occasions when no one
23 was around with the exception of Perpetrator 1. Perpetrator 2 molested Kristina in
24 this manner in multiple locations including the Publishing Corp, Local Church,
25 Kristina sister’s house, during rehearsals, backstage during performances, and other
26 places. Perpetrator 2’s molestation of Kristina was habitual and continuous until
27 Kristina reached the age of 13.
28

1 94. As discussed throughout this Complaint, Defendants Does 1-5 and Defendant Does 8
2 and 9 knew or had reason to know, or were otherwise on notice, of unlawful sexual
3 conduct by Perpetrator 2 and failed to take reasonable steps or to implement
4 reasonable safeguards to prevent further abuse.

5 95. As a result of the wrongful conduct alleged herein, Kristina has suffered, and
6 continues to suffer great pain of mind and body, shock, emotional distress, physical
7 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
8 humiliation, and loss of enjoyment of life; was prevented and will continue to be
9 prevented from performing Kristina’s daily activities and obtaining the full
10 enjoyment of life; has sustained and continues to sustain loss of earnings and earning
11 capacity; and/or has incurred and will continue to incur expenses for medical and
12 psychological treatment, therapy, and counseling.

13 The sexual abuse and exploitation of Kristina and the circumstances under which it
14 occurred caused Kristina to develop various psychological coping mechanisms which
15 reasonably made her incapable of ascertaining the resulting damages from that
16 conduct.

17 **PLAINTIFF SHALOM’S ALLEGATIONS**

18 96. Shalom has been a member of the Fellowship since the age of three. During Shalom’s
19 minority, Shalom and her mom were members of Bakersfield local church and
20 attended there regularly.

21 97. When Shalom was three-years old, she was left with another family for
22 approximately three months at the behest of John Stevens and Defendant Doe 1,
23 Supervisory Company, while Shalom’s mom was sent to the Compound to aid in its
24 construction.

25 98. Shalom also attended Defendant, Doe 3, Local Church during her minority several
26 times per year when the local churches gathered in the North Hills branch to celebrate
27 holidays unique to the Fellowship.

- 1 99. When Shalom was between approximately 5- and 8- years old, she was assigned a
2 “ministry” by a Member of Supervisory Company. Shalom’s assigned “ministry”
3 was “Love.”
- 4 100. As part of her “ministry,” Shalom was assigned to read and internalize the messages
5 of *Some Things About Love*, by John Robert Stevens. She held onto many copies of
6 this book and distributed them, as directed.
- 7 101. As part of her “ministry,” as a young child Shalom was assigned to bring love and
8 affection to adult members of the church. From the age of 8 years old, Shalom was
9 taught to use her body as a means of showing affection. She was routinely subjected
10 to the full body embraces of adult members of the church, including some men whose
11 erections would press against her body during these embraces.
- 12 102. In addition to full body embraces, kissing on the lips was a common and public
13 occurrence, even between unrelated adults and children.
- 14 103. When Shalom was 8 years-old, Defendant Doe 7, Perpetrator 2, a member of
15 Supervisory Company began to take special interest in Plaintiff. Defendant Doe 7
16 Perpetrator 2 was also assigned a “love ministry.” He lived in Los Angeles while
17 Shalom lived in Bakersfield and was unmarried at the time. Every time Shalom
18 attended Defendant Doe 3, Local Church for these annual gatherings, Defendant Doe
19 7 took on the role of “spiritual father.” This type of undertaking was common
20 practice in the Fellowship.
- 21 104. When Shalom was approximately 12-years old Defendant Doe 7, a member of
22 Defendant Doe 1, Supervisory Company, became more involved in her life.
23 Defendant Doe 7 became Shalom’s DR and deepened his role as Shalom’s spiritual
24 father. Defendant Doe 7 referred to Shalom as, his “daughter.” At the time, and all
25 relevant times, Defendant Doe 7 resided in Los Angeles while Shalom lived in
26 Bakersfield.
- 27 105. When Shalom was between 12 and 14-years old, she confided with Defendant Doe 7
28

1 and his relatively new wife, Joyce McDonald, for the first time that she had been
2 sexually molested by a minor member of the Fellowship when she was 4-years old.
3 Plaintiff had not shared this with anyone before sharing with the Defendant Doe 7
4 and his wife, her DRs at the time.

5 106. The personal details of Shalom's molestation were ultimately shared by Defendant
6 Doe 7 and his wife to other members of Defendant Doe 1, Supervisory Company,
7 including Defendant Doe 6, Perpetrator 1, and others. This information was never
8 reported to authorities. Instead this information was used by Defendant Doe 6,
9 Perpetrator 1 to manipulate and degrade Shalom.

10 107. When Plaintiff was approximately 14-years old, she was invited by Defendant Doe,
11 6 Perpetrator 1 and Defendant Doe 7, Perpetrator 2, a member of Defendant Doe 1,
12 Supervisory Company, to attend private, invitation-only youth meetings held at the
13 Defendant Doe 8 Publishing Corp. building located in North Hollywood.

14 108. From approximately the age of 14 to 16, Shalom regularly attended these private
15 meetings led by Defendant Doe 6, Perpetrator 1, and other members of Defendant
16 Doe 1, Supervisory Company. Shalom would also work at Defendant Doe 8,
17 Publishing Corp. and sometimes attend parties held at Defendant Doe 8, Publishing
18 Corp. when she was in town for the youth meetings.

19 109. The youth meetings at Defendant Doe 8, Publishing Corp. provided guidelines on the
20 Fellowship's position on dating, premarital sex, and of course, the intensity of
21 submission and "giving of your life" expected of the youth to their Shepherds and
22 DR's, and ultimately the Fellowship's radical lifestyle

23 110. As part of submission, the Fellowship created and maintained a strict social contract
24 with members wherein all areas of a congregant's life were subject to the approval of
25 the Shepherds, DR's, and/or Supervisory Company. Dating relationships, sex,
26 marriage, divorce, finances/budgeting, naming of children, abortions, jobs,
27 socializing, travel, and all future plans where expected to be subject to approval
28

1 through the process of “submission.”

2 111. When Shalom was approximately 14 years-old, living in Bakersfield, CA, Shalom’s
3 shepherds approved of Shalom and Chris Pollard engaging in a dating relationship
4 despite Pollard being six years older than Shalom. It was common for minor female
5 members of the Fellowship to be approved to date males who were significantly older
6 – especially if the men were in positions of leadership. Later, Defendant Doe, 6,
7 Perpetrator 1 and Defendant Doe 7, Perpetrator 2, forced their relationship to end.

8 112. Defendant Doe 3, Local Church permitted a sexually inappropriate culture to
9 develop. Defendant Doe 3 Local Church hosted parties at houses owned by Local
10 Church, Apostolic Fathering Ministry, and/or other members of leadership for men in
11 the Fellowship. Often, the parties featured heavy alcohol consumption. Minor girls
12 acted as “waitresses” and served alcohol to adults, including church leadership, on
13 trays.

14 113. Defendant Doe 8, Publishing Corp. also perpetuated a highly sexualized environment
15 within its walls – especially in the Recording Studio. Playboy magazines littered the
16 offices of Defendant Doe 6, Perpetrator 1, and other members of leadership.
17 Defendant Doe 6, Perpetrator 1, and others frequented the Recording Studio to
18 engage in sexual activity, including known minors.

19 114. At the time youth meetings were being held at Defendant Doe 8 Publishing Corp., led
20 by Defendant Doe 6, Perpetrator 1, it was known to Fellowship leaders that
21 Defendant Doe 6, Perpetrator 1 had engaged in unlawful sexual activity with
22 children.

23 115. At the time youth summer camps were being developed and tested at the Defendant
24 Doe 9 Church Compound, it was known, or should have been known, to Defendant
25 Doe 1 Supervisory Company, Defendant Doe 3 Local Church, Defendant Doe 5
26 Religious Leader, and Defendant Doe 8 Publishing Corp., that Defendant Doe 6,
27 Perpetrator 1 had engaged in unlawful sexual activity with children. It was also
28

1 known that Defendant Doe 6, Perpetrator 1 would be staying on the Church
2 Compound grounds in the presence of minors at all relevant times.

3 116. At the time the official Young Adult Summer Program “YASP” took place,
4 Defendant Doe 6, Perpetrator 1 was known to have engaged in unlawful sexual acts
5 with children. It was also known, or should have been known, by Defendant Doe 1
6 Supervisory Company, Defendant Doe 3 Local Church, Defendant Doe 5 Religious
7 Leader, and Defendant Doe 8 Publishing Corp. that Defendant Doe 6, Perpetrator 1
8 would be at the Church Compound during the time of YASP in the presence of
9 minors at all relevant times.

10 **FIRST SERIES OF SEXUAL ASSAULTS OF PLAINTIFF SHALOM**

11 117. When Shalom was approximately 8 years old, it became known that Defendant Doe 7
12 Perpetrator 2 became her “spiritual father.” They were both assigned “love
13 ministries.”

14 118. As it did with many children, the Fellowship culture broke down Shalom’s familial
15 bonds and replaced them with the unhealthy and abusive relationship with her
16 assigned “spiritual father,” Perpetrator 2 (and Perpetrator 1, discussed anon). Shortly
17 thereafter, Perpetrator 2 began the predatory and pervasive pattern of grooming
18 Shalom for sexual abuse. He engaged continual acts of touching for his personal
19 sexual gratification that permeated his relationship with Shalom. He routinely
20 touched Shalom’s hair and face, kissed her, told her she was beautiful and sat her on
21 his lap beginning from the time Shalom was 8- years old. Perpetrator 2 would also
22 routinely kiss Shalom on the lips from the time she was approximately 8- years old.
23 He would kiss her on the lips in public settings, at parties and at church in front of
24 other members of Fellowship leadership. As Shalom entered her pre-teen years,
25 Perpetrator 2 would have Shalom rub his back, head, feet and hands.

26 119. As an influential leader within the Fellowship, Perpetrator 2 was “entitled” to demand
27 that minor girls rub his back and feet. He routinely demanded that Shalom touch him
28

1 by rubbing his back from the time younger than 10 years old. She would do so, at his
2 demand, in both private settings and public settings such as church parties and events,
3 and in front of other members of Fellowship leadership.

4 120. When Shalom was between 8- and 12- years old, Perpetrator 2 would hold Shalom
5 and embrace her while she sat on his lap. He would tell her he loved her and that she
6 was beautiful and kiss her face and head, and Shalom could feel his breath on her
7 neck. Shalom felt uncomfortable and scared by this and told him to stop. When this
8 sort of activity persisted as she got older, she objected in order to make him stop.

9 121. When Shalom was approximately 14 years old, she was selected by members of
10 Defendant Doe 1 Supervisory Company and her DRs (Defendant Doe 7 Perpetrator
11 2), and his wife to be part of a small test group for the summer program being
12 developed for young people at Defendant Doe 9 Church Compound in Iowa. This
13 program would later be known as the Young Adult Summer Program (“YASP”).

14 122. In response to this invitation, Shalom’s family worked extra shifts and overtime in
15 order to finance her trip.

16 123. When Shalom arrived, she was immediately assigned a “Dorm Mom,” who would act
17 as her mom and authority figure throughout her stay. However, the Defendant Doe 7
18 Perpetrator 2 and his wife were also there and “in charge” of Shalom. Shalom was
19 also assigned a place to sleep and a rigid schedule consisting of spiritual trainings,
20 religious services as well as work assignments filling her days.

21 124. When Shalom was 16- years old, she was moved to the Church Compound in Iowa
22 without her parents and she was placed directly under the care of her DRs,
23 Perpetrator 2 and his wife. While living in Shiloh, Shalom and another minor girl
24 were required to perform house cleaning and laundry services for their DRs,
25 Perpetrator 2 and his wife. Perpetrator 2 would regularly demand foot and back rubs
26 from Shalom while they were alone together in a room. On several occasions when
27 they were alone in Perpetrator 2’s apartment, Perpetrator 2 would come out of the
28

1 shower wearing only a towel request that Shalom give massage him. This would
2 make Shalom feel afraid, vulnerable and scared, and she would make up excuses to
3 leave the room.

4 **SECOND SERIES OF SEXUAL ASSAULTS OF PLAINTIFF SHALOM**

5 125. When Shalom was 14- years old and attending the summer program described in
6 Paragraph 121, above, one evening, she was personally invited by Defendant Doe 6
7 Perpetrator 1 to attend an adult party. Parties were reserved solely for Defendant Doe
8 5 Religious Leader, Marilyn Hargrave and elite members of the Fellowship. Shalom
9 was taken to the party by the Defendant Doe 7 Perpetrator 2 and his wife, members of
10 Supervisory Company, at an apartment in the 200-wing of the Defendant Doe 9
11 Church Compound where the “higher ups” lived. When Shalom arrived, loud music
12 was playing and alcohol was being served to adults and minors. Defendant Doe 6
13 Perpetrator 1 was the only male in the front room. Shalom was seated in a chair
14 across the room from Defendant Doe 6 Perpetrator 1 who was sitting on a couch.
15 Leilani, a young woman, sat on Defendant Doe 6 Perpetrator 1’s lap and began to
16 dance and dry hump his lap to the music. Shalom could see Defendant Doe 6
17 Perpetrator 1’s visible erection. Defendant Doe 6 Perpetrator 1 and Leilani appeared
18 to engage in a consensual sexual exchange. This lasted for the duration of a song –
19 approximately 3-5 minutes. Shalom was shocked and uncomfortable by what she
20 saw.

21 126. Leilani went to Maria, another young woman about 17 or 18 years-old and brought
22 her to Defendant Doe 6 Perpetrator 1 to sit on his lap. Maria appeared uncomfortable
23 but, complied. Perpetrator 1 then put his hands all over Maria’s body. Maria sat still.
24 As Defendant Doe 6 Perpetrator 1 touched Maria’s breasts and other parts of her
25 body, he stared directly at Shalom. Shalom left the party terrified and disturbed by
26 what she had seen.

27 **THIRD SERIES OF SEXUAL ASSAULTS OF PLAINTIFF SHALOM**

- 1 127. As an influential figure within the Fellowship, Defendant Doe 6, Perpetrator 1, was
2 able to exert control over the lives of anyone within his sphere of power. For
3 example, Defendant Doe 6, Perpetrator 1, was the DR to a young man approximately
4 Shalom's age. When he expressed interest in dating Shalom to Defendant Doe 6,
5 Perpetrator 1, Defendant Doe 6, Perpetrator 1 discouraged him from pursuing a
6 relationship with Shalom by saying, "she has a bad spirit," because of her past.
- 7 128. In the summer of 1990, when Shalom was 16 years-old, she attended the first official
8 Young Adult Summer Program (YASP). Leilani – the same Leilani from the party –
9 was the new director of YASP.
- 10 129. Shalom was again assigned a dorm room and a "dorm mom," who would be in charge
11 of her during her stay at the Defendant 9 Church Compound.
- 12 130. The official YASP program under Leilani's leadership was slightly different than the
13 summers before. Leilani was even more strict in her control over YASP. Leilani
14 bragged about how much control she had over the youth in attendance.
- 15 131. Shalom was assigned to share a dorm room with between six and ten other young
16 girls. Shalom's schedule again consisted of attending multiple religious services each
17 day and performing manual labor on and around the Church Compound.
- 18 132. Shalom's work that summer included cutting and tossing dense rose bushes in 80+
19 degree heat. Many of the youth were so overworked and dehydrated that they were
20 throwing up and passing out because of the work.
- 21 133. During a rest period while all the girls were supposed to be sleeping, Shalom was in
22 her dorm room laying nude from the waist-up due to heat and exhaustion. Outside the
23 door, Shalom heard Leilani and Defendant Doe 6 Perpetrator 1 speaking. Someone
24 opened the door and Leilani said, "see, they will do anything I tell them to do."
25 Defendant Doe 6 Perpetrator 1 walked over to Shalom's bed and groped Shalom's
26 breasts while she pretended to be asleep. Shalom felt extremely dirty, exhausted and
27 scared.
- 28

1 134. In 1995, nearly five years later at Defendant Doe 8 Publishing Corp., Defendant Doe
2 6 Perpetrator 1, Shalom, and other church members were sitting in a circle, and
3 Perpetrator 1 told other members, including his then wife, Maria, about the time he
4 walked into Shalom's dorm room at the Compound and, saw her nude. Perpetrator 1
5 then described how "perky" Shalom's "boobs" were. Perpetrator 1's statement was a
6 direct reference to the incident in Shalom's dorm room during YASP at the
7 Compound in 1990 alleged in Paragraph 124.

8 **FOURTH SERIES OF SEXUAL ASSAULTS OF PLAINTIFF SHALOM**

9 135. In January of 1995, Shalom returned from living at the Compound to live in the Los
10 Angeles area where Defendant Doe 6 Perpetrator 1 and Defendant Doe 7 Perpetrator
11 2 were assigned as her DRs.

12 136. Even as a young woman, Defendant Doe 6 Perpetrator 1 constantly touched Shalom's
13 breasts and buttocks while walking past her on Defendant Doe 8 Publishing Corp.'s
14 property and surrounding areas. Defendant Doe 6 Perpetrator 1 and Defendant Doe 7
15 Perpetrator 2, would constantly make comments towards Shalom including phrases
16 like, "you will make a great wife one day" "you're so sexy," and "you're so hot."

17 137. At Defendant Doe 6 Perpetrator 1's wedding to his third wife, Maria in 1995,
18 Perpetrator 1 and Defendant Doe 7 Perpetrator 2 approached Shalom and put their
19 arms around her. Perpetrator 1 leaned in and told Shalom, "That could have been you
20 up there," implying that Shalom "missed her chance" to be Perpetrator 1's wife.
21 Defendant Doe 7 Perpetrator 2 said, "Yes, it could have."

22 138. At a party at Defendant Doe 8 Publishing Corp., Perpetrator 1 found Shalom and
23 pressed his body up against hers in a dark secluded hallway and rubbed his erect
24 penis against her body. Perpetrator 1 only moved away from Shalom when another
25 person could be heard walking down the hallway. Only then was Shalom was able to
26 get away from him and escape.

27 139. On another occasion, Shalom was sitting in a private room speaking with Defendant
28

1 Doe 7 Perpetrator 2 at Defendant Doe 8 Publishing Corp., in North Hollywood,
2 California, when Perpetrator 1 entered the room. Perpetrator 1 approached Shalom
3 and put his hands on her upper thigh under Shalom’s skirt, and touched her genitals.
4 He said, “you will make a great wife one day and you will make a man very happy.”
5 Shalom looked at Defendant Doe 7 Perpetrator 2 for help and he just nodded his head
6 in agreement and said, “Yes, you will.”

7 140. Shalom again went to Defendant Doe 7 Perpetrator 2 on numerous occasions upset
8 that Perpetrator 1 was repeatedly touching her and that it wasn’t okay. Defendant Doe
9 7 Perpetrator 2 would become angry with her for questioning Perpetrator 1’s actions
10 or motivations. On one occasion, Defendant Doe 7 Perpetrator 2 became so agitated
11 by Shalom’s emotion around being harassed, he said, “if it’s bothering you this
12 much”... “maybe this isn’t the right place for you” “maybe you should leave the
13 Church.”

14 141. When Shalom was approximately 20- or 21- years old, she noticed that Defendant
15 Doe 6 Perpetrator 1 would continually target minor girls for abuse. She noticed that
16 he would regularly approach girls as young as 12- years old and demand they rub his
17 back. Troubled by this behavior, Shalom approached no fewer than 6 members of
18 Fellowship leadership, including Defendant Doe 7 Perpetrator 2 to complain about
19 Defendant Doe 6 Perpetrator 1’s inappropriate behavior.

20 142. Defendant Doe 6 Perpetrator 1 continuously subjected Shalom to degrading and
21 demoralizing verbal and physical assault that was sexual in nature. Perpetrator 1’s
22 characterization, narrative, and treatment of Shalom, apparently because of her past
23 molestation as a child, influenced and shaped the way that the young adult men and
24 women treated Shalom during her young adulthood in the Fellowship.

25 143. When Plaintiff was approximately 27 years old and living in North Hills, California,
26 Defendant Doe 6, Perpetrator 1 and Defendant Doe 7, Perpetrator 2 found out that
27 Shalom became pregnant. Shalom was instructed by Defendant Doe 6, Perpetrator 1,
28

1 and Defendant Doe 7, Perpetrator 2, to seek an abortion because she was single, did
2 not have a full-time job, and that if she committed to a child, she couldn't be fully
3 committed to the church. Plaintiff relented.

4 144. As discussed throughout this Complaint, Defendants Doe 1-9 knew or had reason to
5 know, or were otherwise on notice of unlawful sexual conduct by Defendant Doe 6
6 Perpetrator 1 but, failed to take reasonable steps or implement reasonable safeguards
7 to prevent further abuse.

8 145. Defendant Doe's 1 through 5 and Defendants Does 7 through 9 knew of the dangers
9 posed by Perpetrator 1 and acted with conscious disregard for the rights and safety of
10 Shalom and others.

11 146. As a result of the wrongful conduct alleged herein, Shalom has suffered, and
12 continues to suffer great pain of mind and body, shock, emotional distress, physical
13 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
14 humiliation, and loss of enjoyment of life; was prevented and will continue to be
15 prevented from performing Shalom's daily activities and obtaining the full enjoyment
16 of life; has sustained and continues to sustain loss of earnings and earning capacity;
17 and/or has incurred and will continue to incur expenses for medical and psychological
18 treatment, therapy, and counseling.

19 147. The sexual abuse and exploitation of Shalom and the circumstances under which it
20 occurred caused Shalom to develop various psychological coping mechanisms which
21 reasonably made her incapable of ascertaining the resulting damages from that
22 conduct. Shalom did not begin to discover the causal relationship between the
23 molestation and adulthood psychological injuries until October of 2018.

24 **FIRST CAUSE OF ACTION**

25 **NEGLIGENCE**

26 **(Against All Defendants)**

27 148. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.
28

1 149. Defendants had a duty to protect Plaintiffs when they were entrusted to their care by
2 Plaintiffs' parents. Plaintiffs' care, welfare, and/or physical custody were temporarily
3 entrusted to Defendants who voluntarily accepted the entrusted care of both Plaintiffs.
4 As such, Defendants owed Plaintiffs, as minor children, a special duty of care, in
5 addition to a duty of ordinary care, and owed Plaintiffs the higher duty of care that
6 adults dealing with children owe to protect them from harm.

7 150. Defendants, by and through their agents, servants, volunteers, and employees, knew
8 or reasonably should have known of the dangerous and exploitative propensities of
9 both Perpetrators 1 and 2 and/or that Perpetrators 1 and 2 were unfit agents. It was
10 foreseeable that if Defendants did not adequately exercise or provide the level of care
11 owed to children in their care, including but not limited to Plaintiffs, those individuals
12 would be vulnerable to sexual abuse by Perpetrator 1 and Perpetrator 2.

13 151. Defendants breached their duty of care to Plaintiffs by allowing Perpetrators 1 and 2
14 to come into contact with minors without supervision; by failing to adequately hire,
15 supervise, or retain Perpetrators who Defendants permitted and enabled to have
16 access to Plaintiffs; by failing to investigate or otherwise confirm or deny such facts
17 about Perpetrators; by failing to tell and/or concealing from Plaintiffs and law
18 enforcement officials that Perpetrators 1 and 2 were, or may have been, sexually
19 abusing minors; by failing to tell and/or concealing from law enforcement officials
20 that Plaintiffs was or may have been sexually abused after Defendants knew or had
21 reason to know that the same had occurred, thereby enabling Plaintiffs and others to
22 continue to be endangered and sexually abused, and/or creating the circumstance
23 wherein Plaintiffs was less likely to receive medical/mental health care and treatment,
24 thus exacerbating the harm done to Plaintiffs; and/or by holding out Perpetrators to
25 Plaintiffs as being in good standing and trustworthy. Defendants cloaked within the
26 facade of normalcy Perpetrators' contact and/or actions with Plaintiffs and/or with
27 other minors in Defendants' organization who were victims of Perpetrators and
28

1 disguised the nature and extent of the sexual battery and contact.

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

10 **SECOND CAUSE OF ACTION**

11 **NEGLIGENT HIRING/RETENTION/SUPERVISION**

12 **(Against All Defendants)**

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

14 154. Defendants had a duty to not hire and/or retain Perpetrators 1 and 2, and other
15 employees, agents, volunteers, and other representatives, given Perpetrators'
16 dangerous and exploitive propensities.

17 155. Defendants had a duty to competently supervise their agents, Perpetrators 1 and 2,
18 given Perpetrators' dangerous and exploitive propensities.

19 156. Defendants, by and through their agents, servants and employees, knew or reasonably
20 should have known of the dangerous and exploitive propensities of Perpetrators 1 and
21 2 and/or that Perpetrators were unfit agents. Despite such knowledge, Defendants
22 negligently hired and/or retained Perpetrators 1 and 2 in positions of trust and
23 authority as members of Supervisory Company, Local Church, Publishing Corp.,
24 Church Compound, and/or other authority figures, where they were able to commit
25 the wrongful acts against Plaintiffs. Defendants failed to use reasonable care in
26 investigating Perpetrators 1 and 2 and failed to provide adequate warning to Plaintiffs
27 and Plaintiffs' families of the dangerous propensities and unfitness of Perpetrators 1
28

1 and 2. Defendants further failed to take reasonable measures to prevent future sexual
2 abuse and failed to adequately supervise Perpetrators 1 and 2, given their dangerous
3 and exploitive propensities.

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

12 **THIRD CAUSE OF ACTION**

13 **NEGLIGENT FAILURE TO WARN, TRAIN OR EDUCATE**

14 **(Against All Defendants)**

15 158. Plaintiffs incorporates all paragraphs of this Complaint as if fully set forth herein.

16 159. Defendants breached their duty to take reasonable protective measures to protect
17 Plaintiffs and other minor congregants and/or students from the risk of childhood
18 sexual abuse by Perpetrators 1 and 2, such as the failure to properly warn, train, or
19 educate Plaintiffs and other minor congregants and/or students about how to avoid
20 such a risk, pursuant to *Juarez v. Boy Scouts of America, Inc.*, 97 Ca.Rptr.2d 12, 81
21 Cal.App.4th 377 (2000).

22 160. As a result of the above described conduct, Plaintiffs have suffered and continue to
23 suffer, great pain of mind and body, physical injury, shock, emotional distress,
24 physical manifestations of emotional distress, embarrassment, loss of self-esteem,
25 disgrace, humiliation, and loss of enjoyment of life; were prevented and will continue
26 to be prevented from performing their daily activities and obtaining the full
27 enjoyment of life; have sustained and will continue to sustain loss of earnings and
28

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

3 **FOURTH CAUSE OF ACTION**

4 **NEGLIGENCE PER SE**

5 **(Against Defendant Doe 4, Religious School)**

- 6 161. Plaintiffs incorporates all paragraphs of this Complaint as if fully set forth herein.
- 7 162. Pursuant to California's Child Abuse and Neglect Reporting Act found in California
8 Penal Code §§ 11164-11174.3, Defendant Doe 4, Religious School and its agents
9 owed a statutory duty to report any child abuse that they know, or reasonably suspect
10 has occurred, to law enforcement.
- 11 163. At all material times, Defendant Doe 4, Religious School and its agents were required
12 to comply with the laws of the state of California, including the Child Abuse and
13 Neglect Reporting Act.
- 14 164. The Child Abuse Neglect and Reporting Act was created for, amongst other reasons,
15 the protection of the health and welfare of members of the public, including
16 Plaintiffs.
- 17 165. Defendant Doe 4, Religious School and its agents knew, or should have reasonably
18 suspected, that Perpetrators 1 and 2 were committing acts of sexual abuse against
19 minors.
- 20 166. Despite such knowledge, Defendant Doe 4, Religious School did not report the abuse
21 of minors to law enforcement as required by the Child Abuse Neglect and Reporting
22 Act.
- 23 167. The mandatory duty imposed by the Child Abuse and Neglect Reporting Act is
24 designed to guard against the very type of injury suffered by Plaintiffs as a result of
25 the matters alleged in this Complaint.
- 26 168. Defendant Doe 4 Religious School's violations of the Child Abuse and Neglect
27 Reporting Act constitutes a breach of statutory duties owed to Plaintiffs.
- 28

1 169. But for the intentional and negligent acts and omissions of Defendant Doe 4,
2 Religious School and their violations of the statutes and ordinances set forth herein,
3 Plaintiffs would not have been injured.

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

12 **FIFTH CAUSE OF ACTION**

13 **SEXUAL BATTERY**

14 **(Against All Defendants)**

15 171. Plaintiffs incorporates all paragraphs of this Complaint as if fully set forth herein.

16 172. During the period of approximately 1978 through 1984, Defendant Doe's 6 and 7
17 engaged in unpermitted, harmful and offensive sexual contact upon Kristina's person,
18 and all other Defendants ratified or approved of that sexual contact.

19 173. During the period of approximately 1989 through 1996, Defendant Doe 6 engaged in
20 unpermitted, harmful and offensive sexual contact upon Shalom's person, and all
21 other Defendants ratified or approved of that sexual contact.

22 174. As a result of the above described conduct, Plaintiffs have suffered and continue to
23 suffer, great pain of mind and body, physical injury, shock, emotional distress,
24 physical manifestations of emotional distress, embarrassment, loss of self-esteem,
25 disgrace, humiliation, and loss of enjoyment of life; were prevented and will continue
26 to be prevented from performing their daily activities and obtaining the full
27 enjoyment of life; have sustained and will continue to sustain loss of earnings and
28

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

3 **SIXTH CAUSE OF ACTION**

4 **SEXUAL HARASSMENT**

5 **(Against All Defendants)**

6 175. Plaintiffs incorporates all paragraphs of this Complaint as if fully set forth herein.

7 176. During Kristina's association with Defendants Doe 1 through Doe 9 and Does 10-
8 100, Perpetrators 1 and 2 intentionally, recklessly and wantonly made sexual
9 advances, sexual solicitations, sexual comments and / or sexual requests and engaged
10 in other visual, verbal or physical conduct of a sexual nature based on Kristina's
11 gender that were unwelcome, pervasive and severe, including but not limited to
12 engaging in sexual talk with Kristina and / or touching Kristina in a sexually
13 motivated and illegal manner, all while Perpetrators 1 and 2 was acting in the course
14 and scope of his agency with Does 1 through 5 and Does 8 through 9, and Does 10
15 through 100.

16 177. The incidents of sexual misconduct and sexual harassment outlined herein took place
17 while Kristina was under the control of Perpetrators 1 and 2 in their capacities as
18 agents of Defendants Doe 1 through Doe 5 and Doe 8 through 9, and Defendants Doe
19 10-100, while specifically acting on behalf of the Defendants Doe 1 through 5, and
20 Does 8 through 9 and Does 10 through 100.

21 178. During Kristina's association with Defendants Doe 1 through 5, Does 8 through 9,
22 and Does 10-100, Perpetrators 1 and 2 intentionally, recklessly and wantonly did acts
23 which resulted in harmful and offensive contact with intimate parts of Plaintiff's
24 person, including but not limited to, using his position as agent of Defendants Doe 1
25 through 5, Does 8 through 9, and Does 10 through 100 to require Kristina to give into
26 their sexual suggestions, and used their authority and position of trust to exploit
27 Kristina physically, sexually and emotionally.

1 179. Because of Kristina's relationship with Perpetrators 1 and 2, Kristina's young age as
2 a minor child, and Kristina's inexperience, Kristina was emotionally unable to
3 terminate the contact she had with Perpetrators 1 and 2.

4 180. Because of Perpetrators 1 and 2's positions of authority over Kristina, Kristina's
5 mental and emotional state, and Kristina's young age under the age of consent,
6 Kristina did not, and was unable to, give meaningful consent to such acts.

7 181. Even though Defendants Doe 1 through Doe 5, Does 8 through 9, and Does 10
8 through 100 knew or should have known of these activities by Perpetrators 1 and 2,
9 Defendants Doe 1 through Doe 5, Does 8 through 9, and Does 10 through 100 did
10 nothing to investigate, supervise or monitor Perpetrators 1 and 2 to ensure the safety
11 of the minors brought into contact with Perpetrators 1 and 2.

12 182. Defendants Doe 1 through Doe 5, Does 8 through 9 and Does 10 through 100 ratified
13 or approved the conduct of Perpetrators 1 and 2 in committing the acts of sexual
14 misconduct described herein.

15 183. Defendants Doe 1 through Doe 9 and Does 10 through 100's conduct was a breach of
16 their duties to Kristina.

17 184. During Shalom's association with Defendants Doe 1 through Doe 9 and Does 10-100,
18 Perpetrator 1 and Perpetrator 2 intentionally, recklessly and wantonly made sexual
19 advances, sexual solicitations, sexual comments and / or sexual requests and engaged
20 in other visual, verbal or physical conduct of a sexual nature based on Plaintiff's
21 gender that were unwelcome, pervasive and severe, including but not limited to
22 engaging in sexual talk with Shalom and / or touching Shalom in a sexually
23 motivated and illegal manner, all while Perpetrator 1 and Perpetrator 2 were acting in
24 the course and scope of their agency with Does 1 through 5 and Does 8 through 9,
25 and Does 10 through 100.

26 185. The incidents of sexual misconduct and sexual harassment outlined herein took place
27 while Shalom was under the control of Perpetrator 1 and Perpetrator 2 in their
28

1 capacities as agents of Defendant Doe 1 through Doe 5 and Doe 8 through 9, and
2 Defendants Doe 10-100, while specifically acting on behalf of the Defendants Doe 1
3 through 5, Does 8 through 9, and Does 10 through 100.

4 186. During Shalom's association with Defendants Doe 1 through 5, Does 8 through 9,
5 and Does 10-100, Perpetrator 1 and Perpetrator 2 intentionally, recklessly and
6 wantonly did acts which resulted in harmful and offensive contact with intimate parts
7 of Plaintiff's person, including but not limited to, using their positions as agents of
8 Defendants Does 1 through 5, Does 8 through 9, and Does 10 through 100 to require
9 Shalom to give into their sexual suggestions, and used their authority and position of
10 trust to exploit Shalom physically, sexually and emotionally.

11 187. Because of Shalom's relationship with Perpetrator 1 and Perpetrator 2, Shalom's
12 young age as a minor child, and Shalom's inexperience, Shalom was emotionally
13 unable to terminate the contact she had with Perpetrator 1.

14 188. Because of Perpetrator 1 and Perpetrator 2's positions of authority over Shalom,
15 Shalom's mental and emotional state, and Shalom's young age under the age of
16 consent, Shalom did not, and was unable to, give meaningful consent to such acts.

17 189. Even though Defendants Doe 1 through Doe 5, Does 8 through 9, and Does 10
18 through 100 knew or should have known of these activities by Perpetrator 1
19 Perpetrator 2, Defendants Doe 1 through Doe 5, Does 8 through 9, and Does 10
20 through 100 did nothing to investigate, supervise or monitor Perpetrator 1 to ensure
21 the safety of the minors brought into contact with Perpetrator 1.

22 190. Defendants Doe 1 through Doe 5, Does 8 through 9 and Does 10 through 100 ratified
23 or approved the conduct of Perpetrator 1 and Perpetrator 2 in committing the acts of
24 sexual misconduct described herein.

25 191. Defendants Does 1 through Doe 9 and Does 10 through 100's conduct was a breach
26 of their duties to Shalom.

27 192. As a result of the above-described conduct, Plaintiffs have suffered and will continue
28

1 to suffer physical injury, great pain of mind and body, shock, emotional distress,
2 physical manifestations of emotional distress, embarrassment, loss of self-esteem,
3 disgrace, humiliation, and loss of enjoyment of life; have suffered and will continue
4 to suffer spiritually; were prevented and will continue to be prevented from
5 performing Plaintiff's daily activities and obtaining the full enjoyment of life; have
6 sustained and will continue to sustain loss of earnings and earning capacity; and/or
7 have incurred and will continue to incur expenses for medical and psychological
8 treatment, therapy, and counseling.

9 **COVER UP: TREBLE DAMAGES**

10 193. Defendant Doe 1 Supervisory Company, Defendant Doe 2 Family Ministry
11 Company, Defendant Doe 3 Local Church, Defendant Doe 4 Religious School,
12 Defendant Doe 5 Religious Leader, Defendant Doe 8 Publishing Corp. and Defendant
13 Doe 9 Church Compound retained Defendant Doe 6 Perpetrator 1 and Defendant Doe
14 7 Perpetrator 2 in positions of authority within each organization despite knowledge
15 that both Perpetrator 1 and Perpetrator 2 had engaged in multiple inappropriate sexual
16 relationships with minor children entrusted in their care by virtue of their positions of
17 authority within the Fellowship Defendants 1 through 5, Defendants 8 through 9 and
18 Defendant's 10 through 100 collectively operated. Defendant Does 1 through 9 and
19 Defendants 10 through 100 Defendants engaged in a pattern of intimidating, blaming,
20 shaming, shunning, and discouraging minor victims of sexual assault, including both
21 Plaintiffs, from taking any action in response to the sexual abuse committed against
22 them by Perpetrators 1 and 2, and Defendants 1 through 9 and Defendants 10-100
23 collectively engaged in a cover up that resulted in Plaintiffs being the victims of
24 childhood sexual assault. Therefore, all Defendants are liable for treble damages
25 under Code of Civil Procedure § 340.1 (3).

26 **WHEREFORE**, Plaintiffs pray for damages, attorney fees, interest,
27 statutory/civil penalties according to law, and treble damages in accordance with CCP
28

1 340.1(3) against Defendant Doe 1, Supervisory Company; Doe 2, Family Ministry
2 Corporation; Doe 3, Local Church 1; Doe 4, Religious School; Defendant Doe 5
3 Religious Leader; Doe 6, Perpetrator 1; Doe 7 Perpetrator 2, Defendant Doe 8
4 Publishing Corp., Doe 9 Church Compound; Plaintiffs also pray for punitive damages
5 against Defendant Doe 1 Supervisory Company, Doe 5 Religious Leader, Doe 6
6 Perpetrator 1, Doe 7 Perpetrator 2, and Doe 8 Publishing Corp., and costs; and such
7 other relief as the court deems appropriate and just.

8 //

9 //

10 //

11 **JURY DEMAND**

12 Plaintiffs demands a jury trial on all issues so triable.

13
14 THE ZALKIN LAW FIRM, P.C.

15
16 Dated: 7-20-20

17 By: Daniel L. Varon
18 Daniel L. Varon
19 Attorneys for Plaintiff
20
21
22
23
24
25
26
27
28