

1 **SAMINI BARIC KATZ LLP**  
 2 Bobby Samini, Esq. (SBN 181796)  
 3 Michael Katz, Esq. (SBN 181728)  
 4 Steve Baric, Esq. (SBN 200066)  
 5 Nicole C. Prado, Esq. (SBN 269833)  
 6 John S. Oney IV, Esq. (SBN 338596)  
 7 650 Town Center Drive, Suite 1500  
 8 Costa Mesa, CA 92626  
 9 Telephone: (949) 724-0900  
 10 Facsimile: (949) 724-0901  
 11 Email: bobby.samini@sbklawyers.com  
 12 Email: michael.katz@sbklawyers.com  
 13 Email: steve.baric@sbklawyers.com  
 14 Email: nicole.prado@sbklawyers.com  
 15 Email: john.oney@sbklawyers.com

16 *Attorneys for Plaintiffs*  
 17 *Jane Roe 6 and Jane Roe 7*

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

20 JANE ROE 6, an individual; and JANE  
 21 ROE 7, 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; THE  
 ESTATE OF CHARLES “CHUCK”  
 LUCAS; NORTH RIVER CHURCH  
 OF CHRIST, a Georgia nonprofit  
 corporation; AL BAIRD, an individual;

Case No. 2:23-cv-0999

**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 SEP. BASED ON VICARIOUS**

1 ALBERTO SCHIRMER, an individual;  
2 ANNA MARIA SCHIRMER, an  
3 individual; and DOES 1 through 100,  
4 inclusive,

5 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**

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Plaintiffs JANE ROE 6 and JANE ROE 7 (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 THOMAS “KIP” McKEAN, THE ESTATE OF CHARLES “CHUCK” LUCAS,  
7 NORTH RIVER CHURCH OF CHRIST, AL BAIRD, ALBERTO SCHIRMER,  
8 ANNA MARIA SCHIRMER and all other named and unnamed defendants  
9 (collectively, “Defendants”) and states as follows:

### 10 INTRODUCTION

11 1. This action to recover damages on behalf of adult victims of childhood  
12 sexual assault is governed by Code of Civil Procedure section 340.01 (“section  
13 340.01”).

14 2. The incidents of childhood sexual assault against Plaintiffs alleged herein  
15 were facilitated and actively concealed by Defendants while Plaintiffs were minors.

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

### 21 JURISDICTION AND VENUE

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

25 5. Pursuant to Code of Civil Procedure §340.1(q) as amended by Assembly  
26 Bill 218, effective January 1, 2020, there is a three (3) year window in which all civil  
27 claims of childhood sexual assault are revived if they have not been litigated to finality.  
28 This provision provides that, “[n]otwithstanding any other provision of law, any claim

1 for damages described in paragraphs (1) through (3), inclusive, of subdivision (a) that  
2 has not been litigated to finality and that would otherwise be barred as of January 1,  
3 2020, because the applicable statute of limitations, claim presentation deadline, or any  
4 other time limit had expired, is revived, and these claims may be commenced within  
5 three years of January 1, 2020. A plaintiff shall have the later of the three-year time  
6 period under this subdivision or the time period under subdivision (a) as amended by  
7 the act that added this subdivision.” This claim has not been previously litigated to  
8 finality; thus, it is timely under the revised provisions of Code of Civil Procedure  
9 §340.1(q).

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

15 7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a) because a  
16 substantial part of the events and omissions giving rise to the claims occurred in this  
17 District. Additionally, the “nerve centers” of the International Churches of Christ, Inc.,  
18 and The International Christian Church, Inc. are both within the jurisdictional  
19 boundaries of the Central District of California.

20 **THE PARTIES**

21 **A. PLAINTIFFS**

22 8. Plaintiff Jane Roe 6 is a 19-year-old female citizen and resident of  
23 Georgia. Jane Roe 6 was a minor, citizen of the United States of America, and resident  
24 of the State of Georgia at the time that she first became a victim and survivor of  
25 Defendants’ sexual abuse and trafficking.

26 9. Plaintiff Jane Roe 7 is a 24-year-old female citizen and resident of  
27 Georgia. Jane Roe 7 was a minor, citizen of the United States of America, and resident  
28 of the State of Georgia at the time that she first became a victim and survivor of

1 Defendants' sexual abuse and trafficking.

2 **B. DEFENDANTS**

3 10. Defendant International Churches of Christ, Inc. (the "ICOC") is a  
4 religious non-profit corporation organized and existing under and by virtue of the laws  
5 of the State of California. The ICOC purposefully conducts substantial religious and  
6 affiliated programs and activities in the County of Los Angeles, State of California.  
7 The ICOC has ecclesiastical, governmental, and administrative authority over the  
8 business and conduct of all locations worldwide. This authority includes, but is not  
9 limited to, the selection of ministers, the direction of liturgical interpretation, the  
10 collection of tithings and additional funds, and the issuance of behavioral and  
11 commercial directives for members, ICOC churches and ICOC affiliate churches  
12 worldwide.

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

22 12. Defendant HOPE worldwide, Ltd. ("HOPE") was founded in 1994 by the  
23 ICOC and is a religious non-profit corporation organized and existing under and by  
24 virtue of the laws of the State of Delaware, with a principal place of business registered  
25 with the Secretary of State for the State of California located at 9449 Balboa Ave. Ste.  
26 311, San Diego, California 92117. HOPE purposefully conducts substantial religious  
27 and affiliated programs and activities in the County of Los Angeles, State of California.  
28 HOPE operates at the specific direction and control of ICOC.

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

10           14. Defendant The Estate of Charles “Chuck” Lucas (“Chuck” or “Lucas”),  
11 upon information and belief, was a citizen of the United States of America and was  
12 residing, at the time of his death, in Thomasville, Georgia. At all times relevant to the  
13 events that form the basis of this Complaint, Defendant Chuck was a member of the  
14 ICOC, and later, formed another church called Cornerstone. Defendant Chuck resided  
15 in Georgia for extended periods while conducting business in California on behalf of  
16 Defendant ICOC. Defendant Chuck’s supervision, direction, and control over the  
17 Defendants forms the basis of his personal liability.

18           15. Defendant North River Church of Christ (“North River ICOC”) is a  
19 religious non-profit corporation organized and existing under and by virtue of the laws  
20 of the State of Georgia. North River ICOC purposefully conducts substantial religious  
21 and affiliated programs and activities in the State of Georgia. North River ICOC has  
22 ecclesiastical, governmental, and administrative authority over the business and  
23 conduct of all locations worldwide. This authority includes, but is not limited to, the  
24 selection of ministers, the direction of liturgical interpretation, the collection of tithings  
25 and additional funds, and the issuance of behavioral and commercial directives for  
26 members worldwide. North River ICOC operates at the specific direction and control  
27 of ICOC.

28 ///

1           16. Defendant Al Baird (“Baird”) upon information and belief, is a United  
2 States citizen, currently residing in the Los Angeles metro area in California. At all  
3 times relevant to the events that form the basis of this Complaint, Baird is a member  
4 and Lead Elder of ICOC’s Los Angeles branch, which directs and controls the activities  
5 of all other ICOC branches, including but not limited to North River ICOC. Baird’s  
6 supervision, direction, and control over Defendants forms the basis of his personal  
7 liability.

8           17. Defendant Alberto Schirmer upon information and belief, is a United  
9 States citizen, currently residing in Marietta, Georgia. At all times relevant to the  
10 events that form the basis of this Complaint, Alberto Schirmer held a leadership  
11 position as a Deacon of the North River ICOC. Alberto Schirmer’s active concealment  
12 of Plaintiffs’ abuse, along with his supervision, direction, and control over Defendants  
13 forms the basis of his personal liability.

14           18. Defendant Anna Maria Schirmer upon information and belief, is a United  
15 States citizen, currently residing in Marietta, Georgia. At all times relevant to the  
16 events that form the basis of this Complaint, Anna Maria Schirmer was a Deacon’s  
17 wife (i.e., a leadership position) of the North River ICOC. Anna Maria Schirmer’s  
18 active concealment of Plaintiffs’ abuse, along with her supervision, direction, and  
19 control over Defendants forms the basis of her personal liability.

20           19. Plaintiffs are ignorant of the true names of the defendants sued herein as  
21 Does 1-100, inclusive, and therefore sue these defendants by such fictitious names.  
22 Plaintiffs will amend the Complaint to allege their true names when ascertained.  
23 Plaintiffs allege that, at all relevant times herein, Does 1-100 were the co-conspirators,  
24 subsidiaries, employees, employers, and agents of constituent members of Defendants  
25 herein. Plaintiffs allege that each of the fictitiously named defendants is legally  
26 responsible for the actions forming the basis of this Complaint and that Plaintiffs’ losses  
27 and damages are the result of their wrongful conduct.

28 ///





1 **communal ostracization and isolation from the outside world has caused highly**  
2 **debilitating emotional and mental harm, and in some cases, suicide.**

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

9 26. Only “disciplers” were allowed to provide any counseling to church  
10 members, however, they were not licensed counselors or mental health practitioners.  
11 Abuses were reported to the “disciplers”, however, no investigations were initiated and  
12 no reports were made to the police by Defendants, and each of them.

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

18 28. In addition to the “discipler” structure, Defendants were/are characterized  
19 by **indoctrination of rigid fundamentalist teachings, unyielding compliance with**  
20 **instruction and strict social separatism**. Every new member undergoes a rigid  
21 conversion process that is tantamount to **systemic brainwashing**, called the “First  
22 Principles” and once a new member agrees to all indoctrination related teachings, they  
23 must be baptized in water and completely devote their life to the church.

24 29. Defendants taught their members that only fellow church members are  
25 “true disciples” of Jesus who will be rewarded with a place in heaven in the afterlife;  
26 non-members will not go to heaven and are not “true disciples” of Jesus. Indeed, this  
27 **insider-outsider dichotomy** allowed scores of sexual predators within the churches to  
28 abuse children without fear of criminal prosecution. Defendants created a **highly**

1 **exclusive environment for its members** wherein they were/are prohibited from  
2 marrying anyone outside the church and the church must approve all marriages, which  
3 ultimately gives the church an incredible degree of control over every aspect of  
4 members' lives.

5 30. Moreover, Defendants indoctrinated their parishioners to forgive any  
6 slight, no matter how severe, and "move on" without reporting such abuses. Defendants  
7 teach/taught that because "no one is free from sin," judging the conduct of another, no  
8 matter how villainous, is beyond the right of any individual. Further, **parishioners**  
9 **must protect God's church and modern-day movement from all challenges.**

10 **THE CHURCHES' EARLY ORGANIZATIONAL STRUCTURES CREATED**  
11 **AN IMMOVABLE FOUNDATION THAT FACILITATED THE SYSTEMIC**  
12 **PHYSICAL AND SEXUAL ABUSE OF CHILDREN**

13 31. Founded in Boston in 1979 under the "Boston Movement" moniker by  
14 Thomas "Kip" McKean ("Thomas McKean", "Kip" or "McKean") (and 29 other  
15 members) through secession from the Church of Christ in Gainesville, Florida. The  
16 fledgling "church" quickly sought new members upon formation and enjoyed  
17 considerable expansion and success. After the Boston Movement obtained religious  
18 and corporate recognition as the International Church of Christ in the 1980's, **ICOC**  
19 **swiftly grew into a multinational movement.** According to the ICOC's self-reported  
20 statistics, the ICOC is a body of approximately 700 cooperating Christian non-  
21 denominational congregations spread across 144 nations, with more than 120,000  
22 members worldwide.

23 32. Although ICOC contends that each ICOC church location is unrelated to  
24 the others, they present a unified front and hold themselves out to the general public as  
25 a fiercely loyal consolidated unit. However, when any church comes under scrutiny for  
26 any reason, the churches conveniently distance themselves from the scrutinized church.  
27 Regardless of the churches' feigned individuality, their websites clearly delineate the  
28 interconnectedness of all ICOC locations, specifically in connection with their general

1 structure, belief system, Chairs, overseers and delegates of each department.

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

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

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

18 36. The International Christian Church (ICC) was founded by Kip McKean in  
19 2006 after he was forced out of ICOC. ICC was registered in California as a nonprofit  
20 religious corporation in October 2006, and as of December 2022, ICC listed 104  
21 affiliate churches on its website. Articles of Incorporation filed by ICC with the  
22 California Secretary of State included references to affiliates of ICC. One part stated  
23 that upon dissolution of ICC, “the assets of this Corporation shall be distributed to other  
24 nonprofit funds, foundations or corporations affiliated with the International Christian  
25

26 <sup>1</sup> 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 <sup>2</sup> 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 Church.<sup>34</sup>

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

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

13 39. 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. On information and belief,  
16 **HOPE and ICOC often commingled these funds and made arbitrary decisions**  
17 **regarding where "donation" money meant for HOPE would eventually be**  
18 **disbursed.**

19 40. Chuck Lucas led the CrossRoads Church of Christ in Gainesville, Florida,  
20 before he was paid off to leave Florida and start another church in approximately 1986,  
21

---

22 <sup>3</sup> 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 <sup>4</sup> 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  
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."

28 <sup>5</sup> 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 with the explicit goal that **Chuck would no longer be associated with the ICOC**  
2 **because of his deviant behavior.** ICOC and McKean strategically downplayed  
3 Chuck’s pattern of abuse by labeling his conduct as “recurring sins.” Sadly enough,  
4 these “recurring sins” were never investigated by ICOC.<sup>6</sup> Defendants, McKean and  
5 other church leaders were acutely aware of Chuck’s disturbing pattern of abuse, but  
6 nevertheless actively concealed Chuck’s misdeeds to avert discovery by the police.

7 41. Chuck died in August 2018, however, Plaintiffs and scores of members  
8 witnessed his ongoing abuse of children and adults within the congregation through the  
9 end of his despicable life.

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

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

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

21 43. In or about 2003, McKean formally split from ICOC after an uprising and  
22 various op ed public letters were published by ICOC leaders. He officially formed ICC  
23 in or about 2006. ICC encompassed the same guiding principles and culture as ICOC.  
24 **ICC was a carbon copy of ICOC, however, ICC eventually eclipsed ICOC in terms**  
25

26 \_\_\_\_\_  
27 <sup>6</sup> 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>

28 <sup>7</sup> 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 **of the mania, secrecy and abuse that occurred within its churches.**

2 44. From its inception, ICC improved upon ICOC's tools of mass  
3 manipulation and exploitation, which aligned with McKean's vow to learn from any  
4 past incidents of dissent or divisiveness and ensure that challenges to his authority never  
5 occurred in his new "movement of God".

6 45. McKean currently oversees all ICC operations from its Los Angeles  
7 headquarters and he has completely separated himself from ICOC because he believes  
8 the entire ICOC congregation is lost, likely because he is no longer the leader. ICC's  
9 current membership is believed to include approximately 7,000 individuals.

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

17 47. On or about December 24, 2022, Coltin became aware of an ICC letter,  
18 sent out to every ICC member showing the process of "marking" Coltin and his wife.  
19 Defendants have continued to threaten anyone who speaks out against the church with  
20 vexatious legal actions, disfellowship, and/or "marking."

21 **THE "DISCIPLING" STRUCTURE IS THE FOUNDATION OF**  
22 **DEFENDANTS' DEPLORABLE CAMPAIGN OF MANIPULATION,**  
23 **PSYCHOLOGICAL AND SEXUAL ABUSE OF CHILDREN**

24 48. ICOC was born from a "discipling" movement that arose among the  
25 Churches of Christ during the 1970's and the church has maintained this practice in  
26

---

27 <sup>8</sup> The New York Daily News stated that "dozens" of former members of ICOC "call it a destructive sect that is more  
28 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 present times. This is a strict practice involving a “discipleship hierarchy” where a  
2 formal **discipleship tree or a top-down authoritarian hierarchy** was formed.

3 49. Church leadership assigns a specific and strategic discipleship partner to  
4 oversee and guide the other member. The “disciplining” movement was memorialized  
5 by Flavilil R Yeakley Jr. in a book titled “The Discipling Dilemma”. The **rigid and**  
6 **pervasive culture of fear, coercion, control, manipulation, judgment, exclusion,**  
7 **punishment**, along with the church’s overt focus on membership growth (i.e., its  
8 primary source of income), have resulted in a **widely accepted categorization of**  
9 **ICOC and ICC as toxic, destructive cults.**

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

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

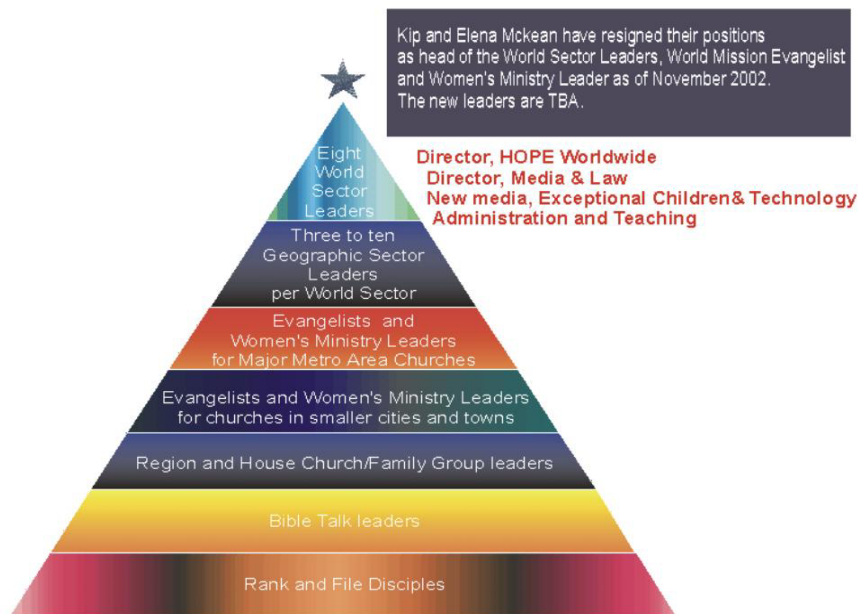
27 ///

28 ///



1 51. An illustration of the Defendants’ hierarchical model of authority is  
 2 depicted below:

3  
 4 The ICC had a complex and highly hierarchical organizational structure, unusually so for a  
 5 relatively new and small religious group. There are many layers of leadership, similar to a  
 6 pyramid or the Roman Catholic Church.



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

19 52. In addition to functioning as a life coach to other members, the “discipler”  
 20 members also acted as de facto therapists. The disciplers would frequently instruct  
 21 members to conduct themselves in a certain manner and if the member did not heed to  
 22 the instructions, they were rebuked or labeled as “disobedient” or “arrogant” until they  
 23 were eventually “broken” by their sins.

24 53. The discipler structure has facilitated Defendants’ systemic concealment  
 25 of abuse and allowed predators to abuse women and children with impunity. For  
 26 example, on July 1, 2018, Damon and Vicki James, ICC “disciplers” working at the  
 27 specific direction of McKean instructed a member to refrain from reporting two years  
 28 of physical and sexual abuse by her husband. Damon James scolded this survivor and



1 stated, "[w]e don't do that to our brothers as disciples."

2 54. Vicki James then victim shamed the woman by stating "[w[]hy would you  
3 have the heart to press charges?" Damon continued and told the woman, "[w]hat does  
4 that gain? That puts you in front of 'the world'." This situation resulted in the woman  
5 eventually defecting from ICC and she is trying her best to recover from the years of  
6 abuse she endured by her husband and ICC.

7 55. The following is a harrowing statement by Carter Whitten regarding the  
8 abuse he endured in connection with his "discipler" experience:

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

28 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

1 ordeal and shunned by most of those fathers.

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

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

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

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

28 We had to meet in one-on-one and group D-times, where  
we had to confess our sins (especially sexual sins) in a  
group setting, and the disciplers (teen leaders) would  
sometimes confess sins as well. During one such meeting,  
an adult discipler confessed to a group of four or five boys  
that he had had a wet dream (nocturnal emission) that  
week, and in many other meetings we were told by  
disciplers that masturbation equated to "ejaculating on the  
cross." I never understood why grown men were spending  
so much time with boys as young as 12 and 13 confessing

1 all their sexual sins to them... I heard things I had never  
2 heard before, and it all felt very abusive and inappropriate  
3 to me, even as a child.

4 Why were grown adults grilling other people's teenagers  
5 for specific sexual details... When most of these teens had  
6 never even had a sexual experience in their life. The abuse  
7 of power here and power dynamics were so damaging to  
8 most of these teens in the teen ministry, that the PTSD and  
9 anxiety and therapy that most of these children have  
10 needed their whole lives is astounding."

11 **CHURCH LEADERS WERE OBSESSED WITH FINANCIALLY**  
12 **EXPLOITING ITS MEMBERS**

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

23 57. Defendants' members were forced to tithe and give 10-40% of their gross  
24 income to the church *and* participate in special contributions for missions  
25 approximately twice a year equaling approximately **40 times their normal tithe**  
26 **amount**. ICOC was relentless in its pursuit for funding and church leadership would  
27 resort to **interrogating members about their income**, going so far as to **demand**  
28 **copies of the members' paystubs**. For example, if a member gave \$4,000 per month,  
the total mission contributions for that year would equal an additional (40x) and the  
total required sum would be \$160,000 in addition to the normal yearly tithe amount of

1 \$48,000. This member would be required to give the church a whopping total of  
2 \$208,000 for the year! Unfortunately, only a minuscule percentage of money (noted on  
3 internal ICOC pie charts), approximately 8-10% was disbursed for “special missions  
4 contribution.” On information and belief, most of the money collected from ICOC  
5 members was used to pay upper leadership salaries.

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

12 59. In 2005, two former ICOC members filed a suit in Tennessee “claiming  
13 the church uses cultlike tactics, manipulation, peer pressure and guilt to force members  
14 into tithing and making other financial contributions.” They alleged that for personal  
15 gain, “the Nashville Church, the [ICOC], Hope Worldwide, and Central and South  
16 America World Sector jointly participated in a scheme to defraud church members,  
17 who are not allowed to inspect the church’s financial records.”

18 60. A former member named Tina witnessed Non-Disclosure Agreements  
19 being forced upon parishioners, claiming that they could never talk about the true  
20 finances of the Defendants despite evidence that ICOC opened offshore accounts  
21 containing massive quantities of cash.<sup>9</sup>

22 61. Moreover, McKean actively solicited church members to turn over their  
23 COVID-19 relief money to the church. The following are excerpts of emails from  
24 McKean to various church elders and leaders:

25 \_\_\_\_\_

26 <sup>9</sup> 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.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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!

**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**

62. Initially, early recruits received profound amounts of "love bombing" to lure them into a false sense of security, thereby allowing sexual predators to



1 successfully manipulate them and eventually abuse them with the comfort of knowing  
2 these vulnerable and newly brainwashed people would never report the abuse.

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

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

12       65. It is without doubt that their education and training enabled these members  
13 to psychologically deplete members and manipulate children and their parents into  
14 submission, which created fertile ground for heinous sexual and physical abuse to  
15 thrive.

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

22 ///

23 ///

24 ///

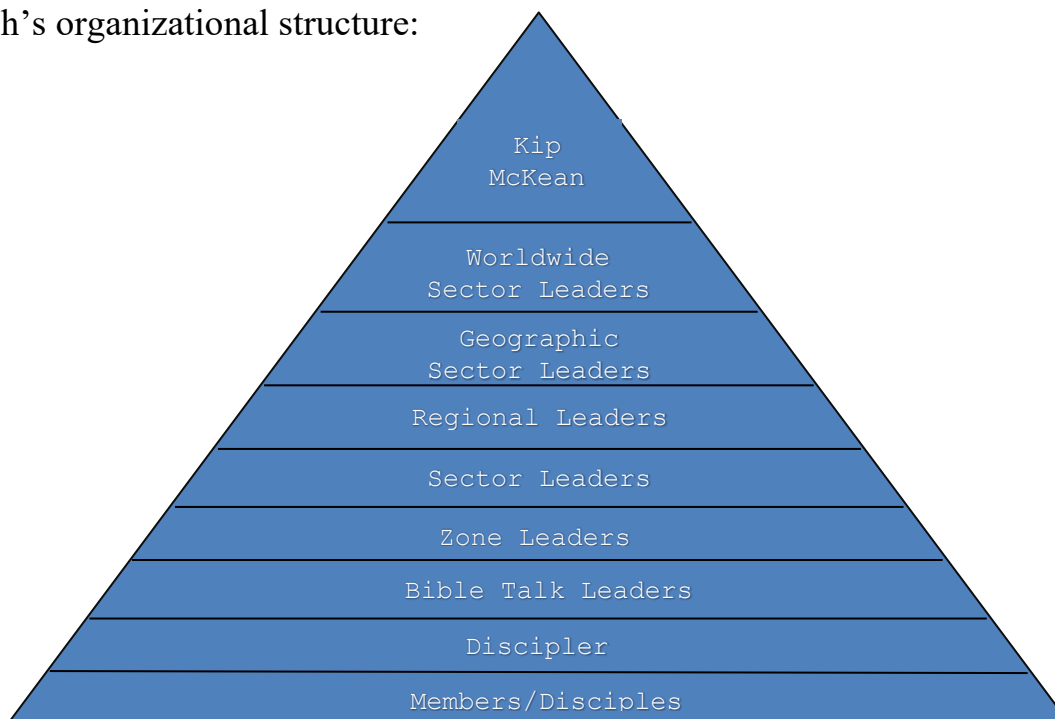
25 ///

26 ///

27 ///

28 ///

1           67. McKean’s carefully crafted church hierarchy lent itself to maintaining  
 2 secrecy and preventing outside intervention. The following is a rough depiction of the  
 3 church’s organizational structure:



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

19           69. Questioning higher ranking members or the church in any manner was  
 20 frowned upon. Some individuals were “disfellowshipped” or “marked” for being  
 21 divisive if they asked too many questions or questioned any leaders. A member with  
 22 either of these labels was **fiercely ostracized by the entire membership, including**  
 23 **their families**. “Disfellowshipped” members are essentially excommunicated and  
 24 shunned from Defendants’ communities. Accordingly, being labeled as  
 25 “disfellowshipped” or “marked” equated to hell on earth and in the afterlife for any  
 26 member so labeled.

27           70. In furtherance of the Abuse Enterprise, the pyramid hierarchy also paved  
 28 the way for leadership to require that **all ICOC and ICC members receive mental**

1 **health services (i.e., therapy) exclusively from church therapist members.** The  
 2 therapist members were biased in favor of the church and tailored their treatment and  
 3 “findings” based on guidance and instruction from McKean and other leaders within  
 4 ICOC and ICC. These therapist members’ strong bias is best evidenced by the fact that  
 5 a single instance of abuse was never reported to the police. In fact, these therapist  
 6 members routinely instructed victims to refrain from reporting the abuse to the police,  
 7 along with instructions to “forgive” the abuser for their heinous transgressions.

8 **DEFENDANTS CREATED A SICKENING CONVERSION THERAPY**  
 9 **MINISTRY TO FACILITATE THE BRAINWASHING SCHEME THAT**  
 10 **MANIPULATED ADULTS AND CHILDREN INTO SILENCE**

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

19 72. The mere existence of Strength in Weakness is nothing short of ironic, as  
 20 it became **common knowledge within the churches that Chuck Lucas had**  
 21 **numerous homosexual relationships with young men in the church.** In a 2022  
 22 podcast with Steve Johnson, ICOC evangelist James Lloyd stated:

23 “The truth is that the foundational “original sin” of our  
 24 movement was homosexual sin. Man on man, specifically  
 25 a male older leader, on young interns. And not just a few  
 26 times—you can find out, it’s not like nobody knows. The  
 27 fact that our original sin was a senior leader (Lucas) who  
 28 is respected and loved and training a group of young  
 men—As the leader gets them in a room and shuts the  
 door and this leader (Lucas) ‘puts the moves’ on these



1 young men. And it's worse than it sounds because those  
2 men then became ministers (perpetrators) and went out  
3 into their churches and did the same things to others—  
4 and I know that personally, because I was in some of those  
meetings where it was confessed.

5 They thought it was best not to share this with anybody,  
6 and I bought into those reasons. They would say things  
7 like, 'He's got children, he's got a wife, you can't just say  
8 those things out loud, it could hurt the faith of a young  
Christian.'

9 All these things are just the hierarchy and patriarchy  
10 saying that we don't need to bring this thing up about  
11 'man on man.' And I don't personally think that this sin  
12 is any different than if it was between a man and a woman  
13 by the way—I'm only calling it sin because they weren't  
14 married.

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

20 **DEFENDANTS SHAMELESSLY PREYED UPON AND DEFRAUDED**  
21 **COLLEGE STUDENTS**

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

28 74. The practice of preying upon college students resulted in numerous  
televised exposés in the mid-1990's when the ICOC cult commanded larger numbers,  
including but not limited to: 20/20 with Barbara Walters, Inside Edition, Fox News,

1 BBC, and MTV.

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

6 76. Indeed, ICOC and ICC's exploitation of college students ultimately  
7 resulted in the ICOC\ICC being **banned from on-campus recruiting from several**  
8 **schools across the nation**, including but not limited to Boston University, which is  
9 situated near the epicenter of the ICOC. Surprisingly, the exposés did not garner  
10 enough outrage among the general population, leaving the ICOC\ICC to continue to  
11 prey upon college students without repercussion. Until now, the ICOC has had the  
12 luxury of the benefits from their long-time obfuscation of their parasitic internal  
13 practices.

14 77. Mr. McKean is so brazen that he **publicly admitted to defrauding**  
15 **students** by handing out unearned, illegitimate, and meritless doctoral degrees  
16 designed to both inflate the importance of its senior members and extract unearned  
17 pecuniary gains. The following are quotes from Mr. McKean taken from an ICC  
18 YouTube video:

19 "The ICC runs an unaccredited college, called the  
20 International College of Christian Ministries, or ICCM,  
21 where they are handing out doctorates to anyone they  
22 choose, where the established course work is limited only  
23 to literature/books created within the ICC. This is why  
24 most leaders in the ICC put the abbreviation of "Dr" in  
25 front of their names, because they have been giving each  
26 other unaccredited doctorate status. The ICCM has already  
27 brought in approximately \$6 million through ICC  
28 members attending this unaccredited college."

*"During Covid, while the (financial) giving inside most  
religious organizations declined, our giving inside of  
God's Sold-Out Modern-Day Movement steadily*



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

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

10           82. An ICOC affiliate, formerly known as AMS Ministry of the Los Angeles  
11 ICOC, and currently known as **Turning Point Church has similarly facilitated and**  
12 **concealed abuse.** Recently, Turning Point Church claimed publicly that no sexual  
13 abuse has occurred in their church, however, there are at least three survivors that  
14 reported abuse to staff members who took no action with the reported abuse and never  
15 alerted the congregation to the existence of sexual predators, some of whom worked in  
16 Kids Kingdom (children’s ministry).

17           83. Turning Point Church’s leadership that ignored reports of abuse include  
18 the following: Kevin and Tracena Holland, Mike and Kim Upton and Jay and Traci  
19 Minor. In addition to the foregoing, Turning Point Church uses a licensed “Marriage  
20 & Family” counselor named David Bruce, who is a mandated reporter. Mr. Bruce,  
21 notwithstanding his knowledge of abuse, refused to report several instances of abuse  
22 and helped conceal the abuse for the Defendants’ benefit.

23           84. One former member of the Los Angeles ICOC and the Turning Point  
24 Church, Sandi Derby, Advanced Grief Recovery Specialist, Trainer for The Grief  
25 Recovery Institute and Ordained Minister, has “firsthand knowledge that allegations  
26 of sexual, physical, and psychological abuse of teens and adults were brought to leaders  
27 in Turning Point in 2019 for abuses that occurred in the early 2000s.” This former  
28 member witnessed leadership’s failure to support the abuse survivors and their failure

1 to report the abuse to the police. As a result of her open support for the survivors, this  
2 former member was discredited within the church, which eventually led to her  
3 defection.

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

8 **DEFENDANTS’ DOCTOR MEMBERS ILLEGALLY MEDICATED YOUNG**  
9 **CHILDREN IN FURTHERANCE OF THE ABUSE ENTERPRISE**

10 86. Defendants’ abuse went far beyond physical, psychological, and financial  
11 exploitation. Many children, such as Anthony Stowers, were administered medication  
12 by church affiliated “doctors”. Often, the affiliate doctors such as Dr. Kris Stowers  
13 (Anthony’s uncle) would administer medications that were prescribed for other  
14 conditions or children received medication for conditions for which they were never  
15 diagnosed. To conceal their illegal conduct and minimize scrutiny, **Defendants’**  
16 **doctors provided the children with medication in unmarked or mismarked**  
17 **bottles.**

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

22 88. **Medicating children has also facilitated the ICOC’s clandestine**  
23 **efforts to conceal the ongoing child abuse from anyone outside the church.** The  
24 children were persuaded to believe, through strategic pharmacological deception and  
25 psychological manipulation, that they were never abused and if their own memories  
26 seem contradictory, then their memories were faulty.

27 ///

28 ///

1                    **DEFENDANTS LEVERAGED CHILDREN’S MINISTRIES TO**  
2                    **EFFECTUATE THE ABUSE ENTERPRISE**

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

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

16            **DEFENDANTS PROMOTED THE DEPLORABLE PHYSICAL ABUSE OF**  
17            **CHILDREN UNDER THE GUISE OF “DISCIPLINE”**

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

23    ///  
24    ///  
25    ///  
26    ///  
27    ///  
28    ///

1           92. 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:



5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22           93. Members were instructed, with visuals, how to **use corporal punishment**  
23 **without leaving bruises, welts or red marks, so the offending members could not**  
24 **be reported to child protective services.** One former member recalls frequently  
25 seeing young children at church with welts or bruises on their thighs. On one occasion,  
26 this member witnessed a child with a “heart shaped welt” on his/her body.

27 ///

28 ///



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

3            94.     Since at least 1979, ICOC and ICC have averted suspicion by authorities  
4 notwithstanding the fact that in excess of the last 40 years, **predatory members have**  
5 **escaped prosecution for countless instances of sexual abuse (children and adults),**  
6 **physical abuse (adults and children), spousal abuse, and emotional abuse.**

7            95.     From its inception in 1979 to the present, approximately **1,200,000 souls**  
8 **defected from ICOC.** The large number of defectors is due, in large part, to the  
9 explosive growth that ICOC experienced.

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

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

25           98.     Defectors have since revealed the abuse they suffered and/or witnessed at  
26 ICOC and ICC. Former member Lisa Johnson who as a top leader in New York City  
27 and a friend of McKean, in a podcast called “Eavesdropping” made the following  
28 comments regarding the church, based on her personal experience. This is a quote by



1 Lisa Johnson from a recent episode of their podcast called “Eavesdropping.”

2           *“Women (in the ICOC) are getting ground up, and I mean*  
3           *tons of people, it’s not an isolated case here and*  
4           *there....And I think about these women now, after all these*  
5           *years...*

6           *So I’m gonna bring up something here...*

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

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

17           **DEFENDANTS AUDACIOUSLY AND REPEATEDLY REFUSED TO**  
18           **REPORT PEDOPHILES WHO WERE LATER ARRESTED AND**  
19           **PROSECUTED**

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

24           100. In January 2012, David Iburg, aka David Saracino (“David” or “David  
25 Saracino”) was sentenced to 40 years of hard labor in the State of Louisiana, the  
26 maximum sentence, for **forcible rape upon a 4-year-old girl in 2004.**<sup>11</sup> The  
27 prosecutor, Cynthia Guillory, told the judge that he was among the worst of the worst.

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

1 Mr. Saracino purposefully sought out women who were vulnerable and struggling  
2 financially so he could gain access to and victimize their young children. Mr. Saracino  
3 faced charges and convictions in Texas, Utah and Louisiana, where he received the 40-  
4 year sentence.

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

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

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

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

1           105. In 2005, Benjamin Samuel Speights, a member of the south region of the  
2 LA ICOC, was convicted for lewd and lascivious acts against a child under the age of  
3 15. Mr. Speights' unlawful conduct included forceable participation of a 14-year-old  
4 girl to create pornographic videos that he sold.

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

13           107. Nicholas Griffin Lombardi ("Mr. Lombardi") is another example of a  
14 known pedophile abusing children within Defendants' churches. He was a long-  
15 standing member of the ICOC, as were his parents. On or about November 27, 2022,  
16 as a clear demonstration of the kind of monster Mr. Lombardi truly is, Mr. Lombardi  
17 posted on his personal Facebook page "I kind of have a fantasy of fucking a child ha[.]"

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

22           109. In approximately August 2011, one ICOC abuser, William (Bill) Thomas  
23 McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for  
24 various counts of felony sexual assault on a child by a person in a position of trust.<sup>12</sup>  
25 He abused approximately 10-15 individuals, all of whom were expelled or in some  
26 fashion pushed out of the Denver ICOC as punishment for failing to comply with the  
27

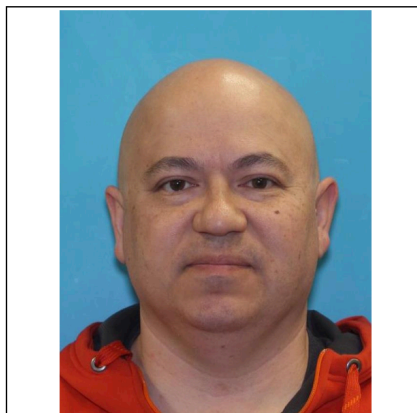
28 \_\_\_\_\_  
<sup>12</sup> <https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child,117951>

1 leaders' commands.

2 110. Tomotaka ("Tom") Andrews Wilton of the Portland, Oregon ICC location  
3 raped a child<sup>13</sup> for years and church leaders, including McKean, were acutely aware of  
4 the abuse but did nothing to warn anyone regarding this despicable predator's presence.  
5 He was convicted in Idaho in 2009 of two counts of third-degree rape of a child and is  
6 now a registered sex offender. On information and belief, Mr. Wilton remains a  
7 member of the Portland ICC and is free to abuse other children.

8  
9 **Tomotaka Andrews Wilton Registration Details**

Last Known Address: 2509 W BOISE AVE  
BOISE, ID 83706-2920  
ADA COUNTY, ID



DOB: 1971-11-04  
Race: Asian Or Pacific Islander  
Sex: Male  
Eyes: Brown  
Height: 5 ft 3 in  
Hair: Brown  
Weight: 173 lbs.

Tomotaka Andrews Wilton - Registered Sex Offender

18 [VIEW CRIMINAL RECORD](#)

19 **Offense or Statute**

20 Offense/Statute: Rcw 9a 44 079 Rape Of A Child In The Third Degree  
Charge Correlation Pending  
21 Date: 17 March 2009

22 ///  
23 ///  
24 ///  
25 ///  
26 ///

27 \_\_\_\_\_

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

1 111. 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:



14 ///  
15 ///  
16 ///  
17 ///  
18 ///  
19 ///  
20 ///  
21 ///  
22 ///  
23 ///  
24 ///  
25 ///  
26 ///  
27 ///  
28 ///

1 112. There are at least 4 known pedophiles who were allowed to run rampant  
2 within the churches without any notification to the congregation that their children  
3 were in danger.

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

Offense: INDECENCY WITH A CHILD BY CONTACT	
Statute	TEXAS PENAL CODE 21.11(a)(1)
Victim Sex	Female
Victim Age	16
Disposition Date	07/19/1999
JUDGMENT	3YPROBATION/COMMUNITY SUPERVISION



Photo Reported - 04/10/2006



Photo Reported - 01/08/2001

8  
9  
10  
11  
12  
13  
14  
15 ///  
16 ///  
17 ///  
18 ///  
19 ///  
20 ///  
21 ///  
22 ///  
23 ///  
24 ///  
25 ///  
26 ///  
27 ///  
28 ///

1           114. 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.



19 ///  
20 ///  
21 ///  
22 ///  
23 ///  
24 ///  
25 ///  
26 ///  
27 ///  
28 ///

1 115. 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.



11 MONTHS AGO

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

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

14 116. 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.

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



| QUIROZ LUIS MIGUEL

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

28



1 **SPECIFIC ALLEGATIONS**

2 **Plaintiffs Were Tortured and Abused At Ages 5 and 9**

3 117. On or about September 21, 2008, Plaintiffs’ mother was approached by a  
4 deacon’s wife, Sheila Grubb, also a leader in the ICOC, at a party she was hosting for  
5 moms of special needs children. Sheila said: “one of the boys from across the street is  
6 messing with your baby girl. I saw him this morning at church; he led her behind a  
7 door leading into the auditorium.”

8 118. Plaintiffs’ mother immediately spoke with her youngest daughter, who  
9 was 5 years old and in kindergarten at the time. Jane Roe 6 burst into tears and said,  
10 Ian Schirmer “won’t stop”. Ian told her, “don’t tell anyone” and “this is how I show  
11 you I love you”. On information and belief, Ian was approximately 10 years old when  
12 he sexually abused Plaintiffs in various locations, including but not limited to church-  
13 owned facilities.

14 119. Immediately, Plaintiffs’ mother understood why Jane Roe 6 had been  
15 falling behind in school the prior month. Jane Roe 6’s teacher and Plaintiffs’ mother  
16 had recently met to discuss concerns regarding Jane Roe 6’s lack of progress at school.

17 120. Plaintiffs’ mother asked Jane Roe 7, who was 9 years old at the time, if  
18 she had been abused and she confirmed that she had also been abused by Ian Schirmer  
19 in the same manner as her sister.

20 121. Ian sexually abused Plaintiffs by aggressively groping them and touching  
21 their bodies in a sexual manner. Ian told both girls they were not allowed to say no to  
22 his touching and groping.

23 122. Ian Schirmer’s parents are Alberto and Anna Maria Schirmer and the  
24 Schirmer family attended the North River Church of Christ (“North River ICOC”)<sup>14</sup>,  
25 an ICOC church in Marietta, Georgia. Alberto Schirmer was in a leadership position  
26 as a Deacon at North River ICOC in or about the time Plaintiffs’ abuse occurred.

27  
28 

---

<sup>14</sup> <https://nrcoc.org>

1           123. On or about September 22, 2008, Plaintiffs' mother spoke with Alberto  
2 and Anna Maria Schirmer regarding Plaintiffs' abuse. When Plaintiff's mother  
3 disclosed the abuse she discovered the day before, Anna Maria looked at Alberto and  
4 said, "I guess this means the other stuff at school is true then."

5           124. Plaintiffs' mother bluntly asked Alberto and Anna Maria, "has he done  
6 this before? You could have told me so that we could have installed further safety  
7 measures." They both reacted calmly and in an unalarmed, yet calculated manner. After  
8 this meeting with the Schirmers, Plaintiffs' mother immediately went home and began  
9 searching for help for her daughters. She called a counselor at North River ICOC,  
10 Steven Brand, who on information and belief was/is a licensed therapist, and someone  
11 that the ICOC recommended and used to counsel its members in a professional  
12 capacity. When Steven Brand gave advice, church members were expected and  
13 directed to take that advice. Upon hearing which of the Schirmer children (they had  
14 twin boys) abused Plaintiffs, Steven said, "they have got to get a hold on that boy."  
15 This telling, but simple statement conveyed a disheartening fact to Plaintiffs' mother:  
16 church leadership was already aware of Ian's pattern of abusing other children. Steven  
17 told Plaintiffs' mother they should "talk again tomorrow" about the situation. **Steven**  
18 **Brand, a counselor and mandatory reporter, never reported the abuse to anyone.**

19           125. Plaintiffs' mother also went to Plaintiffs' school, Eastside Elementary  
20 School, spoke with a school counselor and specifically requested assistance in keeping  
21 Ian away from both girls. The school counselor listened and said, "I don't need the  
22 boy's name I think I know who it is." Plaintiffs' school had approximately 1,200  
23 students at the time in grades ranging from Kindergarten to 5<sup>th</sup> grade, however, among  
24 such a large student body, this counselor knew the perpetrator's name without  
25 Plaintiffs' mother disclosing his name. The counselor helped Plaintiffs' mother create  
26 an action plan and the counselor also reported the abuse to the Department of Family  
27 and Children Services ("DFACS"). She recommended SafePath Children's Advocacy  
28 Center ("SafePath") in Marietta, Georgia, as a safe space to obtain help for Plaintiffs

1 in connection with the abuse they endured

2 126. On or about September 23, 2008, Plaintiffs' mother received a call on her  
3 lunch break from Steven Brand and he said, "I've known Anna Maria for years going  
4 back to Boston where we were in the same family ministry group, so I don't think I  
5 can help you with your girls." Plaintiffs' mother was completely stunned that a  
6 **mandatory reporter such as Steven Brand would refuse to report child abuse**  
7 **because of his personal relationship with the abuser's mother.**

8 127. Later that evening on September 23, 2008, Lin Beaty Ottenweller, a  
9 women's ministry leader in the ICOC and registered nurse, visited Plaintiffs' home and  
10 stated she wanted to help Plaintiffs' mother with Plaintiffs. Plaintiffs' mother asked for  
11 Lin's help in convincing Anna Maria to drive the twins to school so Plaintiffs would  
12 not be forced to confront their abuser 5 days each week during the bus ride to school.  
13 Plaintiffs' mother made this request of Lin because when she previously asked Anna  
14 Maria to personally drive the twins to school, Anna Maria refused and stated that her  
15 "boys really enjoy riding the bus." **Lin Beaty Ottenweller was at all relevant times**  
16 **a registered nurse and clergy member, and as a result, a mandatory reporter. Lin**  
17 **failed to report the abuse to DFACS.**

18 128. On September 24, 2008, Plaintiffs' mother received a call from Detective  
19 Adamchek from the Cobb County Crimes Against Children Unit and they scheduled a  
20 time for him to interview Plaintiffs at SafePath.

21 129. On September 30, 2008, Anna Maria Schirmer came to Plaintiffs' home  
22 and spoke with Plaintiffs' mother. Anna Maria asked, "when you talk to your girls how  
23 do you question them?" Anna Maria's question clearly insinuated that Plaintiffs'  
24 mother had installed false narratives in Plaintiffs' minds regarding the abuse. Plaintiffs'  
25 mother responded, "you think I would want my girls to think they are victims of sexual  
26 assault if it didn't happen to them?" Plaintiffs' mother then asked Anna Maria to  
27 "please leave [her] home now and don't ever step foot on [her] property again!"

28 ///

1           130. On October 1, 2008, Plaintiffs and their mother went to SafePath to be  
2 interviewed by Detective Adamchek. He interviewed Plaintiffs and their mother  
3 separately for approximately an hour each. Detective Adamchek requested Sheila  
4 Grubb's phone number so he could obtain a witness statement from her.

5           131. On October 5, 2008, Lin Beaty Ottenweller visited Plaintiffs' home  
6 because, she said she was concerned Plaintiffs' mother was receiving advice outside  
7 of North River ICOC and, therefore, not receiving "Godly advice." Plaintiffs' mother  
8 informed Lin that the family was receiving help from experts in the field, including  
9 Detective Adamchek.

10           132. On October 8, 2008, Plaintiffs' mother received a call from an angry  
11 Sheila Grubb who was upset because she received a voicemail from Detective  
12 Adamchek and she did not want to be involved in the situation.

13           133. In November 2008, a meeting between the elders and Plaintiffs' mother  
14 was held at Plaintiffs' next-door neighbor's home. The next-door neighbor was also a  
15 member of North River ICOC and the following individuals were present at the  
16 meeting: Plaintiffs' mother, Kevin and Echo Garrett, Ken Furlong (elder), Ross  
17 Mckenzie (elder) Thom Bogle and Bob Keen (elder and attorney). Thom Bogle was  
18 the only individual Plaintiffs' mother did not know personally; he and his wife had  
19 recently moved to Georgia from the New York City ICOC. Plaintiffs' mother later  
20 learned that Thom Bogle was a new elder at North River ICOC and Thom had received  
21 an endorsement from Tom and Kellie Brown, who were leading the North River ICOC  
22 at the time. Plaintiffs' mother shared with the group what Plaintiffs had endured and  
23 Echo Garrett responded by sharing how **ICOC leadership showed no concern**  
24 **regarding Plaintiffs' inhumane abuse.**

25           134. During the meeting, the elders had little to nothing to say about Plaintiffs'  
26 abuse. However, Ross McKenzie said, "someday soon your girls and the boys (Ian)  
27 across the street can play together again!" This calloused statement horrified Plaintiffs'  
28 mother and she quickly told the group that Plaintiffs would never play with the

1 Schirmer boys ever again. **None of the leaders at this meeting in November 2008**  
2 **ever reported Plaintiffs' abuse.**

3 135. On November 13, 2008, Detective Adamchek called Plaintiffs' mother  
4 and asked to take photos of the family home. He arrived with 2 other detectives in an  
5 all-black vehicle. Plaintiffs' mother told Detective Adamchek about the feedback she  
6 received from North River ICOC staff and leaders and he curtly said, "your family  
7 should have no contact with anyone in that family, they are truly dangerous to you."  
8 Plaintiffs' mother was floored that an "outsider" had such strong views about the  
9 Schirmer family, yet not a single member or leader within the North River ICOC shared  
10 this opinion. Indeed, it felt like **everyone at North River ICOC fiercely protected**  
11 **the Schirmer family instead of Plaintiffs.** Detective Adamchek told Plaintiffs'  
12 mother that he caught Alberto Schirmer in a lie and Anna Maria was "covering" for  
13 Alberto. Detective Adamchek told Plaintiffs' mother that **the police department**  
14 **should have received multiple reports from North River ICOC, however, they had**  
15 **not received a single report regarding Plaintiffs' abuse.**

16 136. In December 2008, Plaintiffs' mother spoke with the mother of a little boy  
17 who was also abused by Ian Schirmer at Eastside Elementary School in approximately  
18 2007. This mother said her experience dealing with the Schirmer family was horrific  
19 and she felt the family was hiding something. She was frustrated that she had no  
20 success convincing anyone at Eastside Elementary School to restrict Ian's activities to  
21 protect the other children from his abuse. After discussing her concerns with the school  
22 counselor, the school counselor told Plaintiffs' mother, "good luck trying to get  
23 accommodations concerning that boy, cause his mom [Anna Maria] is at the school on  
24 a weekly basis making sure her son has his freedom!"

25 137. In January 2009, roughly three months after Plaintiffs' mother first  
26 learned of Plaintiffs' abuse, Kellie Brown called Plaintiffs' mother to schedule a  
27 meeting with the new North River ICOC Elder, Thom Bogle, at his home. Plaintiffs'  
28 mother refused because she stopped attending the church and did not consider Thom

1 Bogle her Elder. Kellie stated that the Elders wanted to apologize to her because they  
2 realized they mishandled the situation concerning Plaintiffs' abuse. She begged  
3 Plaintiffs' mother to meet and suggested that the meeting could help the family heal.  
4 Reluctantly, Plaintiffs' mother agreed to meet with the Elders and Kellie agreed to  
5 attend the meeting to support Plaintiffs and their mother.

6 138. The January 2009 meeting at Thom Bogle's house also included Lin  
7 Beaty Ottenweller, Kellie Brown, and Thom's wife, Gail Bogle. Lin commenced the  
8 meeting by telling Plaintiffs' mother she was concerned that she was not helping  
9 Plaintiffs "heal and forgive". Lin alleged that Plaintiffs' mother was trusting people in  
10 the "world" rather than the ICOC spiritual leaders who loved and cared for the family.  
11 Taken aback by the group's assault on her parenting abilities, Plaintiffs' mother  
12 responded, "are you seriously going to sit there and tell me I'm not a good mom to my  
13 girls because I'm seeking help from experts in the field of pediatric sexual abuse, and  
14 I have the backing of the Crimes Against Children unit of the Cobb police!"

15 139. Thom Bogle then presented a document to the group, stating, "I have a  
16 letter from a child psychologist in Athens saying that the abuser, Ian Schirmer, is not a  
17 threat to other children." Plaintiffs' mother immediately responded, "are you talking  
18 about the therapists named the Shapiros? They are ICOC members, and are  
19 developmental psychology therapists, and not trained in child predator situations! The  
20 Shapiros have been seeing Ian once a month for many years, so this abuse happened  
21 on their watch! They are not qualified to make that assessment!"

22 140. Thom Bogle then replied verbatim to Plaintiffs' mother: "what happened  
23 to your girls isn't that big of a deal, as most girls have been molested by the time they  
24 reach 18."

25 141. Thom told Plaintiffs' mother, "we don't need you at North River, or your  
26 friends, as we have 60,000 square feet of building space, and people are moving in  
27 every week." Plaintiffs' mother took her cue from Thom and immediately left his  
28 home.

1           142. In September 2009, Plaintiffs and their mother attempted to attend Ian  
2 Schirmer’s court hearing regarding the abuse. The prosecutor told Plaintiffs’ mother,  
3 “this boy comes from a wealthy family and they have good representation.” Plaintiffs’  
4 mother responded and said, “she knew the family was not wealthy because she made  
5 more money than Alberto Schirmer.” On information and belief, Thom Bogel, a  
6 wealthy individual, funded Ian Schirmer’s defense costs.

7           143. In September 2010, word began spreading in the community that other  
8 abuse survivors came forward to expose abuse by Thom Bogle that the church actively  
9 concealed. After these other survivors publicly disclosed their abuse, Plaintiffs’ mother  
10 discovered that **Thom Bogle had an extensive history of abusing young men in**  
11 **ministries he oversaw**. When survivors reported Thom’s abuse to church leaders, they  
12 were immediately victim shamed and church leaders minimized their experiences by  
13 calling the abuse “David/Jonathan” “affairs”. These church leaders never reported the  
14 abuse to the authorities.

15           144. Jeff Hickman, a staff evangelist at North River ICOC, was assigned to  
16 help Plaintiffs’ mother as a “friend” after she left the ICOC to keep an eye on her.  
17 After learning about Thom’s history of abusing young men, Plaintiffs’ mother  
18 demanded to Jeff Hickman that Bogle be removed as an elder and as a board member  
19 of the church’s children camp called The Swamp. Plaintiffs’ mother, desperate to save  
20 other innocent people from Thom’s abuse, contacted the Survivors Network of those  
21 Abused by Priests (“SNAP”) to obtain help in exposing North River ICOC’s deeply  
22 rooted and repeated coverup of abuse within the church. At the time, Plaintiffs’ mother  
23 was told that exposing the church would require the cooperation of multiple victims,  
24 so unfortunately, SNAP was unable to help her at that time.

25           145. In or about December 2010, Al Baird, Lead Elder for the Los Angeles  
26 ICOC, also commonly known as the ICOC “fixer,” flew to Georgia for a meeting with  
27 the wife of one of Thom’s abuse victims, to represent the ICOC Elders Group. On  
28 information and belief, Al Baird was in a meeting in Boston with Thom regarding this



1 same victim Thom abused in the 1990's. This victim tried on multiple occasions to  
2 obtain help from the ICOC leadership, however, nothing happened and **Thom was**  
3 **allowed to continue his abuse unabated with the ICOC turning a blind eye.**

4 146. On January 17, 2011, Plaintiffs' mother received a text from Jeff Hickman  
5 telling her that Bogle was removed as an Elder at North River ICOC. North River  
6 ICOC announced to the church that Thom was removed because "someone from  
7 Bogle's past had come forward and is unforgiving." Therefore, **North River ICOC**  
8 **concealed the assaults and never informed the congregation that Thom's sexual**  
9 **abuse victim came forward or that Thom abused multiple individuals while he**  
10 **was a campus minister.**

11 147. As a result of the abuse, Jane Roe 6 experienced severe trauma throughout  
12 her childhood. For example, Jane Roe 6's school performance went from stellar to  
13 requiring that she repeat the first grade. Her trauma culminated in her teen years and is  
14 ongoing to this day.

15 148. Plaintiffs have continuously seen psychotherapists from the time of  
16 incident to the present and both have struggled with flashbacks, severe depression and  
17 other related conditions.

18 149. As a direct and proximate result of Plaintiffs' abuse, they suffered and  
19 continue to suffer a litany of injuries. Among other injuries, Plaintiffs have experienced  
20 and will continue to experience damages, including but not limited to, severe pain and  
21 suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life,  
22 loss of educational opportunity, loss of wages, loss of income, and loss of future wages.

23 **FIRST CLAIM FOR RELIEF**  
24 **SEXUAL ASSAULT OF A MINOR**  
25 *(Against All Defendants and Does 1-100)*

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

1           151. Defendants intentionally, willfully, and maliciously sexually assaulted  
2 and/or sexually abused and molested Plaintiff during the time that Plaintiff was a  
3 minor.

4           152. In committing the unlawful acts of sexual assault against Plaintiff,  
5 Defendants intended to put Plaintiff in imminent apprehension of harmful or offensive  
6 contact.

7           153. Defendants put Plaintiffs in imminent apprehension of such harmful  
8 offensive contact as Plaintiffs actually believed Defendants had the ability to make  
9 harmful or offensive contact with plaintiff's person.

10           154. Plaintiffs did not consent to Defendants' intended harmful or offensive  
11 contact with plaintiff, Defendants' intention to put Plaintiffs in fear of imminent  
12 apprehension of such contact, plaintiff was a minor during the time herein alleged and,  
13 therefore, lacked the ability to consent to sexual contact with any person, including  
14 Defendants.

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

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

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

28 ///

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

158. 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.

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

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

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

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

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

1 them.

2 **THIRD CAUSE OF ACTION**  
3 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
4 *(Against All Defendants and Does 1-100)*

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

8 165. The conduct of all Defendants as set forth in this Complaint was extreme  
9 and outrageous, and committed with the intention of causing, or reckless disregard of  
10 the probability of causing, emotional distress.

11 166. A reasonable person would not expect or tolerate the sexual assault  
12 committed by Defendants.

13 167. A reasonable person would not expect, accept or tolerate Defendants'  
14 unlawful sexual assault and/or sexual abuse, and molestation of Plaintiffs.

15 168. Defendants' conduct exceeded all bounds of that usually tolerated in a  
16 civilized community.

17 169. Defendants intended to cause Plaintiffs injury when they sexually  
18 assaulted Plaintiffs, manipulated and brainwashed Plaintiffs into silence and actively  
19 concealed Plaintiffs' abuse.

20 170. Plaintiffs have suffered severe and/or extreme distress as a result.

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

27 172. Defendants' conduct described herein was oppressive, malicious and  
28 despicable in that it was intentional and done in conscious disregard for the rights and

1 safety rights of Plaintiffs, and with the substantial certainty that it would cause  
2 Plaintiffs, to suffer humiliation, mental anguish and emotional and physical distress.

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

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

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

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

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

26 During the same time period, Defendants, and each of them, were negligent in failing  
27 to exercise reasonable care to protect Plaintiffs, and other minors, who were members  
28 of, or participants in, activities at Defendants' Church, from the risk of sexual assault,

1 sexual abuse and molestation by perpetrators, including Defendants.

2 177. Defendants were further negligent in failing to notify law enforcement  
3 and other appropriate authority that Plaintiffs were and/or continued to be a victim of  
4 child abuse/assault by Defendants when they learned of this fact. Defendants' failure  
5 to report the known and/or reasonably suspected child abuse of Plaintiffs, but instead  
6 Defendants perpetuated and facilitated Defendants' continued sexual abuse and/or  
7 sexual assault, and molestation of Plaintiffs.

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

12 179. Prior to, during, and after the sexual assault of Plaintiffs, Defendants,  
13 through their administrators, employees, agents, and/or volunteers, had knowledge,  
14 and/or were otherwise on notice, that Defendants had and/or was engaged in, and/or  
15 presented the risk of, sexual assault of Plaintiffs, and other minors.

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

24 181. Defendants breached their duties by failing to use reasonable care to  
25 protect Plaintiffs from their pastor, deacon, employee, and/or agent, to wit, Defendants.

26 182. If Defendants fulfilled their duty and responsibility, then Plaintiffs would  
27 not have been subject to all or most of the misconduct perpetrated against her and the  
28 resulting harm.

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

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

13 185. Plaintiffs' damages as a result of Defendants' repeated sexual assault,  
14 abuse, and molestation of Plaintiffs was a direct result of Defendants' concealment and  
15 cover-up. As such. Plaintiffs are entitled to treble damages against Defendants pursuant  
16 to Code of Civil Procedure section 340.1(b)(2).

17 **FIFTH CAUSE OF ACTION**  
18 **NEGLIGENT SUPERVISION OF A MINOR**  
19 *(Against All Defendants and Does 1-100)*

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

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



1           188. Defendants and Church Leader Defendants, and each of them, breached  
2 their duty to properly and adequately supervise, monitor, and protect Plaintiffs, in part  
3 because officers, administrators, agents, and other supervisory employees knew or  
4 should have known of Defendants' improper behavior, including that minor children,  
5 including Plaintiffs, were frequently alone with Defendants without any justification,  
6 that Defendants would frequently touch and sexually abuse minor children, including  
7 Plaintiffs, at Church Leader Defendants and Defendants' Churches without any  
8 justifiable reason for doing so, including when the minor children were by themselves,  
9 and Defendants sexually abused, assaulted, and/or molested minor children, including  
10 but not limited to Plaintiffs.

11           189. Defendants and Church Leader Defendants, acting through their  
12 administrative and supervisory employees, knew or should have known that Plaintiffs  
13 were unattended and unsupervised with Defendants on numerous occasions, without  
14 any justification.

15 It should have been obvious to any officer, agent, administrator, employee, or staff  
16 member that there was no reason that neither Plaintiffs, nor any other child, should  
17 have been alone with Defendants. The employees and agents of Defendants and Church  
18 Leader Defendants instead turned a blind eye to the fact that Defendants were spending  
19 time with minor children, including Plaintiffs, unattended and unsupervised without  
20 any investigation into the matter.

21           190. After engaging in grooming activity of Plaintiffs while spending time  
22 alone with Plaintiffs, Defendants started sexually assaulting, sexually abusing, and  
23 molesting Plaintiffs and other minor children on Defendants' premises and during  
24 Defendants and Church Leader Defendants' church related services. The acts of sexual  
25 assaults and abuse occurred while Plaintiffs were left unattended and unsupervised  
26 with Plaintiffs.

27           191. If Defendants and Church Leader Defendants, and each of them,  
28 adequately and properly supervised, monitored, and protected Plaintiffs, Plaintiffs

1 would not have been harmed, or would not have been harmed to the extent that  
2 Plaintiffs were.

3 192. Defendants and Church Leader Defendants, and each of them, also  
4 recklessly and negligently failed to implement and/or enforce policies and procedures  
5 that were aimed at preventing or detecting sexual assault and assault of their minor  
6 members.

7 193. If Defendants and Church Leader Defendants, and each of them,  
8 adequately performed their duties and responsibilities, then Plaintiffs would not have  
9 been subject to the sexual assault, assault and harassment perpetrated by the  
10 Defendants.

11 194. Plaintiffs have been severely damaged emotionally and physically, and  
12 otherwise, in amounts to be proven at the time of trial, but which exceed the  
13 jurisdictional limits of the Superior Court as a direct and legal result of the acts and  
14 omissions of Defendants and Church Leader Defendants, and each of them.

15 **SIXTH CAUSE OF ACTION**  
16 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION**  
17 **OF PENAL CODE SECTION 11165. ET SEP. BASED ON VICARIOUS**  
18 **LIABILITY**

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

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

23 196. Defendants and Church Leader Defendants, through their administrators  
24 and employees knew or reasonably suspected that Defendants had, and or was, engaged  
25 in the sexual assault of children while the children were under the care, custody, and  
26 supervision of Defendants, and each of them, and thus had a duty to report Defendants  
27 to the appropriate authorities under the California Child Abuse and Neglect Reporting  
28 Law. (Penal Code §§ 11164-11174.3, "CANRA".)

28 ///

1 197. At all times relevant herein and material hereto, Defendants were  
2 employees of Defendants and Church Leader Defendants. Defendants and Church  
3 Leader Defendants were responsible for hiring, training, supervising, and retaining  
4 Defendants as part of their church and youth bible studies program. Defendants and  
5 Church Leader Defendants' staff, employees, and administrators were required to  
6 report any suspected child or sexual abuse as part of their duties and responsibilities as  
7 employees and/or agents of Defendants and Church Leader Defendants.

8 198. Defendants' and Church Leader Defendants' administrators, board  
9 members, and employees are mandated reporters under Penal Code section 11165.7.

10 199. Penal Code section 11166(a) states that a mandated reporter shall make a  
11 report to an agency whenever he/she, in his/her professional capacity or within the  
12 scope of his/her employment, has knowledge of or observes a child whom the  
13 mandated reporter knows, or reasonably suspects has been a victim of child abuse or  
14 neglect. "Reasonable suspicion" does not require certainty that child abuse or neglect  
15 has occurred but looks to if it is objectively reasonable for a person to entertain a  
16 suspicion to suspect child abuse or neglect. (Penal Code § 11166(a)(1).)

17 200. As set forth in this Complaint, Defendants and Church Leader  
18 Defendants, through their administrators, board members, and employees knew and/or  
19 reasonably suspected that children had been sexually assaulted by Defendants, prior to  
20 Defendants' sexual assault of Plaintiffs, giving rise to a duty to report such conduct  
21 under CANRA.

22 201. Defendants and Church Leader Defendants, through their administrators,  
23 board members, and employees knew that in the absence of the exercise of reasonable  
24 diligence, that an undue risk to minors, including the Plaintiffs, existed because  
25 Defendants' administrators, board members, and/or employees did not comply with  
26 California's mandatory reporting requirements.

27 202. Defendants, through their administrators, board members, and employees,  
28 including but not limited to and Church Leader Defendants, failed to report the known

1 and/or reasonably suspected child molestations and assaults, created the risk and  
2 danger contemplated by CANRA, and a result, unreasonably and wrongfully exposed  
3 Plaintiffs and other minors to sexual molestation and abuse,

4 203. If Defendants, through their administrators, board members, and  
5 employees, including but not limited to the Church Leader Defendants, complied with  
6 CANRA's mandatory reporting requirements, then Plaintiffs would not have been  
7 harmed at all or to the extent that she was.

8 204. As a direct result of Defendants and Church Leader Defendants' failure  
9 to comply with CANRA's mandatory reporting requirements, through their  
10 administrators, board members, and employees. Defendants and Church Leader  
11 Defendants wrongfully denied the Plaintiffs the intervention of child protection  
12 services and constituted a per se breach of Defendants, through their administrators,  
13 board members, and employees, duties to Plaintiffs.

14 205. As a direct and legal result of Defendants and Church Leader Defendants'  
15 conduct, Plaintiffs suffered severe and permanent injuries including, but not limited to,  
16 physical and mental pain and suffering, severe emotional distress, physical injuries,  
17 past and future costs of medical care and treatment, and other damages, in an amount  
18 not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

19 **SEVENTH CAUSE OF ACTION**  
20 **NEGLIGENCE**

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

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

25 207. Defendants owed a duty of care to the minor Plaintiffs or had a duty to  
26 control the conduct of Defendants by way of the special relationship existing between  
27 those individuals and Plaintiffs.

28 ///

1 208. Defendants knew or should have known, reasonably suspected, and/or  
2 were otherwise on notice, of the misconduct and sexually predatory behavior of the  
3 Defendants directed towards minor children, including Plaintiffs.

4 209. Despite having knowledge of the misconduct of Defendants, all  
5 Defendants herein failed to take any preventative action to control, curb, and/or prevent  
6 that conduct, failed to warn Plaintiffs or Plaintiffs' parents of that wrongful conduct,  
7 and/or failed to notify law enforcement, despite having a legal duty to do so.

8 210. As a direct and legal result of Defendants' negligence, Plaintiffs were  
9 sexually assaulted, sexually abused, sexually harassed, and assaulted by the  
10 Defendants.

11 211. If Defendants fulfilled their duty and responsibility, then Plaintiffs would  
12 not have been subject to all or most of the misconduct perpetrated against Plaintiffs  
13 and the resulting harm.

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

19 **EIGHTH CLAIM FOR RELIEF**  
20 **Violation of Federal Racketeer Influenced and Corrupt Organization ("RICO")**  
21 **Act 18 U.S.C. § 1962(c)**  
*(Against All Defendants and Does 1-100)*

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

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

28 ///

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

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

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

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

19           219. Each Defendant, in their individual capacity, knew or should have known  
20 about the majority of the predicate acts carried out by Defendants within the Abuse  
21 Enterprise.

22           220. Upon information and belief, some combination of Defendants have  
23 engaged in an uninterrupted course of unlawful conduct consisting of all of the herein  
24 described predicate acts.

25           221. Defendants’ pattern of racketeering activity includes, but is not limited to,  
26 many repeated occurrences of the following predicate acts: (i) violating the prohibition  
27 against human trafficking under 18 U.S.C. § 1590; (ii) laundering of monetary  
28 instruments outside of the United States with the intent to promote the carrying on of

1 unlawful activity in violation of 18 U.S.C. §1956(a)(2); and (iii) sexual exploitation of  
2 minors and the transmission of visual depictions of minors engaged in sexually explicit  
3 conduct in violation of 18 U.S.C. §§ 2251, 2252, and 2260 Upon information and  
4 belief, several hundred children have been sexually exploited as a result of this pattern  
5 of racketeering behavior.

6 222. Upon information and belief, hundreds of individuals within Defendants'  
7 inner circles have been extorted through fear of financial and physical injury into  
8 making large financial payments to Defendants and into providing sexual services to  
9 Defendants as a result of this pattern of racketeering behavior.

10 223. Upon information and belief, many millions of dollars have been  
11 trafficked out of the United States for the purposes of carrying on unlawful activity as  
12 a result of this pattern of racketeering behavior.

13 224. Upon information and belief, Defendants' pattern of racketeering  
14 behavior has been related and continuous since its inception. Upon information and  
15 belief, there is not only a threat of continued criminal activity, but continued criminal  
16 activity is occurring within the Abuse Enterprise at the hands of nearly all Defendants  
17 as of the writing of this Complaint.

18 225. Defendants and the Abuse Enterprise regularly move goods, money, and  
19 people across state lines, and are therefore engaged in interstate commerce.

20 226. As a direct and proximate result of these patterns of racketeering  
21 behaviors, Plaintiffs have sustained damages, including lost wages, loss of economic  
22 opportunity, loss of educational opportunity, loss of future income, loss of specific  
23 extorted payments, physical injury, severe emotional distress, and additional economic  
24 losses.

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

28 ///



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

228. 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.

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

230. Plaintiffs bring this claim pursuant to California Assembly Bill 218, amending Sections 340.1 and 1002 of the 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.

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

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

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

234. Plaintiffs were minors minor when Defendants sexually battered them.

235. Each Defendant 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

1 sexually battering Plaintiffs and in furtherance of the Abuse Enterprise.

2 236. The sexual battery of Plaintiffs by the Abuse Defendants was the result of  
3 Defendants' collective cover up, as statutorily defined by California Code of Civil  
4 Procedure § 340.1(b).

5 237. As a direct and proximate cause of Defendants' actions, Plaintiffs have  
6 suffered severe emotional and mental distress and anxiety, humiliation,  
7 embarrassment, and additional damages.

8 238. The aforementioned conduct was willful, wanton, and malicious. At all  
9 relevant times, Defendants acted with conscious disregard of Plaintiffs' rights and  
10 safety as a minor in their care. Defendants also acted with the knowledge of or with  
11 reckless disregard for the fact that their conduct was certain to cause injury and/or  
12 humiliation to Plaintiffs.

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

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

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

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

25 242. Plaintiffs bring this claim pursuant to California Assembly Bill 218,  
26 amending Sections 340.1 and 1002 of the California Code of Civil Procedure and  
27 Section 905 of the Government Code, relating to childhood sexual assault, reviving  
28 until December 31, 2023 the statute of limitations for all previously extinguished

1 claims for damages suffered as a result of childhood sexual assault for victims within  
2 22 years of the age of majority.

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

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

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

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

17 247. The repeated sexual battery of Plaintiffs by Defendants was the result of  
18 Defendants' collective cover up, as statutorily defined by California Code of Civil  
19 Procedure § 340.1(b).

20 248. As a direct and proximate cause of Defendants' actions, Plaintiffs have  
21 suffered severe emotional and mental distress and anxiety, humiliation,  
22 embarrassment, and additional damages.

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

28 ///

