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16 *Attorneys for Plaintiffs Jane Roe 1*
 17 *and Jane Roe 2*

18 **UNITED STATES DISTRICT COURT**
 19 **CENTRAL DISTRICT OF CALIFORNIA**

20 JANE ROE 1, an individual, JANE
 21 ROE 2, an individual,

22 Plaintiffs,

23 v.

24 INTERNATIONAL CHURCHES OF
 25 CHRIST, INC., a California nonprofit
 26 corporation; THE INTERNATIONAL
 27 CHRISTIAN CHURCH, INC., a
 28 California nonprofit corporation; HOPE
 WORLDWIDE, LTD., a Delaware
 nonprofit corporation; THOMAS
 (“KIP”) McKEAN, an individual;
 MARK WILKINSON, an individual;
 CINDY WILKINSON, an individual;
 MARTY WILKINSON, an individual;
 NANCY WILKINSON, an individual;

Case No. 2:23-cv-00765

COMPLAINT FOR:

1. **SEXUAL ASSAULT OF A MINOR**
2. **VIOLATION OF PENAL CODE 647.6(A)(1)**
3. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
4. **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**
5. **NEGLIGENT SUPERVISION OF A MINOR**
6. **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE SECTION 11165. ET SEQ. BASED ON VICARIOUS**

1 MIKE TALIAFERRO, an individual;
2 MISSION POINT CHRISTIAN
3 CHURCH, a Texas nonprofit
4 corporation; and DOES 1 through 100,
5 inclusive,

6 Defendants.

- LIABILITY**
- 7. **NEGLIGENCE**
 - 8. **VIOLATION OF FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATION (“RICO”) ACT 18 U.S.C. § 1962(C)**
 - 9. **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**
 - 10. **GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4**

JURY TRIAL DEMANDED

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1 Plaintiffs JANE ROE 1 and JANE ROE 2 (collectively, “Plaintiffs”) hereby
2 submit this Complaint pursuant 18 U.S.C. §§ 1961 *et. seq.*, the California Civil Code
3 and the California Penal Code, under federal question and supplemental jurisdiction
4 against Defendants INTERNATIONAL CHURCHES OF CHRIST, INC., THE
5 INTERNATIONAL CHRISTIAN CHURCH, INC., HOPE WORLDWIDE, LTD.,
6 MERCYWORLDWIDE, THOMAS “KIP” McKEAN, MARK WILKINSON, CINDY
7 WILKINSON, MARTY WILKINSON, NANCY WILKINSON, MIKE
8 TALIAFERRO and MISSION POINT CHRISTIAN CHURCH, and all other named
9 and unnamed defendants (collectively, “Defendants”), and states as follows:

10 **INTRODUCTION**

11 1. This case involves an **inhumane abuse enterprise of epic proportions**
12 that has been perpetrated and actively concealed by a **ruthless den of sexual predators**
13 wherein, through systemic physical force and psychological manipulation, **women and**
14 **children as young as 3 years old were repeatedly raped and sexually abused with**
15 **impunity by trusted church members.**

16 **JURISDICTION AND VENUE**

17 2. This Court has federal subject matter jurisdiction over this action pursuant
18 to 28 U.S.C. § 1331 because it arises under the Racketeer Influenced and Corrupt
19 Organizations Act (18 U.S.C. §§ 1961 *et. seq.*).

20 3. This Court has supplemental jurisdiction over all asserted state law claims
21 pursuant to 28 U.S.C. § 1367 because all state law claims are so related to, and arise
22 from, the same common nucleus of operative facts from which the federal claims arise
23 and, therefore, they form part of the same case or controversy under Article III of the
24 United States Constitution.

25 4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a) because a
26 substantial part of the events and omissions giving rise to the claims occurred in this
27 District. Additionally, the “nerve centers” of the International Churches of Christ, Inc.,
28 and The International Christian Church, Inc. are both within the jurisdictional

1 boundaries of the Central District of California.

2 **THE PARTIES**

3 **A. PLAINTIFFS**

4 5. Plaintiff Jane Roe 1 (“Jane Roe 1”) is a citizen and resident of San
5 Antonio, Texas. Jane Roe 1 was a citizen of the United States of America, and resident
6 of the State of Texas at the time that she first became a victim and survivor of
7 Defendants’ sexual abuse and trafficking.

8 6. Plaintiff Jane Roe 2 (“Jane Roe 2”) is a citizen and resident of Antonio,
9 Texas. Jane Roe 2 was a citizen of the United States of America, and resident of the
10 State of Texas when she was victim and survivor of Defendants’ sexual abuse and
11 trafficking.

12 **DEFENDANTS**

13 7. Defendant International Churches of Christ, Inc. (the “ICOC”) is a
14 religious non-profit corporation organized and existing under and by virtue of the laws
15 of the State of California. The ICOC purposefully conducts substantial religious and
16 affiliated programs and activities in the County of Los Angeles, State of California.
17 The ICOC has ecclesiastical, governmental, and administrative authority over the
18 business and conduct of all locations worldwide. This authority includes, but is not
19 limited to, the selection of ministers, the direction of liturgical interpretation, the
20 collection of tithings and additional funds, and the issuance of behavioral and
21 commercial directives for members worldwide.

22 8. Defendant The International Christian Church, Inc. (“ICC”) is a religious
23 non-profit corporation organized and existing under and by virtue of the laws of the
24 State of California. ICC purposefully conducts substantial religious and affiliated
25 programs and activities in the County of Los Angeles, State of California. ICC has
26 ecclesiastical, governmental, and administrative authority over the business and
27 conduct of all locations worldwide. This authority includes, but is not limited to, the
28 selection of ministers, the direction of liturgical interpretation, the collection of tithings

1 and additional funds, and the issuance of behavioral and commercial directives for
2 members worldwide.

3 9. Defendant HOPE worldwide (“HOPE”) was founded in 1994 by the
4 ICOC and is a religious non-profit corporation organized and existing under and by
5 virtue of the laws of the State of Delaware, with a principal place of business registered
6 with the Secretary of State for the State of California located at 9449 Balboa Ave. Ste.
7 311, San Diego, California 92117. HOPE purposefully conducts substantial religious
8 and affiliated programs and activities in the County of Los Angeles, State of California.

9 10. Defendant Thomas “Kip” McKean (“Kip” or “McKean”), upon
10 information and belief, is a United States citizen, currently residing in Pacific Palisades,
11 California. At all times relevant to the events that form the basis of this Complaint,
12 Defendant Kip was a member of ICOC’s Los Angeles regional branch, and later, the
13 City of Angels International Church of Christ in Los Angeles, California. Defendant
14 Kip resided in California for extended periods while conducting business in California
15 on behalf of Defendant ICOC and Defendant ICC. Defendant Kip’s supervision,
16 direction, and control over Defendants forms the basis of his personal liability.

17 11. Defendant Mark Wilkinson (“Mark”), upon information and belief, is a
18 United States citizen, currently residing in Lubbock, Texas. At all times relevant to the
19 events that form the basis of this Complaint, Mark was/is a member and leader of
20 ICOC’s San Antonio Texas branch. His abuse of Plaintiffs combined with his
21 supervision, direction, and control over Defendants forms the basis of his personal
22 liability. Mark is the husband of Cindy Wilkinson and the father of Marty and Nancy
23 Wilkinson.

24 12. Defendant Cindy Wilkinson (“Cindy”), upon information and belief, is a
25 United States citizen, currently residing in Lubbock, Texas. At all times relevant to the
26 events that form the basis of this Complaint, Cindy was/is member and leader of
27 ICOC’s San Antonio Texas branch. Her abuse of Plaintiffs combined with her
28 supervision, direction, and control over Defendants forms the basis of her personal

1 liability. Cindy is the wife of Mark Wilkinson and the mother of Marty and Nancy
2 Wilkinson.

3 13. Defendant Marty Wilkinson (“Marty”), upon information and belief, is a
4 United States citizen, currently residing in San Antonio, Texas. At all times relevant to
5 the events that form the basis of this Complaint, Marty was/is a member and leader of
6 ICOC’s San Antonio Texas branch. His abuse of Plaintiffs combined with his
7 supervision, direction, and control over Defendants forms the basis of his personal
8 liability. Marty is son of Mark and Cindy Wilkinson and the brother of Nancy
9 Wilkinson.

10 14. Defendant Nancy Wilkinson (“Nancy”), upon information and belief, is a
11 United States citizen, currently residing in Lubbock, Texas. At all times relevant to the
12 events that form the basis of this Complaint, Nancy was/is a member of ICOC’s San
13 Antonio Texas branch. Her abuse of Plaintiffs combined with her supervision,
14 direction, and control over Defendants forms the basis of her personal liability. Nancy
15 is daughter of Mark and Cindy Wilkinson and the sister of Marty Wilkinson.

16 15. Defendant Mike Taliaferro (“Mike”), upon information and belief, is a
17 United States citizen, currently residing in San Antonio, Texas. At all times relevant to
18 the events that form the basis of this Complaint, Mike was a member and leader of
19 ICOC’s San Antonio Texas branch and later Defendant Mission Point Christian
20 Church, which he currently leads. His abuse of Plaintiffs combined with his
21 supervision, direction, and control over Defendants forms the basis of his personal
22 liability. Marty is son of Mark and Cindy Wilkinson and the brother of Nancy
23 Wilkinson.

24 16. Defendant Mission Point Christian Church (“Mission Point”) was founded
25 in or about 1991 by the ICOC and is a religious non-profit corporation organized and
26 existing under and by virtue of the laws of the State of Texas, with a principal place of
27 business registered with the Secretary of State for the State of Texas located at 618
28 Northwest Loop 410 #207, San Antonio, TX 78216. On information and belief, Mission

1 Point is an affiliate of ICOC. Mission Point purposefully conducts substantial religious
2 and affiliated programs and activities in San Antonio, Texas.

3 17. Plaintiffs are ignorant of the true names of the defendants sued herein as
4 Does 1-100, inclusive, and therefore sue these defendants by such fictitious names.
5 Plaintiffs will amend the Complaint to allege their true names when ascertained.
6 Plaintiffs allege that, at all relevant times herein, Does 1-100 were the co-conspirators,
7 subsidiaries, employees, employers, and agents of constituent members of Defendants
8 herein. Plaintiffs allege that each of the fictitiously named defendants is legally
9 responsible for the actions forming the basis of this Complaint and that Plaintiffs' losses
10 and damages are the result of their wrongful conduct.

11 **GENERAL ALLEGATIONS**

12 **INTRODUCTION TO DEFENDANTS' METICULOUSLY CRAFTED,**

13 **HEINOUS ABUSE ENTERPRISE**

14 18. Defendants, at the direction and control of McKean and Lucas, have
15 collectively exploited everything good and noble in their trusting and loyal members
16 by callously robbing them of their childhood innocence through **psychological**
17 **coercion and manipulation; pervasive sexual abuse of children as young as 3 years**
18 **old; and shameful financial abuse.** Each of the foregoing abuses were actively
19 concealed by Defendants to avert discovery by child protective services and the police.

20 19. Founded in 1993, ICOC has become an intricate and intentionally
21 confusing "network of over 700 non-denominational churches in about 150 countries."
22 Throughout its history, ICOC has gone by other names, such as: the Boston Movement,
23 the Discipling Movement, the Crossroads Movement, and Multiplying Ministries, for
24 example. Often, the city in which a local assembly is located is added to the name, for
25 example, Milwaukee Church of Christ and Sarajevo Church of Christ."

26 20. To ensure Defendants' exploitative conduct remains unchecked,
27 Defendants have utilized their vast resources to **silence any internal dissidents**
28 **through physical and sexual violence**, and if necessary, vexatious litigation.

1 21. Defendants have created a “David and Goliath” scenario, where the few
2 members that have spoken up over the last four decades, have been swiftly suppressed.
3 Defendants have intentionally created a system of exploitation that extracts any and all
4 value it can from members and non-members while shielding their illicit conduct from
5 discovery by outsiders.

6 22. Defendants coerced parents/members to remain silent regarding the
7 abuses their children suffered through payoffs and non-disclosure agreements. It is the
8 vast financial base that has insulated Defendants from exposure, and provides
9 legitimacy and license to Defendants’ shameful system of exploitation and abuse. The
10 **communal ostracization and isolation from the outside world has caused highly**
11 **debilitating emotional and mental harm, and in some cases, suicide.**

12 23. Defendants operate with a strict and documented **discipleship pyramid**,
13 where every member has an elder disciple member “over them” that acts as a mentor
14 and jailor. This carefully crafted infrastructure enables both churches to execute and
15 maintain a **micromanaged degree of control over every aspect of each member’s**
16 **life**. Members are systematically deindividualized, only to endure communal isolation
17 from the world at large.

18 24. Only “disciplers” were allowed to provide any counseling to church
19 members, however, they were not licensed counselors or mental health practitioners.
20 Abuses were reported to the “disciplers”, however, no investigations were initiated and
21 no reports were made to the police by Defendants, and each of them.

22 25. Defendants created a religious requirement that mandated victims to
23 confess “sins” on a daily basis, however, “disciplers” would share the specifics of these
24 “sins” with other groups and leaders in a juvenile gossip-like culture that permeated
25 the church. This allowed Defendants to use Plaintiffs’ abuses as emotional blackmail
26 within the community.

27 26. In addition to the “discipler” structure, Defendants were/are characterized
28 by **indoctrination of rigid fundamentalist teachings, unyielding compliance with**

1 **instruction and strict social separatism.** Every new member undergoes a rigid
2 conversion process that is tantamount to **systemic brainwashing**, called the “First
3 Principles” and once a new member agrees to all indoctrination related teachings, they
4 must be baptized in water and completely devote their life to the church.

5 27. Defendants taught their members that only fellow church members are
6 “true disciples” of Jesus who will be rewarded with a place in heaven in the afterlife;
7 non-members will not go to heaven and are not “true disciples” of Jesus. Indeed, this
8 **insider-outsider dichotomy** allowed scores of sexual predators within the churches to
9 abuse children without fear of criminal prosecution. Defendants created a **highly**
10 **exclusive environment for its members** wherein they were/are prohibited from
11 marrying anyone outside the church and the church must approve all marriages, which
12 ultimately gives the church an incredible degree of control over every aspect of
13 members’ lives.

14 28. Moreover, Defendants indoctrinated their parishioners to forgive any
15 slight, no matter how severe, and “move on” without reporting such abuses. Defendants
16 teach/taught that because “no one is free from sin,” judging the conduct of another, no
17 matter how villainous, is beyond the right of any individual. Further, **parishioners**
18 **must protect God’s church and modern-day movement from all challenges.**

19 **THE CHURCHES’ EARLY ORGANIZATIONAL STRUCTURES CREATED**
20 **AN IMMOVABLE FOUNDATION THAT FACILITATED THE SYSTEMIC**
21 **PHYSICAL AND SEXUAL ABUSE OF CHILDREN**

22 29. Founded in Boston in 1979 under the “Boston Movement” moniker by
23 Thomas “Kip” McKean (“Thomas McKean”, “Kip” or “McKean”) (and 29 other
24 members) through secession from the Church of Christ in Gainesville, Florida. The
25 fledgling “church” quickly sought new members upon formation and enjoyed
26 considerable expansion and success. After the Boston Movement obtained religious
27 and corporate recognition as the International Church of Christ in the 1980’s, **ICOC**
28 **swiftly grew into a multinational movement.** According to the ICOC’s self-reported

1 statistics, the ICOC is a body of approximately 700 cooperating Christian non-
2 denominational congregations spread across 144 nations, with more than 120,000
3 members worldwide.

4 30. In 1979, the Church of Christ that helped spawn ICOC and eventually ICC,
5 was jointly led by Charles Howard Lucas (“Chuck” or “Chuck Lucas”), a licensed
6 psychologist at the time, and McKean. It is commonly understood that **McKean, was**
7 **acutely aware of, the physical, psychological, and sexual abuses Lucas and other**
8 **church members wrought upon children and adult parishioners.**

9 31. Academic writings, journals, recovered correspondence, newspaper
10 articles, eyewitness accounts, and publications like the book, “Toxic Christianity,”
11 which was written by former ICOC leading members under the pseudonym “Mr. X”.¹
12 These are but a fraction of the litany of information depicting the practices and abuses
13 Defendants institutionalized to the point of normalcy within the church.²

14 32. ICOC was incorporated in California in December 1994. Its Articles of
15 Incorporation filed with the California Secretary of State stated that upon dissolution,
16 “the remaining assets of this Corporation shall be distributed to...the individual
17 congregations that are part of the worldwide fellowship of churches of Christ (which
18 are affiliated with the Corporation), if they qualify as distributes under the provisions
19 of this Section.”

20 33. The International Christian Church (ICC) was founded by Kip McKean in
21 2006 after he was forced out of ICOC. ICC was registered in California as a nonprofit
22 religious corporation in October 2006, and as of December 2022, ICC listed 104
23 affiliate churches on its website. Articles of Incorporation filed by ICC with the
24 California Secretary of State included references to affiliates of ICC. One part stated
25 that upon dissolution of ICC, “the assets of this Corporation shall be distributed to other

26 ¹ Toxic Christianity. It’s widely believed that Rick Bauer co-published with another church leader under the pseudonym
27 “Mr. X” and can be accessed in its entirety here: <http://www.reveal.org/library/theology/Toxic.pdf>

28 ² Writings from former members and ICOC leaders, in addition to information about the ICOC/ICC churches
organizational structure, religious dogma, and their associated analyses can be found at
<http://www.reveal.org/library/psych/stumpk.html>

1 nonprofit funds, foundations or corporations affiliated with the International Christian
2 Church.³⁴

3 34. Defendants are independently operating a **highly profitable pyramid**
4 **scheme supported by a web of paper corporations and sham 501(c)(3) entities,**
5 culminating in **hundreds of millions of dollars in illicit gains.** The full extent of ICOC
6 and ICC’s profiteering is unknown, especially given the tithing and labor contributions
7 ICOC and ICC routinely coerce from their members.

8 35. ICOC and ICC also benefitted from millions in governmental support
9 through SBA loans, authorized under the Coronavirus Aid, Relief, and Economic
10 Security Act (CARES Act).⁵ Through their veiled abuse of the corporate form and
11 systematic financial exploitation of their members, Defendants have created a cash cow
12 built upon complex layers of deceit and manipulation of their vulnerable members.

13 36. One example of a tax-exempt corporation under the ICOC/ICC corporate
14 umbrella is the sham charity organization Defendant HOPE, which has generated over
15 \$100 million in tax-free revenue over the last six years.

16 37. Chuck Lucas led the CrossRoads Church of Christ in Gainesville, Florida,
17 before he was paid off to leave Florida and start another church in approximately 1986,
18 with the explicit goal that **Chuck would no longer be associated with the ICOC**
19 **because of his deviant behavior.** ICOC and McKean strategically downplayed
20 Chuck’s pattern of abuse by labeling his conduct as “recurring sins.” Sadly enough,
21

22 ³ Between April 2020 and February 2021, 18 branches of the ICC received Paycheck Protection Program (PPP) loans.
23 These loans totaled \$287,490, and a total of \$290,040 was forgiven, including accrued interest.

24 ⁴ Churches associated with the ICOC appeared to be incorporated into separate entities, according to a review of public
25 records. For instance, the Los Angeles International Church (LAICC), the largest ICOC church by membership, was
26 incorporated in California in December 1990, according to corporate records with the California Secretary of State. The
27 Los Angeles International Church (LAICC) described its structure on its website, noting that it’s “organized into eight
28 self-supported regions. Each regional evangelist has been given the charge of equipping the brothers and sisters in his part
of the LA church (region) to effectively evangelize his area with the saving message of Jesus Christ as well as helping one
another mature in Christ.” Notably, “each region has a regional financial advisory group that assists the ministry staff and
the Board of Directors with the oversight of the finances in their particular region.”

⁵ During the COVID-19 pandemic, branches of ICOC received 77 Paycheck Protection Program (PPP) loans, totaling over
\$9.4 million. Over \$9.2 million of those loans were forgiven, including accrued interest. (projects.propublica.org, accessed
December 15, 2022; disciplestoday.org, accessed December 15, 2022)

1 these “recurring sins” were never investigated by ICOC.⁶ Defendants, McKean and
2 other church leaders were acutely aware of Chuck’s disturbing pattern of abuse, but
3 nevertheless actively concealed Chuck’s misdeeds to avert discovery by the police.

4 38. Chuck died in August 2018, however, Plaintiffs and scores of members
5 witnessed his ongoing abuse of children and adults within the congregation through the
6 end of his despicable life.

7 39. Sam Laing, one of Chuck’s continued faithful supporters and a prominent
8 lead evangelist with ICOC, was aware of Chuck’s deeply disturbing abuses and its
9 chronology. Sam Laing recently made a statement about Chuck in a 2018 article
10 published in “Disciples Today,” which is an ICOC owned platform/news source:

11 **“Chuck Lucas was a man of deep conviction. He was a**
12 **disciple of great courage and perseverance. He was**
13 **criticized, persecuted and attacked for what he stood**
14 **for, but he never quit. Yes, he had his weaknesses and**
15 **failures along the way, but he, by grace, repented and**
16 **overcame them, and was**
17 **restored.”⁷**

18 **McKEAN FORMED ICC, A CARBON COPY OF ICOC, TO CONTINUE THE**
19 **SAVAGE ABUSE ENTERPRISE**

20 40. In or about 2003, McKean formally split from ICOC after an uprising and
21 various op ed public letters were published by ICOC leaders. He officially formed ICC
22 in or about 2006. ICC encompassed the same guiding principles and culture as ICOC.
23 **ICC was a carbon copy of ICOC, however, ICC eventually eclipsed ICOC in terms**
24 **of the mania, secrecy and abuse that occurred within its churches.**

25 41. From its inception, ICC improved upon ICOC’s tools of mass
26 manipulation and exploitation, which aligned with McKean’s vow to learn from any
27 past incidents of dissent or divisiveness and ensure that challenges to his authority never

28 ⁶ History Repeats Itself: The Rise and Fall of Kip McKean & Chuck Lucas. Ryan Britt. 2002. Accessed on December 29, 2022 at <http://www.reveal.org/library/history/britt2.html>

⁷ Chuck Lucas: A Servant of God. Sam Laing. 2018. Accessed on December 29, 2022.
<https://www.dtodayarchive2.org/chuck-lucas-gods-servant-and-how-he-used-him>

1 occurred in his new “movement of God”.

2 42. McKean currently oversees all ICC operations from its Los Angeles
3 headquarters and he has completely separated himself from ICOC because he believes
4 the entire ICOC congregation is lost, likely because he is no longer the leader. ICC’s
5 current membership is believed to include approximately 7,000 individuals.

6 43. A former leader of ICC, Coltin Rohn, oversaw the Columbus, Ohio ICC
7 congregation and was **fired for publicly voicing concerns surrounding McKean and**
8 **other ICC leaders’ financial abuse, coercion, and control.** Coltin was a full-time
9 evangelist with ICC but was immediately fired for criticizing the church’s tactic of
10 bullying members to give a specific amount of money to the church. Coltin was deeply
11 concerned about the church’s practice of threatening a members’ salvation and standing
12 within the community if they did not give 10-40% of their annual income to the church.⁸

13 44. On or about December 24, 2022, Coltin became aware of an ICC letter,
14 sent out to every ICC member showing the process of “marking” Coltin and his wife.
15 Defendants have continued to threaten anyone who speaks out against the church with
16 vexatious legal actions, disfellowship, and/or “marking.”

17 **THE “DISCIPLING” STRUCTURE IS THE FOUNDATION OF**
18 **DEFENDANTS’ DEPLORABLE CAMPAIGN OF MANIPULATION,**
19 **PSYCHOLOGICAL AND SEXUAL ABUSE OF CHILDREN**

20 45. ICOC was born from a “discipling” movement that arose among the
21 Churches of Christ during the 1970’s and the church has maintained this practice in
22 present times. This is a strict practice involving a “discipleship hierarchy” where a
23 formal **discipleship tree or a top-down authoritarian hierarchy** was formed.

24 46. Church leadership assigns a specific and strategic discipleship partner to
25 oversee and guide the other member. The “disciplining” movement was memorialized
26 by Flavilil R Yeakley Jr. in a book titled “The Discipling Dilemma”. The **rigid and**

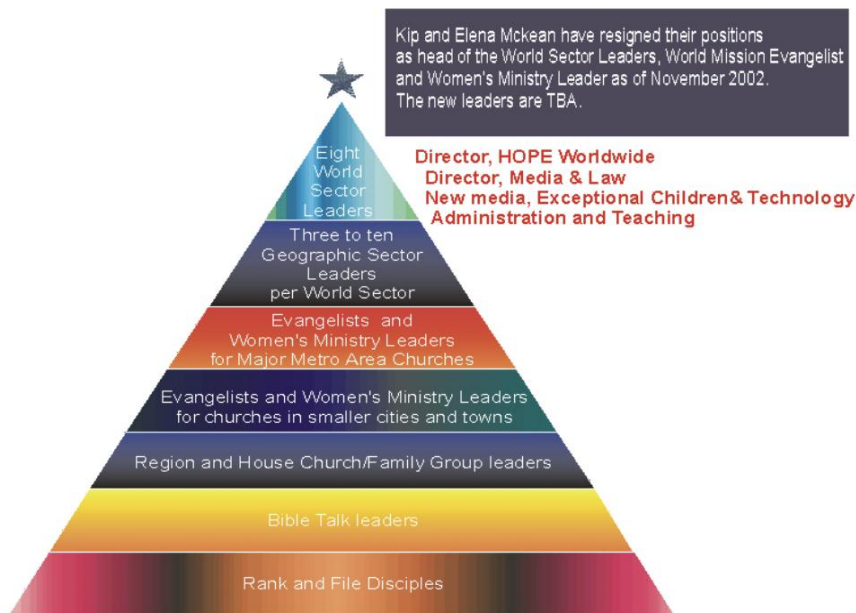
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28 ⁸ The New York Daily News stated that “dozens” of former members of ICOC “call it a destructive sect that is more
concerned with drawing in new members and draining their money than in matters of faith.” **One ex-member of ICOC
described ICOC as a “pyramid scheme” in which members “were all giving 10% to 40% of our income.”**

1 **pervasive culture of fear, coercion, control, manipulation, judgment, exclusion,**
 2 **punishment,** along with the church’s overt focus on membership growth (i.e., its
 3 primary source of income), have resulted in a **widely accepted categorization of**
 4 **ICOC and ICC as toxic, destructive cults.**

5 47. Any member’s position, health, and wellbeing depend heavily upon
 6 success in expanding the congregational rosters. Defendants’ leadership created a self-
 7 perpetuating business model to attract new recruits/members, and in doing so, generate
 8 hundreds of millions of dollars in revenue for the church.

9 48. An illustration of the Defendants’ hierarchical model of authority is
 10 depicted below:

11 The ICC had a complex and highly hierarchical organizational structure, unusually so for a
 12 relatively new and small religious group. There are many layers of leadership, similar to a
 13 pyramid or the Roman Catholic Church.



14 The ICC has a pyramid-shaped, hierarchical structure of authority. At the top was Kip
 15 McKean, the *World Missions Evangelist*, and his wife Elena Garcia-McKean, who served as
 16 *Women's Ministry Leader* for the group as a whole. As of November of 2002, the Mckeans

17 49. In addition to functioning as a life coach to other members, the “discipler”
 18 members also acted as de facto therapists. The disciplers would frequently instruct
 19 members to conduct themselves in a certain manner and if the member did not heed to
 20
 21
 22

1 the instructions, they were rebuked or labeled as “disobedient” or “arrogant” until they
2 were eventually “broken” by their sins.

3 50. The discipler structure has facilitated Defendants’ systemic concealment
4 of abuse and allowed predators to abuse women and children with impunity. For
5 example, on July 1, 2018, Damon and Vicki James, ICC “disciplers” working at the
6 specific direction of McKean instructed a member to refrain from reporting two years
7 of abuse physical and sexual by her husband. Damon James scolded this survivor and
8 stated, “[w]e don't do that to our brothers as disciples.”

9 51. Vicki James then victim shamed the woman by stating “[w[]hy would you
10 have the heart to press charges?” Damon continued and told the woman, “[w]hat does
11 that gain? That puts you in front of 'the world'.” This situation resulted in the woman
12 eventually defecting from ICC and she is trying her best to recover from the years of
13 abuse she endured by her husband and ICC.

14 52. The following is a harrowing statement by Carter Whitten regarding the
15 abuse he endured in connection with his “discipler” experience:

16 “For reasons I still don't fully understand, my ‘discipler’
17 met with me and two other teen boys at one of the boys’
18 houses. In the basement we sat in a circle, and the goal of
19 my discipler was to break me down and to get me to fully
20 understand the horrors of Hell: Meaning what I had to
21 look forward to if I didn’t enter the Kingdom (the ICOC)
22 before I died. So next he took it upon himself to paint a
23 vivid picture for me: My discipler described a scene in
24 hell in which I was nailed to a ceiling by my PENIS and
25 spun around by a demon. Hanging only by my genitals, I
26 was forced to watch the devil RAPE my mother
27 repeatedly for all eternity. I was then asked to take that
28 grotesque vignette and multiply its terror by 10,000 (or
some other arbitrarily large number) to catch even a
glimpse of how utterly horrifying the future awaiting me
was, unless I was to get baptized and be saved. I finally
broke down and cried. Which was clearly the goal, as the
ICOC famously conducted what they called “breaking
sessions.”

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In addition to completing their entire conversion series of Bible studies, there were even more hurdles I was told I had to clear in order to become a baptized disciple. One is that I had to call the fathers of all the girls in the teen ministry to whom I was sexually attracted, confess my sins of lust after their daughters, and ask for the fathers' forgiveness. I was mortified. I then asked another teen boy—a good friend of mine, if he had been made to do the same thing before he got baptized. He revealed he had indeed been told to do so, and was terrified by the whole ordeal and shunned by most of those fathers.

The final step was the sin letter or sin list. All disciples-in-training (those studying the Bible) were expected to write an exhaustive letter to God, documenting every single sin they had ever committed in their entire lives and asking for forgiveness. The letter was usually meant to be read aloud in a group setting. I was only 14.

I must have been twelve or thirteen when I realized that almost every conversation or sermon in the teen ministry was talking about lust and masturbation and sexual sin on some level. So now looking back as an adult, I am horrified by how perverse and abusive this culture was. Like many evangelical denominations, the ICOC indulged in purity culture and thus placed a heavy emphasis on sexual purity.

But the ICOC took it to a whole new level, the way that adults dealt with teens in these ministries—children that were not their children—Seems criminal to me. At the very least, it was a gross and egregious abuse of the power dynamic between adults and children. And I know enough people across the country in the ICOC to know that this was not an isolated incident, it was literally happening in every 'teen ministry.'

But even worse than this, I had a friend that was physically assaulted while he was studying the Bible, because he tried to get up and leave. So the teen leader held him down and beat him up.

1 We had to meet in one-on-one and group D-times, where
2 we had to confess our sins (especially sexual sins) in a
3 group setting, and the disciplers (teen leaders) would
4 sometimes confess sins as well. During one such meeting,
5 an adult discipler confessed to a group of four or five boys
6 that he had had a wet dream (nocturnal emission) that
7 week, and in many other meetings we were told by
8 disciplers that masturbation equated to "ejaculating on the
9 cross." I never understood why grown men were spending
10 so much time with boys as young as 12 and 13 confessing
11 all their sexual sins to them... I heard things I had never
12 heard before, and it all felt very abusive and inappropriate
13 to me, even as a child.

14 Why were grown adults grilling other people's teenagers
15 for specific sexual details... When most of these teens had
16 never even had a sexual experience in their life. The abuse
17 of power here and power dynamics were so damaging to
18 most of these teens in the teen ministry, that the PTSD and
19 anxiety and therapy that most of these children have
20 needed their whole lives is astounding."

21 **CHURCH LEADERS WERE OBSESSED WITH FINANCIALLY**
22 **EXPLOITING ITS MEMBERS**

23 53. McKean, along with other ICOC leaders were obsessed with growing
24 church membership and, therefore, **imposed recruiting quotas on members.** All
25 members were required to attempt to recruit a certain number of new members each
26 day and members were also required to bring visitors to all church events. ICOC
27 imposed quotas for everything imaginable. **Members were isolated from outsiders**
28 **and the church cultivated an atmosphere that promoted and concealed the**
systemic abuse of women and children within the church. Members were together
every day, and they were not allowed much, if any, contact with family members or
friends who were not church members. Of course, the only exception to this strict rule
is that members could contact outsiders for the sole purpose of recruitment.

1 54. Defendants' members were forced to tithe and give 10-30% of their gross
2 income to the church *and* participate in special contributions for missions
3 approximately twice a year equaling approximately **40 times their normal tithe**
4 **amount**. ICOC was relentless in its pursuit for funding and church leadership would
5 resort to **interrogating members about their income**, going so far as to **demand**
6 **copies of the members' paystubs**. For example, if a member gave \$4,000 per month,
7 the total mission contributions for that year would equal an additional (40x) and the
8 total required sum would be \$160,000 in addition to the normal yearly tithe amount of
9 \$48,000. This member would be required to give the church a whopping total of
10 \$208,000 for the year!

11 55. If the tithing budget was not satisfied, leaders or "disciplers" were forced
12 to contribute the financial shortfall themselves, or members were required to **locate the**
13 **offending member who failed to tithe and sit on their porch until they arrived**
14 **home to obtain their tithe funds before Sunday evening was over**. The pressure to
15 comply with the church's rigid demands was a source of anxiety and depression for
16 many members. So much so that **several ex-members committed suicide**.

17 56. In 2005, two former ICOC members filed a suit in Tennessee "claiming
18 the church uses cultlike tactics, manipulation, peer pressure and guilt to force members
19 into tithing and making other financial contributions." They alleged that for personal
20 gain, "the Nashville Church, the [ICOC], Hope Worldwide, and Central and South
21 America World Sector jointly participated in a scheme to defraud church members,
22 who are not allowed to inspect the church's financial records."

23 57. A former member named Tina witnessed Non-Disclosure Agreements
24 being forced upon parishioners, claiming that they could never talk about the true
25 finances of the Defendants despite evidence that ICOC opened offshore accounts
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1 containing massive quantities of cash.⁹

2 58. Moreover, McKean actively solicited church members to turn over their
3 COVID-19 relief money to the church. The following are excerpts of emails from
4 McKean to vario

I would like to address the USA Churches, but I want all of the International Churches to realize "our" unprecedented situation and unprecedented opportunity. Recently, the USA Congress passed a 2 Trillion USD Stimulus Package. Already this week, many Americans received their \$1,200 stimulus checks from the government. The World Sector Leaders knew this was coming, so we laid out a plan for every USA Church to help make Missions: 40% of the membership will give all of their stimulus checks; 40% give half; 20% raise their missions contribution pledge some other way. Prayerfully, many churches will exceed these goals!

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26 ⁹ Top leaders of the ICOC put "different ICOC assets and properties in their names" to shelter and hide those assets "so
27 that the church didn't specifically own them." For example, The Bay Area Christian Church listed its address at the
28 location of the HOPE Technology School for Autistic Children, which was owned by Bay Area Christian Church
executive minister Russ Ewell. As of 2022, the property had a total assessed value of \$7.7 million, all of which was
exempt from taxes under another exemption. The Bay Area Christian Church also received a PPP loan of \$764,600 in
April 2020.

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Here are my charges for the USA Churches:

1. Call your members to give their stimulus checks ASAP. Americans are known to spend everything in their accounts. The great Chicago Church has called these \$1,200 checks "Manna from Heaven!"

Presently, all around the world, if a member misses 2 or 3 weeks – usually recognized by missing 2 or 3 weeks of weekly contribution – this is a red flag that they may have become unfaithful. (There of course are always exceptions.) It is a fact that almost every USA Disciple has the ability to give online. So discipling in the COVID-19 Era must include how to give one's weekly contribution online.

Therefore, in the COVID-19 Era to show more forbearance and grace, if a person on your membership has not given for 4 straight weeks – remember this is the USA Churches not third world like India, the Philippines, Africa and some nations of Central and South America – then we must have the conviction that they have become unfaithful to God. At this point, after consulting your World Sector Leader then a decision needs to be made concerning the removal of their name from your membership. However, before that is done, the Evangelist or Women's Ministry Leader must contact them to see if there are extenuating circumstances. Take each situation on a case by case basis.

ICOC AND ICC MEMBERS WERE SYSTEMATICALLY BRAINWASHED AND MANIPULATED INTO SILENCE

59. Initially, early recruits received profound amounts of "love bombing" to lure them into a false sense of security, thereby allowing sexual predators to successfully manipulate them and eventually abuse them with the comfort of knowing these vulnerable and newly brainwashed people would never report the abuse.

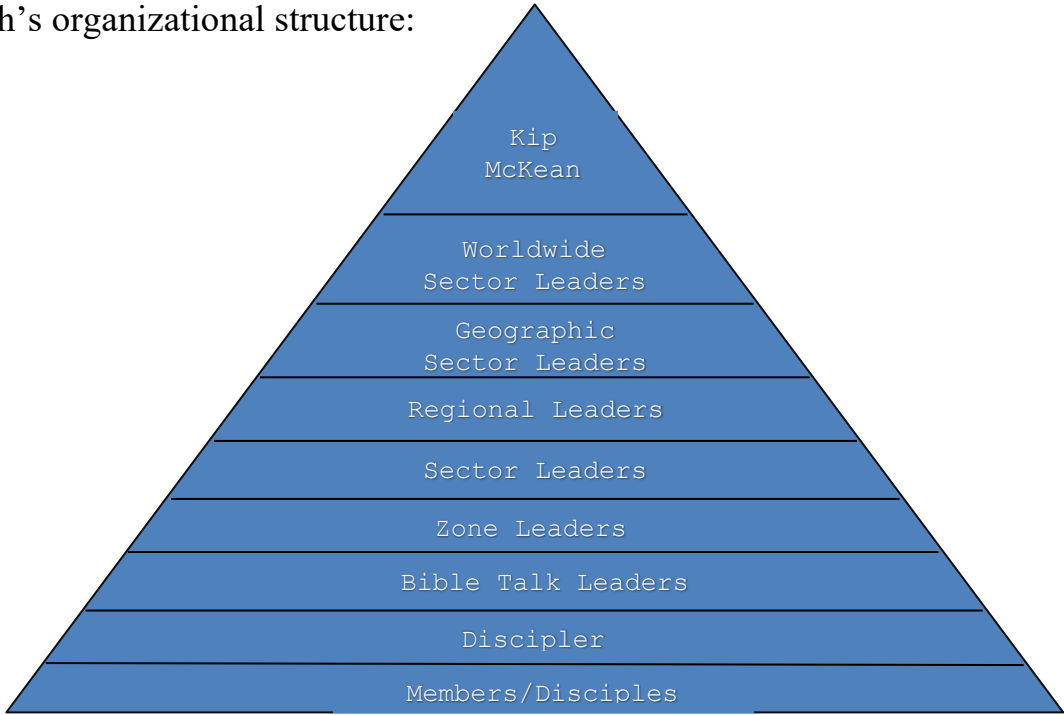
60. Each member is trained to understand, which they come to wholeheartedly believe that in connection with the church, **"compliance was the path of least resistance."** Members sincerely believed they needed to follow the Bible verbatim and **Defendants, including their leadership, were the only "true" modern-day disciples on Earth.**

61. Church members were a dynamic and diverse group, consisting of scores of successful individuals such as doctors, lawyers, professional athletes, actors, teachers, business owners, PhDs, and **a remarkable number of leaders possessed psychology degrees.**

1 62. It is without doubt that their education and training enabled these members
2 to psychologically deplete members and manipulate children and their parents into
3 submission, which created fertile ground for heinous sexual and physical abuse to
4 thrive.

5 63. One psychologist ICOC member currently owns a school for autistic
6 children in the San Francisco area and he has been accused of multiple instances of
7 sexual abuse of adults and children/teenagers while he was in Boston. ICOC and
8 McKean were aware of this despicable man’s repeated abuse, but **McKean**
9 **orchestrated his relocation from Boston to San Francisco to conceal his predatory**
10 **practices and avert criminal prosecution.**

11 64. McKean’s carefully crafted church hierarchy lent itself to maintaining
12 secrecy and preventing outside intervention. The following is a rough depiction of the
13 church’s organizational structure:



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25 65. Defendants’ structure was purposefully organized in this manner to
26 **ensure the abuse within the church remained a secret to all outsiders**, including the
27 authorities. Indeed, someone within the church was always monitoring lower ranking
28 members and giving them explicit instructions on how to conduct themselves.

1 66. Questioning higher ranking members or the church in any manner was
2 frowned upon. Some individuals were “disfellowshipped” or “marked” for being
3 divisive if they asked too many questions or questioned any leaders. A member with
4 either of these labels was **fiercely ostracized by the entire membership, including**
5 **their families.** “Disfellowshipped” members are essentially excommunicated and
6 shunned from Defendants’ communities. Accordingly, being labeled as
7 “disfellowshipped” or “marked” equated to hell on earth and in the afterlife for any
8 member so labeled.

9 67. In furtherance of the Abuse Enterprise, the pyramid hierarchy also paved
10 the way for leadership to require that **all ICOC and ICC members receive mental**
11 **health services (i.e., therapy) exclusively from church therapist members.** The
12 therapist members were biased in favor of the church and tailored their treatment and
13 “findings” based on guidance and instruction from McKean and other leaders within
14 ICOC and ICC. These therapist members’ strong bias is best evidenced by the fact that
15 a single instance of abuse was never reported to the police. In fact, these therapist
16 members routinely instructed victims to refrain from reporting the abuse to the police,
17 along with instructions to “forgive” the abuser for their heinous transgressions.

18 **DEFENDANTS CREATED A SICKENING CONVERSION THERAPY**
19 **MINISTRY TO FACILITATE THE BRAINWASHING SCHEME THAT**
20 **MANIPULATED ADULTS AND CHILDREN INTO SILENCE**

21 68. ICOC implemented a LGBTQ+ conversion therapy ministry called
22 **Strength in Weakness spearheaded by Guy Hammond.** Strength in Weakness
23 offers/offered its members three options: live the remainder of their lives celibate;
24 partner with someone of the opposite sex; or continue living their homosexual life of
25 sin and spend their afterlife in eternal damnation. Although “conversion therapy” is
26 banned in several states, **ICOC used this ministry for conversion therapy under the**
27 **pretext of a support system.** ICOC has held at least 20 Strength in Weakness
28 “conversion therapy” seminars in states where conversion therapy is banned.

 69. The mere existence of Strength in Weakness is nothing short of ironic, as
it became **common knowledge within the churches that Chuck Lucas had**

1 **numerous homosexual relationships with young men in the church.** In a 2022
2 podcast with Steve Johnson, ICOC evangelist James Lloyd stated:

3
4 “The truth is that the foundational “original sin” of our
5 movement was homosexual sin. Man on man, specifically
6 a male older leader, on young interns. And not just a few
7 times—you can find out, it’s not like nobody knows. The
8 fact that our original sin was a senior leader (Lucas) who
9 is respected and loved and training a group of young
10 men—As the leader gets them in a room and shuts the
11 door and this leader (Lucas) ‘puts the moves’ on these
12 young men. And it’s worse than it sounds because those
13 men then became ministers (perpetrators) and went out
14 into their churches and did the same things to others—
15 and I know that personally, because I was in some of those
16 meetings where it was confessed.

17 They thought it was best not to share this with anybody,
18 and I bought into those reasons. They would say things
19 like, ‘He’s got children, he’s got a wife, you can’t just say
20 those things out loud, it could hurt the faith of a young
21 Christian.’

22 All these things are just the hierarchy and patriarchy
23 saying that we don’t need to bring this thing up about
24 ‘man on man.’ And I don’t personally think that this sin
25 is any different than if it was between a man and a woman
26 by the way— I’m only calling it sin because they weren’t
27 married.

28 But the real sin here is that we (church) hid it. People
should be taught that this is how our group started. And
some of that (sin) has continued for three generations.
Some of that trauma was carried on, was passed on to
other men as they went out into other (ICOC) churches.”

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1 **DEFENDANTS SHAMELESSLY PREYED UPON AND DEFRAUDED**
2 **COLLEGE STUDENTS**

3 70. Defendants have increasingly focused on **recruiting college students**. By
4 utilizing college campuses across the globe as its primary hunting grounds, they are
5 more successful at grooming new members but have an opportunity at pecuniary gain
6 by convincing them to pay for a worthless education. On information and belief, ICOC
7 operates a campus ministry at Pepperdine University under the name “Alpha Omega”
8 to conceal its connection to ICOC.

9 71. The practice of preying upon college students resulted in numerous
10 televised exposés in the mid-1990’s when the ICOC cult commanded larger numbers,
11 including but not limited to: 20/20 with Barbara Walters, Inside Edition, Fox News,
12 BBC, and MTV.

13 72. These news stories were explosive and highly negative representations of
14 the church, as many parents were crying out to the media for help because their college
15 aged children were being brainwashed by a cult. Some parents expressed that they felt
16 like their children were kidnapped by ICOC.

17 73. Indeed, ICOC and ICC’s exploitation of college students ultimately
18 resulted in the ICOC\ICC being **banned from on-campus recruiting from several**
19 **schools across the nation**, including but not limited to Boston University, which is
20 situated near the epicenter of the ICOC. Surprisingly, the exposés did not garner
21 enough outrage among the general population, leaving the ICOC\ICC to continue to
22 prey upon college students without repercussion. Until now, the ICOC has had the
23 luxury of the benefits from their long-time obfuscation of their parasitic internal
24 practices.

25 74. Mr. McKean is so brazen that he **publicly admitted to defrauding**
26 **students** by handing out unearned, illegitimate, and meritless doctoral degrees
27 designed to both inflate the importance of its senior members and extract unearned
28 pecuniary gains.

 “The ICC runs an unaccredited college, called the
 International College of Christian Ministries, or ICCM,

1 where they are handing out doctorates to anyone they
2 choose, where the established course work is limited only
3 to literature/books created within the ICC. This is why
4 most leaders in the ICC put the abbreviation of “Dr” in
5 front of their names, because they have been giving each
6 other unaccredited doctorate status. The ICCM has
7 already brought in approximately \$6 million through ICC
8 members attending this unaccredited college.”

9 *“During Covid, while the (financial) giving inside most
10 religious organizations declined, our giving inside of
11 God’s Sold-Out Modern-Day Movement steadily
12 increased! Due to our disciples receiving \$3000 each in
13 stimulus checks, and approximately \$6000 total per
14 couple, these members turned over that stimulus money to
15 the church. As a matter of fact, the sold-out ICC Disciples
16 are now giving \$250K every single WEEK!”¹⁰*

17 *“In addition to this money, and according to God’s
18 promise of always taking care of his people, the Sold-Out
19 movement was further blessed by the government
20 providing SBA loans to our members. Therefore, we were
21 able to bring in \$1.2 million of SBA loans to God’s sold-
22 out movement. We in turn used this SBA loan money to
23 start 22 churches around the world. Isn’t that incredible!!
24 To God be the glory!”*

25 **DEFENDANTS ACTIVELY CONCEALED ABUSE, INCLUDING THE**
26 **FORCIBLE RAPE OF A 3-YEAR-OLD GIRL**

27 75. The active concealment of systemic abuse within the churches by a **den**
28 **of “religious” sexual predators** was the impetus of a devious and rampant culture of
psychological abuse and manipulation, willfully ignoring the pervasive sexual abuse
of children and adults throughout the churches and actively concealing abuse from the
authorities.

76. In furtherance of efforts to protect the church and its primary source of
revenue (its members) at all costs, Defendants attempted to cover up these disgraceful
crimes by manipulating members with remarks from McKean such as:

¹⁰ Currently, the sold-out ICC Disciples are now giving approximately \$360K per week.

1 *“We cannot report these abuses, because it would hurt*
2 *our church, which is God’s Modern-Day Movement.”*

3 *“Do you want the fall of God’s modern-day movement*
4 *on your head????!”*

5 *“The cause of protecting God’s Kingdom on earth is*
6 *more important than the sin or the pain of a few*
7 *individuals.”*

8 *“We need to forgive our brothers who sin and realize that*
9 *they are a new creation in Christ, and give them a chance*
10 *to make things right. If we report them, it will destroy*
11 *their lives and hurt the church.”*

12 77. In addition, the church engaged in strategic victim blaming and victim
13 shaming. For example, **young children who were abused were later blamed for that**
14 **abuse when the ICOC would assert how their clothing was “too provocative”.**

15 78. One former member of the East Region Los Angeles ICOC was pressured
16 and ultimately convinced to refrain from reporting her 3-year-old daughter’s abuse.
17 She was told that if she reported the abuse, it could “ruin everything” and bankrupt the
18 church. **McKean himself contacted this woman and personally thanked her for**
19 **her “loyalty” and for not reporting the abuse to the police.** He congratulated her on
20 her strength and courage to endure the situation with such faith.

21 79. An ICOC affiliate, formerly known as AMC Ministry of the Los Angeles
22 ICOC, and currently known as **Turning Point Church has similarly facilitated and**
23 **concealed abuse.** Recently, Turning Point Church claimed publicly that no sexual
24 abuse has occurred in their church, however, there are at least three survivors that
25 reported abuse to staff members who took no action with the reported abuse and never
26 alerted the congregation to the existence of sexual predators, some of whom worked in
27 Kids Kingdom (children’s ministry).

28 80. Turning Point Church’s leadership that ignored reports of abuse include
29 the following: Kevin and Tracena Holland, Mike and Kim Upton and Jay and Traci
30 Minor. In addition to the foregoing, Turning Point Church uses a licensed “Marriage
31 & Family” counselor named David Bruce, who is a mandated reporter. Mr. Bruce,

1 notwithstanding his knowledge of abuse, refused to report several instances of abuse
2 and helped conceal the abuse for the Defendants' benefit.

3 81. One former member of the Los Angeles ICOC and the Turning Point
4 Church, Sandi Derby, Advanced Grief Recovery Specialist, Trainer for The Grief
5 Recovery Institute and Ordained Minister, has "firsthand knowledge that allegations
6 of sexual, physical, and psychological abuse of teens and adults were brought to leaders
7 in Turning Point in 2019 for abuses that occurred in the early 2000s." This former
8 member witnessed leadership's failure to support the abuse survivors and their failure
9 to report the abuse to the police. As a result of her open support for the survivors, this
10 former member was discredited within the church, which eventually led to her
11 defection.

12 82. The Hampton Roads ICOC location in Virginia has also received reports
13 of abuse and done nothing in response. Specifically, Ed and Dr. Deb Anton were
14 informed of the sexual abuse of a teen ministry member and refused to report the abuse
15 or alert the congregation to the existence of a sexual predator within the church.

16 **DEFENDANTS' DOCTOR MEMBERS ILLEGALLY MEDICATED YOUNG**
17 **CHILDREN IN FURTHERANCE OF THE ABUSE ENTERPRISE**

18 83. Defendants' abuse went far beyond physical, psychological, and financial
19 exploitation. Many children, such as Anthony Stowers, were administered medication
20 by church affiliated "doctors". Often, the affiliate doctors such as Dr. Kris Stowers
21 (Anthony's uncle) would administer medications that were prescribed for other
22 conditions or children received medication for conditions for which they were never
23 diagnosed. To conceal their illegal conduct and minimize scrutiny, **Defendants'**
24 **doctors provided the children with medication in unmarked or mismarked**
25 **bottles.**

26 84. One of these affiliate physicians is a staff doctor at Florida State
27 University and another that has **administered medications to children for mental**
28 **illness despite lacking any qualification to do so medically or through public**
license. On information and belief, this physician is an orthopedic surgeon for athletes.

1 85. **Medicating children has also facilitated the ICOC’s clandestine**
2 **efforts to conceal the ongoing child abuse from anyone outside the church.** The
3 children were persuaded to believe, through strategic pharmacological deception and
4 psychological manipulation, that they were never abused and if their own memories
5 seem contradictory, then their memories were faulty.

6 **DEFENDANTS LEVERAGED CHILDREN’S MINISTRIES TO**
7 **EFFECTUATE THE ABUSE ENTERPRISE**

8 86. The children’s ministry was named the “**Kids Kingdom**”, which served
9 **as a demented playground for the multitude of sexual predators within**
10 **Defendants’ churches.** Countless instances of abuse happened within the Kids
11 Kingdom, as the program hosted mission trips (HOPE Worldwide), social events and
12 the children frequently visited members’ homes.

13 87. Defendant HOPE Worldwide is ICOC’s benevolent arm wherein
14 teenagers took mission trips around the world to spread God’s Word. Many of these
15 children who were participating in what they believed to be an evangelical trip, were
16 ultimately sexually abused by vile adult men. Children and/or their parents reported
17 the sexual abuse, including rape, to elders and doctors (i.e., mandated reporters) within
18 the church, however, the church never bothered notifying the police of the illegal
19 activity. **There were no instances of any ICOC medical doctors reporting the abuse**
20 **to anyone, let alone anyone outside the church.**

21 **DEFENDANTS PROMOTED THE DEPLORABLE PHYSICAL ABUSE OF**
22 **CHILDREN UNDER THE GUISE OF “DISCIPLINE”**

23 88. In addition to sexual abuse, ICOC and ICC children were routinely
24 physically abused under the pretext of “discipline”. Church leadership often recited the
25 following commonly known passage from Proverbs 13:24 as justification for child
26 abuse: “Those who spare the rod of discipline hate their children. Those who love their
27 children care enough to discipline them.”

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1 89. For example, members were instructed to **spank children, including**
2 **infants, with a wooden paddle, custom made with a heart shaped hole in it, to**
3 **create a more aerodynamic and effective (painful) spanking device.** A true and
4 correct image of the heart shaped paddle is depicted below:



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21 90. Members were instructed, with visuals, how to **use corporal punishment**
22 **without leaving bruises, welts or red marks, so the offending members could not**
23 **be reported to child protective services.** One former member recalls frequently
24 seeing young children at church with welts or bruises on their thighs. On one occasion,
25 this member witnessed a child with a “heart shaped welt” on his/her body.

26 **1,200,000 PEOPLE DEFECTED FROM ICOC AND ICC AFTER**
27 **GROTESQUE ABUSES WERE EXPOSED**

28 91. Since at least 1979, ICOC and ICC have averted authority suspicion

1 notwithstanding the fact that in excess of the last 40 years, **predatory members have**
2 **escaped prosecution for countless instances of sexual abuse (children and adults),**
3 **physical abuse (adults and children), spousal abuse, and emotional abuse.**

4 92. From its inception in 1979 to the present, approximately **1,200,000 souls**
5 **defected from ICOC.** The large number of defectors is due, in large part, to the
6 explosive growth that ICOC experienced.

7 93. For three consecutive years, the ICOC was labeled in the religious world
8 as the **fastest growing church on the planet.** Simply put, ICOC's growth was nothing
9 short of profound. On the other hand, its bleeding was also profound, because members
10 defected in record numbers as they became increasingly aware of the heinous,
11 pervasive abuse of children and adults and the corresponding cover ups. These
12 courageous souls would simply disappear, never again to be seen by anyone in the
13 church.

14 94. According to some of the most respected cult experts around the world,
15 including but not limited to Dr. Steve Hassan PhD, Defendants are some of the most
16 dangerous cults in existence. This is primarily because of the church's insidious tactic
17 of masquerading as the Christian church next-door with a deeply rooted Biblical
18 foundation. On its face, this public image of the church seems innocent and believable,
19 however, **the church's internal machinations are characterized by unmitigated**
20 **systemic and chronic physical and sexual abuse of children and adults of both**
21 **genders within the church.**

22 95. Defectors have since revealed the abuse they suffered and/or witnessed at
23 ICOC and ICC. Former member Lisa Johnson who as a top leader in New York City
24 and a friend of McKean, in a podcast called "Eavesdropping" made the following
25 comments regarding the church, based on her personal experience. This is a quote by
26 Lisa Johnson from a recent episode of their podcast called "Eavesdropping."

27 *"Women (in the ICOC) are getting ground up, and I mean*
28 *tons of people, it's not an isolated case here and*

1 *there....And I think about these women now, after all these*
2 *years...*

3 *So I'm gonna bring up something here...*

4 *...The sexual abuse....there has been sexual abuse, there*
5 *has been emotional abuse, and there has been some*
6 *physical abuse of women... and part of that is the issue of*
7 *patriarchy. We developed a system and a way that was not*
8 *safe for women....There are women that have been very*
9 *damaged and ground up by that.*

10 *The fruit of this is so obvious, how can you miss it?! How*
11 *many women have been told to stay with their physically*
12 *abusive husbands and how many women have been*
13 *sexually abused?!"*

14 **DEFENDANTS AUDACIOUSLY AND REPEATEDLY REFUSED TO**
15 **REPORT PEDOPHILES WHO WERE LATER ARRESTED AND**
16 **PROSECUTED**

17 96. Several pedophiles have been arrested in connection with various abuses.
18 These individuals committed numerous crimes before the police intervened and are a
19 miniscule representation of the true number of predators who have operated with
20 impunity within the church since 1979.

21 97. In January 2012, David Iburg, aka David Saracino (“David” or “David
22 Saracino”) was sentenced to 40 years of hard labor in the State of Louisiana, the
23 maximum sentence, for **forcible rape upon a 4-year-old girl in 2004**.¹¹ The
24 prosecutor, Cynthia Guillory, told the judge that he was among the worst of the worst.
25 Mr. Saracino purposefully sought out women who were vulnerable and struggling
26 financially so he could gain access to and victimize their young children. Mr. Saracino
27 faced charges and convictions in Texas, Utah and Louisiana, where he received the 40-

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¹¹ *State v. Iburg*, 12-2720 (La. 5/17/13), 118 So.3d 372, 31-

1 year sentence.

2 98. Mr. Saracino attended the East Region of the LA ICOC, where several
3 members (single mothers) of the ICOC reported to the leaders in the East Region in or
4 about 1998 that David Saracino had continuously molested their daughters. Ultimately,
5 several police reports were filed by the parents, while the ICOC remained silent. Just
6 as the ICOC did nothing to address these reports while David escaped to the San Diego
7 ICOC and freely resided in the Escondido area temporarily Like so many others, these
8 mothers were told not to share with anyone else what David had done, as it would “hurt
9 the church.”

10 99. David ultimately disappeared uncaptured. David was free to go on a
11 nationwide crime spree, abusing and raping little girls along the way. David was finally
12 caught, but only an episode of America’s Most Wanted produced credible leads that
13 resulted in his capture. Had ICOC assisted in his arrest or alerted their congregations,
14 David Saracino could not have continued abusing children with reckless abandon.
15 ICOC’s commitment to abject apathy is sickening and clearly intentional.

16 100. Since December 31, 2022, at least four of David’s previously unknown
17 victims from the East Region Los Angeles ICOC have come forward regarding the
18 abuse they endured, and it is believed there are scores of additional victims who are
19 either too entrenched in the church or too scared to tell their stories.

20 101. In or about February 2018, a volunteer soccer coach named Waldo Milla-
21 Guerra of Middlesex County, New Jersey was arrested on charges of possession and
22 distribution of child pornography. Mr. Milla-Guerra volunteered at the South
23 Brunswick Soccer Club and formerly taught at Kid’s Kingdom at Central Jersey
24 Church of Christ in North Brunswick.

25 102. In 2005, Benjamin Samuel Speights, a member of the south region of the
26 LA ICOC, was convicted for lewd and lascivious acts against a child under the age of
27 15. Mr. Speights’ unlawful conduct included forceable participation of a 14-year-old
28 girl to create pornographic videos that he sold.

1 103. In December 2020 Mr. Speights was convicted in Arizona in connection
2 with a Class 2 felony of sexual exploitation of a minor as part of a negotiated plea deal
3 related to child pornography charges. Mr. Speights was a leader in the “Kid’s
4 Kingdom” ministry in the El Segundo South Region of the Los Angeles ICOC. Several
5 children at this ministry reported his physical abuse. Without a doubt, Mr. Speights has
6 a sordid and despicable history of abusing children. Consistent with their historic
7 complicity, Defendants never reported the abuse these children endured or attempted
8 to prevent future abuses.

9 104. Nicholas Griffin Lombardi (“Mr. Lombardi”) is another example of a
10 known pedophile abusing children within Defendants’ churches. He was a long-
11 standing member of the ICOC, as were his parents. On or about November 27, 2022,
12 as a clear demonstration of kind of monster Mr. Lombardi truly is, Mr. Lombardi
13 posted on his personal Facebook page “I kind of have a fantasy of fucking a child ha[.]”

14 105. Mr. Lombardi was convicted for lewd and lascivious acts against a child
15 under the age 15. In addition, there are numerous accusations of abuse against Mr.
16 Lombardi, however, Defendants refused to report his abusive conduct to the
17 authorities, and he remains free to continue abusing children with impunity.

18 106. In approximately August 2011, one ICOC abuser, William (Bill) Thomas
19 McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for
20 various counts of felony sexual assault on a child by a person in a position of trust.¹²
21 He abused approximately 10-15 individuals, all of whom were expelled or in some
22 fashion pushed out of the Denver ICOC as punishment for failing to comply with the
23 leaders’ commands.

24 107. Tomotaka (“Tom”) Andrews Wilton of the Portland, Oregon ICC location
25 raped a child¹³ for years and church leaders, including McKean, were acutely aware of
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27 ¹² <https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child,117951>

28 ¹³ http://www.isp.idaho.gov/sor_id/SOR?id=35071&sz=1360; <https://www.homefacts.com/offender-detail/IDSX35071/Tomotaka-Andrews-Wilton.html>

1 108. The active concealment and protection of known pedophiles was
2 pervasive particularly in the Texas ICOC churches, which is consistent with an ethos
3 that in Texas, “we don’t call 911”. Indeed, this slogan is branded on apparel and other
4 retail items such as the following t-shirt and snow globe:



15 109. There are at least 4 known pedophiles who were allowed to run rampant
16 within the churches without any notification to the congregation that their children
17 were in danger.

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1 110. Karim Torres was convicted of indecency with a child by contact and on
2 information and belief, he is currently a Bible talk leader and he has served several
3 Texas ICOC locations. He and his wife are known to frequently visit other ICOC
4 churches as speakers at family retreats.

5 Offense: INDECENCY WITH A CHILD BY CONTACT

6 Statute	TEXAS PENAL CODE 21.11(a)(1)
7 Victim Sex	Female
8 Victim Age	16
9 Disposition Date	07/19/1999
JUDGMENT	3YPROBATION/COMMUNITY SUPERVISION



Photo Reported - 04/10/2006



Photo Reported - 01/08/2001

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1 111. Warren Inman was convicted of at least three counts of indecency with a
2 child in or about February 2021 in Denton County, Texas, Case No. F-2012-0728-D.
3 He was a member of the Dallas ICOC and lives in Denton County. He was a worship
4 leader and allowed college students to live in his home, as he regularly had college
5 worship group meetings at his home. Mr. Inman has been in and out of prison and was
6 finally arrested for child molestation. On information and belief, he was *not* reported to
7 the police by ICOC.



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1 112. Joseph Ursini has multiple arrests and has been in and out of the ICOC
2 fellowship over the years. On information and belief, none of the Texas ICOC
3 churches, including the Dallas location, have reported Mr. Ursini’s criminal conduct
4 to the relevant authorities.



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9 **Ursini, Joseph** Mugshot | 2022-
10 02-12 16:20:00 Dallas County,
11 Texas Arrest

12 Booking Details name URSINI, JOSEPH dob 1980-09-
13 30 age 41 years old race White sex Male booked
2022-02-12 Charges Information about charges is
not available yet

14 113. Luis Miguel Quiroz was the subject of several individuals’ reports to
15 ICOC regarding extreme sexual abuse of several minors. However, the church did
16 nothing and he was finally arrested approximately 10 years after the reports were made
17 to the church. Luis is the brother of Dr. Carlos Quiroz, an ICOC pediatrician.

18 Home » Texas Mugshots » Fort Bend County
19 Mugshots » Quiroz,Luis Miguel Mugshot | 2017-07-05
20 20:26:00 Fort Bend County, Texas Arrest



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27 | QUIROZ LUIS MIGUEL

28 ON 2017-07-05 20:26:00 FORT BEND COUNTY, TX MUGSHOTS

1 **SPECIFIC ALLEGATIONS**

2 **The 17-Year Abuse and Torture of Jane Roe 1**

3 114. Jane Roe 1 was born in 1984 and she is the younger sister of Jane Roe 2.
4 Jane Roe 1 was **diagnosed as an infant with cystic fibrosis and she spent much of**
5 **her childhood in and out of hospitals, sickly, frail and constantly worried that she**
6 **would die at an early age.** Notwithstanding her fragile physical state, she was
7 repeatedly abused and tortured by the entire Wilkinson family for approximately 17
8 years, including Mark and Cindy, and two of their children Nancy and Marty
9 Wilkinson. Mark, Cindy, Nancy and Marty Wilkinson are collectively referred to as
10 the “Wilkinson Family”.

11 115. The Wilkinson Family attended the same ICOC church as Plaintiffs and
12 as a result, the Wilkinson Family engaged in a systemic, deceptive and strategic cover-
13 up orchestrated by Mark and Cindy Wilkinson, Mike Taliaferro, and other church
14 leaders that ensured Jane Roe 1 would not report the abuse to the authorities.

15 116. Jane Roe 1’s first memory of abuse occurred when she was 3 years old
16 when she was abused by Nancy Wilkinson at Nancy’s parents’ home (the “plantation
17 house”). Over a period of 17 years, Plaintiffs spent several days a week with the
18 Wilkinson Family at ICOC sanctioned events and not a single ICOC leader or church
19 member reported Plaintiffs’ horrific abuse.

20 117. In this first memory of abuse, Nancy Wilkinson, who is approximately 7
21 years older than Jane Roe 1, forcefully held Jane Roe 1 on the floor, laid on top of her
22 exceptionally small body, simulated sex and forcibly kissed her while Jane Roe 1
23 frantically kicked and struggled to get away from Nancy. Jane Roe 1 suffers from cystic
24 fibrosis, so she was unusually small for her age and was quite frail. The more Jane Roe
25 1 fought back, the more determined and aroused Nancy became. Nancy threatened Jane
26 Roe 1 by telling her if she made any noise, they would both get in trouble and “really
27 bad things” would happen to Jane Roe 1 and her parents as a result. Nancy used similar
28 manipulative threats and fear tactics every time she abused Jane Roe 1.

1 118. Plaintiffs were repeatedly, and interchangeably forced into the closet to
2 watch the other's abuse over the course of approximately 2 years. Every time Nancy
3 had access to Jane Roe 1, she either forcibly French kissed her, groped her, or abused
4 her in some other heinous fashion. Put simply, **the abuse Jane Roe 1 endured at**
5 **Nancy's hands was relentless.**

6 119. Nancy became increasingly violent and constantly sought and found new
7 opportunities to forcibly abuse her, either putting her hands down Jane Roe 1's pants,
8 and/or pinching her breasts, inner thighs and buttocks. On one occasion, in
9 approximately 1994, when Jane Roe 1 was approximately 9 years old, Nancy lifted tiny
10 Jane Roe 1 onto the bathroom countertop at Steve and Diane Brown's (ministry leaders)
11 home and violently molested the child.

12 120. At this time, Jane Roe 1 was very ill due to her cystic fibrosis disorder,
13 and she could not defend herself against a person who was roughly 7 years her senior,
14 let alone process the severe and continuous trauma she endured. Nancy took advantage
15 of Jane Roe 1's vulnerability and used her size and strength to overpower Jane Roe 1.

16 121. This bathroom incident led to one of the first times that Jane Roe 1 sought
17 help from a church friend regarding Nancy's abuse. After Cindy discovered Jane Roe
18 1's disclosure of the abuse, she aggressively approached Jane Roe 1 and angrily scolded
19 her by saying "[d]on't you ever talk about my daughter ever again!" That night after
20 Jane Roe 1 arrived home, she discovered that **Mark and Cindy told her parents to**
21 **ground her for "gossiping" about the Wilkinsons**, which they told her was a sin.
22 **ICOC leaders blamed Jane Roe 1 for "lying" about the abuse and she was**
23 **constantly instructed to "forgive and move on," and commanded to never say**
24 **anything negative about the Wilkinsons.**

25 122. By way of another example of Nancy overpowering Jane Roe 1 against
26 her will, when Jane Roe 1 was very sick and the lights were off at a church "movie
27 night", Nancy aggressively rubbed Jane's vagina and tried to force Jane Roe 1 to rub
28 Nancy's vagina.

1 123. Jane Roe 1 was abused, tortured, stalked and threatened by Nancy
2 Wilkinson for most of her childhood and early adolescence. Jane Roe 1 made every
3 effort to avoid Nancy, however, since they were in the same church group, staying away
4 from Nancy was impossible.

5 124. When Jane Roe 1 was approximately 11 or 12 years old, the Wilkinson
6 Family moved into Plaintiffs' home for approximately one month. During this period
7 of cohabitation, **Nancy's brother, Marty Wilkinson, also groomed and abused Jane**
8 **Roe 1.** Marty's abuse continued into Jane Roe 1's high school years and finally ended
9 when Marty left for college. Marty's sexual abuse of Jane Roe 1 lasted approximately
10 6 years, however, the verbal abuse continued for several years thereafter.

11 125. **Marty frequently walked into the bathroom while Jane Roe 1 was**
12 **showering and stared at her naked body.** He would also turn off the lights while she
13 was in the middle of her shower, which forced her to stumble out of the shower naked
14 and turn the light on, all while he watched her. On more than one occasion, he took her
15 towel and held it, and forced her to walk out of the shower naked to retrieve the towel
16 from him. **Marty's shower abuse was humiliating and left Jane Roe 1 in a constant**
17 **state of fear and anticipation regarding the abuse she would have to endure next.**

18 126. Marty Wilkinson, a popular football player, cornered Jane Roe 1 at high
19 school and intentionally publicly humiliated her on numerous occasions by loudly
20 making sexual remarks for everyone to hear and embarrassing her by doing crude
21 sexual simulations in the hallways. **Marty pulled her shirt down in front of students**
22 **and exposed her cleavage.** At school and other places, Marty frequently put his hands
23 over her breasts, forced his hand between her legs, grabbed her buttocks or groped her
24 in some fashion.

25 127. **Jane Roe 1 continued to report the abuse to numerous ICOC**
26 **members and leaders, all to no avail.** Cindy Wilkinson told Jane Roe 1 that she was
27 "not allowed to tell anyone or report the abuse". **Anne-Brigitte Taliaferro, the church**
28 **leader and Mike's wife, specifically told Jane Roe 1 that she was upset with her,**

1 **and had not forgiven Jane for “threatening to pursue legal action.”**

2 128. The Wilkinson Family was/is angry, predatory, entitled, and deceitful;
3 Jane Roe 1 is afraid of them to this day, which is one of many reasons why she is
4 unwilling to reveal her name herein. It was generally understood among the
5 congregation that **the Wilkinson Family was untouchable and no one was allowed**
6 **to disparage them in any manner, even if the allegations were true.** People in the
7 church were repeatedly told that if they: “had issues with Marty, they had to go through
8 Mike Taliaferro first.” Marty was routinely called “Mike’s Golden Boy.”

9 129. When Jane Roe 1 was approximately 12 or 13 years old and when Jane
10 Roe 2 was 15 or 16 years old, Plaintiffs worked at the Wilkinson’s cleaning business
11 where approximately 5-10 other teens from the ICOC teen ministry would clean
12 overnight at various businesses serviced by the Wilkinson Family. These teen workers,
13 including Plaintiffs, were never compensated for their labor. The church leaders told
14 the girls that it was their “privilege to serve The Wilkinsons.”

15 130. During these free labor cleaning nights, Marty frequently terrorized and
16 sexually threatened Plaintiffs. Plaintiffs recall several times when they bent over for
17 some reason (e.g., to pick up trash), Marty seized the opportunity to grab their hips and
18 thrust his penis against their buttocks or pelvis to simulate sex. He would also grab their
19 heads and pretend to push them into his lap to simulate oral sex. He also embarrassed
20 Jane Roe 1 by pretending to ejaculate on/over her.

21 131. Marty entertained himself by humiliating Jane Roe 1 at every opportunity,
22 as his sexual acts and overtly sexual language were inevitably accompanied by his
23 hysterical laughter, taunting his powerless victim. Marty justified his abuse by making
24 comments such as: “[w]ith that body you should expect to be groped or assaulted!”

25 132. During the numerous instances of abuse, Jane Roe 1 was extremely ill, as
26 she was constantly in and out of the hospital because of her cystic fibrosis, sometimes
27 for months at a time. There were several scary times during Jane Roe 1’s childhood and
28 adolescence when she questioned whether she would survive. **Her health was so**

1 **fragile and volatile that she received “end of life” counseling when everyone feared**
2 **the worst.** The Wilkinson Family was cruel and inhumane insofar as they took
3 advantage of a sickly child during her most vulnerable time, both physically and
4 emotionally. She dreaded going to the Wilkinson Family home and on one occasion,
5 she was too afraid to enter the home and instead sat on their front porch coughing up
6 blood while waiting for her parents to pick her up.

7 133. In or about 2003, Defendant Mike Taliaferro (“Mike”) and his wife Anne
8 Brigitte Taliaferro moved to town to lead the San Antonio ICOC, which was later
9 renamed Mission Point Christian Church. Defendant Mission Point Christian Church
10 remains closely affiliated with ICOC and partners with HOPEWorldwide.

11 134. On information and belief, Mike Taliaferro also has direct partnerships
12 and business dealings with HOPEWorldwide. Plaintiffs mistakenly and naively
13 believed that the new Taliaferro leadership could turn the tide and they would have
14 allies to help end or report the longstanding, unmitigated Wilkinson Family abuse.
15 Indeed, that was not the case.

16 135. When Mike first learned of Plaintiffs’ abuse, he feigned alarm and
17 promised he would help the girls, yet refused to report the abuses to the authorities
18 because Plaintiffs needed to “forgive” the Wilkinson Family and move on.

19 136. Mike Taliaferro lied to Jane Roe 1 during a phone conversation wherein
20 he told her that he called child protective services about the abuse, however, that was a
21 lie. Jane Roe 1 contacted child protective services and learned that there was no record
22 of a report from Mike. According to Mike, he sought advice regarding the abuse from
23 Jacob Sanchez, an ICOC member who worked for child protective services. Mike also
24 told Jane Roe 1 that he reported the abuse to ICOC key leaders Frank Kim, Roger Lamb
25 and Roddy Oaks and their local church board and the ICOC staff lawyer.

26 137. Several other ICOC members, including mandatory reporters such as
27 doctors and counselors, became aware of Plaintiffs’ abuse, yet did nothing. ICOC
28 Elders Bill and Sally Hooper pretended to be shocked by what they learned about the

1 Wilkinson Family's shocking history of abuse against Plaintiffs, however, they also
2 failed to report the abuse to the authorities.

3 138. Dave Potca, was a church staff member and served as the Youth and
4 Family leader; he currently serves as an ICOC ordained teacher and consultant. **Dave**
5 **was also aware of Plaintiffs' abuse, yet defended Marty at every turn and refused**
6 **to report the abuse to authorities.**

7 139. The following is a list of individuals, including mandatory reporters,
8 within ICOC who were aware of Plaintiffs' abuse, yet they never reported the abuse to
9 the authorities:

- 10 • Steve and Diane Brown (leaders of the church 1991-1994 est.)
- 11 • Bill and Sally Hooper (Elders in Dallas)
- 12 • Mike Taliaferro and Anne-Bridgette Taliaferro (leaders in San Antonio 2003-
13 current)
- 14 • Carlos Quiroz (pediatrician present at a meeting in 2006 regarding the abuse)
- 15 • Clay and Nancy Wilkinson (Mark's brother and sister-in-law)
- 16 • Luke Wilkinson (Mark and Cindy Wilkinson's youngest child)
- 17 • Nadine Templer (contacted Jane Roe 1 through Facebook after hearing
18 rumors about the Wilkinsons)
- 19 • Tom and Lori Ziegler (current Elders and Board members who admitted to
20 discussing the abuse with others)
- 21 • Dan and Lori Nabors (close friends for many years; current Elders who
22 admitted to discussing the abuse with others)
- 23 • Herve Fluerant and wife Janet Fluerant (current leaders)
- 24 • Jeff and Amanda Henderson (previous leaders in San Antonio; now working
25 for the church in Brazil)
- 26 • Dave and Beth Pocta (Teachers and leaders with authority)
- 27 • Harry Lindsay (board member)
- 28 • Joe Cole (board member)

- 1 • Nate Bigbee (previous leader now working for the church in Corpus Christi)
- 2 • Sunil Punjabi (board member)
- 3 • Mike Sandoval (board member)
- 4 • Jacob and Michelle (“Misha”) Sanchez (Jacob worked for child protective
- 5 services and advised the church about the abuse in 2006)
- 6 • Carmen Garcia (Bible talk leader in 2006; Carmen attended a meeting with
- 7 both sisters in 2006)
- 8 • Larry and Shelly Anthis (previous leaders; Larry was a board member)
- 9 • Jerry Condra (board member)
- 10 • Trudy Menke (board member and church administrator. She told Jane Roe 1
- 11 that she was instructed to call the “church lawyer in California”)
- 12 • Robert Carrillo (previous leader in San Diego and Director of
- 13 HopeWorldwide in 2017)
- 14 • Lisa Cerie (former volunteer in Kid’s Kingdom; she told leadership that
- 15 Mark should not serve and was removed from leadership as a result)
- 16 • Becky Quiroz (primary care physician also director of HopeWorldwide in San
- 17 Antonio)
- 18 • Kerry and Michelle Niester (Bible talk leaders in 2006, and he was a board
- 19 member)
- 20 • Lori Hale (Jane Roe 2’s former roommate)
- 21 • Karen Louis (Jane Roe 2 sent her an email regarding the abuse, but she never
- 22 responded)
- 23 • Barrett and Rachel O’Connell (Marty’s best friends)
- 24 • Juan and Laura Aguilar (previous leaders)
- 25 • Nick Young (deceased)

26 140. Dr. Carlos Quiroz, an ICOC pediatrician, was present during a meeting
27 with Plaintiffs and various church members regarding the abuse. Dr. Quiroz failed to
28 report Plaintiffs’ abuse, notwithstanding his knowledge of the same. The church used

1 Dr. Quiroz and his position as a physician as yet another “reason” why Plaintiffs did
2 not need to report the abuse to the authorities.

3 141. Coincidentally, Dr. Quiroz’s brother, Luis Quiroz, (also an ICOC member
4 at the time) was convicted for molesting young girls, which Cindy Wilkinson was
5 directly aware of. This evidences the **pervasive nature of the sexual abuse that**
6 **occurred across a litany of ICOC family of churches.**

7 142. Mark and Cindy Wilkinson were eventually asked to leave Mission Point
8 Christian Church, however, they were relocated to the San Diego ICOC. Mike
9 Taliaferro made the following comment to Jane Roe 1 about the Wilkinsons: “I don’t
10 really care where they go, as long as they get out of my church.” This statement clearly
11 demonstrates that **Mike knew that Mark and Cindy Wilkinson were abusing**
12 **children.**

13 143. On information and belief, the San Diego congregation was not warned
14 about their abusive history. In San Diego, Mark and Cindy Wilkinson continued to
15 oversee parts of the Kids Kingdom ministry and they also worked in and traveled with
16 the HOPEWorldwide ministry.

17 144. Plaintiffs contacted HOPEWorldwide in a desperate attempt to get help
18 reporting the Wilkinson Family, as they were gravely concerned because Mark and
19 Cindy were working in the “Open Arms” orphanage in Mexico and also in portions of
20 the Kids Kingdom ministry, and HOPEWorldwide. Jane Roe 1 sent emails to the
21 following individuals within HOPEWorldwide with the subject line “Church
22 Concerns”: The Denver ICOC, Mark Ottenweller, Roger Lamb, Robert Carillo, Mike
23 Taliaferro, Herve Fleurant, Ann Brigitte Taliaferro, and Dave Pocta. In the email,
24 **Plaintiffs vulnerably detailed the shameful history of abuse and begged for help.**
25 Not a single person responded to the emails.

26 145. Nadine Templer, a longtime ICOC leader, who currently works for
27 HOPEWorldwide, contacted Jane Roe 1 via Facebook. Nadine heard about Jane Roe
28 1’s pleas for help and told Jane Roe 1 that she felt disheartened and exhausted, and she

1 was fighting a battle regarding the rampant sexual abuse. Nadine conceded that the
2 church was turning a blind eye to the abuse and she agreed that something needed to be
3 done. She also stated that for years, no one would listen to her. She stated that after she
4 contacted Steve Staten (ICOC/HOPE leader) about the abuse, that she had to accept
5 that the matter was out of her hands. Nadine then ceased contact with Jane Roe 1.

6 146. Nadine Templer also told Jane Roe 1 that she was nearly disfellowshipped
7 for trying to tackle the litany of issues surrounding sexual abuse within the church.
8 Nadine admitted to personally calling many ICOC leaders to report abuse over the
9 years, but no one would listen or take any action. Nadine also mentioned that there are
10 many recent abuse cases and the abuse is not a “thing of the past.” As recent as January
11 2023, Jane Roe 1 has been forwarded text messages from Nadine, which mentioned the
12 same comments to several other current ICOC members.

13 147. Once Jane Roe 1 became engaged to another ICOC member, Marty
14 Wilkinson tried to “warn” Jane Roe 1’s fiancé that he should not marry her because
15 Jane was “damaged goods.” Marty made this comment because he had firsthand
16 knowledge of the abuse, as his family “damaged” Plaintiffs. Marty went far as to
17 demand that other church members provide him with reports about Jane Roe 1’s pre-
18 marriage counseling sessions. Marty made every possible effort to remain in total
19 control of any information about her life.

20 148. In or about 1999, Marty Wilkinson began working at the Thousand Oaks
21 Teen Ranch that the ICOC church owned and in approximately 2004, he became
22 Director of the ranch. Over the years, Marty’s leadership position gave him access to
23 thousands of vulnerable children through this youth program. In fact, Jane Roe 1 has
24 heard terrifying first-hand stories of abuse inflicted upon innocent children by Marty at
25 the ranch. One example occurred when Marty put batteries inside an empty pillowcase,
26 swung it around and violently hit little boys with the weaponized pillowcase.

27 149. On information and belief, **Marty is currently overseeing all of the**
28 **ICOC campuses across the US, and he is the “Chair” of all ICOC Campus**

1 **Ministries.** Nancy Wilkinson has also maintained access to children over the years, as
2 she worked in Kids Kingdom, outside organizations involving children, and she also
3 frequently babysat for various ICOC families.

4 150. In or about 2020, Plaintiffs defected from ICOC. They both find it almost
5 impossible to trust anyone around them and they have a hard time determining who is
6 safe and who is not. They will be forced to cope with the emotional consequences and
7 the invasive traumatizing memories of the long-standing and pervasive abuse for the
8 rest of their lives.

9 151. As a direct and proximate result of the abuse, at the hands of ICOC, and
10 its leadership, Jane Roe 1 suffered and continues to suffer a litany of injuries. Among
11 other injuries, Jane Roe 1 has experienced and will continue to experience for the rest
12 of her life severe pain and suffering, emotional distress, humiliation, mental anguish,
13 loss of enjoyment of life, loss of educational opportunity, loss of wages, loss of income,
14 and loss of future wages.

15 **The 17-Year Abuse and Torture of Jane Roe 2**

16 152. Jane Roe 2 was born in 1981 and she was systematically abused by the
17 Wilkinson Family for approximately 17 years. She is 3 years older than her sister, Jane
18 Roe 1. Her first memory of abuse is an incident that occurred when she was
19 approximately 5 or 6 years old at the Wilkinson Family home by Nancy Wilkinson,
20 who is roughly 4 years her senior. Although this is the first memory, it is probable that
21 the abuse began much earlier and like many young victims of sexual abuse, Jane Roe
22 2's defense mechanisms have suppressed those memories.

23 153. Like her sister, Jane Roe 1, Jane Roe 2 endured what felt like a lifetime of
24 abuse by Nancy and Marty, along with an appalling strategic cover-up orchestrated by
25 Mark and Cindy Wilkinson, Mike Taliaferro, and other ICOC leaders. Indeed,
26 **Defendants covered up Plaintiffs' ongoing, heinous abuse for 17 years and they**
27 **continue to publicly deny the abuse occurred.**

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1 154. In Jane Roe 2’s first cognitive memory of abuse, Nancy Wilkinson
2 aggressively held Jane on the floor, laid on top of her, firmly pressed Jane Roe 2’s little
3 body into the floor as she frantically squirmed and struggled to get away from Nancy.
4 The more Jane Roe 2 fought back, the more determined and excited Nancy became.
5 **Nancy was approximately 10 years old at the time and she forcefully inserted her**
6 **fingers inside Jane Roe 2 and shoved her tongue in her mouth, which prevented**
7 **Jane Roe 2 from screaming for help. While assaulting Jane Roe 2, Nancy**
8 **threatened the child and said that if she made any noise, they would both get in**
9 **trouble and “really bad things” would happen to Jane Roe 2 and her parents as a**
10 **result.** Using similar manipulation and threat tactics, Nancy instilled fear in Jane Roe
11 2 and coerced her into ongoing silence each time they were together.

12 155. Around the same time as the first abuse incident at the Wilkinson Family
13 home, Jane Roe 2 also recalls Nancy shoving her in the closet with wooden slats on the
14 doors to watch as Nancy viciously abused her younger sister, Jane Roe 1. Jane Roe 2
15 watched helplessly from the closet as Nancy molested her younger, physically ill sister
16 in a grotesque manner. Specifically, Jane Roe 2 witnessed Nancy grab her sister
17 (approximately 3 years old at the time), hold her onto the ground, crushing her while
18 forcing her tongue into Jane Roe 1’s mouth. **Witnessing her fragile little sister endure**
19 **such reprehensible abuse has permanently scarred Jane Roe 2.**

20 156. The next cognitive memory of abuse occurred at approximately age 7
21 when Nancy molested Jane Roe 2 by **pinning her to the ground and raping her with**
22 **foreign objects.** Jane Roe 2 recalls being penetrated with objects such as pencils, a rod
23 of some kind, a Barbie doll and other painful objects. At one point, Nancy attempted to
24 forcibly sodomize Jane Roe 2, but she was able to scream loud enough and fend off
25 Nancy’s savage attempts. **As a result of Nancy’s repeated rape and other forms of**
26 **abuse beginning at a young age, the abuse became normalized for Jane Roe 2 and**
27 **she did not feel safe unless she was out of reach from the entire Wilkinson Family.**
28 To this day, she struggles with safety concerns, anxiety, depression, and other lasting

1 effects of the severe physical violence and psychological trauma she suffered beginning
2 at the age of 5 and continuing thereafter for approximately 17 years.

3 157. Jane Roe 2 was/is a fighter at heart and in the third grade, she mustered
4 the courage to tell a teacher at her public school about Nancy's repeated abuse. For
5 some inexplicable reason, the teacher failed to notify the police or child protective
6 services.

7 158. **Mark and Cindy Wilkinson's response to reports of Nancy's rape and**
8 **sexual abuse was to assemble the children and have Nancy "apologize" to Jane**
9 **Roe 2.** Authorities were never called and no other corrective action was taken. Indeed,
10 the Wilkinson Family's approach was ratified and promoted by Nick Young, the Dallas ICOC
11 leader at the time. Nick commanded everyone involved to refrain from notifying the
12 police and he said, "the church will handle this." **Nick's word was gospel and no one**
13 **within the church dared to defy him**, as was customary based on the hierarchical
14 organization of the church and the "discipleship" structure that facilitated the
15 systematic abuse of children within the church for decades.

16 159. One month after the "apology", Nancy resumed abusing Jane Roe 2,
17 however, she was much more hostile and aggressive as retaliation for Jane Roe 2's
18 pleas for help. **The intensity, severity and frequency of Nancy's abuse escalated** into
19 uncharted territory.

20 160. Jane Roe 2 endured a litany of abuse by Nancy such that every time Nancy
21 had access to Jane Roe 2, she either forcibly French kissed her, groped her, or abused
22 her in some other reprehensible fashion. **Nancy's abuse of Jane Roe 2 was**
23 **unrelenting and overwhelming for a young child who was intentionally isolated**
24 **from "outsiders"** (i.e., anyone who was not an ICOC member or recruit).

25 161. For example, on a 1990 trip to Los Angeles for a church wide ICOC
26 convention, Jane Roe 2's family carpooled with the Wilkinson Family. As a result, Jane
27 Roe 2 was forced to lie in the back of the truck canopy area with Nancy. Unfortunately
28 for Jane Roe 2, there was a mattress in the back canopy area and Nancy was in a

1 strategic position to abuse Jane Roe 2 yet again. **During the drive from San Antonio**
2 **to Los Angeles, Nancy repeatedly rubbed Jane Roe 2's entire body and forcibly**
3 **inserted her fingers inside Jane Roe 2's vagina.**

4 162. **Jane Roe 2 was abused, stalked and threatened by Nancy Wilkinson**
5 **throughout her childhood and early adolescence.** Jane Roe 2 attempted to avoid
6 Nancy, as much as a child her age could, and this **constant evasion of her abuser**
7 **substantially altered her psyche and the nature of her existence, both as a child**
8 **and as an adult.** Nancy and Jane Roe 2 attended the same church and they were in the
9 same church group, which made navigating this delicate situation even more confusing
10 and troublesome for little Jane Roe 2.

11 163. When Jane Roe 2 was in the 7th or 8th grade, the Wilkinson Family moved
12 into Plaintiffs' family home during a time when Mark and Cindy were in between
13 homes. **During this period of cohabitation, Nancy's brother, Marty Wilkinson,**
14 **began abusing Jane Roe 2.** Marty's abusive behavior continued throughout Jane Roe
15 2's high school years until Marty eventually left for college.

16 164. Marty's abuse of Jane Roe 2 was substantially similar to her sister's abuse,
17 regrettably. For example, Marty would enter the bathroom while Jane Roe 2 was
18 showering and stare at her naked body. Other times while she was showering, Marty
19 would enter the bathroom, turn off the light, which forced her to get out of the shower
20 naked and turn on the light – all while Marty intently glared at Jane Roe 2's wet, nude
21 body. On more than one occasion, Marty took Jane Roe 2's towel and forced her to
22 walk naked out of the shower to retrieve the towel from him. Marty's abuse was nothing
23 short of humiliating for Jane Roe 2.

24 165. Marty Wilkinson also cornered Jane Roe 2 at high school and publicly
25 humiliated her on numerous occasions by making **crude sexual remarks and**
26 **performing disgusting sexual simulations in the hallways.** Marty also humiliated her
27 by **pulling her shirt completely down in front of other students and exposing her**
28 **cleavage.**

1 166. Jane Roe 2 has vivid memories of Marty molesting her at least two other
2 times. On one occasion, he forced himself on top of her on a desk inside one the
3 buildings they were cleaning. There was no one around to defend her, however, she
4 was able to fight him off and ran away before he could injure her further. Marty also
5 grabbed her breasts and/or groped her at every possible opportunity, in addition to his
6 frequent and humiliating overtly sexual comments directed at her both in public and
7 privately.

8 167. Notwithstanding Defendants' perpetual thwarting of her attempts to stop
9 the abuse, Jane Roe 2 was undeterred and desperately continued contacting several
10 individuals within ICOC with pleas for help to end the abuse by Nancy and Marty.
11 Concurrently with these efforts, **Cindy Wilkinson made it abundantly clear that Jane**
12 **Roe 2 was prohibited from discussing the abuse and torture with anyone.**

13 168. Jane Roe 2's family was convinced to hold the Wilkinson Family in the
14 highest of regards and to never utter a negative word about the family. Anytime Jane
15 Roe 2 solicited help regarding the ongoing abuse or disclosed the abuse to *anyone*
16 within the church, she was immediately rebuked and blamed for speaking up. The
17 Wilkinson Family was angry, hostile, predatory, entitled, and deceitful such that Jane
18 Roe 2 described their home as a "house of horrors". Consequently, **Jane Roe 2, in spite**
19 **of her current age, remains afraid of the Wilkinson Family.** She is so afraid of the
20 family's far-reaching power and vast resources (ICOC) that she is unwilling to disclose
21 her name in this Complaint.

22 169. Even in her adult years, after Jane Roe 2 became engaged, somehow the
23 Wilkinson Family managed to insert themselves into her life by insisting on being part
24 of her wedding. Even more concerning is **the family's insistence that Mark, Cindy,**
25 **Nancy and Marty's wife, Daonna Wilkinson, conduct "marriage counseling"**
26 **sessions with Jane Roe 2 and her new husband regarding their sex life.** Jane Roe 2,
27 as a result of the family's possessive and inappropriately invasive conduct, felt like
28 nothing more than a piece of Wilkinson Family property.

1 170. Due to the history of abuse, Jane Roe 2 has been forced to deal with
2 crippling anxiety, panic attacks, depression and suicidal thoughts, among other things.
3 In 2009, she was almost hospitalized for suicidal ideations and prescribed anxiety
4 medication. In 2016, she was prescribed anxiety medications again for panic attacks
5 and suicidal thoughts. Notwithstanding the foregoing, she continues to courageously
6 battle the challenging effects of nearly two decades of grotesque physical and
7 psychological abuse. Jane Roe 2's numerous attempts to make her voice heard in the
8 past fell on deaf ears for *decades*. This ends now.

9 171. As a direct and proximate result of the abuse, at the hands of ICOC, and
10 its leadership, Jane Roe 2 suffered and continues to suffer a litany of injuries. Among
11 other injuries, Jane Roe 2 has experienced and will continue to experience for the rest
12 of her life severe pain and suffering, emotional distress, humiliation, mental anguish,
13 loss of enjoyment of life, loss of educational opportunity, loss of wages, loss of income,
14 and loss of future wages.

15 **FIRST CLAIM FOR RELIEF**
16 **SEXUAL ASSAULT OF A MINOR**
17 *(Against All Defendants and Does 1-100)*

18 172. Plaintiffs re-allege and incorporate by reference herein each and every
19 allegation contained herein above as though fully set forth and brought in this cause of
20 action.

21 173. Defendants intentionally, willfully, and maliciously sexually assaulted
22 and/or sexually abused and molested Plaintiff during the time that Plaintiff was a
23 minor.

24 174. In committing the unlawful acts of sexual assault against Plaintiff,
25 Defendants intended to put Plaintiff in imminent apprehension of harmful or offensive
26 contact.

27 175. Defendants put Plaintiffs in imminent apprehension of such harmful
28 offensive contact as Plaintiffs actually believed Defendants had the ability to make

1 harmful or offensive contact with plaintiff's person.

2 176. Plaintiffs did not consent to Defendants' intended harmful or offensive
3 contact with plaintiff, Defendants' intention to put Plaintiffs in fear of imminent
4 apprehension of such contact, plaintiff was a minor during the time herein alleged and,
5 therefore, lacked the ability to consent to sexual contact with any person, including
6 Defendants.

7 177. As a direct and legal result of this conduct. Plaintiffs suffered harm
8 including, but not limited to, physical, mental, and emotional injuries of childhood
9 sexual abuse and molestation; was caused to incur medical and other expenses for care,
10 treatment, and counseling, and Plaintiffs will continue to incur all such damages in the
11 future, and other damages, in an amount not yet ascertained, but which exceed the
12 minimum jurisdictional limits of this Court.

13 178. Defendants conduct described herein was oppressive, malicious, and
14 despicable in that it was intentional and done in conscious disregard for the rights and
15 safety rights of Plaintiffs, and with the substantial certainty that it would cause
16 Plaintiffs, to suffer humiliation, mental anguish, and emotional and physical distress.

17 179. Defendants' conduct as alleged constitutes malice and oppression under
18 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
19 punitive damages in an amount to be determined by the Court.

20 **SECOND CAUSE OF ACTION**
21 **VIOLATION OF PENAL CODE 647.6(a)(1)**
22 *(Against All Defendants and Does 1-100)*

23 180. Plaintiffs re-allege and incorporate by reference herein each and every
24 allegation contained herein above as though fully set forth and brought in this cause of
25 action.

26 181. California Penal Code § 647.6(a)(1) provides that "[every person who
27 aims or molests any child under 18 years of age shall be punished by a fine not
28 exceeding five thousand dollars (\$5,000), by imprisonment in a county jail not

1 exceeding one year, or by both the fine and imprisonment."

2 182. As alleged herein, Defendants engaged in sexual penetration with
3 Plaintiffs while Plaintiffs were under eighteen years of age, in violation of California
4 Penal Code § 647.6(a)(1).

5 183. Under California law, victims of childhood sexual abuse are entitled to
6 bring civil actions for violations of Penal Code provisions that prohibit adults from
7 engaging in sexual acts with minors, including Penal Code § 647.6(a)(1). See *Angie*
8 *M. v. Superior Court*, (1995) 37 6 Cal.App.4th 1217, 1224-1225.

9 184. Defendants above-noted actions in annoying and molesting the minor
10 Plaintiffs was the proximate and legal causes of physical, psychological, emotional,
11 and economic damages Plaintiffs have suffered and continues to suffer to this day. It
12 also has resulted in Plaintiffs incurring, and will require Plaintiffs to incur into the
13 future, expenses for medical and psychological treatment, therapy, and counseling.

14 185. The above-described conduct of Defendants was oppressive, malicious
15 and despicable in that it was intentional and done in conscious disregard for the rights
16 and safety of Plaintiffs, and was carried out with a conscious disregard of Plaintiffs
17 right to be free from such tortious behavior, such as to constitute oppression, fraud or
18 malice pursuant to California Civil Code section 3294, entitling Plaintiffs to punitive
19 damages against Defendants in an amount appropriate to punish and set an example
20 of them.

21 **THIRD CAUSE OF ACTION**
22 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
23 *(Against All Defendants and Does 1-100)*

24 186. Plaintiffs re-allege and incorporate by reference herein each and every
25 allegation contained herein above as though fully set forth and brought in this cause of
26 action.

27 187. The conduct of all Defendants as set forth in this Complaint was extreme
28 and outrageous, and committed with the intention of causing, or reckless disregard of

1 the probability of causing, emotional distress.

2 188. A reasonable person would not expect or tolerate the sexual assault
3 committed by Defendants.

4 189. A reasonable person would not expect, accept or tolerate Defendants'
5 unlawful sexual assault and/or sexual abuse, and molestation of Plaintiffs.

6 190. Defendants' conduct exceeded all bounds of that usually tolerated in a
7 civilized community.

8 191. Defendants intended to cause Plaintiffs injury when they sexually
9 assaulted Plaintiffs, manipulated and brainwashed Plaintiffs into silence and actively
10 concealed Plaintiffs' abuse.

11 192. Plaintiffs have suffered severe and/or extreme distress as a result.

12 193. As a direct and legal result of Defendants' conduct, Plaintiffs suffered
13 harm including, but not limited to, physical, mental, and emotional injuries of
14 childhood sexual abuse and molestation; was caused to incur medical and other
15 expenses for care, treatment, and counseling, and Plaintiffs will continue to incur all
16 such damages in the future, and other damages, in an amount not yet ascertained, but
17 which exceed the minimum jurisdictional limits of this Court.

18 194. Defendants' conduct described herein was oppressive, malicious and
19 despicable in that it was intentional and done in conscious disregard for the rights and
20 safety rights of Plaintiffs, and with the substantial certainty that it would cause
21 Plaintiffs, to suffer humiliation, mental anguish and emotional and physical distress.

22 195. Defendants' conduct as alleged constitutes malice and oppression under
23 California Civil Code section 3294. Plaintiffs are, therefore, entitled to the recovery of
24 punitive damages, in an amount to be determined by the Court.

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1 **FOURTH CAUSE OF ACTION**
2 **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**
3 *(Against All Defendants and Does 1-100)*

4 196. Plaintiffs re-allege and incorporate by reference herein each and every
5 allegation contained herein above as though fully set forth and brought in this cause of
6 action.

7 197. At all times relevant, a special relationship existed between Defendants
8 and Defendants, because Defendants were the agents of Defendants, each of whom had
9 the ability to control of Defendants' conduct, yet failed to exert it. In doing so,
10 Defendants created a widespread culture of acceptance of the abuse of children, as
11 Defendants and Defendants collectively brainwashed and manipulated Plaintiffs to
12 remain silent about the abuse and these Defendants also actively concealed the abuse
13 to avert discovery by the authorities.

14 198. At all times herein, Defendants, and each of them, negligently supervised,
15 managed, and controlled Defendants in their membership and participation in
16 Defendants' Church, and negligently failed to warn Plaintiffs, Plaintiffs' parents, and
17 other members of the Church, of the propensity and risk that Defendants would
18 sexually assault, sexually abuse, and/or molest minor children, a propensity and history
19 of which Defendants, and each of them, acting through their employees, agents, and
20 volunteers, had actual notice.

21 199. During the same time period, Defendants, and each of them, were
22 negligent in failing to exercise reasonable care to protect Plaintiffs, and other minors,
23 who were members of, or participants in, activities at Defendants' Church, from the
24 risk of sexual assault, sexual abuse and molestation by perpetrators, including
25 Defendants.

26 200. Defendants were further negligent in failing to notify law enforcement
27 and other appropriate authority that Plaintiffs were and/or continued to be a victim of
28 child abuse/assault by Defendants when they learned of this fact. Defendants' failure

1 to report the known and/or reasonably suspected child abuse of Plaintiffs, but instead
2 Defendants perpetuated and facilitated Defendants continued sexual abuse and/or
3 sexual assault, and molestation of Plaintiffs.

4 201. If Defendants satisfied their duty to take reasonable steps to protect
5 Plaintiffs all minor children, from known and/or foreseeable harm, including sexual
6 assault, including reporting the sexual assault and/or sexual abuse, and molestation to
7 law enforcement, then some or all of the Plaintiff's injuries would have been avoided.

8 202. Prior to, during, and after the sexual assault of Plaintiffs, Defendants,
9 through their administrators, employees, agents, and/or volunteers, had knowledge,
10 and/or were otherwise on notice, that Defendants had and/or was engaged in, and/or
11 presented the risk of, sexual assault of Plaintiffs, and other minors.

12 203. Plaintiffs are informed, believes, and thereupon alleges that prior to, and
13 during Defendants' sexual assault and/or sexual abuse, and molestation of Plaintiffs,
14 Defendants knew or should have known, reasonably suspected, and/or were otherwise
15 on notice, of Defendants' unlawful conduct, as set forth in this Complaint, but failed
16 and/or refused to take any affirmative action, including but not limited to notifying law
17 enforcement. Instead, Defendants directed Plaintiffs and Plaintiffs' parents to continue
18 to have contact with Defendants thereby ratifying and facilitating Defendants
19 continued sexual assault and/or sexual abuse and molestation of Plaintiffs.

20 204. Defendants breached their duties by failing to use reasonable care to
21 protect Plaintiffs from their pastor, deacon, employee, and/or agent, to wit, Defendants.

22 205. If Defendants fulfilled their duty and responsibility, then Plaintiffs would
23 not have been subject to all or most of the misconduct perpetrated against her and the
24 resulting harm.

25 206. As a direct and legal result of Defendants' conduct, Plaintiffs suffered
26 harm including, but not limited to, physical, mental, and emotional injuries of
27 childhood sexual abuse and molestation; was caused to incur medical and other
28 expenses for care, treatment, and counseling, and Plaintiffs will continue to incur all

1 such damages in the future, and other damages, in an amount not yet ascertained, but
2 which exceed the minimum jurisdictional limits of this Court.

3 207. Plaintiffs are informed, believes, and thereupon alleges that Defendants'
4 failure to respond, investigate, terminate Defendants' employment, report, or take any
5 other action following Plaintiffs, other minor children, and Plaintiffs parents' report of
6 sexual assault and/or abuse by Defendants was part of Defendants' concerted effort to
7 cover up and/or hide evidence related to childhood sexual assault of minor children,
8 including Plaintiffs.

9 208. Plaintiffs' damages as a result of Defendants repeated sexual assault,
10 abuse, and molestation of Plaintiffs was a direct result of Defendants' concealment and
11 cover-up. As such. Plaintiffs are entitled to treble damages against Defendants pursuant
12 to Code of Civil Procedure section 340.1(b)(2).

13 **FIFTH CAUSE OF ACTION**
14 **NEGLIGENT SUPERVISION OF A MINOR**
15 *(Against All Defendants and Does 1-100)*

16 209. Plaintiffs re-allege and incorporate by reference herein each and every
17 allegation contained herein above as though fully set forth and brought in this cause of
18 action.

19 210. Defendants and McKean and Lucas (McKean and Lucas are collectively,
20 the "Church Leader Defendants"), and each of them, were responsible for the care,
21 custody, control, supervision, and protection of the minor children entrusted to them,
22 including Plaintiffs. Defendants had a duty to adequately and properly supervise,
23 monitor, and protect Plaintiffs from known and knowable dangers, such as those posed
24 by Defendants.

25 211. Defendants, and each of them, breached their duty to properly and
26 adequately supervise, monitor, and protect Plaintiffs, in part because officers,
27 administrators, agents, and other supervisory employees knew or should have known
28 of Defendants' improper behavior, including that minor children, including Plaintiffs,

1 were frequently alone with Defendants without any justification, that Defendants
2 would frequently touch and sexually abuse minor children, including Plaintiffs, at
3 Defendants' Churches without any justifiable reason for doing so, including when the
4 minor children were by themselves, and Defendants sexually abused, assaulted, and/or
5 molested minor children, including but not limited to Plaintiffs.

6 212. Defendants, acting through their administrative and supervisory
7 employees, knew or should have known that Plaintiffs were unattended and
8 unsupervised with Defendants on numerous occasions, without any justification.

9 213. It should have been obvious to any officer, agent, administrator,
10 employee, or staff member that there was no reason that neither Plaintiffs, nor any
11 other child, should have been alone with Defendants. The employees and agents of
12 Defendants instead turned a blind eye to the fact that Defendants were spending time
13 with minor children, including Plaintiffs, unattended and unsupervised without any
14 investigation into the matter.

15 214. After engaging in grooming activity of Plaintiffs while spending time
16 alone with Plaintiffs, Defendants started sexually assaulting, sexually abusing, and
17 molesting Plaintiffs and other minor children on Defendants' premises and during
18 Defendants' church related services. The acts of sexual assaults and abuse occurred
19 while Plaintiffs were left unattended and unsupervised with Plaintiffs.

20 215. If Defendants, and each of them, adequately and properly supervised,
21 monitored, and protected Plaintiffs, Plaintiffs would not have been harmed, or would
22 not have been harmed to the extent that Plaintiffs were.

23 216. Defendants also recklessly and negligently failed to implement and/or
24 enforce policies and procedures that were aimed at preventing or detecting sexual
25 assault and assault of their minor members.

26 217. If Defendants adequately performed their duties and responsibilities, then
27 Plaintiffs would not have been subject to the sexual assault, assault and harassment
28 perpetrated by Defendants.

1 218. Plaintiffs have been severely damaged emotionally and physically, and
2 otherwise, in amounts to be proven at the time of trial, but which exceed the
3 jurisdictional limits of the Superior Court as a direct and legal result of the acts and
4 omissions of Defendants, and each of them.

5 **SIXTH CAUSE OF ACTION**
6 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF**
7 **PENAL CODE SECTION 11165. ET SEP. BASED ON VICARIOUS**
8 **LIABILITY**

9 *(Against All Defendants and Does 1-100)*

10 219. Plaintiffs re-allege and incorporate by reference herein each and every
11 allegation contained herein above as though fully set forth and brought in this cause of
12 action.

13 220. Defendants knew or reasonably suspected that Defendants had, and or
14 was, engaged in the sexual assault of children while the children were under the care,
15 custody, and supervision of Defendants, and each of them, and thus had a duty to report
16 Defendants to the appropriate authorities under the California Child Abuse and Neglect
17 Reporting Law. (Penal Code §§ 11164-11174.3, "CANRA".)

18 221. At all times relevant herein and material hereto, Defendants were
19 employees of the other Defendants. Defendants were responsible for hiring, training,
20 supervising, and retaining Defendants as part of their church and youth bible studies
21 program. Defendants and their staff, employees, and administrators were required to
22 report any suspected child or sexual abuse as part of their duties and responsibilities as
23 employees and/or agents of Defendants.

24 222. Defendants' and their administrators, board members, and employees are
25 mandated reporters under Penal Code section 11165.7.

26 223. Penal Code section 11166(a) states that a mandated reporter shall make a
27 report to an agency whenever he/she, in his/her professional capacity or within the
28 scope of his/her employment, has knowledge of or observes a child whom the
mandated reporter knows, or reasonably suspects has been a victim of child abuse or

1 neglect. "Reasonable suspicion" does not require certainty that child abuse or neglect
2 has occurred but looks to if it is objectively reasonable for a person to entertain a
3 suspicion to suspect child abuse or neglect. (Penal Code § 111r66(a)(1).)

4 224. As set forth in this Complaint, Defendants knew and/or reasonably
5 suspected that children had been sexually assaulted by Defendants, prior to
6 Defendants' sexual assault of Plaintiffs, giving rise to a duty to report such conduct
7 under CANRA.

8 225. Defendants, including their administrators, board members, and
9 employees knew that in the absence of the exercise of reasonable diligence, that an
10 undue risk to minors, including the Plaintiffs, existed because Defendants'
11 administrators, board members, and/or employees did not comply with California's
12 mandatory reporting requirements.

13 226. Defendants, through their administrators, board members, and
14 employees, failed to report the known and/or reasonably suspected child molestations
15 and assaults, created the risk and danger contemplated by CANRA, and as a result,
16 unreasonably and wrongfully exposed Plaintiffs and other minors to sexual molestation
17 and abuse,

18 227. If Defendants, through their administrators, board members, and
19 employees complied with CANRA's mandatory reporting requirements, then Plaintiffs
20 would not have been harmed at all or to the extent that she was.

21 228. As a direct result of Defendants failure to comply with CANRA's
22 mandatory reporting requirements, through their administrators, board members, and
23 employees. Defendants wrongfully denied the Plaintiffs the intervention of child
24 protection services and constituted a per se breach of Defendants, through their
25 administrators, board members, and employees, duties to Plaintiffs.

26 229. As a direct and legal result of Defendants and Church Leader Defendants'
27 conduct, Plaintiffs suffered severe and permanent injuries including, but not limited to,
28 physical and mental pain and suffering, severe emotional distress, physical injuries,

1 past and future costs of medical care and treatment, and other damages, in an amount
2 not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

3 **SEVENTH CAUSE OF ACTION**
4 **NEGLIGENCE**
5 *(Against All Defendants and Does 1-100)*

6 230. Plaintiffs re-allege and incorporate by reference herein each and every
7 allegation contained herein above as though fully set forth and brought in this cause of
8 action.

9 231. Defendants owed a duty of care to the minor Plaintiffs or had a duty to
10 control the conduct of Defendants by way of the special relationship existing between
11 those individuals and Plaintiffs.

12 232. Defendants knew or should have known, reasonably suspected, and/or
13 were otherwise on notice, of the misconduct and sexually predatory behavior of
14 Defendants directed towards minor children, including Plaintiffs.

15 233. Despite having knowledge of the misconduct of Defendants, all
16 Defendants herein failed to take any preventative action to control, curb, and/or prevent
17 that conduct, failed to warn Plaintiffs or Plaintiffs' parents of that wrongful conduct,
18 and/or failed to notify law enforcement, despite having a legal duty to do so.

19 234. As a direct and legal result of Defendants' negligence, Plaintiffs were
20 sexually assaulted, sexually abused, sexually harassed, and assaulted by Defendants.

21 235. If Defendants fulfilled their duty and responsibility, then Plaintiffs would
22 not have been subject to all or most of the misconduct perpetrated against Plaintiffs
23 and the resulting harm.

24 236. As a direct and legal result of Defendants' conduct, Plaintiffs suffered
25 severe and permanent injuries including, but not limited to, physical and mental pain
26 and suffering, severe emotional distress, physical injuries, past and-future costs of
27 medical care and treatment, and other damages, in an amount not yet ascertained, but
28 which exceed the minimum jurisdictional limits of this Court.

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EIGHTH CLAIM FOR RELIEF

Violation of Federal Racketeer Influenced and Corrupt Organization (“RICO”) Act 18 U.S.C. § 1962(c)
(Against All Defendants and Does 1-100)

237. Plaintiffs re-allege and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

238. Plaintiffs bring this claim for relief under the private cause of action provided by 18 U.S.C. § 1984(c), which prohibits violations of the Federal RICO Act insofar as such violation injures any person in his business or property.

239. Defendants are “persons” within the meaning of 18 U.S.C. § 1961(3) who conducted the affairs of the enterprise through a pattern of racketeering activity in violation of 18 U.S.C. § 1962(c).

240. The Abuse Enterprise, distinct from Defendants, is an association-in-fact within the meaning of 18 U.S.C. § 1961(4), organized within individual ministries, funneling into regions governed by individual bishops, and headquartered in Los Angeles, California. Members of the Abuse Enterprise maintain a common purpose of extracting money from its members and perpetrating sexual abuse upon minor children under the auspices of liturgical praxis and writings taught by its church ministers worldwide. The Abuse Enterprise began as early as 1979 and continues with a growing global membership of more than 120,000 today.

241. Defendants have conducted and participated in the affairs of the Abuse Enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1) and 1961(5).

242. Defendants’ pattern of racketeering activity includes, but is not limited to, many repeated occurrences of the following predicate acts: sexual exploitation of minors and the transmission of visual depictions of minors engaged in sexually explicit conduct in violation of 18 U.S.C. §§ 2251, 2252, and 2260.

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1 243. Each Defendant, in their individual capacity, knew or should have known
2 about the majority of the predicate acts carried out by Defendants within the Abuse
3 Enterprise.

4 244. Upon information and belief, some combination of Defendants have
5 engaged in an uninterrupted course of unlawful conduct consisting of all of the herein
6 described predicate acts.

7 245. Defendants' pattern of racketeering activity includes, but is not limited to,
8 many repeated occurrences of the following predicate acts: (i) violating the prohibition
9 against human trafficking under 18 U.S.C. § 1590; (ii) laundering of monetary
10 instruments outside of the United States with the intent to promote the carrying on of
11 unlawful activity in violation of 18 U.S.C. §1956(a)(2); and (iii) sexual exploitation of
12 minors and the transmission of visual depictions of minors engaged in sexually explicit
13 conduct in violation of 18 U.S.C. §§ 2251, 2252, and 2260 Upon information and
14 belief, several hundred children have been sexually exploited as a result of this pattern
15 of racketeering behavior.

16 246. Upon information and belief, hundreds of individuals within Defendants'
17 inner circles have been extorted through fear of financial and physical injury into
18 making large financial payments to Defendants and into providing sexual services to
19 Defendants as a result of this pattern of racketeering behavior.

20 247. Upon information and belief, many millions of dollars have been
21 trafficked out of the United States for the purposes of carrying on unlawful activity as
22 a result of this pattern of racketeering behavior.

23 248. Upon information and belief, Defendants' pattern of racketeering
24 behavior has been related and continuous since its inception. Upon information and
25 belief, there is not only a threat of continued criminal activity, but continued criminal
26 activity is occurring within the Abuse Enterprise at the hands of nearly all Defendants
27 as of the writing of this Complaint.

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1 249. Defendants and the Abuse Enterprise regularly move goods, money, and
2 people across state lines, and are therefore engaged in interstate commerce.

3 250. As a direct and proximate result of these patterns of racketeering
4 behaviors, Plaintiffs have sustained damages, including lost wages, loss of economic
5 opportunity, loss of educational opportunity, loss of future income, loss of specific
6 extorted payments, physical injury, severe emotional distress, and additional economic
7 losses.

8 251. Plaintiffs are therefore entitled to recover treble the damages she sustained
9 in an amount to be proven at trial, the cost of the suit, plus a reasonable attorney's fee,
10 pursuant to 18 U.S.C. § 1964(c).

11 **NINTH CLAIM FOR RELIEF**
12 **Sexual Battery in Violation of Cal. Civ. Code § 1708.5**
13 *(Against All Defendants and Does 1-100)*

14 252. Plaintiffs re-allege and incorporate by reference herein each and every
15 allegation contained herein above as though fully set forth and brought in this cause of
16 action.

17 253. Plaintiffs bring this claim for relief under Cal. Civ. Code Section 1708.5,
18 which prohibits sexual battery.

19 254. Plaintiffs bring this claim pursuant to California Assembly Bill 218,
20 amending Sections 340.1 and 1002 of the Code of Civil Procedure and Section 905 of
21 the Government Code, relating to childhood sexual assault, reviving until December
22 31, 2023 the statute of limitations for all previously extinguished claims for damages
23 suffered as a result of childhood sexual assault for victims within 22 years of the age
24 of majority.

25 255. As alleged herein, Plaintiffs the victim of sexual battery as a minor
26 perpetrated by Defendants. Defendants subjected Plaintiffs to this sexual battery at the
27 hands of while Plaintiffs were minors.

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1 256. Cal. Civ. Code § 1708.5 prohibits any act with the intent to cause a
2 harmful or offensive contact with an intimate part of another, and a sexually offensive
3 contact with the person results, or any act that causes an imminent apprehension of
4 such harmful or offensive contact and the offensive contact results.

5 257. Defendants knowingly conspired and/or aided and abetted to force
6 Plaintiffs into sexual battery with Defendants, and such sexual battery did, on multiple
7 occasions, occur.

8 258. Plaintiffs were minors minor when Defendants sexually battered them.

9 259. Each Defendant knowingly conspired and/or aided and abetted to create
10 conditions of coercion and control that caused Plaintiffs to be repeatedly subjected to
11 private, egregiously offensive sexual contact with Defendants, all in furtherance of
12 sexually battering Plaintiffs and in furtherance of the Abuse Enterprise.

13 260. The sexual battery of Plaintiffs by Defendants was the result of
14 Defendants' collective cover up, as statutorily defined by California Code of Civil
15 Procedure § 340.1(b).

16 261. As a direct and proximate cause of Defendants' actions, Plaintiffs have
17 suffered severe emotional and mental distress and anxiety, humiliation,
18 embarrassment, and additional damages.

19 262. The aforementioned conduct was willful, wanton, and malicious. At all
20 relevant times, Defendants acted with conscious disregard of Plaintiffs' rights and
21 safety as a minor in their care. Defendants also acted with the knowledge of or with
22 reckless disregard for the fact that their conduct was certain to cause injury and/or
23 humiliation to Plaintiffs.

24 263. Plaintiffs are therefore entitled to recover treble the amount of damages
25 they sustained, pursuant to California Code of Civil Procedure § 340.1(b)(1) in an
26 amount to be proven at trial, attorneys' fees, and other relief that the Court may deem
27 proper.

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TENTH CLAIM FOR RELIEF
Gender Violence in Violation of Cal. Civ. Code § 52.4
(Against Defendants and Does 1-100)

264. Plaintiffs re-allege and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

265. Plaintiffs bring this claim for relief under Cal. Civ. Code Section 52.4, which prohibits acts of gender violence.

266. Plaintiffs bring this claim pursuant to California Assembly Bill 218, amending Sections 340.1 and 1002 of the California Code of Civil Procedure and Section 905 of the Government Code, relating to childhood sexual assault, reviving until December 31, 2023, the statute of limitations for all previously extinguished claims for damages suffered as a result of childhood sexual assault for victims within 22 years of the age of majority.

267. As alleged herein, Plaintiffs were the victims of multiple instances of sexual battery as a minor perpetrated by Defendants and facilitated by all Defendants herein. Defendants subjected Plaintiffs to these multiple incidents of sexual battery at the hands of Defendants while Plaintiffs were minors.

268. Cal. Civ. Code § 52.4 prohibits commission of acts of gender violence, defined to include a physical intrusion or physical invasion of a sexual nature under coercive conditions, whether or not those acts have resulted in criminal complaints, charges, prosecution, or conviction.

269. As alleged herein, Plaintiffs were repeatedly the victim of acts of gender violence by Defendants while they were minors.

270. Each Defendant herein knowingly conspired and/or aided and abetted to create conditions of coercion and control that caused Plaintiffs to be repeatedly subjected to private, egregiously offensive sexual contact with Defendants, all in furtherance of committing acts of gender violence against Plaintiffs.

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Plaintiffs respectfully demand a trial by jury on all claims so triable.

SAMINI BARIC KATZ LLP

Date: February 1, 2023

By: /s/ Bobby Samini
Bobby Samini
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Steve Baric
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