

1 **SAMINI BARIC APC**
2 Bobby Samini, Esq. (SBN 181796)
3 Ignacio Lazo, Esq. (SBN 105945)
4 Nicole C. Prado, Esq. (SBN 269833)
5 650 Town Center Drive, Suite 1500
6 Costa Mesa, California 92626
7 Telephone: (949) 724-0900
8 Fax: (949) 724-0901
9 Email: bobby.samini@saminilaw.com
10 Email: nicole.prado@saminilaw.com
11 Email: ignacio.lazo@saminilaw.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
10/06/2023 2:31 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Nunez, Deputy Clerk

12 *Attorneys for Plaintiffs*

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

15 JANE ROE 4, an individual; JANE ROE 5, an
16 individual; JANE ROE 6, an individual; JANE
17 ROE 7, an individual; JANE ROE 9, an
18 individual; JANE ROE 10, an individual; and
19 ALYSSIA PHILLIPS, an individual,

20 Plaintiffs,

21 v.

22 INTERNATIONAL CHURCHES OF
23 CHRIST, INC., a California nonprofit
24 corporation; THOMAS ("KIP") McKEAN, an
25 individual; MARK WILKINSON, an
26 individual; CINDY WILKINSON, an
27 individual; MARTY WILKINSON, an
28 individual; NANCY WILKINSON, an
individual; MIKE TALIAFERRO, an
individual; MISSION POINT CHRISTIAN
CHURCH, a Texas nonprofit corporation;
MIKE ROCK, an individual; ELIZABETH
("LIBBY") ROCK, an individual; STEVE
LOUNSBURY, an individual; CARRIE
LOUNSBURY, an individual; JAY MINOR,
an individual; TRACI MINOR, an individual;
KEVIN HOLLAND, an individual; DAVID
BRUCE, an individual; NATHAN CHUNG,
an individual; LOS ANGELES
INTERNATIONAL CHURCH OF CHRIST, a

Case No. **23STCV24432**

COMPLAINT FOR:

1. **SEXUAL ASSAULT OF A MINOR**
2. **VIOLATION OF PENAL CODE 647.6(a)(1)**
3. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
4. **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**
5. **GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4**
6. **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE SECTION 11165. ET SEQ. BASED ON VICARIOUS LIABILITY**
7. **AGGRAVATED SEXUAL ABUSE ACROSS STATE LINES IN VIOLATION OF 18 U.S.C. §§ 2241(c) & 2255**
8. **NEGLIGENT SUPERVISION OF A MINOR**
9. **NEGLIGENCE**

JURY TRIAL DEMANDED

1 California non-profit corporation; EDWARD
2 (“ED”) TOWNSEND, an individual; KAREN
3 TOWNSEND, an individual; ALLEN
4 PHILLIPS, an individual; JOHN UNZEUTA,
an individual; and DOES 1 through 10,
inclusive,

5 Defendants.

6
7 Plaintiffs JANE ROE 4, JANE ROE 5, JANE ROE 6, JANE ROE 7, JANE ROE 9, JANE
8 ROE 10 and ALYSSIA PHILLIPS (collectively, “Plaintiffs”) hereby submit this Complaint against
9 Defendants INTERNATIONAL CHURCHES OF CHRIST, INC., THOMAS “KIP” McKEAN,
10 MARK WILKINSON, CINDY WILKINSON, MARTY WILKINSON, NANCY WILKINSON,
11 MIKE TALIAFERRO, MISSION POINT CHRISTIAN CHURCH, MIKE ROCK, ELIZABETH
12 (“LIBBY”) ROCK, STEVE LOUNSBURY, CARRIE LOUNSBURY, JAY MINOR, TRACI
13 MINOR, KEVIN HOLLAND, DAVID BRUCE, NATHAN CHUNG, LOS ANGELES
14 INTERNATIONAL CHURCH OF CHRIST, EDWARD (“ED”) TOWNSEND, KAREN
15 TOWNSEND, ALLEN PHILLIPS, JOHN UNZEUTA and all other named and unnamed defendants
16 (collectively, “Defendants”), and states as follows:

17 **INTRODUCTION**

18 1. This action is one to recover damages on behalf of adult victims of childhood sexual
19 assault. It is governed by California’s Code of Civil Procedure section 340.01 (“section 340.01”).

20 2. This case arises from an ongoing and systemic scheme of abuse that shocks the
21 conscience from its appallingly epic proportions. The ICOC and its affiliate churches have created a
22 money-making enterprise through its psychological manipulation, tight control, and hierarchical
23 “discipleship” structure. That same structure fostered an environment that facilitated pervasive
24 sexual abuse of children and adults alike. Sexual predators gained unfettered access to manipulated
25 women and children. They could and did abuse them without fear of accountability. Instead of taking
26 action, the ICOC, its leaders, and its affiliates did more than turn a blind eye; together, they actively
27 concealed the abuse in order to protect their mega-church tithing empire. As a result, the ICOC and
28 its leaders, from top to the bottom, aided and abetted the continued sexual abuse of women, minors,

1 the “nerve center” of the International Churches of Christ, Inc., and their affiliate churches, including
2 Mission Point, lie within the boundaries of the City of Los Angeles.

3 **THE PARTIES**

4 **A. PLAINTIFFS**

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

8 8. Plaintiff Jane Roe 5 (“Jane Roe 5”) is a citizen and resident of Antonio, Texas. Jane
9 Roe 5 was a citizen of the United States of America, and resident of the State of Texas when she was
10 victim and survivor of Defendants’ sexual abuse and trafficking.

11 9. Plaintiff Jane Roe 6 (“Jane Roe 6”) is a citizen and resident of San Bernardino,
12 California. Jane Roe 6 was a citizen of the United States of America, and resident of the State of
13 California when she was victim and survivor of Defendants’ sexual abuse and trafficking.

14 10. Plaintiff Jane Roe 7 (“Jane Roe 7”) is a citizen and resident of Los Angeles, California.
15 Jane Roe 7 was a citizen of the United States of America, and resident of the State of California when
16 she was victim and survivor of Defendants’ sexual abuse and trafficking.

17 11. Plaintiff Jane Roe 9 (“Jane Roe 9”) is a citizen and resident of Ventura, California.
18 Jane Roe 9 was a citizen of the United States of America, and resident of the State of California when
19 she was victim and survivor of Defendants’ sexual abuse and trafficking.

20 12. Plaintiff Jane Roe 10 (“Jane Roe 10”) is a citizen and resident of Morgan, Utah. Jane
21 Roe 10 was a citizen of the United States of America, and resident of the State of California when
22 she was victim and survivor of Defendants’ sexual abuse and trafficking.

23 13. Plaintiff Alyssia Phillips (“Alyssia”) is a citizen and resident of San Antonio, Texas.
24 Alyssia was a citizen of the United States of America, and resident of the State of California when
25 she was victim and survivor of Defendants’ sexual abuse and trafficking.

26 **B. DEFENDANTS**

27 14. Defendant International Churches of Christ, Inc. (the “ICOC”) is a religious non-profit
28 corporation organized and existing under and by virtue of the laws of the State of California. The

1 ICOC purposefully conducts substantial religious and affiliated programs and activities in the County
2 of Los Angeles, State of California. The ICOC has ecclesiastical, governmental, and administrative
3 authority over the business and conduct of all locations worldwide. This authority includes, but is
4 not limited to, the selection of ministers, the direction of liturgical interpretation, the collection of
5 tithings and additional funds, and the issuance of behavioral and commercial directives for members
6 worldwide.

7 15. Defendant Thomas “Kip” McKean (“Kip” or “McKean”), upon information and
8 belief, is a United States citizen, currently residing in Pacific Palisades, California. At all times
9 relevant to the events that form the basis of this Complaint, Defendant Kip was a member of the
10 ICOC’s Los Angeles regional branch (the LA ICOC as defined below), and later, the City of Angels
11 International Church of Christ in Los Angeles, California. Defendant Kip resided in California for
12 extended periods while conducting business in California on behalf of Defendant ICOC. McKean’s
13 supervision, direction, and control over Defendants forms the basis of his personal liability. At all
14 relevant times herein, McKean gave directives to ICOC and LA ICOC leaders, who in turn, directed
15 subordinate leaders and church members concerning the conduct alleged herein.

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

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

28 18. Defendant Marty Wilkinson (“Marty”), upon information and belief, is a United States

1 citizen, currently residing in San Antonio, Texas. At all times relevant to the events that form the
2 basis of this Complaint, Marty was/is a member and leader of ICOC's San Antonio Texas branch.
3 His abuse of Plaintiffs combined with his supervision, direction, and control over Defendants forms
4 the basis of his personal liability. Marty is son of Mark and Cindy Wilkinson and the brother of Nancy
5 Wilkinson.

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

12 20. Defendant Mike Taliaferro ("Taliaferro"), upon information and belief, is a United
13 States citizen, currently residing in San Antonio, Texas. At all times relevant to the events that form
14 the basis of this Complaint, Taliaferro was a member and leader of ICOC's San Antonio Texas branch
15 and later Defendant Mission Point Christian Church, which he currently leads. His supervision,
16 direction, and control over Defendants forms the basis of his personal liability.

17 21. Defendant Mission Point Christian Church ("Mission Point") was founded in or about
18 1991 by the ICOC and is a religious non-profit corporation organized and existing under and by virtue
19 of the laws of the State of Texas, with a principal place of business registered with the Secretary of
20 State for the State of Texas located at 618 Northwest Loop 410 #207, San Antonio, TX 78216.
21 Mission Point purposefully conducts substantial religious and affiliated programs and activities in
22 San Antonio, Texas. On information and belief, Mission Point is an agent, affiliate, subsidiary, and/or
23 alter ego of the ICOC.

24 22. Defendant Mike Rock ("Rock"), upon information and belief, is a United States
25 citizen, currently residing in Orlando, Florida. At all times relevant to the events that form the basis
26 of this Complaint, Rock was a member and leader of the LA ICOC. His abuse of Jane Roe 6,
27 combined with his supervision, direction, and control over Defendants forms the basis of his personal
28 liability. Rock is the father of Jane Roe 6's abuser.

1 23. Defendant Elizabeth Rock (“Libby”), upon information and belief, is a United States
2 citizen, currently residing in Orlando, Florida. At all times relevant to the events that form the basis
3 of this Complaint, Libby was a member and leader of the LA ICOC. Her abuse of Jane Roe 6,
4 combined with her supervision, direction, and control over Defendants forms the basis of her personal
5 liability. Libby is Rock’s wife and the mother of Jane Roe 6’s abuser.

6 24. Defendant Steve Lounsbury (“Steve”), upon information and belief, is a United States
7 citizen, currently residing in Culver City, California. At all times relevant to the events that form the
8 basis of this Complaint, Steve was/is a member and leader of the LA ICOC. On information and
9 belief, Steve currently leads the Westside Church within the LA ICOC. His abuse of Jane Roe 6,
10 combined with his supervision, direction, and control over Defendants forms the basis of his personal
11 liability.

12 25. Defendant Carrie Lounsbury (“Carrie”), upon information and belief, is a United
13 States citizen, currently residing in Culver City, California. At all times relevant to the events that
14 form the basis of this Complaint, Carrie was/is a member and leader of the LA ICOC. On information
15 and belief, Carrie currently leads the Westside Church within the LA ICOC. Her abuse of Jane Roe
16 6, combined with her supervision, direction, and control over Defendants forms the basis of her
17 personal liability. Carrie is Steve’s wife.

18 26. Defendant Jay Minor (“Jay”), upon information and belief, is a United States citizen,
19 currently residing in Ladera Ranch, California. At all times relevant to the events that form the basis
20 of this Complaint, Jay was a full-time paid ministry staff member and leader of the Turning Point
21 Ministry within the LA ICOC. On information and belief, Steve recently resigned from his leadership
22 role within the ICOC Orange County Region. His abuse of Jane Roe 7, combined with his
23 supervision, direction, and control over Defendants forms the basis of his personal liability.

24 27. Defendant Traci Minor (“Traci”), upon information and belief, is a United States
25 citizen, currently residing in Ladera Ranch, California. At all times relevant to the events that form
26 the basis of this Complaint, Traci was a full-time paid ministry staff member and leader of the Turning
27 Point Ministry within the LA ICOC. On information and belief, Traci recently resigned from her
28 leadership role within the ICOC Orange County Region. Her abuse of Jane Roe 7, combined with her

1 supervision, direction, and control over Defendants forms the basis of her personal liability. Traci is
2 also the wife of Jay.

3 28. Defendant Kevin Holland (“Kevin”), upon information and belief, is a United States
4 citizen, currently residing in Los Angeles, California. At all times relevant to the events that form the
5 basis of this Complaint, Kevin was/is a member and leader of the Turning Point Ministry within the
6 LA ICOC. His abuse of Jane Roe 7, combined with his supervision, direction, and control over
7 Defendants forms the basis of his personal liability.

8 29. Defendant David Bruce (“David”), upon information and belief, is a United States
9 citizen, currently residing in Van Nuys, California. At all times relevant to the events that form the
10 basis of this Complaint, David was/is a member and Elder/leader of the Turning Point Ministry within
11 the LA ICOC, and also a Licensed Marriage and Family Therapist. His abuse of Jane Roe 7, combined
12 with his supervision, direction, and control over Defendants forms the basis of his personal liability.

13 30. Defendant Nathan Chung (“Nathan”) upon information and belief, is a United States
14 citizen, currently residing in Los Angeles, California. At all times relevant to the events that form the
15 basis of this Complaint, Nathan was a member of the Turning Point Ministry within the LA ICOC.
16 His sexual abuse of Jane Roe 7 in 2015 forms the basis of his personal liability.

17 31. Defendant Los Angeles International Church of Christ (“LA ICOC”) is a religious
18 non-profit corporation organized and existing under and by virtue of the laws of the State of
19 California. The LA ICOC purposefully conducts substantial religious and affiliated programs and
20 activities in the County of Los Angeles, State of California and operates in concert with the ICOC.
21 The LA ICOC, in conjunction with the ICOC, has ecclesiastical, governmental, and administrative
22 authority over the various regions within Southern California, including but not limited to the Inland
23 Empire, Ventura and South Bay. This collaborative authority includes, but is not limited to, the
24 selection of ministers, the direction of liturgical interpretation, the collection of tithings and additional
25 funds, and the issuance of behavioral and commercial directives for members worldwide. Each
26 Plaintiff herein, except Jane Roe 4 and 5, was a member of a regional church operated and controlled
27 by the ICOC and the LA ICOC collectively.

28 32. Defendant Edward Townsend (“Ed”), upon information and belief, is a United States

1 citizen, currently residing in Atlanta, Georgia. At all times relevant to the events that form the basis
2 of this Complaint, Ed was a member and leader of the Ventura Region branch of the LA ICOC. His
3 abuse of the Roe Sisters and Alyssia, combined with his supervision, direction, and control over
4 Defendants forms the basis of his personal liability.

5 33. Defendant Karen Townsend (“Karen”), upon information and belief, is a United States
6 citizen, currently residing in Atlanta, Georgia. At all times relevant to the events that form the basis
7 of this Complaint, Karen was/is a leader of the Ventura Region branch of the LA ICOC. Her abuse
8 of the Roe Sisters and Alyssia, combined with her supervision, direction, and control over Defendants
9 forms the basis of her personal liability. Karen is also the wife of Ed.

10 34. Defendant Allen Phillips (“Allen”) upon information and belief, is a United States
11 citizen, currently residing in San Antonio, Texas. At all times relevant to the events that form the
12 basis of this Complaint, Allen was a member of the Ventura region LA ICOC, and other locations
13 where he and his family relocated over the years, such as San Francisco Bay Area, Stockton,
14 Sacramento, and San Antonio. His sexual abuse of Alyssia forms the basis of his personal liability.

15 35. Defendant John Unzueta (“John”), upon information and belief, is a United States
16 citizen, currently residing in Las Vegas, Nevada. At all times relevant to the events that form the basis
17 of this Complaint, John was a member and leader of the Ventura Region LA ICOC. His abuse of
18 Alyssia, combined with his supervision, direction, and control over Defendants forms the basis of his
19 personal liability.

20 36. Plaintiffs are ignorant of the true names of the defendants sued herein as Does 1-10,
21 inclusive, and therefore sue these defendants by such fictitious names. Plaintiffs will amend the
22 Complaint to allege their true names when ascertained. Plaintiffs allege that, at all relevant times
23 herein, Does 1-10 were the co-conspirators, subsidiaries, employees, employers, and agents of
24 constituent members of Defendants herein. Plaintiffs allege that each of the fictitiously named
25 defendants is legally responsible for the actions forming the basis of this Complaint and that
26 Plaintiffs’ losses and damages are the result of their wrongful conduct.

27 ////

28 ////

1 GENERAL ALLEGATIONS

2 **A. Kip McKean and His Core Leadership Team Spawned a Tightly Woven Network of**
3 **Cult-Like Churches.**

4 37. In 1979, Kip McKean officially broke off from the traditional Church of Christ—the
5 proto-organization that helped spawn the ICOC.

6 38. Around that time in Boston, McKean founded what would become the ICOC under
7 the moniker of the “Boston Movement.” McKean founded the Boston Movement with 29 other
8 members, who seceded from the Church of Christ based out of Gainesville, Florida. The fledgling
9 “church” quickly grew, rapidly seeking out new members and enjoying considerable expansion and
10 success. After the Boston Movement obtained religious recognition in the 1980s, it became the ICOC
11 and grew into a multinational movement.

12 39. Over time, the ICOC morphed into an intricate and intentionally confusing “network
13 of over 700 non-denominational churches in about 150 countries.” Throughout its history, the ICOC
14 has gone by other names, including the Boston Movement, the Discipling Movement, the Crossroads
15 Movement, and Multiplying Ministries. Local ICOC churches or assemblies would often append the
16 name of their city, in which they were located, to their name, *e.g.*, the Milwaukee Church of Christ
17 or the Sarajevo Church of Christ.

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

23 41. Chuck Lucas, one of the original founding ministers with Kip in Florida, was
24 eventually paid off to leave the group because of his deviant behavior. Early on, the ICOC and
25 McKean strategically downplayed Lucas’s pattern of abuse by labeling his conduct as “recurring
26 sins.” Sadly enough, those “recurring sins” were never investigated by ICOC. McKean and other
27 ICOC leaders were acutely aware of Lucas’s disturbing pattern of abuse, but nevertheless, they
28 actively concealed Lucas’s misdeeds to avert discovery by the police or church members. Covering

1 up for Lucas became the blueprint for the ICOC moving forward, integrating coverups and
2 concealment into its organizational DNA.

3 42. In 2006, McKean spun off a derivative church, dubbed the International Christian
4 Church (or “the ICC”), after he was forced out of the ICOC. The ICC was registered in California as
5 a nonprofit religious corporation in October 2006. As of December 2022, the ICC listed 104 affiliate
6 churches on its website. Its Articles of Incorporation, filed with the California Secretary of State,
7 included references to affiliates. One part stated that upon dissolution of ICC, “the assets of this
8 Corporation shall be distributed to other nonprofit funds, foundations or corporations affiliated with
9 the International Christian Church.¹²

10 **B. The ICOC Meticulously Crafted an Enterprise That Enabled, Encouraged, and**
11 **Concealed Sexual and Psychological Abuse.**

12 43. Under the direction and control of McKean, the ICOC (and, later, the ICC) has
13 collectively exploited everything good and noble in their trusting and loyal members by callously
14 robbing them of their childhood innocence through psychological coercion and manipulation,
15 pervasive sexual abuse of children as young as three years old, and shameful financial abuse. Each
16 of the foregoing abuses was actively concealed by ICOC and its members to avert discovery by child
17 protective services and the police.

18 44. The ICOC was born out of a “discipling” movement that arose among the Churches
19 of Christ during the 1970s. The ICOC has maintained this practice into present times. It is a strict
20 practice involving a “discipleship hierarchy” centered around a formal discipleship tree—in other
21 words, a top-down authoritarian hierarchy.

22
23
24 ¹ Between April 2020 and February 2021, eighteen branches of the ICC received Paycheck Protection Program (PPP)
loans. These loans totaled \$287,490, and a total of \$290,040 was forgiven, including accrued interest.

25 ² Churches associated with the ICOC appeared to be incorporated into separate entities, according to a review of public
26 records. For instance, the Los Angeles International Church (LAICC), the largest ICOC church by membership, was
27 incorporated in California in December 1990, according to corporate records with the California Secretary of State. The
28 Los Angeles International Church (LAICC) described its structure on its website, noting that it is “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.”

1 45. McKean co-designed the specific discipling pyramid that would later become the
2 foundational structure of both the ICOC and the ICC as organizations. That pyramid structure served
3 as the mechanism of control and coercion frequently exerted over their members.³

4 46. Pursuant to that strict and documented discipleship pyramid, every member has an
5 elder disciple preside over them, who acts as quasi-mentor-qua-jailor.

6 47. This carefully crafted “discipleship tree” was nothing short of a sophisticated scheme,
7 deeply rooted in psychological manipulation, accomplished by institutionally normalizing the use of
8 aggressive, abusive, and coercive tactics that brainwash members into fearing the loss of salvation
9 for menial transgressions. It allowed the ICOC and ICC to execute and maintain considerable control
10 over every aspect of every member’s life. Members became systematically deindividualized, only to
11 endure communal isolation from the world at large.

12 48. Only those members named as “disciplers” were allowed to provide any counseling to
13 church members. Abuses were reported only to the “disciplers.” ICOC church members and
14 leadership discouraged reporting those abuses to outside authorities by routinely branding abuse
15 victims as “disobedient” and blaming them for the abuse they suffered. Many incidents which could
16 have been reported, therefore never were.

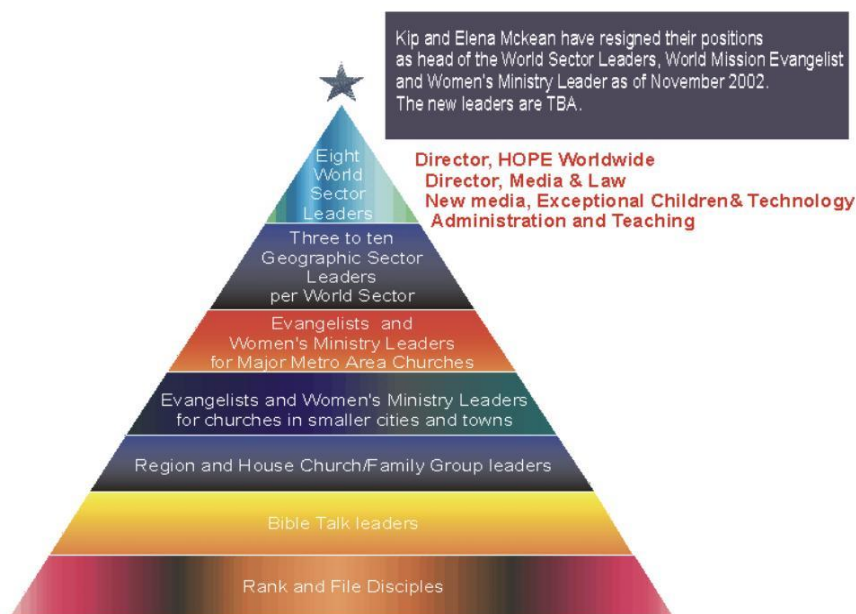
17 49. McKean and the ICOC created a religious practice that required victims to confess
18 their “sins” daily. “Disciplers” would then share the specifics of those “sins” with other groups and
19 leaders to reinforce their control over the victim. This pattern of practice allowed McKean and the
20 ICOC to leverage the abuse as emotional blackmail within the community.

21 50. An illustration of the ICOC’s hierarchical model of authority is depicted below:
22
23

24 **[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]**
25
26

27 ³ Flavil R Yeakley Jr. documented the “disciplining” movement in a book titled *The Discipling Dilemma*. The ICOC and
28 ICC have been classified as toxic, destructive cults due to their rigid and pervasive culture of fear, coercion, control,
manipulation, judgment, exclusion, and punishment, along with their overt focus on membership growth (to drive income
from tithing).

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



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

22 **C. As Designed by McKean, the ICOC Systematically Indoctrinates, Brainwashes, and**
23 **Manipulates Its Members.**

24 51. Initially, new recruits receive profound amounts of “love bombing” to lure them into
25 a false sense of security, thereby allowing sexual predators to effectively manipulate them and
26 eventually abuse them with the comfort of knowing that these vulnerable and newly brainwashed
27 people would never report the abuse.

28 52. Every new member undergoes a rigid conversion process tantamount to systemic
brainwashing, called the “First Principles.” Once a new member agrees to all indoctrination related
teachings, the neophyte must be baptized in water and commit to devote their entire life and schedule
to the church.

53. The ICOC trains each new member to understand that “compliance was the path of
least resistance.” Members genuinely and wholeheartedly believed that they needed to follow the
Bible verbatim, and that the ICOC’s leadership were the only “true” modern-day disciples on Earth.

1 54. In addition to the “discipler” structure, the ICOC indoctrinated its members with rigid
2 fundamentalist teachings, demanded unyielding compliance with its instruction, and enforced strict
3 social separation.

4 55. The “discipler” hierarchy facilitated McKean and the ICOC’s systemic concealment
5 of abuse, created a culture of fear among its most vulnerable, and allowed predators to abuse women
6 and children with impunity. Their practice of concealment became an institutionalized pattern within
7 the ICOC. For example:

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

13 b. On information and belief, non-parties Damon and Vicki James, two ICC
14 “disciplers” working under the specific direction of McKean, instructed a member on July 1, 2018, to
15 refrain from reporting two years of physical and sexual abuse by her husband. Damon James even
16 scolded this survivor and stated, “[w]e don’t do that to our brothers as disciples.” Vicki James then
17 victim shamed the woman by stating “[w]hy would you have the heart to press charges?” Damon
18 continued and told the woman, “[w]hat does that gain? That puts you in front of ‘the world.’”

19 c. Former ICOC member Carter Whitten made the following harrowing statement
20 to an ICOC whistleblower regarding the abuse he endured in connection with his “discipler”
21 experience:

22 “For reasons I still don’t fully understand, my ‘discipler’ met
23 with me and two other teen boys at one of the boys’ houses.
24 In the basement we sat in a circle, and the goal of my
25 discipler was to break me down and to get me to fully
26 understand the horrors of Hell: Meaning what I had to look
27 forward to if I didn’t enter the Kingdom (the ICOC) before
28 I died. So next he took it upon himself to paint a vivid
picture for me: My discipler described a scene in hell in
which I was nailed to a ceiling by my PENIS and spun
around by a demon. Hanging only by my genitals, I was
forced to watch the devil RAPE my mother repeatedly for
all eternity. I was then asked to take that grotesque vignette

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

and multiply its terror by 10,000 (or some other arbitrarily large number) to catch even a glimpse of how utterly horrifying the future awaiting me was, unless I was to get baptized and be saved. I finally broke down and cried. Which was clearly the goal, as the ICOC famously conducted what they called “breaking sessions.”

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

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

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

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

But even worse than this, I had a friend that was physically

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

assaulted while he was studying the Bible, because he tried to get up and leave. So the teen leader held him down and beat him up.

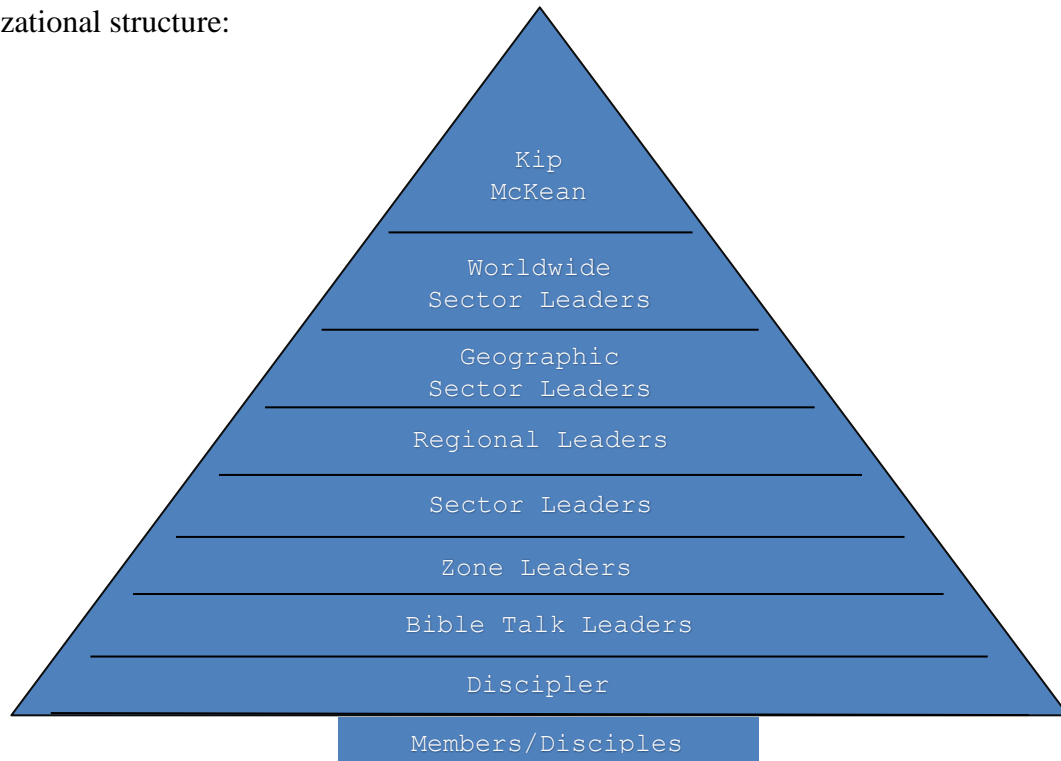
We had to meet in one-on-one and group D-times, where we had to confess our sins (especially sexual sins) in a group setting, and the disciplers (teen leaders) would sometimes confess sins as well. During one such meeting, an adult discipler confessed to a group of four or five boys that he had had a 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 all their sexual sins to them... I heard things I had never heard before, and it all felt very abusive and inappropriate to me, even as a child.

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

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

1 **D. McKean Structured the ICOC to Maintain Secrecy.**

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



17 57. Among other goals, McKean purposefully structured the ICOC’s hierarchy to ensure
18 that abuse within the church remained a secret to all outsiders, including the authorities. Indeed,
19 someone within the church was always monitoring lower ranking members and giving them explicit
20 instructions on how to conduct themselves.

21 58. McKean and the ICOC’s leadership taught, and continue to teach, the doctrine that
22 only fellow church members are “true disciples” of Jesus who will be rewarded with a place in heaven
23 in the afterlife. Conversely, non-members will not go to heaven because they are not “true disciples.”
24 That doctrine engendered an insider-outsider mindset, which allowed scores of sexual predators
25 within the churches to abuse children without fear of criminal prosecution.

26 59. The ICOC also created a highly exclusive environment for its members wherein they
27 were/are prohibited from marrying anyone outside the church. The ICOC must approve all marriages,
28 which ultimately gives it an incredible degree of control—and power—over each of its members.

1 60. Questioning higher ranking members or the church in any manner invited damning
2 ostracization. Sometimes, the ICOC would label those individuals as “disfellowshipped” or “marked”
3 for being divisive. “Disfellowshipped” meant excommunication. Being disfellowshipped or marked
4 would lead to ostracization and scorn from the ICOC’s communities. From the point of view of ICOC
5 doctrine, being labeled as “disfellowshipped” or “marked” equated to being condemned to hell on
6 earth and in the afterlife, too. Indeed, that communal ostracization and isolation from the outside
7 world inflicted highly debilitating emotional and mental harm to many of their members and, in some
8 cases, drove them to suicide.

9 61. But when it came time to judge known or suspected abusers, the ICOC demanded that
10 its parishioners forgive anything slight, no matter how severe, and “move on” without reporting such
11 abuses. Judging the conduct of another, no matter how villainous, was beyond the right of any
12 individual, according to McKean and others, because “no one is free from sin,” unless they are male
13 members of the ICOC.

14 62. Because of the ICOC’s strict rules, the expanse of its control over its members’ lives,
15 and the severe consequences it could impose on members who questioned its teachings (let alone
16 transgressed its instructions), the ICOC created the ideal conditions for child molesters, pedophiles,
17 and other sexual abusers to fester and thrive. Furthermore, McKean and other abusers expressly
18 leveraged the ICOC’s hierarchical system of authority to insulate predatory church leaders from
19 exposure. Many of those predators continue to prey upon children without fear of repercussion.

20 63. It is commonly understood that McKean was acutely aware of the physical,
21 psychological, and sexual abuses that church leaders (like Chuck Lucas and others) wrought upon
22 both children and adult parishioners of the church. Academic writings, journals, recovered
23 correspondence, newspaper articles, eyewitness accounts, and publications like the book Toxic
24 Christianity—written by former ICOC leading members under the collective pseudonym “Mr. X”⁴—
25 corroborate that fact. These are but a fraction of the litany of sources of information depicting the
26

27
28 ⁴ It is widely believed that Rick Bauer, a former ICOC member and whistleblower, co-published with another church
leader under the pseudonym “Mr. X” and can be accessed in its entirety here:
<http://www.reveal.org/library/theology/Toxic.pdf>

1 practices and abuses that the ICOC institutionalized to the point of normalcy within the church.

2 64. To ensure that the ICOC's exploitative conduct remains unchecked, McKean, the
3 ICOC, and its leadership have utilized their vast resources to silence any internal dissidents, including
4 through vexatious litigation. The ICOC has created a "David and Goliath" scenario, swiftly
5 suppressing the few members who have spoken up over the last four decades. The ICOC would use
6 its vast resources to silence any internal dissidents, through coercive, deceptive, and threatening tactics
7 to not only force members to give 10 to 40% of their income every month, but also to turn over student
8 loans, IRS tax returns, children's college funds, heirlooms, stocks, furniture, wedding rings, cars,
9 prized possessions, and literally anything that the ICOC could get their hands on. The ICOC grew its
10 resources from nonstop fundraisers, forcing members to put their "special contribution" amounts of
11 thousands of dollars on credit cards, or borrowing it from outside family members.

12 65. When many abused victims escaped the ICOC, they were so financially destitute (and
13 emotionally devastated) that they lacked both the financial resources and emotional resilience to take
14 on the ICOC through legal recourse. The ICOC used this to their advantage, as it would help silence
15 any word of sexual abuse. In short, McKean and the ICOC intentionally created a system of
16 exploitation that extracts all the financial value it can from its members, which it could deploy to
17 further shield their illicit conduct from discovery by outsiders.

18 66. The ICOC and its leaders have cajoled, manipulated, and even coerced parents and
19 other church members to remain silent about the abuses that their children suffered, such as through
20 payoffs and non-disclosure agreements. The ICOC's affiliate organizations (*e.g.*, its non-profit arm,
21 HOPE Worldwide) also helped insulated abusers from accountability by lending legitimacy to the
22 ICOC's system of exploitation and abuse.

23 **E. McKean Grew the ICOC's Ranks to Feed Its Financial Operation.**

24 67. McKean and other ICOC leaders were obsessed with growing church membership
25 because more members meant more revenue from income tithing and other coerced, uncompensated
26 labor from adults and minors.

27 68. Accordingly, they imposed recruiting quotas on members to help grow their ranks.
28 The ICOC requires all its members to recruit a certain number of new members at regular intervals,

1 as well as to bring visitors to all church events. Tolerating, concealing, and hiding sexual abusers
2 (while at the same time inviting more abusers into the ICOC's ranks) simply became a cost of doing
3 business.

4 69. To incentivize bringing new members into the fold, the ICOC cultivated an atmosphere
5 that isolated its members from other social networks, while concealing the systemic abuse of women
6 and children within the church. Members spent every day together; they were not allowed much, if
7 any, contact with family members or friends who were not church members. Of course, the only
8 exception to that strict rule was contact with outsiders for the sole purpose of their recruitment.

9 70. Members were required to give at least 10-30% of their income to the churches *before*
10 they were allowed to be baptized and become an official member.

11 71. Thereafter, any member's position, health, and wellbeing in an ICOC church
12 community depended heavily upon success in expanding the congregational rosters. Those social
13 incentives created a self-perpetuating business model to attract new recruits/members, and in doing
14 so, generate hundreds of millions of dollars in revenue for the church through new tithing.

15 72. Also, the ICOC forced its members to participate in special contributions for missions
16 approximately twice a year equaling approximately 40 times their normal tithe amount. The ICOC
17 was relentless in its pursuit for funding and church leadership would resort to interrogating members
18 about their income, going so far as to demand copies of the members' paystubs. By way of example,
19 if a member gave \$4,000 per month, the total mission contributions for that year would equal an
20 additional (40x) and the total required sum would be \$160,000 in addition to the normal yearly tithe
21 amount of \$48,000. This particular member would be required to give the church a whopping total of
22 \$208,000 for the year.

23 73. Children were also asked to contribute, including their labor for events like car washes
24 or baby-sitting.

25 74. On information and belief, the ICOC has collected upwards of \$10 to \$15 billion in tax
26 free contributions over the past four decades.

27 75. If the tithing budget was not satisfied, the ICOC forced its leaders or "disciplers" to
28 contribute the financial shortfall themselves. Examples of the ICOC's pattern of coercive tactics to

1 enforce non-consensual tithing include, but are not limited to, the following:

2 a. The ICOC put members, who failed to tithe, on a “weak and struggling list,” a
3 list which was known to all ICOC leaders. If the “weak and struggling” member did not eventually
4 repent and repay the tithe, the ICOC “disfellowshipped” him or her.

5 b. The ICOC would ask its members to locate members who failed to tithe and
6 peer pressure them into tithing, for example, by sitting on their porch and waiting until they arrived
7 home to collect the money.

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

13 d. A former member (who only wishes to go by Tina C.) witnessed Non-
14 Disclosure Agreements being forced upon parishioners, claiming that they could never talk about the
15 true finances of the Defendants despite evidence that ICOC opened offshore accounts containing
16 massive quantities of cash.⁵

17 76. The pressure to comply with the church’s rigid demands became a source of anxiety
18 and depression for many members—so much so that several ex-members committed suicide.

19 77. In furtherance of efforts to protect the church and its primary source of revenue (*i.e.*,
20 its members) at all costs, McKean and the ICOC used psychological manipulation to conceal the
21 incidents of abuse. ICOC members routinely read scripture to discourage “dragging brothers into
22 court.” For example, McKean told members of the ICOC, including the mother of Jane Roe 8, that:

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

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

26 ⁵ Top leaders of the ICOC put “different ICOC assets and properties in their names” in order shelter and hide those assets
27 “so 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 an “other” 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

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

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

78. In addition, the ICOC engaged in strategic victim blaming and victim shaming. For example, ICOC leaders blame victims for bringing on their suffering because their clothing was too provocative, they were supposedly disobedient, or that they did not listen to the ICOC’s advice.

79. Through this combination of tithing, labor contributions, and concealment of crimes through fear, coercion, and manipulation, McKean and the ICOC managed to operate a highly profitable pyramid scheme.

80. A web of paper corporations and alter ego 501(c)(3) entities supported that pyramid scheme, culminating in hundreds of millions of dollars in illicit gains. The full extent of the ICOC (and the ICC’s) profiteering is unknown, especially in view of the tithing and labor contributions that the ICOC and the ICC routinely coerce from their members.

81. Plaintiffs are aware that the ICOC and the ICC have also benefitted from millions in governmental support through SBA loans, authorized under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).⁶ Through their abuse of the corporate form and systematic exploitation of their members, the ICOC and the ICC have created literal cash cows built upon layers of lies and deceit.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

⁶ 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. *See* <https://projects.propublica.org/coronavirus/bailouts/> for more information.

1 82. McKean actively solicited church members to turn over their COVID-19 relief money
2 to the church. The following are excerpts of emails from McKean to various church elders and leaders:

3
4
5 **Here are my charges for the USA Churches:**

6
7 1. Call your members to give their stimulus checks ASAP.
8 Americans are known to spend everything in their accounts. The great Chicago Church has called these \$1,200 checks "Manna from Heaven!"

9
10 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.

11
12 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.

13
14
15
16
17 83. HOPE, a sham charity organization, is one example of a tax-exempt corporation under
18 the ICOC's and the ICC's corporate umbrellas. HOPE has generated over \$100 million in revenue
19 over the last six years. It continues to generate a substantial share of its tax-free revenue from its
20 members using substantially similar methods of the ICOC and the ICC, which are characterized by
21 the tax-deductible contributions from third-party corporations and high-net-worth individuals.

22 **F. McKean and His Churches Used Children's Ministries to Extend the Abuse Enterprise.**

23 84. The ICOC's children's ministry, named the "Kids Kingdom," further insinuated the
24 ICOC into the lives of its members and their children.

25 85. The ICOC built a culture of child grooming. Children were taught from a very young
26 age to "obey" their ICOC elders or face corporal punishment. The ICOC indoctrinated the children
27 under its control to therefore obey adults and authority figures unquestioningly.

28 86. Those policies, practices, and norms allowed the ICOC and its Kids Kingdom, in

1 particular, to become fertile grounds for sexual predators. Countless instances of abuse happened
2 within the Kids Kingdom ministries themselves, during its hosted mission trips (*e.g.*, HOPE
3 Worldwide trips), and other related religious and social events.

4 87. HOPE took teenagers on mission trips around the world to spread God’s Word. Many
5 of these children thought they were participating in an evangelical trip. Ultimately, many, including
6 some of the Plaintiffs, were sexually abused by vile adult men. Children and/or their parents reported
7 the sexual abuse, including rape, to elders and doctors (*i.e.*, mandated reporters) within the church,
8 but the church never bothered notifying the police of the illegal activity. There were no instances of
9 any ICOC medical doctors reporting the abuse to anyone, let alone anyone outside the church.

10 **G. McKean and His Churches Encouraged Physical Abuse of Children Under the Guise of**
11 **Discipline.**

12 88. In addition to sexual abuse, children in the care of ICOC (and ICC) staff were routinely
13 physically abused under the pretext of “discipline.” The ICOC also instructed the parents to routinely
14 physically abuse their children under the pretext of discipline.

15 89. Church leadership often recited the following commonly known passage from
16 Proverbs 13:24 as justification for child abuse: “Those who spare the rod of discipline hate their
17 children. Those who love their children care enough to discipline them.”

18
19 **[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]**
20
21
22
23
24
25
26
27
28

1 90. For example, the ICOC instructed its members to spank children, including infants,
2 with a wooden paddle or spoon. Pictured is an example of a custom-made ICOC paddle with a heart
3 shaped hole in it. A true and correct image of the heart shaped paddle is depicted below:



4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21 91. Members were instructed, with visuals, on how to use corporal punishment without
22 leaving bruises, welts, or red marks, so the offending members could not be reported to child
23 protective services. One former member recalls frequently seeing young children at church with welts
24 or bruises on their thighs. On one occasion, this member witnessed a child with a “heart shaped welt”
25 on his/her body.

26 **H. Defectors are Beginning to Corroborate the Abuses Publicly, and Experts are Taking**
27 **Note.**

28 92. McKean and his team of capable, well-educated henchmen convinced nearly everyone

1 within his churches to remain silent for the last 43 years. That silence has come to an end.

2 93. Some ICOC members were fortunate enough to escape the church's tight grasp and
3 successfully flee the toxic and harmful environment that McKean created.

4 94. According to some of the most respected cult experts around the world (such as Dr.
5 Steve Hassan, PhD), the ICOC and ICC are some of the most dangerous cults in existence. The danger
6 arises primarily because the church insidiously masquerades as the approachable 'church next-door'
7 with deeply rooted Biblical foundations. On its face, this public image of the church seems innocent.
8 But the church's internal machinations are characterized by unmitigated systemic and chronic
9 physical and sexual abuse of children and women within the church.

10 95. Defectors have since revealed the abuse they suffered or witnessed at the ICOC. For
11 example:

12 a. Former member (and non-party) Lisa Johnson was a top leader in New York
13 City and a friend of McKean. In a podcast called *Eavesdropping*,⁷ she made the following comments
14 regarding the ICOC based on her personal experience: "Women [in the ICOC] are getting ground up,
15 and I mean tons of people, it's not an isolated case here and there . . . And I think about these women
16 now, after all these years . . . So I'm gonna bring up something here. . . . There has been sexual abuse,
17 there has been emotional abuse, and there has been some physical abuse of women . . . and part of
18 that is the issue of patriarchy. We developed a system and a way that was not safe for women . . .
19 There are women that have been very damaged and ground up by that. The fruit of this is so obvious,
20 how can you miss it? How many women have been told to stay with their physically abusive husbands
21 and how many women have been sexually abused?"

22 b. In a 2022 podcast with Steve Johnson,⁸ another ICOC defector, James Lloyd,
23 explained the irony of Lucas's pedophilia with young men when the ICOC had implemented its own
24

25 _____
26 ⁷ The podcast may be accessed from YouTube from [https://m.youtube.com/watch?v=mqhs4GJ1D-
27 s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIEhpc2EgbXkgTGlzYSBhbmQgU2hhcmk%3D](https://m.youtube.com/watch?v=mqhs4GJ1D-s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIEhpc2EgbXkgTGlzYSBhbmQgU2hhcmk%3D). The statements begin
at the 44:40-minute mark and last for about four minutes.

28 ⁸ The podcast may be accessed from Facebook at [https://www.facebook.com/watch/live/?extid=CL-UNK-UNK-UNK-
IOS_GK0T-GK1C&mibextid=2Rb1fB&ref=watch_permalink&v=1109647602942209](https://www.facebook.com/watch/live/?extid=CL-UNK-UNK-UNK-
IOS_GK0T-GK1C&mibextid=2Rb1fB&ref=watch_permalink&v=1109647602942209). The statements begin around
29:00-minute into the clip and continues to the 31:30-minute mark.

1 a LGBTQ+ conversion therapy ministry:

2

3 “The truth is the foundational—what I call—“original sin” of our movement was
4 homosexuality. Man on man. Specifically, male older leader on young intern . . . Not
5 a few times . . . You can find out, it’s not like nobody knows. The fact that our sin, our
6 original sin, was a senior leader [Lucas] who is respected and loved and training a
7 group of young men. They get in a room and shut door and then this senior leader
8 [Lucas] ‘puts the moves’ on these young men. And it’s worse than it sounds because
9 those men became ministers and went out into their churches and some of them did the
10 same. And I know that because I was in some of those meetings where it was
11 confessed!

8

9 We [the church leadership] thought it was best not to ever share that with everybody,
10 and I heard all the reasons and I bought into them: ‘He’s got children, you know.’ ‘He’s
11 got children, he’s got a wife.’ ‘You don’t just say those things . . . it could hurt the faith
12 of a young Christian.’

12

13 All those things are hierarchy saying, that’s patriarchy saying, that we don’t need to
14 bring this thing up about men on men. But I’m telling you, one of the problems—and
15 one of the reasons why I call it “original sin”—I don’t think that that sin is any different
16 than if it had been a man and a woman, by the way, that’s not married. But the fact
17 that we hid it. You laughed at the word ‘transparent.’ That’s what we needed. . . We
18 needed to be hearing about that. People should be taught that that’s how things started
19 in our group. And some of that has continued for three generations. . . . Some of that
20 trauma was carried on, was passed on to other men as those men went out to start their
21 churches. . .”

18

19 **I. The ICOC and the ICC Refused to Report Numerous Pedophiles Who Were Later**
20 **Arrested.**

21 96. At least ten pedophiles have been arrested in connection with abuses linked to the
22 ICOC or ICC. Described below, these individuals committed numerous crimes before the police
23 intervened. On information and belief, they represent only miniscule fraction of the true number of
24 predators who have operated with impunity within the ICOC since 1979.

25 **A. David Saracino**

26 97. In January 2012, Defendant David Iburg, *a/k/a* David Saracino (“Saracino”), was
27 sentenced to 40 years of hard labor in the State of Louisiana, the maximum sentence, for the **forcible**

28

1 **rape of a 4-year-old girl in 2004.**⁹ The prosecutor, Cynthia Guillory, told the judge that he was
2 among the worst of the worst. Saracino purposefully sought out women with financial problems so
3 he could gain access to their small children, who became his victims. He had charges and convictions
4 in Texas, Utah, and Louisiana, where he received the 40-year sentence.¹⁰

5 98. Saracino attended the East Region of the Los Angeles ICOC, where several members
6 (single mothers) of the ICOC reported to the leaders in the East Region in or about 1998 that Saracino
7 had continuously molested their daughters. Ultimately, several police reports were filed by the
8 parents, while the ICOC remained silent. Just as the ICOC did nothing to address these reports,
9 Saracino escaped to the San Diego ICOC and freely resided in the Escondido area, temporarily, until
10 fleeing again.

11 99. For a time, Saracino disappeared. He was free to go on a nationwide crime spree,
12 abusing and raping little girls along the way. Saracino was finally caught, but only after an episode
13 of America’s Most Wanted produced credible leads that resulted in his capture.

14 100. Like so many others, the mothers of the victims were told not to share with anyone
15 else what Saracino had done, as it would “hurt the church.”

16 101. Had the ICOC assisted in his arrest or alerted their congregations, Saracino could not
17 have continued abusing children with reckless abandon. On information and belief, the ICOC
18 intentionally, willfully, maliciously, and recklessly knew of his proclivities without warning parents,
19 concealed his whereabouts, and enabled his escape from authorities.

20 **B. Waldo Milla-Guerra**

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

25
26 _____
27 ⁹ *State v. Iburg*, 12-2720 (La. 5/17/13), 118 So.3d 372.

28 ¹⁰ For more information, see Theresa Schmidt, *Prosecutor to child rapist: You’re the worst of the worst*, KPLC News
(Jan. 6, 2012), last accessed June 13, 2023 from <https://www.kplctv.com/story/16464797/man-gets-40-years-for-raping-a/?outputType=amp>.

1 **C. Benjamin Samuel Speights**

2 103. In 2005, Benjamin Samuel Speights, a member of the south region Los Angeles ICOC,
3 was convicted for lewd and lascivious acts against a child under the age of 15.

4 104. Speights' unlawful conduct included forceable participation of a 14-year-old girl to
5 create pornographic videos that he sold.

6 105. In December 2020, Speights was convicted in Arizona in connection with a Class 2
7 felony of sexual exploitation of a minor as part of a negotiated plea deal related to child pornography
8 charges. Speights was a leader in the "Kid's Kingdom" ministry in the El Segundo South Region of
9 the Los Angeles ICOC church. Several children at this ministry reported his physical abuse, but
10 neither the ICOC nor its ever reported the abuse that those children endured or attempted to prevent
11 future abuses.

12 **D. Nicholas Griffin Lombardi**

13 106. Nicholas Griffin Lombardi is another example of a known pedophile abusing children
14 within the ICOC's churches. He was a long-standing member of the ICOC, as were his parents.

15 107. On or about November 27, 2022, Lombardi posted on his personal Facebook page "I
16 kind of have a fantasy of fucking a child ha[.]"

17 108. Lombardi was convicted for lewd and lascivious acts against a child under the age of
18 15. In addition, there are numerous accusations of abuse against Lombardi. And yet, the ICOC
19 refused to report his abusive conduct to the authorities.

20 **E. William (Bill) Thomas McLaughlin**

21 109. In approximately August 2011, one ICOC abuser, William (Bill) Thomas
22 McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for various counts
23 of felony sexual assault on a child by a person in a position of trust.¹¹ He abused approximately ten
24 to fifteen individuals, all of whom were expelled or in some fashion pushed out of the Denver ICOC
25 as punishment for failing to comply with the leaders' commands.

26

27

28

¹¹ For more information, see Rhonda Moore, "Denver man sentenced in Douglas County for sex assault on child" *Castle Rock News-Press* (Aug. 16, 2011), last accessed June 13, 2023 from <https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child.117951>.

1 **F. Tomotaka Andrews Wilton**

2 110. Tomotaka (“Tom”) Andrews Wilton of the Portland, Oregon ICC location raped a
3 child for years.¹²

4 111. Church leaders, including McKean, were acutely aware of the abuse but did nothing
5 to warn anyone regarding this despicable predator’s presence.

6 112. In 2009, he was convicted in Idaho of two counts of third-degree rape of a child and
7 is now a registered sex offender. On information and belief, Wilton remains a member of the Portland
8 ICC.

9 **G. Karim Torres**

10 113. Karim Torres was convicted of indecency with a child by contact.

11 114. On information and belief, he is currently a registered sex offender.

12 115. On information and belief, he serves as a Bible talk leader at several Texas ICOC
13 locations. He and his wife are known to frequently visit other ICOC churches as speakers at family
14 retreats.

15 **H. Warren Inman**

16 116. Warren Inman was convicted of at least three counts of indecency with a child in or
17 about February 2021 in Denton County, Texas, Case No. F-2012-0728-D. He was a member of the
18 Dallas ICOC and lives in Denton County.

19 117. He was a worship leader and allowed college students to live in his home, as he
20 regularly had college worship group meetings at his home. Inman has been in and out of prison and
21 was finally arrested for child molestation. On information and belief, the ICOC neglected to report
22 him to the police.

23 **I. Joseph Ursini**

24 118. Joseph Ursini has multiple arrests and has been in and out of the ICOC fellowship
25 over the years. On information and belief, none of the Texas ICOC churches, including the Dallas
26

27 ¹² For more information, *see* the Idaho State Police offender profile, last accessed June 13, 2023 from:
28 http://www.isp.idaho.gov/sor_id/SOR?id=35071&sz=1360; <https://www.homefacts.com/offender-detail/IDSX35071/Tomotaka-Andrews-Wilton.html>.

1 location, have ever reported Ursini’s criminal conduct to the relevant authorities.

2 **J. Luis Miguel Quiroz**

3 Luis Miguel Quiroz was the subject of several individuals’ reports to ICOC regarding extreme sexual
4 abuse of several minors. However, the church did nothing. He was finally arrested approximately ten
5 years after the reports were made to the church. Luis is the brother of Dr. Carlos Quiroz, an ICOC
6 pediatrician.

7 **SPECIFIC ALLEGATIONS**

8 **The 17-Year Abuse and Torture of Jane Roe 4**

9 119. Jane Roe 4 is currently 39 years old, and she is the younger sister of Jane Roe 5.

10 120. Jane Roe 4 was diagnosed as an infant with cystic fibrosis, and she spent much of her
11 childhood in and out of hospitals, sickly, frail and constantly worried that she would die at an early
12 age. Notwithstanding her fragile physical state, she was repeatedly abused and tortured by the entire
13 Wilkinson family for approximately 17 years, including Mark and Cindy, and two of their children,
14 Nancy and Marty Wilkinson. Mark, Cindy, Nancy and Marty Wilkinson are collectively referred to
15 as the “Wilkinson Family.”

16 121. The Wilkinson Family attended the same ICOC church as Plaintiffs and as a result,
17 the Wilkinson Family engaged in a systemic, deceptive, and strategic cover-up orchestrated by Mark
18 and Cindy Wilkinson (“Cindy”), Mike Taliaferro (“Taliaferro”), and other church leaders to ensured
19 Jane Roe 4 would not report the abuse to the authorities.

20 122. Jane Roe 4’s first memory of abuse occurred when she was 3 years old when she was
21 abused by Nancy Wilkinson at Nancy’s parents’ home (the “plantation house”). Over a period of 17
22 years, Jane Roe 4 and Jane Roe 5 spent several days a week with the Wilkinson Family at ICOC
23 sanctioned events and not a single ICOC leader or church member reported the girls’ horrific abuse.

24 123. In this first memory of abuse, Nancy Wilkinson (“Nancy”), who is approximately 7
25 years older than Jane Roe 4, **forcefully held Jane Roe 4 on the floor, laid on top of her**
26 **exceptionally small body, simulated sex and forcibly kissed her while Jane Roe 4 frantically**
27 **kicked and struggled to get away from Nancy.**

28 124. Jane Roe 4 suffers from cystic fibrosis, so she was unusually small for her age and

1 was quite frail. The more Jane Roe 4 fought back, the more determined and aroused Nancy became.
2 Nancy threatened Jane Roe 4, telling her that if she made any noise, then they would both get in
3 trouble and “really bad things” would happen to Jane Roe 4 and her parents. Nancy used similar
4 manipulative threats and fear tactics every time she abused Jane Roe 4.

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

9 126. Nancy became increasingly violent and constantly sought and found new opportunities
10 to forcibly abuse her, either putting her hands down Jane Roe 4’s pants, and/or pinching her breasts,
11 inner thighs, and buttocks. On one occasion, in approximately 1994, when Jane Roe 4 was
12 approximately 9 years old, **Nancy lifted tiny Jane Roe 4 onto the bathroom countertop at Steve**
13 **and Diane Brown’s (ministry leaders) home and violently molested the child.**

14 127. At this time, Jane Roe 4 was very ill due to her cystic fibrosis disorder, and she could
15 not defend herself against a person who was roughly 7 years her senior, let alone process the severe
16 and continuous trauma she endured. Nancy took advantage of Jane Roe 4’s vulnerability and used her
17 size and strength to overpower Jane Roe 4.

18 128. This bathroom incident led to one of the first times that Jane Roe 4 sought help from a
19 church friend regarding Nancy’s abuse. After Cindy discovered Jane Roe 4’s disclosure of the abuse,
20 she aggressively approached Jane Roe 4 and angrily scolded her by saying “[d]on’t you ever talk about
21 my daughter ever again!”

22 129. That night after Jane Roe 4 arrived home, she discovered that Mark and Cindy told her
23 parents to ground her for “gossiping” about the Wilkinsons, which they told her was a sin. **ICOC**
24 **leaders blamed Jane Roe 4 for “lying” about the abuse and she was constantly instructed to**
25 **“forgive and move on,”** and commanded to never say anything negative about the Wilkinsons.

26 130. Nancy also overpowered and assaulted Jane Roe 4 against her will on other occasions.
27 When Jane Roe 4 was very sick and the lights were off at a church “movie night,” **Nancy aggressively**
28 **rubbed Jane Roe 4’s vagina and tried to force Jane Roe 4 to rub Nancy’s vagina.**

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

4 132. When Jane Roe 4 was approximately 11 or 12 years old, the Wilkinson Family moved
5 into Jane Roe 4 and Jane Roe 5's home for approximately one month. During this period of
6 cohabitation, Nancy's brother, Marty Wilkinson ("Marty"), also groomed and abused Jane Roe 4.
7 **Marty's abuse continued into Jane Roe 4's high school years and finally ended when Marty left**
8 **for college.** Marty's sexual abuse of Jane Roe 4 lasted approximately 6 years, however, the verbal
9 abuse continued for several years thereafter.

10 133. Marty frequently walked into the bathroom while Jane Roe 4 was showering and stared
11 at her naked body. He would also turn off the lights while she was in the middle of her shower, which
12 forced her to stumble out of the shower naked and turn the light on, all while he watched her. On more
13 than one occasion, he took her towel and held it, and forced her to walk out of the shower naked to
14 retrieve the towel he was holding. Marty's shower abuse was humiliating and left Jane Roe 4 in a
15 constant state of fear and anticipation regarding the abuse she would have to endure next.

16 134. Marty, a popular football player, cornered Jane Roe 4 at high school and intentionally
17 publicly humiliated her on numerous occasions by loudly making sexual remarks for everyone to hear
18 and embarrassing her by doing crude sexual simulations in the hallways. Marty pulled her shirt down
19 in front of students and exposed her cleavage. At school and other places, **Marty frequently put his**
20 **hands over her breasts, forced his hand between her legs, grabbed her buttocks or groped her**
21 **in some fashion.**

22 135. Jane Roe 4 continued to report the abuse to numerous ICOC members and leaders, all
23 to no avail. Cindy told Jane Roe 4 that she was "not allowed to tell anyone or report the abuse." Anne-
24 Brigitte Taliaferro, the church leader and Taliaferro's wife, specifically told Jane Roe 4 that she was
25 upset with her and had not forgiven Jane for "threatening to pursue legal action."

26 136. Jane Roe 4 remains afraid of the Wilkinson Family to this day, which is one of many
27 reasons why she is unwilling to reveal her name herein. It was generally understood among the
28 congregation that **the Wilkinson Family was untouchable,** and no one was allowed to disparage

1 them in any manner, even if the allegations were true. People in the church were repeatedly told that
2 if they “had issues with Marty, they had to go through Taliaferro first.” Marty was routinely called
3 “Taliaferro’s Golden Boy.”

4 137. When Jane Roe 4 was approximately 12 or 13 years old and when Jane Roe 5 was 15
5 or 16 years old, they worked at the Wilkinson’s cleaning business where approximately 5-10 other
6 teens from the ICOC teen ministry would clean overnight at various businesses serviced by the
7 Wilkinson Family. These teen workers were never compensated for their labor. The church leaders
8 told the girls that it was their “privilege to serve The Wilkinsons.”

9 138. During these free labor cleaning nights, Marty frequently terrorized and sexually
10 threatened Plaintiffs. Several times, **when Jane Roe 4 and Jane Roe 5 bent over (e.g., to pick up**
11 **trash), Marty seized the opportunity to grab their hips and thrust his penis against their**
12 **buttocks or pelvis to simulate sex.** He would also grab their heads and pretend to push them into his
13 lap to simulate oral sex. Marty also embarrassed Jane Roe 4 by **pretending to ejaculate on/over her.**

14 139. Marty entertained himself by humiliating Jane Roe 4 at every opportunity, as his sexual
15 acts and overtly sexual language were inevitably accompanied by his hysterical laughter, taunting his
16 powerless victim. Marty justified his abuse by making comments such as: “[w]ith that body you
17 should expect to be groped or assaulted!”

18 140. During the numerous instances of abuse, Jane Roe 4 was extremely ill. She was
19 constantly in and out of the hospital because of her cystic fibrosis, sometimes for months at a time.
20 There were several scary times during Jane Roe 4’s childhood and adolescence when she questioned
21 whether she would survive. Her health was so fragile and volatile that she received “end of life”
22 counseling when everyone feared the worst.

23 141. The Wilkinson Family was cruel and inhumane insofar as they took advantage of a
24 sickly child during her most vulnerable time, both physically and emotionally. She dreaded going to
25 the Wilkinson Family home and on one occasion, she was too afraid to enter the home and instead sat
26 on their front porch coughing up blood while waiting for her parents to pick her up.

27 142. In or about 2003, Taliaferro and his wife Anne-Brigitte relocated to lead the San
28 Antonio ICOC, which was later renamed Mission Point Christian Church. Defendant Mission Point

1 Christian Church remains closely affiliated with ICOC and partners with HOPEWorldwide.

2 143. On information and belief, Taliaferro also has direct partnerships and business dealings
3 with HOPEWorldwide. Plaintiffs mistakenly and naively believed that the new leadership under
4 Taliaferro would help end the Wilkinson Family's abuse or report their longstanding, unmitigated
5 abuse. But that was not the case.

6 144. When Taliaferro first learned of Plaintiffs' abuse, he feigned alarm and promised he
7 would help the girls, yet **refused to report the abuses to the authorities because Plaintiffs needed**
8 **to "forgive" the Wilkinson Family and move on.**

9 145. Taliaferro lied to Jane Roe 4 during a phone conversation wherein he told her that he
10 reported the abuse to protective services, however, that was a lie. Jane Roe 4 contacted child protective
11 services and learned that there was no record of a report from Taliaferro. According to Taliaferro, he
12 merely sought advice regarding the abuse from Jacob Sanchez, an ICOC member who worked for
13 child protective services. Taliaferro also told Jane Roe 4 that he reported the abuse to ICOC key
14 leaders Frank Kim, Roger Lamb and Roddy Oaks and their local church board and the ICOC staff
15 lawyer.

16 146. Several other ICOC members, including mandatory reporters such as doctors and
17 counselors, became aware of Plaintiffs' abuse, yet did nothing. ICOC Elders Bill and Sally Hooper
18 pretended to be shocked by what they learned about the Wilkinson Family's shocking history of abuse
19 against Jane Roe 4 and Jane Roe 5, however, they also failed to report the abuse to the authorities.

20 147. Dave Potca, was a church staff member and served as the Youth and Family leader; he
21 currently serves as an ICOC ordained teacher and consultant. Dave was also aware of Jane Roe 4 and
22 Jane Roe 5's abuse, yet defended Marty at every turn and refused to report the abuse to authorities.

23 148. The following is a list of individuals, including mandatory reporters, within ICOC who
24 were aware of Jane Roe 4 and Jane Roe 5's abuse, yet they never reported the abuse to the authorities:

- 25 • Steve and Diane Brown (leaders of the church 1991-1994 est.);
- 26 • Bill and Sally Hooper (Elders in Dallas);
- 27 • Mike Taliaferro and Anne-Bridgette Taliaferro (leaders in San Antonio 2003- current);
- 28 • Carlos Quiroz (pediatrician present at a meeting in 2006 regarding the abuse)

- 1 • Clay and Nancy Wilkinson (Mark’s brother and sister-in-law) ;
- 2 • Luke Wilkinson (Mark and Cindy Wilkinson’s youngest child);
- 3 • Nadine Templer (contacted Jane Roe 4 through Facebook after hearing rumors about the
- 4 Wilkinsons);
- 5 • Tom and Lori Ziegler (current Elders and Board members who admitted to discussing the
- 6 abuse with others);
- 7 • Dan and Lori Nabors (close friends for many years; current Elders who admitted to
- 8 discussing the abuse with others);
- 9 • Herve Fluerant and wife Janet Fluerant (current leaders);
- 10 • Jeff and Amanda Henderson (previous leaders in San Antonio; now working for the church
- 11 in Brazil);
- 12 • Dave and Beth Pocta (Teachers and leaders with authority);
- 13 • Harry Lindsay (board member);
- 14 • Joe Cole (board member);
- 15 • Nate Bigbee (previous leader now working for the church in Corpus Christi);
- 16 • Sunil Punjabi (board member);
- 17 • Mike Sandoval (board member);
- 18 • Jacob and Michelle (“Misha”) Sanchez (Jacob worked for child protective services and
- 19 advised the church about the abuse in 2006);
- 20 • Carmen Garcia (Bible talk leader in 2006; Carmen attended a meeting with both sisters in
- 21 2006);
- 22 • Larry and Shelly Anthis (previous leaders; Larry was a board member);
- 23 • Jerry Condra (board member);
- 24 • Trudy Menke (board member and church administrator. She told Jane Roe 4 that she was
- 25 instructed to call the “church lawyer in California”);
- 26 • Robert Carrillo (previous leader in San Diego and Director of HopeWorldwide in 2017)
- 27 • Lisa Crierie (former volunteer in Kid’s Kingdom; she told leadership that Mark should not
- 28 serve and was removed from leadership as a result)

- 1 • Becky Quiroz (primary care physician also director of HopeWorldwide in San Antonio);
- 2 • Kerry and Michelle Niester (Bible talk leaders in 2006, and he was a board member);
- 3 • Lori Hale (Jane Roe 5’s former roommate);
- 4 • Karen Louis (Jane Roe 5 sent her an email regarding the abuse, but she never responded);
- 5 • Barrett and Rachel O’Connell (Marty’s best friends);
- 6 • Juan and Laura Aguilar (previous leaders); and,
- 7 • Nick Young (deceased)

8 149. Dr. Carlos Quiroz, an ICOC pediatrician, was present during a meeting with Jane Roe
9 4 and Jane Roe 5 and various church members regarding the abuse. Dr. Quiroz failed to report their
10 abuse, notwithstanding his knowledge of the same. The church used Dr. Quiroz and his position as a
11 physician as yet another “reason” why Jane Roe 4 and Jane Roe 5 did not need to report the abuse to
12 the authorities.

13 150. Coincidentally, Dr. Quiroz’s brother, Luis Quiroz (also an ICOC member at the time),
14 was convicted for molesting young girls, which Cindy Wilkinson was directly aware of. This fact
15 evidences the pervasive nature of the sexual abuse that occurred across a litany of ICOC family of
16 churches.

17 151. Mark and Cindy Wilkinson were eventually asked to leave Mission Point Christian
18 Church and the ICOC relocated them to the San Diego ICOC.

19 152. Taliaferro knew that Mark and Cindy Wilkinson were abusing children. The active
20 concealment and protection of known pedophiles was pervasive particularly in the Texas ICOC
21 churches like Mission Point, which is consistent with an ethos that in Texas, “we don’t call 911”—a
22 slogan that has been branded on ICOC apparel and other retail items. At least 4 known pedophiles
23 were allowed to run rampant within the churches without any notification to the congregation that
24 their children were in danger.

25 153. On information and belief, the San Diego ICOC congregation was not warned about
26 the Wilkinson Family’s abusive history. In San Diego, Mark and Cindy Wilkinson continued to
27 oversee parts of the Kids Kingdom ministry and they also worked in and traveled with the HOPE
28 Worldwide ministry.

1 154. Plaintiffs contacted HOPE in a desperate attempt to get help reporting the Wilkinson
2 Family, as they were gravely concerned because Mark and Cindy were working in the “Open Arms”
3 orphanage in Mexico, in portions of the Kids Kingdom ministry, and also in HOPE Worldwide. Jane
4 Roe 4 sent emails to the following individuals within HOPE Worldwide with the subject line “Church
5 Concerns”: The Denver ICOC, Mark Ottenweller, Roger Lamb, Robert Carillo, Mike Taliaferro,
6 Herve Fleurant, Ann Brigitte Taliaferro, and Dave Pocta. In the email, Plaintiffs vulnerably detailed
7 the shameful history of abuse and begged for help. Not a single person responded to the emails.

8 155. Nadine Templer, a longtime ICOC leader who currently works for HOPE, contacted
9 Jane Roe 4 via Facebook. Nadine heard about Jane Roe 4’s pleas for help and told Jane Roe 4 that she
10 felt disheartened and exhausted. She sympathized, because she was fighting a battle regarding the
11 rampant sexual abuse. Nadine conceded that the church was turning a blind eye to the abuse, and she
12 agreed that something needed to be done. She also stated that, for years, no one would listen to her.
13 She stated that after she contacted Steve Staten (an ICOC and HOPE leader) about the abuse, that she
14 had to accept that the matter was out of her hands. Nadine then ceased contact with Jane Roe 4.

15 156. Nadine Templer also told Jane Roe 4 that she, Templer, was nearly “disfellowshipped”
16 for trying to tackle the litany of issues surrounding sexual abuse within the church. Nadine admitted
17 to personally calling many ICOC leaders to report abuse over the years, but no one would listen or
18 take any action. Nadine also mentioned that there are many recent abuse cases and the abuse is not a
19 “thing of the past.” As recent as January 2023, Nadine has forwarded Jane Roe 4 text messages from
20 other current ICOC members with the same concerns around sexual abuse in the church.

21 157. Once Jane Roe 4 became engaged to another ICOC member, Marty Wilkinson tried
22 to “warn” Jane Roe 4’s fiancé that he should not marry her because Jane was “damaged goods.”
23 Marty made this comment because he had firsthand knowledge of the abuse, as his family “damaged”
24 Plaintiffs. Marty went far as to demand that other church members provide him with reports about
25 Jane Roe 4’s pre-marriage counseling sessions. Marty made every possible effort to remain in total
26 control of any information about her life.

27 158. In or about 1999, Marty Wilkinson began working at the Thousand Oaks Teen Ranch
28 that the ICOC church owned and in approximately 2004, he became Director of the Ranch. Over the

1 years, Marty’s leadership position gave him access to thousands of vulnerable children through this
2 youth program. In fact, Jane Roe 4 has heard terrifying first-hand stories of abuse inflicted upon
3 innocent children by Marty at the ranch. One example occurred when Marty put batteries inside an
4 empty pillowcase, swung it around and violently hit little boys with the weaponized pillowcase.

5 159. On information and belief, Marty is currently overseeing all of the ICOC campuses
6 across the US, and he is the “Chair” of all ICOC Campus Ministries. Nancy Wilkinson has also
7 maintained access to children over the years, as she worked in Kids Kingdom, outside organizations
8 involving children, and she also frequently babysat for various ICOC families.

9 160. In or about 2020, Jane Roe 4 and Jane Roe 5 defected from ICOC. They have lost the
10 ability to trust anyone from years of abuse. They will be forced to cope with the emotional
11 consequences and the invasive traumatizing memories of the long-standing and pervasive abuse for
12 the rest of their lives.

13 161. As a direct and proximate result of the abuse, at the hands of ICOC, and its leadership,
14 Jane Roe 4 suffered and continues to suffer a litany of injuries. Among other injuries, Jane Roe 4 has
15 experienced and will continue to experience for the rest of her life severe pain and suffering,
16 emotional distress, humiliation, mental anguish, loss of enjoyment of life, loss of educational
17 opportunity, loss of wages, loss of income, and loss of future wages.

18 **The 17-Year Abuse and Torture of Jane Roe 5**

19 162. Jane Roe 5 is currently 42 years old and she was systematically abused by the
20 Wilkinson Family for approximately 17 years. She is 3 years older than her sister, Jane Roe 4. Her
21 first memory of abuse is an incident that occurred when she was approximately 5 or 6 years old at the
22 Wilkinson Family home by Nancy Wilkinson, who is roughly 4 years her senior. Although this is the
23 first memory, it is probable that the abuse began much earlier and like many young victims of sexual
24 abuse, Jane Roe 5’s defense mechanisms have suppressed those memories.

25 163. Like her sister, Jane Roe 5 endured what felt like a lifetime of abuse by Nancy and
26 Marty, along with an appalling strategic cover-up orchestrated by Mark and Cindy Wilkinson,
27 Taliaferro, and other ICOC leaders. Indeed, Defendants covered up Jane Roe 4 and Jane Roe 5’s
28 ongoing, heinous abuse for 17 years and they continue to publicly deny the abuse occurred.

1 164. In Jane Roe 5’s first cognitive memory of abuse, Nancy Wilkinson aggressively held
2 Jane on the floor, laid on top of her, firmly pressed Jane Roe 5’s little body onto the floor as she
3 frantically squirmed and struggled to get away from Nancy. The more Jane Roe 5 fought back, the
4 more determined and excited Nancy became.

5 165. Nancy was approximately 10 years old at the time and she forcefully inserted her
6 fingers inside Jane Roe 5 and shoved her tongue in her mouth, which prevented Jane Roe 5 from
7 screaming for help. While assaulting Jane Roe 5, Nancy threatened the child and said that if she made
8 any noise, they would both get in trouble and “really bad things” would happen to Jane Roe 5 and her
9 parents as a result. Using similar manipulation and threat tactics, Nancy instilled fear in Jane Roe 5
10 and coerced her into ongoing silence each time they were together.

11 166. Around the same time as the first abuse incident at the Wilkinson Family home, Jane
12 Roe 5 also recalls Nancy shoving her in the closet with wooden slats on the doors to watch as Nancy
13 viciously abused her younger sister, Jane Roe 4. **Jane Roe 5 watched helplessly from the closet as**
14 **Nancy molested her younger, physically ill sister in a grotesque manner.** Specifically, Jane Roe
15 5 witnessed Nancy grab her sister (approximately 3 years old at the time), hold her onto the ground,
16 crushing her while forcing her tongue into Jane Roe 4’s mouth. Witnessing her fragile little sister
17 endure such reprehensible abuse has permanently scarred Jane Roe 5.

18 167. The next cognitive memory of abuse occurred at approximately age 7 when Nancy
19 molested Jane Roe 5 by pinning her to the ground and raping her with foreign objects. **Jane Roe 5**
20 **recalls being penetrated with objects such as pencils, a rod of some kind, a Barbie doll and other**
21 **painful objects.** At one point, **Nancy attempted to forcibly sodomize Jane Roe 5,** but she was able
22 to scream loud enough and fend off Nancy’s savage attempts. As a result of Nancy’s repeated rape
23 and other forms of abuse beginning at a young age, the abuse became normalized for Jane Roe 5, and
24 she did not feel safe unless she was out of reach from the entire Wilkinson Family. To this day, she
25 struggles with safety concerns, anxiety, depression, and other lasting effects of the severe physical
26 violence and psychological trauma she suffered beginning at the age of 5 and continuing thereafter
27 for approximately 17 years.

28 168. In the third grade, Jane Roe 5 mustered the courage to tell a teacher at her public school

1 about Nancy’s repeated abuse, but her teacher failed to notify the police or child protective services.

2 169. Mark and Cindy Wilkinson’s response to reports of Nancy’s rape and sexual abuse
3 was to assemble the children and have Nancy “apologize” to Jane Roe 5. **Authorities were never**
4 **called and no other corrective action was taken.**

5 170. Indeed, the Wilkinson Family’s approach was ratified and promoted by Nick Young, the
6 Dallas ICOC leader at the time. Nick commanded everyone involved to refrain from notifying the police.
7 Nick told Jane Roe 5’s father that he personal spoke with Kip McKean to inform him of the abuse
8 and **McKean responded by saying, “the church will handle this internally.”** Nick’s word was
9 gospel and no one within the church dared to defy him, as was customary based on the hierarchical
10 organization of the church and the “discipleship” structure that facilitated the systematic abuse of
11 children within the church for decades.

12 171. One month after the “apology,” Nancy resumed abusing Jane Roe 5. However, she
13 was much more hostile and aggressive as retaliation for Jane Roe 5’s pleas for help. The intensity,
14 severity and frequency of Nancy’s abuse escalated into unchartered territory.

15 172. Jane Roe 5 endured a litany of abuse by Nancy such that every time Nancy had access
16 to Jane Roe 5, she either forcibly French kissed her, groped her, or abused her in some other
17 reprehensible fashion. Nancy’s abuse of Jane Roe 5 was unrelenting and overwhelming for a young
18 child who was intentionally isolated from “outsiders” (*i.e.*, anyone who was not an ICOC member or
19 recruit).

20 173. For example, on a 1990 trip to Los Angeles for a church wide ICOC convention, both
21 Jane Roe 4 and Jane Roe 5 carpooled with the Wilkinson Family. The sisters, who were now
22 approximately 9 and 6 years old, were instructed to lay down in the back of the vehicle’s trunk bed area,
23 where blankets and pillows were laid out for Jane Roe 4 and Jane Roe 5 to travel and sleep in. During this
24 trip, they were especially isolated and separated from their parents. Nancy Wilkinson took full advantage
25 of their vulnerability.

26 174. During the drive from San Antonio to Los Angeles, **Nancy repeatedly rubbed**
27 **Plaintiffs’ entire bodies and forcibly inserted her fingers and other objects inside Jane Roe 5’s**
28 **vagina.** Nancy also crushed them with her body by holding them down while laying on top of them,

1 and/or forcibly and roughly kissing them as they squirmed.

2 175. When they arrived at their lodging in the Los Angeles area, **Nancy would lie on top**
3 **of Jane Roe 5 at night in bed, fondling her privates.** Nancy would also **insert foreign objects into**
4 **Jane Roe 4 and Jane Roe 5's vaginas, such as pencils.**

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

11 177. When Jane Roe 5 was in the 7th or 8th grade, the Wilkinson Family moved into Jane
12 Roe 4 and Jane Roe 5's family home during a time when Mark and Cindy were in between homes.
13 During this period of cohabitation, Nancy's brother, Marty Wilkinson, began abusing Jane Roe 5.
14 Marty's abusive behavior continued throughout Jane Roe 5's high school years until Marty eventually
15 left for college.

16 178. Marty's abuse of Jane Roe 5 was substantially similar to her sister's abuse, regrettably.
17 For example, Marty would enter the bathroom while Jane Roe 5 was showering and stare at her naked
18 body. Other times while she was showering, Marty would enter the bathroom, turn off the light, which
19 forced her to get out of the shower naked and turn on the light – all while Marty intently glared at
20 Jane Roe 5's wet, nude body. On more than one occasion, Marty took Jane Roe 5's towel and forced
21 her to walk naked out of the shower to retrieve the towel from him. Marty's abuse was nothing short
22 of humiliating for Jane Roe 5.

23 179. Marty Wilkinson also cornered Jane Roe 5 at high school and publicly humiliated her
24 on numerous occasions by making crude sexual remarks and performing disgusting sexual
25 simulations in the hallways. Marty also humiliated her by pulling her shirt completely down in front
26 of other students and exposing her cleavage.

27 180. **Jane Roe 5 has vivid memories of Marty molesting her at least two other times.**
28 On one occasion, he forced himself on top of her on a desk inside one the buildings they were cleaning.

1 There was no one around to defend her, however, she was able to fight him off and ran away before
2 he could injure her further. **Marty also grabbed her breasts and/or groped her at every possible**
3 **opportunity**, in addition to his frequent and humiliating overtly sexual comments directed at her both
4 in public and privately.

5 181. Notwithstanding Defendants’ perpetual thwarting of her attempts to stop the abuse,
6 Jane Roe 5 was undeterred and desperately continued contacting several individuals within ICOC with
7 pleas for help to end the abuse by Nancy and Marty. Concurrently with these efforts, Cindy Wilkinson
8 made it abundantly clear that Jane Roe 5 was prohibited from discussing the abuse and torture with
9 anyone.

10 182. Jane Roe 5’s family was convinced to hold the Wilkinson Family in the highest of
11 regards and to never utter a negative word about the family. Anytime Jane Roe 5 solicited help
12 regarding the ongoing abuse or disclosed the abuse to *anyone* within the church, she was immediately
13 rebuked and blamed for speaking up. The Wilkinson Family was angry, hostile, predatory, entitled,
14 and deceitful such that Jane Roe 5 described their home as a “house of horrors.” Consequently, Jane
15 Roe 5, in spite of her current age, remains afraid of the Wilkinson Family. She is so afraid of the family’s
16 far-reaching power and vast resources of the ICOC that she is unwilling to disclose her name in this
17 Complaint.

18 183. Even in her adult years, after Jane Roe 5 got engaged, somehow the Wilkinson Family
19 managed to insert themselves into her life by insisting on being part of her wedding. Even more
20 concerning is the family’s insistence that Mark, Cindy, Nancy and Marty’s wife, Daonna Wilkinson,
21 conduct “marriage counseling” sessions with Jane Roe 5 and her new husband regarding their sex
22 life. Jane Roe 5, as a result of the family’s possessive and inappropriately invasive conduct, felt like
23 nothing more than a piece of Wilkinson Family property.

24 184. Due to the history of abuse, Jane Roe 5 has been forced to deal with crippling anxiety,
25 panic attacks, depression, and suicidal thoughts, among other things. In 2009, she was almost
26 hospitalized for suicidal ideations and prescribed anxiety medication. In 2016, she was prescribed
27 anxiety medications again for panic attacks and suicidal thoughts. Notwithstanding the foregoing, she
28 continues to courageously battle the challenging effects of nearly two decades of grotesque physical

1 and psychological abuse. Jane Roe 5's numerous attempts to make her voice heard have fallen on
2 deaf ears for *decades*.

3 185. Indeed, Mission Point and the Wilkinson Family continue to silence Jane Roe 5, now
4 even going so far as defaming her. On February 5, 2023, during the Sunday morning service of
5 Mission Point, ICOC elder and staff member **Herve Fleurant stood on stage and read a five-minute**
6 **public church statement claiming that both Jane Roe 4 and Jane Roe 5 were liars**, and that their
7 allegations about abuse were categorically false. Herve made many slanderous and false comments,
8 stating that both sisters have willfully hurt the ICOC and Mission Point with their accusations, and
9 that they will have to answer to God himself. Herve also deceitfully claimed that the situation had
10 already been resolved, and that they were unaware of most of these claims.

11 186. Like Taliaferro, Herve knew that this was not true, as he was directly aware of the
12 unresolved nature of all of the sexual abuse that had happened and was personally in some of the
13 meetings with both sisters. In addition, Herve was also included in outcry emails from the sisters,
14 which they sent to many Hope Worldwide employees. In those emails, Jane Roe 4 and Jane Roe 5
15 begged for help, stating that their abuse had never been addressed or resolved.

16 187. Acting on behalf of the ICOC and Mission Point church, Herve's actions poured salt
17 into the wounds of Jane Roe 4 and Jane Roe 5, as many in the church believed Herve and subsequently
18 harassed the sisters, inflicting intentional additional emotional harm and trauma. The staff at the
19 Mission Point church also accepted this narrative and spread it throughout the congregation and the
20 ICOC at large, resulting in additional emotional harm and backlash to the sisters. This treatment of
21 victim-shaming and victim-blaming is simply a continuation of how Jane Roe 4 and Jane Roe 5 have
22 been repeatedly traumatized for over 17 years. This continued trauma has degraded the physical
23 health of Jane Roe 4, who has been in and out of the hospital.

24 188. As a direct and proximate result of the abuse, at the hands of the Wilkinson Family,
25 the ICOC, Mission Point, and their leadership, Jane Roe 5 suffered and continues to suffer a litany of
26 injuries. Among other injuries, Jane Roe 5 has experienced and will continue to experience for the
27 rest of her life severe pain and suffering, emotional distress, humiliation, mental anguish, loss of
28 enjoyment of life, loss of educational opportunity, loss of wages, loss of income, and loss of future

1 wages.

2 **Jane Roe 6’s Sexual Abuse by the Rocks’ 20-Year-Old Son When She Was 7 or 8 Years Old**

3 189. Jane Roe 6 is currently 19 years old and her parents were members of the LA ICOC
4 and she grew up attending the Inland Empire branch of the Los Angeles ICOC, a.k.a. the “Rancho
5 Region” or “Riverside Region”. This regional church was controlled collectively by the LA ICOC
6 and the ICOC.

7 190. The first incidence of sexual abuse occurred when Jane Roe 6 was approximately 7 or
8 8 years old in 2011, in a discreet back hallway behind the stage at a church event in Riverside located
9 at 5320 Victoria Ave, Riverside, California 92506. A second abuse incident occurred merely 30 days
10 after the first by the same perpetrator. Both incidents were perpetrated by one of the Rocks’ sons.

11 191. Jane Roe 6’s abuser was approximately 20 years old when he abused Jane Roe 6.
12 During both incidents, Jane Roe 6’s abuser aggressively and forcefully molested her little body
13 underneath her clothes, and he also inserted his fingers in her vagina. After the second incident, Jane
14 Roe 6 tried to defend herself against the abuse and elbowed her abuser in the nose, causing severe
15 bleeding. The region leader and Jane Roe 6’s abuser’s father, Mike Rock (“Rock”), who was not
16 aware of the abuse at the time, rushed to the aid of his bleeding son and hurriedly escorted his son to
17 the nearest bathroom. Rock approached Jane Roe 6 and her mother and insisted that Jane Roe 6
18 apologize to his son and Jane Roe 6’s abuser, who had just abused her merely moments earlier.

19 192. Jane Roe 6 lived silently in fear and shame for the next 6-7 years and told no one of
20 the abuses she endured. When she was approximately 14 years old and still reeling from the trauma
21 of enduring sexual abuse at such a young age, Jane Roe 6 in an act of sheer desperation, attempted
22 suicide. Thereafter, she received treatment at Dignity Health Hospital, where she finally felt safe
23 enough to disclose the abuse to the hospital therapist. Her parents were subsequently informed of the
24 abuse by the hospital.

25 193. After the LA ICOC’s leadership, specifically Rock and Elizabeth Rock (“Libby”)
26 (collectively, the “Rocks”) and Steve and Carrie Lounsbury (collectively, the “Lounsburys”), learned
27 of the abuse from Jane Roe 6’s parents, Jane Roe 6 was repeatedly told to “forgive her abuser” and
28 “pray through things”.

1 194. **Jane Roe 6 and her family were instructed by Rock and Steve, to refrain from**
2 **contacting the police and allow the church to address the situation internally, and Steve**
3 **Lounsbury said he would contact the police directly.** The family was assured that the LA ICOC
4 leadership would also contact Child Protective Services to report the abuse, which *never* happened.
5 Rock also told Jane Roe 6 and her family that if they did not heed the instructions, it meant they did
6 not trust God, or “God’s kingdom” (i.e., the ICOC) and their eternal salvation, and the health of the
7 “church” would be in jeopardy as a result. This same ICOC teaching was regularly preached to all
8 church members from the pulpit.

9 195. One of the lead LA ICOC ministers, Steve Lounsbury (“Steve”), falsely represented
10 to Jane Roe 6’s parents that he personally called the police to file a report concerning the abuse and
11 said he also called Child Protective Services. He also told her parents that if Jane Roe 6 had a
12 qualifying case, Child Protective Services would call Jane Roe 6’s parents directly. Steve further
13 informed Jane Roe 6’s parents that he gave Child Protective Services their phone number. None of
14 the foregoing representations were true, which Jane Roe 6’s parents did not learn until several years
15 later. After Child Protective Services failed to contact Jane Roe 6’s parents, Steve said that the lack
16 of contact implied that Jane Roe 6 did not have a qualifying abuse case to warrant intervention.

17 196. Jane Roe 6 was initially too scared to disclose the identity of her abuser to the LA
18 ICOC because of the incessant coercion and pressure she experienced from the LA ICOC leadership,
19 even as a child. Rock was her predominate source of coercion, as he repeatedly asked Jane Roe 6’s
20 parents to speak to Jane Roe 6 (an 8-year-old child) in private about the abuse to maintain her silence
21 regarding his son’s abuse. Jane Roe 6 repeatedly refused Rock’s requests to meet with him in private
22 to discuss the abuse because she was terrified of him, the leader of the Inland Empire Region of the
23 LA ICOC, and her abuser’s father.

24 197. After Jane Roe 6’s abuse became public knowledge and before the identity of her
25 abuser was disclosed, when Jane Roe 6 was 14 years old, she was forced to meet with Steve’s wife,
26 Carrie Lounsbury (“Carrie”). **Carrie pressured Jane Roe 6 to forgive her abuser and move on.**
27 Carrie told Jane Roe 6 that she was also abused as a child, however, she was strong enough and
28 faithful enough to forgive her own abuser. Carrie also told Jane Roe 6 that she expected the same of

1 her. In furtherance of Carrie’s manipulation of young, impressionable Jane Roe 6, Carrie made
2 statements to Jane Roe 6, such as: **“your anger and lack of forgiveness is what nailed Jesus to the**
3 **cross”** or **“our sins that put Jesus on the cross are much worse than anything that has ever**
4 **happened to us.”**

5 198. Carrie also coerced Jane Roe 6 into remaining silent by telling her that if she reported
6 her abuser, it could have devastating effects for his life, and on the church. This guilt and immense
7 pressure weighed heavily upon Jane Roe 6’s conscience, so she felt her only option was to suffer in
8 silence for the greater good of her church family.

9 199. Jane Roe 6’s mother desperately continued seeking assistance from other LA ICOC
10 leaders and members. For example, Jane Roe 6’s mother spoke with an LA ICOC member who
11 happened to be a teacher by trade (i.e., a mandatory reporter), about the abuse her daughter endured.
12 At the time, this teacher was a church administrator for the Riverside LA ICOC group. In one
13 conversation, Jane Roe 6’s mother was desperately explaining the issues that Jane Roe 6 experienced
14 as a direct result of the depraved sexual abuse; the teacher minimized the abuse and coldly stated,
15 “it’s not that big of a deal, and it only happened once or twice.” Jane Roe 6 and her family soon
16 learned, to their disappointment, that this statement embodied the general outlook regarding this and
17 all sexual abuse, by the LA ICOC and ICOC leadership and church members.

18 200. From the ages of approximately 14-16, Jane Roe 6’s family was silenced, coerced and
19 shamed by the LA ICOC church members and the Inland Empire leadership team, which included
20 and is not limited to the Rocks, the Lounsburys, and Stuart and Ashley Mains.

21 201. Libby effectuated her coercion scheme by delegating and dispatching other LA ICOC
22 members, such as Carrie, to assist with keeping the family from disclosing the abuse to outsiders.
23 Libby was Carrie’s “discipler”, thus, Libby was responsible for directing and managing Carrie to help
24 ensure her salvation. Accordingly, Carrie’s actions were closely monitored and controlled by Libby
25 and Carrie did nothing without Libby’s approval.

26 202. The LA ICOC’s motive for silencing the family was to protect Jane Roe 6’s abuser
27 from discovery by the police and other authorities and to **insulate the church from liability for its**
28 **despicable conduct in concealing the abuse and allowing sexual predators to assault children**

1 **with impunity.**

2 203. Consequently, Jane Roe 6 was in a perpetual state of suffering due to depression, self-
3 harm, suicidal ideations, anxiety, self-medicating, nightmares, insomnia, and a myriad of other soul
4 crushing ramifications.

5 204. In 2020, when Jane Roe 6 was approximately 16 years old, she pleaded with her
6 parents to allow her to receive therapy services because she was fearful that she was in imminent
7 danger of harming herself again. Her parents agreed and Jane Roe 6 eventually disclosed the entirety
8 of her abuse to her new therapist Patricia, which was promptly reported by Patricia to both Child
9 Protective Services and law enforcement.

10 205. Thereafter, Jane Roe 6 and her family were shocked and infuriated, realizing that the
11 LA ICOC and the ICOC never reported the abuse, notwithstanding Steve's representations to the
12 contrary. When confronted about this destructive lie, Steve's excuse for failing to report the abuse
13 was that Rock and other LA ICOC leaders, including what Steve described as the LA ICOC and/or
14 the ICOC "Legal Department", **specifically instructed him to refrain from reporting the incidents**
15 **because Jane Roe 6 did not share enough details about the abuse with the church.** At no point
16 did Steve ever disclose this to Jane Roe 6's parents.

17 206. Around this same time, when Jane Roe 6 was 16 years old, Steve met with Jane Roe
18 6's parents, and told them that he had been "praying about the situation," and had a revelatory dream.
19 **He confessed that he knew the identity of Jane Roe 6's abuser and he identified him as one of**
20 **the Rocks' sons.** Steve was correct, but unfortunately, this revelation intensified the collaborative
21 interference and manipulation by the Rocks, along with other members of leadership like Carrie who
22 sought to suppress Jane Roe 6's public disclosure of her abuse and the identity of her abuser.

23 207. Around the same time that Steve met with Jane Roe 6's parents about his dream, Libby
24 gave a sermon to a select group of women, looking directly at Jane Roe 6's mother, placed in the
25 front row, and stated that everyone needed to forgive. She also stated, as though she was trying to
26 defend her son's heinous actions, that one of her sons was abused as a child by someone they highly
27 trusted in the church, so he was also a victim. The crux of her sermon was that many people had been
28 victimized, and they should all forgive as the Rocks had, and simply move on. This sermon, for the

1 first time, alerted Jane Roe 6's mother that **the Rocks never reported their son's abuse or obtained**
2 **the necessary help for him to process the abuse and cope with the trauma in a healthy manner.**

3 Clearly, the Rocks had a conflict of interest wherein their judgment was clouded regarding their son's
4 criminal behavior. As a result of the Rocks' inaction, the Rocks' abusive son repeated the pattern and
5 victimized other little girls.

6 208. Jane Roe 6's parents followed the advice of Jane Roe 6's new therapist, and they
7 personally reported the crimes to the Riverside Police Department located at 10540 Magnolia Ave,
8 Riverside, California 92505.

9 209. Unfortunately, when Detective Ontko began investigating the abuse, the Rocks and
10 other LA ICOC leaders such as Steve, lied about their conduct after Jane Roe 6 first disclosed the
11 abuse at age 14. **Every single leader interviewed by the detective mysteriously suffered from**
12 **situational amnesia and could not recall any salient events regarding Jane Roe 6's disclosure of**
13 **the abuse.** These strategic and collaborated lies rendered it nearly impossible for the detective to
14 make any definitive findings. In fact, the Riverside Police Department case remains open due to the
15 church's refusal to cooperate with law enforcement to bring any of these culpable parties to justice.

16 210. In addition to Jane Roe 6's abuse, **her brother was also abused while the family was**
17 **attending the LA ICOC church in Riverside.** The abuse he suffered destroyed his life and he feels
18 incredibly unstable to this day. Jane Roe 6's brother was bullied, belittled and treated callously by
19 another full-time staff member, Stuart Mains. Stuart exasperated the trauma by telling Jane Roe 6's
20 brother that he needed to forgive and move on, or he would be expelled from the church, which he
21 eventually was.

22 211. After Jane Roe 6's mother learned of her son's abuse for the first time from his
23 therapist, she immediately called Carrie to inquire if she could help her locate her son. Jane Roe 6's
24 mother explained to Carrie that her son's therapist believed her son was going to attempt suicide,
25 however, Carrie responded by scolding the desperate mother and telling her that she needed to calm
26 down and conduct herself maturely, otherwise she would not assist or allow her to speak with anyone
27 else within the ICOC. As a result, Jane Roe 6's brother attempted suicide by driving his car off a cliff
28 at a high speed. Fortunately, his life was spared. The young man's life has been upended by the abuse

1 and ensuing response by his church, all of which have traumatized him for life.

2 212. Jane Roe 6's brother's attempted suicide was the final straw for the family. Her parents
3 mustered the courage and strength to leave their church family, after coming to the grim realization
4 that her brothers and sisters in Christ systematically and collaboratively participated in destroying
5 their entire family.

6 213. Jane Roe 6's mother suffered a nervous breakdown from the weight of the guilt,
7 shame, anxiety and depression that she endured for years.

8 214. Jane Roe 6, her brother and her mother are on a healing journey that will undoubtedly
9 last a lifetime.

10 215. As a direct and proximate result of the abuse, at the hands of the LA ICOC, the ICOC,
11 and their leadership, Jane Roe 6 suffered and continues to suffer a litany of injuries. Among other
12 injuries, Jane Roe 4 has experienced and will continue to experience for the rest of her life severe
13 pain and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life, loss of
14 educational opportunity, loss of wages, loss of income, and loss of future wages.

15 **The Abuse of Jane Roe 7 and the LA ICOC/ICOC's Coverup**

16 216. Jane Roe 7 is currently 25 years old and her parents were long standing members of
17 the LA ICOC. Jane was adopted by her parents in approximately 2002 when she was 4 years old.

18 217. When Jane Roe 7 was 9 or 10 years old, a public church scandal occurred that shaped
19 the rest of her life. This incident occurred at a pre-teen event located at 5656 Vista Del Monte Ave,
20 Van Nuys, California 91411. Another pre-teen church member dared Jane Roe 7 to peck a boy on the
21 cheek, which she did. This simple kiss on the cheek resulted in Jane Roe 7 being permanently branded
22 as a liability, "lustful" and a "struggle". As a result, she was privately and publicly ostracized for the
23 duration of her time at the LA ICOC.

24 218. This church is currently operating as The Turning Point Ministry in Los Angeles, led
25 by Kevin ("Kevin") and Tracena Holland. Based on the "top down" hierarchy "discipling tree" that
26 is firmly embedded the ICOC operations nationwide, Kevin is at the top and he insisted that all
27 "discipling" (decisions, commands, punishments, etc.) flowed through him.

28 219. At all relevant times herein, Kevin made it abundantly clear that he was in charge, and

1 he knew everything that transpired in “his” ministry. He also participated in several meetings
2 discussing Jane Roe 7’s punishment, and the LA ICOC’s strategic efforts to keep her ostracized from
3 the youth ministries and all “brothers” in general.

4 220. At all relevant times herein, Defendants Jay and Traci Minor operated at the specific
5 direction and control of Kevin. Jay Minor (“Jay”) and Traci Minor (“Traci”) (collectively, the
6 “Minors”), **a full-time paid ministry staff couple, spearheaded the shaming of Jane Roe 7,** at
7 Kevin’s specific direction and control, by attempting to convince other church members that the little
8 girl was a “bad seed”. Traci used this innocent incident to ostracize Jane Roe 7 for more than 10 years
9 and at one time, she organized a campaign wherein Jane Roe 7 became the church poster child for an
10 example of a “bad teen”.

11 221. Since Jane Roe 7 was a female, implementing punishments and her ostracization
12 occurred through Traci, however, Traci’s decisions were always made jointly with Jay, as a married
13 couple, pursuant to the LA ICOC and the ICOC’s well-settled practices. Within the ICOC and the
14 LA ICOC, men were the leaders and would dictate policy and procedures; women followed their lead
15 without questioning the men. Traci, as a female, was a knowing and willing instrument in effectuating
16 Jane Roe 7’s punishments.

17 222. Jane Roe 7 was forced to apologize endlessly for this innocent peck on the cheek, both
18 publicly and privately, for over a decade following the incident. Many church leaders and other adults
19 within the LA ICOC, specifically the Turning Point group, repeatedly scrutinized and criticized the
20 sincerity of Jane Roe 7’s “apologies”.

21 223. Jane Roe 7 was also permanently segregated from other preteens after the incident,
22 which meant she could no longer enjoy the company of her existing friend group. During one church
23 camp in approximately 2015, **Jay and Traci told the boys that Jane Roe 7 was a liability, and**
24 **they were not allowed to talk to her or be in her presence.** Jane Roe 7 was told, as alleged
25 justification for the segregation, that she made the brothers “struggle” because she was “the problem”.

26 224. Traci also created “human buffers” around Jane Roe 7, which involved other church
27 members surrounding Jane to forcibly guide her away from any brothers if her physical proximity
28 was too close to the brothers for Traci’s liking. **Traci also told Jane Roe 7 that she was not of any**

1 **benefit to men, and she could not be trusted**, which was extremely painful for a teen aged Jane
2 Roe 7 to hear at the time.

3 225. In addition to all LA ICOC male members being told to avoid Jane Roe 7, the Turning
4 Point leadership, predominantly Traci, who operated under Jay and Kevin’s leadership and direction,
5 also warned potential LA ICOC church recruits to avoid contact with Jane Roe 7. Jane Roe 7 was
6 blamed if male recruits were not baptized to become official members of the ICOC, and at one point
7 **she was blamed for “dragging men away from Jesus”**.

8 226. Throughout the time that Jane Roe 7 was demonized by the ICOC, she felt utterly
9 confused, frustrated and depressed. She failed to understand what she had done that was so incredibly
10 “bad” to warrant the harsh punishment and isolation she endured for years. She could not believe that
11 a simple peck on the cheek when she was 9 or 10 years old was horrible enough to justify the LA
12 ICOC’s malicious campaign of extreme emotional abuse.

13 227. In furtherance of this years’ long campaign, Jane Roe 7’s parents received “disciplining
14 advice” from LA ICOC leadership, to execute in the family home. This advice included practices
15 such as **forcing Jane Roe 7 to shower with the door open so they could ensure she was not**
16 **masturbating**. The shower monitoring began when Jane Roe 7 was a preteen and continued until she
17 was approximately 16 years old. The **shower monitoring practice was humiliating and a source**
18 **of daily devastation for Jane Roe 7**.

19 228. Consequently, Jane Roe 7 began engaging in **self-harm** by cutting, among other
20 things. She was so deeply wounded and traumatized that **she carved the word “slut” into her legs**
21 **with a knife because the ICOC members and leaders collectively convinced her that she was**
22 **indeed a slut and the bad seed**. Jane Roe 7 believes that the monitoring finally stopped because her
23 parents eventually became worried about the self-harm they observed.

24 229. Jane Roe 7’s torture culminated in 2015 when she was 17 years old. She was in the
25 back area of a Chipotle restaurant before a church event in Los Angeles when Defendant Nathan
26 Chung (“Nathan”), one of the teen disciple members, saw her alone, and cozied up next to her in a
27 chair.

28 230. Nathan began to aggressively **put his hands underneath Jane Roe 7’s clothes, up**

1 **her skirt and rubbed her vagina on top of her underwear**. He made arrogant comments like,
2 **“C’mon you know you like it.”** Jane Roe 7 repeatedly told Nathan “no” and “stop it”. In a last-ditch
3 effort to stave off Nathan’s assault, she told him she would punch him in the face if he did not stop
4 touching her. Fortunately, Jane Roe 7 was able to push him off and escape.

5 231. Jane Roe 7 did not disclose this assault to anyone at the LA ICOC because Nathan’s
6 mother, Karyn Chung, was an LA ICOC leader who was oversaw a sector of the Kids Kingdom
7 ministry. As such, Jane Roe 7 was fearful of being subjected to blame, further punishment and
8 ostracization. As a result of her position within the LA ICOC, Karyn was an individual with great
9 power and influence.

10 232. Not long after the Chipotle incident, during an ICOC church camp in Big Bear,
11 California 92314, Nathan found Jane Roe 7 again. **Nathan seized this opportunity to assault Jane**
12 **Roe 7 a second time when she was alone and vulnerable**. Nathan, without her consent, groped Jane
13 Roe 7’s body underneath her clothes by putting his hands under her shirt. Jane Roe 7 yelled at Nathan
14 to stop, and she fought back as though her life were at risk. Her fierce resistance thwarted Nathan’s
15 efforts and she eventually escaped his firm grasp. Had she not fought back, Jane Roe 7 believes she
16 would have been raped that fateful day at church camp.

17 233. After Nathan’s second attack, Jane Roe 7 was incredibly upset, and she told Jay about
18 the two assault incidents. **Jay blamed Jane Roe 7 for Nathan’s assault and decreed that she could**
19 **never be left alone going forward**. As such, Jane Roe 7 was always accompanied by an escort. On
20 the other hand, Nathan was not required to answer for his deplorable actions.

21 234. In 2018, **Traci forced Jane Roe 7 to write “The Adulterous Woman”** letter wherein
22 she admitted that she was like a “prostitute from the Bible that roamed to the streets, looking for
23 men.” Traci required this letter to allow Jane Roe 7 to prove that she was “broken by her sin” and,
24 therefore, sufficiently repentant to be allowed back into the ICOC “fellowship”. Jane Roe 7 was also
25 required to include in the letter her “lustful sins” were the reason Jesus was “nailed to the cross” and
26 killed. In addition, Jane Roe 7 was also forced to detail specific boundaries she would follow, such
27 as: only sitting with women, never speaking to men directly, adhering to a female only buddy system,
28 and doing daily “purity check-ins”. This included interfacing daily with various LA ICOC leaders to

1 confess any “sins”, lustful thoughts, or anything that the LA ICOC deemed as “impure.”

2 235. Concurrently with the letter, **Traci informed Jane Roe 7 that she was banned from**
3 **dating any men or going on any dates for 2 years.** Traci explained that this was Jane Roe 7’s
4 punishment for being “a problem”.

5 236. In approximately 2019, when a very unstable and predatory man in the LA ICOC
6 Turning Point Ministry named Ray Marty Lopez (“Ray”) assaulted a girl in the LA ICOC, Jane Roe
7 7 refused to be in his presence during any church services and asked David Bruce (“David”), an LA
8 ICOC leader and Licensed Marriage & Family Therapist, to approve the request. David refused Jane
9 Roe 7’s request and scolded her, stating that **she needed to forgive Ray and not hold his “past sins”**
10 **against him.** Kevin was also aware of Ray’s sexual abuse and predatory tendencies; however, he saw
11 fit to criticize and rebuke Jane Roe 7 for her desire to avoid contact with the sexual predator.

12 237. Around this same time, **Ray attempted to groom Jane Roe 7 by continually**
13 **harassing her with unsolicited, repeated and overtly sexual conversations that made her**
14 **uncomfortable and fearful.** Jane Roe 7’s prior assaults instilled a greater sense of fear than would
15 have otherwise been the case. As a result, she told David and a few other LA ICOC leaders that Ray
16 attempted to groom her, however, none of these individuals took the report seriously and completely
17 disregarded her desperate pleas for help. Coupled with the previous knowledge of Ray’s assault on
18 the other girl and his attempted grooming of her, Jane Roe 7 completely ceased all communications
19 with Ray, and she avoided contact with him entirely.

20 238. Thereafter, **David told Jane Roe 7 that she was being “unforgiving” with Ray, and**
21 **she needed to “forgive her brother”.** David instructed Jane Roe 7 to reconcile with Ray, and David
22 attempted to force her to do so, notwithstanding the fact that **Ray’s attempts to groom Jane Roe 7**
23 **were common knowledge within the ICOC.** Consequently, **Jane Roe 7’s father pleaded with**
24 **David to keep Ray away from Jane Roe 7, however, David refused.**

25 239. According to David, since Jane Roe 7’s sins were “the reason why Jesus was nailed
26 to the cross”, she was not allowed to protect herself from Ray or create any protective boundaries.
27 Many cases of abuse were reported to Kevin and David, and this was the standard advice given to
28 other victims and their families.

1 240. The abuse endured by Jane Roe 7 and Ray's assault victim caused alarm with a few
2 members within the church. Specifically, Seth Jensen resigned from his position as the LA ICOC
3 Turning Point paid Staff Member for the Campus Ministries, because he believed the church ignored
4 and failed to protect Jane Roe 7 and Ray's victim.

5 241. Thereafter, Jane Roe 7 was too fearful to tell anyone else (other than Jay) about
6 Nathan's assaults and she did not speak of the incidents again until approximately 2020 when she
7 was 21 years old and told her friend Maya. Unfortunately, Maya immediately reported the news to
8 Nathan's mother, Karyn, who was still an LA ICOC/Turning Point member.

9 242. Karyn angrily approached Jane Roe 7 and demanded that she stop spreading lies about
10 Nathan. **Karyn also informed Jane Roe 7 that she was going to sue her for defamation.** Similar
11 to Traci's conduct years before, Karyn commenced her own campaign within the LA ICOC/Turning
12 Point Ministry to convince other members that Jane Roe 7 was the bad seed and not her abusive son.
13 For approximately one year after Karyn learned of the abuse, she continued the oppressive campaign
14 and generally wreaked havoc on Jane Roe 7's life.

15 243. Inexplicably, after Karyn began shaming Jane Roe 7 and threatening legal action in
16 approximately 2021, the tides turned and ICOC members realized that Jane Roe 7 told the truth about
17 Nathan's assaults. Karyn abruptly ceased her threats of a defamation suit and left the LA ICOC
18 completely. Jane Roe 7 eventually learned that another victim of Nathan's came forward regarding
19 the abuse, which undoubtedly prompted a change in church perception of Karyn and Nathan.

20 244. This knowledge of Nathan's additional abuse was the final straw for Jane Roe 7, and
21 she mustered the courage to leave the ICOC permanently.

22 245. As a direct and proximate result of the abuse, at the hands of the LA ICOC, the ICOC,
23 and their leadership, Jane Roe 7 suffered and continues to suffer a litany of injuries. Among other
24 injuries, Jane Roe 7 has experienced and will continue to experience for the rest of her life severe
25 pain and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life, loss of
26 educational opportunity, loss of wages, loss of income, and loss of future wages.

27 246. Jane Roe 7 has been in therapy for most of her life to process the trauma she suffered
28 throughout her childhood at the hands of the LA ICOC and the ICOC. Jane Roe 7 has been

1 institutionalized twice, and has an official diagnosis of clinical depression, PTSD, and chronic
2 anxiety. As a result, she anticipates participating in therapy for the remainder of her life.

3 **The Horrific Abuse and Silencing of 8 and 9-Year-Old Sisters, Jane Roe 9 and Jane Roe 10**

4 247. Jane Roe 9 and Jane Roe 10 (collectively, the “Roe Sisters”) are sisters; Jane Roe 9 is
5 currently 36 years old and Jane Roe 10 is currently 35 years old. The Roe Sisters grew up in the
6 Ventura region of the LA ICOC, where they both witnessed and endured an unsafe environment
7 cultivated by leadership wherein sexual predators would abuse children without consequence.

8 248. In approximately 1995, when Jane Roe 9 was 8 years old and Jane Roe 10 was 7 years
9 old, their parents’ “disciplers” (i.e., ICOC handlers), Larry and Lori Head (sector leaders),
10 commanded the church flock to share their faith with non-believers and to be sacrificial and fruitful
11 members by expanding church membership with new members.

12 249. Larry and Lori were subordinates of Ed (“Ed”) and Karen (“Karen”) Townsend
13 (collectively, the “Townsend”), and were leaders of the LA ICOC Ventura Region; thus, such
14 commands and other directives emanated from the Townsends and trickled down to their subordinates
15 and other LA ICOC members. The Townsends received directives from Kip McKean, who generally
16 directed and controlled ICOC and LA ICOC policies and procedures, among other things.

17 250. Based on the directives from McKean, the Townsends and Larry and Lori Head, **the**
18 **Roe Sisters’ parents were instructed to “deny themselves” and put God’s Kingdom (the ICOC)**
19 **before their own children.** This system was enforced on an individual basis, but also in small and
20 large group settings. The ICOC and the LA ICOC was structured such that there was always a church
21 member “over” other members in the ICOC’s pyramid structure to enforce the church’s commands
22 and beliefs. If one deviated from those beliefs or commands, he or she would be swiftly rebuked and
23 eventually disfellowshipped if he or she did not “repent.”

24 251. Pursuant to leadership’s unambiguous instructions, the Roe Sisters’ parents sent the
25 Roe sisters to a new recruit’s home for a sleepover in Oxnard, California because the woman’s
26 daughter was the same age as Jane Roe 9 and leadership desired to grow church membership.

27 252. All the Kids Kingdom (children’s ministry) leaders and teachers instructed the Roe
28 Sisters to be “good” and obedient examples of Christian children. Against the Roe Sisters’ parents’

1 desires, LA ICOC leadership collectively, by and through the Townsends, instructed the Roe Sisters
2 to befriend the recruit's daughter in hopes of motivating the recruit and her husband to become ICOC
3 members.

4 253. The Roe Sisters' parents were very protective of their daughters, and they were
5 uncomfortable sending them to the recruit's home unsupervised, as she was a stranger. However, the
6 Roe Sisters' parents were heavily indoctrinated by the ICOC, and fearful of being labeled
7 "disobedient" because it was the equivalent of disobeying God. The parents were in the difficult
8 position of acquiescing to a request that made them uneasy or jeopardizing their salvation by
9 disobeying leadership's instructions. The parents, being dutiful servants of the Lord, reluctantly
10 agreed.

11 254. The girls spent the night at the new recruit's home and when they woke up the
12 following morning, they were alone without any adult supervision and the recruit's daughter
13 announced that they would go swimming at her "friend's" house. The girl told the Roe Sisters that
14 before they went swimming, they needed to watch a movie. The recruit's daughter then played an
15 adult pornographic movie for the Roe Sisters.

16 255. After they watched the disturbing movie, the recruit's daughter invited the Roe Sisters
17 to walk with her several blocks to her "friend's" house. Her "friend" was an older man, and he had
18 one rule in his pool – no bathing suits allowed. The little girl told the Roe Sisters about this rule very
19 matter of factly, as though it was perfectly normal for an adult man to require minor girls to swim
20 naked in his pool. The Roe Sisters had been taught by the LA ICOC that they should trust all adults
21 without question, hug adults on demand, and above all, to **always be obedient and respectful to all**
22 **adults**. With this indoctrination in mind, the Roe Sisters never considered the possibility of defying
23 an adult, particularly a man. The Roe Sisters wholeheartedly believed they were on God's mission to
24 save souls and this excursion was in furtherance of that objective, thus, they had no reason to question
25 the propriety of the adult's conduct.

26 256. During this pool outing, the three girls were molested that day. **The man aggressively**
27 **groped their chests, shoved his fingers around and inside their vaginas, and molested the**
28 **entirety of their little bodies.**

1 257. After the assaults, the Roe Sisters were so deeply brainwashed by the ICOC that they
2 invited their abuser to attend church and he had the hubris to attend an ICOC service.

3 258. In approximately 1999, the Roe Sisters began exhibiting serious emotional issues at
4 the ages of 11 and 12, respectively, because of the abuse that fateful day. Jane Roe 9 suffered from
5 **body issues and eating disorders** and Jane Roe 10 was battling substance abuse. **When Jane Roe 9**
6 **was 12 years old, she attempted suicide** and both sisters have experienced and continue to
7 experience suicidal ideations.

8 259. In 2001, when Jane Roe 9 was approximately 14 years old, she was forced to
9 participate in the LA ICOC's conversion Bible studies. During one Bible study, she mustered the
10 courage to "confess" that she was molested when she was 8 years old. In response, Leigh Ann Vett
11 and other female **LA ICOC members told her that the events were unfortunate, but she had no**
12 **choice but to forgive her abuser.**

13 260. Initially, **the ICOC "sisters" insinuated that the abuse was their fault and**
14 **instructed the Roe Sisters to "forgive" the pedophile.** Leigh Anne Vett also told Jane Roe 9 to
15 refrain from harboring any anger toward her abuser because "her sin had nailed Jesus to the cross and
16 was much worse than anything that could be done to her as a human."

17 261. The LA ICOC leadership failed to report the Roe Sisters' abuse to anyone, and the
18 incident was completely ignored as though it never happened. Consequently, the girls' abuser
19 absconded to Mexico and escaped justice.

20 262. The Roe Sisters were raised with knowledge of children being abused within the
21 Ventura Region and the entire LA ICOC, however, the abuse was never publicly addressed and was
22 an open secret. Accordingly, **parents were not warned of the sexual predators lurking among**
23 **them and they were helpless to protect their vulnerable children from pedophiles.** **The ICOC**
24 **cultivated a culture that served as a playground for sexual predators,** which was premised upon
25 the notion that these abusers could hide in plain sight without fear of reproach or criminal prosecution.

26 263. In approximately 2002, Jane Roe 9 was molested by an ICOC member and she
27 "confessed" the incident to Jacqueline Gansert-Morici ("Jacqueline") the new Ventura Region leader,
28 which was led by Jacqueline and her husband, Steve Gansert-Morici. **Jacqueline called her a liar**

1 **solely because the “brother” denied it.** Jane Roe 9 was simultaneously blamed and sexualized by
2 Jacqueline, as she told Jane Roe 9 that if something (abuse) did in fact occur, **Jane Roe 9 was to**
3 **blame because she must have “tempted the brother.”**

4 264. Unfortunately, the childhood sexual trauma and subsequent victim shaming by the
5 ICOC created lifelong consequences and struggles for the Roe Sisters.

6 265. Jane Roe 9 attempted suicide when she was 12 years old, and she has required
7 ongoing, extensive therapy and treatments to cope with her childhood trauma. She almost died from
8 complications associated with eating disorders and had to participate in treatments that lasted 3
9 months. She has struggled with suicidal ideations for years and will remain in therapy, probably for
10 the rest of her life.

11 266. As a result of Jane Roe 10’s abuse, she participated in her first drug treatment program
12 when she was 15 years old, after her parents learned she was planning suicide. She has participated
13 in treatment at 14 additional treatment centers, and she stayed at one treatment center in Florida 3
14 months.

15 267. The Roe Sisters are heavily scarred by the abuses they endured, both physically and
16 emotionally, at the hands of both their abuser and the LA ICOC. The LA ICOC and the ICOC’s lack
17 of any meaningful response to their abuse was nothing short of pathetic.

18 268. As a direct and proximate result of the abuse, at the hands of the LA ICOC, the ICOC,
19 and their leadership, the Roe Sisters suffered and continue to suffer a litany of injuries. Among other
20 injuries, the Roe Sisters have experienced and will continue to experience for the rest of their lives
21 severe pain and 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 **The Repeated and Horrific Childhood Abuse of Alyssia Phillips Beginning At Age 5**

24 269. Alyssia is currently 32 years old and she was sexually abused repeatedly during her
25 childhood by her father, Allen Phillips (“Allen”).

26 270. Allen sexually abused Alyssia beginning at the age of 5 and continuing until she was
27 between 7 and 8 years old. During the time that Allen abused Alyssia, Defendants Ed Townsend
28 (“Ed”) and Karen Townsend (“Karen”) (Ed and Karen are collectively, the “Townsend”) and one of

1 their primary staff members, Defendant John Unzueta (“John”) were leaders of the Ventura Region
2 LA ICOC.

3 271. On information and belief, the Townsends and John had personal knowledge of
4 Allen’s illegal conduct and sexual predatory history with young children, yet failed to report the abuse
5 to the authorities.

6 272. In 1996 when Alyssia was 5 years old, while Allen was “babysitting” another ICOC
7 church member’s 3-year-old daughter, he turned the child around, removed her clothing and rubbed
8 his penis on her vagina. After his wife Rebecca Phillips (“Rebecca”) confronted Allen a few months
9 later because he was inexplicably acting strange and secretive, Allen eventually admitted to Rebecca
10 that he molested the 3-year-old girl. A few months later, Rebecca compelled Allen to confess his
11 transgression to the Townsends and John.

12 273. **These ICOC leaders decided it was in the best interest of the church to keep**
13 **Allen’s conduct a secret**, and they did not report the abuse to the authorities even though Alyssia’s
14 mother was a childcare provider for several other children, and she provided these services in the
15 Phillips family home.

16 274. In approximately 2021, Alyssia’s younger brother confronted Allen regarding his
17 abuse of the 3-year-old. Surprisingly, Allen admitted to his son that he abused the little girl, however,
18 he blamed it on grief from the crib death of his 5-month-old son in 1996.

19 275. **Before and after Allen molested the 3-year-old girl, he consistently “babysat”**
20 **other children in his home and was often alone with children**. Allen also had access to young
21 children through his work in the LA ICOC Kids Kingdom program for the Ventura Region, however,
22 the Townsends and John never warned parents or Kids Kingdom workers about Allen, or alerted
23 authorities regarding his history of sexually assaulting children.

24 276. A few months after Allen abused the 3-year-old, **leadership relieved him of his**
25 **duties in the Kids Kingdom ministry, yet they failed to notify the parents regarding the reasons**
26 **for his removal**. Therefore, unsuspecting church members were never warned, in spite of
27 leadership’s knowledge regarding Allen’s proclivities, to protect the other children from Allen.

28 277. The ICOC’s failure to report Allen’s illegal conduct allowed Allen to continue abusing

1 young children without fear of criminal prosecution. The continued narrative from the church leaders,
2 including but not limited to the Townsends and John, to Alyssia’s mom Rebecca was that they were
3 “handling it.” Other phrases leadership used included that **“it was over and done and that they**
4 **needed to move on with their lives.”**

5 278. On information and belief, the only way the ICOC “dealt” the situation was by
6 requiring that Allen attend therapy for one week.

7 279. After Allen’s abuse became common knowledge within the ICOC’s leadership ranks,
8 he was nevertheless allowed to continue working with children in other capacities by serving as a
9 sports coach for the church and City of Ventura and as a chaperone for field trips in several ICOC
10 regions, including Ventura, San Francisco Bay area, Stockton, Sacramento, and San Antonio.

11 280. In approximately 1998, the Phillips family moved to the San Francisco area ICOC and
12 approximately a year later in 1999, they moved to the Sacramento ICOC, where Allen coached the
13 kids’ ICOC basketball team until approximately 2001. In 2004, the Phillips family moved to the San
14 Antonio, Texas ICOC. On information and belief, the Townsends and John failed to notify members
15 of the foregoing churches where the Phillips relocated regarding Allen’s pedophilia and history of
16 abuse.

17 281. The Phillips family frequently moved to different cities, as Allen was unable to
18 financially support his family because of his **expensive pornography addiction**. Allen was addicted
19 to interactive and live chat rooms with sex workers. This pornographic addiction wreaked havoc on
20 family finances and the family’s overall wellbeing.

21 282. When Alyssia’s younger sister was approximately 9 years old, Allen was caught again
22 with pornography, and he blamed it on his 9-year-old daughter. In approximately 2006, Allen’s
23 addiction spiked again, causing the family’s financial struggles to peak. Consequently, Rebecca
24 temporarily kicked Allen out of the family home and Herve Fleurant advised Allen to move into one
25 of the “single brother’s households”. The ICOC did not otherwise intervene. As a result, Allen
26 continued traumatizing his family until they were old enough to leave the home; Rebecca initiated
27 dissolution proceedings in approximately 2019.

28 283. As further testament to Allen’s deep rooted sexual dysfunction, during his marriage to

1 Rebecca, Allen confessed to her that he was a “Peeping Tom” as a child and teen. **Allen’s**
2 **dysfunction was indeed a compulsion**, as he described his behavior as being the result of
3 “uncontrollable sexual urges.”

4 284. As recent as 2020, Allen was terminated from at least one job for taking unauthorized,
5 graphic photos of women. In addition, Allen was terminated from United Airlines for taking
6 clandestine and inappropriate photos of the flight attendants without their consent.

7 285. Alyssia’s first memory of sexual abuse by Allen was an incident that occurred when
8 **Allen molested her in her parents’ bedroom of the family home** in Ventura, California 93001 in
9 approximately 1996 **when she was 5 years old**. Alyssia also recalls Allen abusing her in their
10 bathroom and she has and continues to recover images and memories of several other abuse incidents.

11 286. Alyssia considers her life during the ages of 5-8 as the “dark years” because Allen’s
12 abuse at such a young age resulted in her **years’ long struggle with dissociative disorders, and**
13 **related psychological issues**. Alyssia has been actively working with therapists to recall details
14 regarding her childhood abuse, as she disassociated the events for many years due to the ghastly
15 childhood trauma she endured. This process is ongoing and will surely reveal many more painful
16 memories that will re-traumatize her.

17 287. In addition to being sexually abused, Alyssia was groomed for the abuse insofar as
18 Allen regularly possessed pornography which Allen “accidentally” left in plain sight for Alyssia and
19 her three siblings to see. Sadly, Alyssia was raised in a sexually charged and unmanaged home
20 environment, and her father’s deviant behavior became normalized.

21 288. In or about 2019, Allen engaged in a 2-month-long sexual relationship with Alyssia’s
22 close friend who was Alyssia’s age and also lived with the Phillips family. This girl also suffered
23 from impairments due to severe medical and mental health issues, which rendered her an easy target
24 for Allen. The relationship lasted approximately two months and the girl ended the relationship after
25 Allen confessed to her that he had a sexually transmitted disease. Given the girl’s serious medical
26 issues, an STD could have compromised her health and she was not interested in jeopardizing her
27 health for the sake of a sexual relationship.

28 289. Shortly thereafter, Allen went to Alyssia’s home and confessed the relationship to her.

1 Alyssia was horrified and immediately sought assistance from Herve Fleurant, Allen’s “discipler” in
2 the San Antonio ICOC. Herve Fleurant told Alyssia that he would “handle it” and for her to move on
3 with her life. Alyssia never heard from Herve Fleurant after that conversation.

4 290. As a direct and proximate result of the abuse, at the hands of the LA ICOC, the ICOC,
5 and their leadership, Alyssia suffered and continues to suffer a litany of injuries. Among other
6 injuries, Alyssia has experienced and will continue to experience for the rest of her life severe pain
7 and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life, loss of
8 educational opportunity, loss of wages, loss of income, and loss of future wages.

9 291. As a result of Allen’s abuse and the ICOC and the LA ICOC’s flagrant disregard for
10 Allen’s predatory ways, Alyssia suffered with self-harm as a teen and she has been diagnosed with
11 PTSD, severe depression, severe anxiety, and suicidal thoughts, all of which render her in perpetual
12 need intense therapy. Alyssia’s depression caused her to miss work and lose income, as she was prone
13 to sudden crying spells and panic attacks. Alyssia has also struggled with intimacy problems.
14 Alyssia’s life has been profoundly shaped by Allen and the ICOC’s trauma.

15 **FIRST CLAIM FOR RELIEF**
16 **SEXUAL ASSAULT OF A MINOR**
17 *(Against All Defendants and Does 1-10)*

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

20 293. Marty and Nancy Wilkinson intentionally, willfully, and maliciously sexually
21 assaulted and/or sexually abused and molested Jane Roe 4 and Jane Roe 5 during the time that they
22 were minors, including fondling of genitalia, forceful kissing, and penetration of genitalia with
23 foreign objects.

24 294. The Rocks’ son intentionally, willfully, and maliciously sexually assaulted and/or
25 sexually abused and molested Jane Roe 6 during the time she was a minor in California.

26 295. Nathan Chung intentionally, willfully, and maliciously sexually assaulted and/or
27 sexually abused and molested Jane Roe 7 during the time she was a minor in California.

28 296. The Roe Sisters were intentionally, willfully, and maliciously sexually assaulted
and/or sexually abused and molested by a “friend” of a new recruit during the time that they were

1 minors in California.

2 297. Allen Phillips intentionally, willfully, and maliciously sexually assaulted and/or
3 sexually abused and molested Alyssia during the time that she was a minor in California.

4 298. In committing the unlawful acts of sexual assault against Plaintiffs, Marty Wilkinson,
5 Nancy Wilkinson, the Rocks' son, Nathan Chung and Allen Phillips intended to put Plaintiffs in
6 imminent apprehension of harmful or offensive contact.

7 299. Marty Wilkinson, Nancy Wilkinson, the Rocks' son, Nathan Chung and Allen Phillips
8 put Plaintiffs in imminent apprehension of such harmful offensive contact as Plaintiffs actually
9 believed they had the ability to make harmful or offensive contact with their persons.

10 300. Plaintiffs did not consent to Marty Wilkinson, Nancy Wilkinson, the Rocks' son,
11 Nathan Chung and Allen Phillips' intended harmful or offensive contact. Marty Wilkinson, Nancy
12 Wilkinson, the Rocks' son, Nathan Chung and Allen Phillips intended to put Plaintiffs in fear of
13 imminent apprehension of such contact. Plaintiffs were minors during the time herein alleged and,
14 therefore, lacked the ability to consent to sexual contact with any person.

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

20 302. Marty Wilkinson, Nancy Wilkinson, the Rocks' son, Nathan Chung and Allen
21 Phillips' conduct described herein was oppressive, malicious, and despicable in that it was intentional
22 and done in conscious disregard for the rights and safety rights of Plaintiffs, and with the substantial
23 certainty that it would cause Plaintiffs, to suffer humiliation, mental anguish, and emotional and
24 physical distress.

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

28 304. Defendants the ICOC, the LA ICOC, Mission Point, Thomas "Kip" McKean, Mark

1 Wilkinson, Cindy Wilkinson, Mike Taliaferro, Mike Rock, Libby Rock, Steve Lounsbury, Carrie
2 Lounsbury, Jay Minor, Traci Minor, Kevin Holland, David Bruce, Ed Townsend, Karen Townsend
3 and John Unzueta (collectively, the “Church Leader Defendants”) are vicariously liable because each
4 Church Leader Defendant knew or should have known that Marty Wilkinson, Nancy Wilkinson, the
5 Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips
6 were molesting children, including sexually assaulting the minor Plaintiffs, at their home, on ICOC
7 church premises, and at ICOC sanctioned social gatherings. Plaintiffs put the Church Leader
8 Defendants, and their agents, employees, or directors, on notice on numerous occasions that the abuse
9 was occurring.

10 305. The Church Leader Defendants are also liable insofar as they orchestrated a “cover
11 up,” as the term is defined pursuant to Cal. Civ. Proc. Code § 340.1(b)(2), of the abuse committed by
12 Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, Nathan Chung and Allen Phillips, for example,
13 by means of indoctrination and manipulation of the impressionable Plaintiffs as children.

14 306. The Church Leader Defendants are liable because they intentionally caused to exist a
15 hierarchical cult-like structure that aided and abetted the access to children and the concealment of
16 sexual abuse of minors, which proximately caused each minor Plaintiff’s injuries at the hands of
17 Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane
18 Roe 10), Nathan Chung and Allen Phillips, who were known abusers.

19 **SECOND CLAIM FOR RELIEF**
20 **VIOLATION OF PENAL CODE 647.6(a)(1)**
21 *(Against All Defendants and Does 1-10)*

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

24 308. California Penal Code § 647.6(a)(1) provides that “[e]very person who aims or molests
25 any child under 18 years of age shall be punished by a fine not exceeding five thousand dollars
26 (\$5,000), by imprisonment in a county jail not exceeding one year, or by both the fine and
27 imprisonment.”

28 309. As alleged herein, Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new
recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips engaged in

1 continuous sexual molestation and occasional acts of penetration with Plaintiffs while they were
2 under eighteen years of age, in violation of California Penal Code § 647.6(a)(1). This molestation
3 occurred in Texas and California.

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

8 311. Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane
9 Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips' continuous sexual abuse and molestation
10 of Plaintiffs, who were young children, constituted the proximate and legal causes of the physical,
11 psychological, emotional, and economic damages that the Plaintiffs have suffered and continue to
12 suffer to this day. It also has resulted in Plaintiffs incurring, and will require Plaintiffs to incur into
13 the future, expenses for medical and psychological treatment, therapy, and counseling.

14 312. The above-described conduct of Marty Wilkinson, Nancy Wilkinson, the Rocks' son,
15 the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips was
16 oppressive, malicious and despicable in that it was intentional and done in conscious disregard for
17 the rights and safety of Plaintiffs, and was carried out with a conscious disregard of Plaintiffs' right
18 to be free from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to
19 California Civil Code section 3294, entitling Plaintiffs to punitive damages against Defendants in an
20 amount appropriate to punish and set an example of them.

21 313. The Church Leader Defendants aided and abetted Marty Wilkinson, Nancy Wilkinson,
22 the Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen
23 Phillips because they knew and/or should have known that they were molesting the Plaintiffs and
24 would continue to molest the Plaintiffs. Those Church Leader Defendants gave Marty Wilkinson,
25 Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan
26 Chung and Allen Phillips substantial assistance and license in carrying out their abuse (*e.g.*, in the
27 form of concealment, cover, and social or financial support), and those Church Leader Defendants'
28 support was a substantial factor in allowing Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the

1 new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips to abuse the
2 minor Plaintiffs unchecked.

3 **THIRD CLAIM FOR RELIEF**
4 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
5 *(Against All Defendants and Does 1-10)*

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

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

11 316. A reasonable person would not expect or tolerate the sexual harassment, abuse, or
12 sexual assault committed by the members of the Wilkinson Family.

13 317. A reasonable person would not expect, accept or tolerate Defendants’ unlawful sexual
14 assault, abuse, molestation, and harassment of Plaintiffs. A reasonable person would not expect,
15 accept or tolerate the Church Leader Defendants’ coverup of Plaintiffs’ ongoing abuse.

16 318. Defendants’ conduct exceeded all bounds of that usually tolerated in a civilized
17 community.

18 319. Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane
19 Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips intended to cause the Plaintiffs injury when
20 they sexually assaulted Plaintiffs, harassed the Plaintiffs, gaslit the Plaintiffs, and manipulated and
21 brainwashed the Plaintiffs into silence to actively concealed the abuse. Moreover, the Church Leader
22 Defendants intended to cause Plaintiffs injury when they repeatedly concealed Plaintiffs’ abuse.

23 320. Plaintiffs have suffered severe and extreme distress as a result.

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

322. Defendants’ conduct described herein was oppressive, malicious and despicable in

1 that it was intentional and done in conscious disregard for the rights and safety rights of Plaintiffs,
2 and with the substantial certainty that it would cause Plaintiffs, to suffer humiliation, mental anguish
3 and emotional and physical distress.

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

7 **FOURTH CLAIM FOR RELIEF**
8 **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**
9 *(Against All Defendants and Does 1-10)*

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

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

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

19 327. As alleged herein, Plaintiffs were the victims of sexual battery as a minor perpetrated
20 by Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9 and
21 Jane Roe 10), Nathan Chung and Allen Phillips.

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

26 329. The Church Leader Defendants knowingly conspired and/or aided and abetted to force
27 Plaintiffs into sexual battery with Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new
28 recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips, and such sexual
battery did, on multiple occasions, occur.

1 Government Code, relating to childhood sexual assault, reviving until December 31, 2023, the statute
2 of limitations for all previously extinguished claims for damages suffered as a result of childhood
3 sexual assault for victims within 22 years of the age of majority.

4 338. As alleged herein, Plaintiffs were the victims of multiple instances of sexual battery
5 as a minor perpetrated by Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's
6 "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips and facilitated by all
7 Defendants herein. Defendants subjected Plaintiffs to these multiple incidents of sexual battery at the
8 hands of Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9
9 and Jane Roe 10), Nathan Chung and Allen Phillips while Plaintiffs were minors.

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

13 340. As alleged herein, Plaintiffs were repeatedly the victims of acts of gender violence by
14 Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane
15 Roe 10), Nathan Chung and Allen Phillips while they were minors.

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

20 342. The repeated sexual battery of Plaintiffs by Marty Wilkinson, Nancy Wilkinson, the
21 Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips
22 was the result of Defendants' collective cover up, as statutorily defined by California Code of Civil
23 Procedure § 340.1(b).

24 343. As a direct and proximate cause of Defendants' actions, Plaintiffs have suffered severe
25 emotional and mental distress and anxiety, humiliation, embarrassment, and additional damages.

26 344. The aforementioned conduct was willful, wanton, and malicious. At all relevant times,
27 Defendants acted with conscious disregard of Plaintiffs' rights and safety as a minor in their care.
28 Defendants also acted with the knowledge of or with reckless disregard for the fact that their conduct

1 was certain to cause injury and/or humiliation to Plaintiffs. Plaintiffs are therefore entitled to recover
2 treble the amount of damages they sustained, pursuant to California Code of Civil Procedure
3 § 340.1(b)(1) in an amount to be proven at trial, attorneys' fees and other relief that the Court may
4 deem proper.

5
6 **SIXTH CLAIM FOR RELIEF**
7 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE**
8 **SECTION 11165 ET. SEQ BASED ON VICARIOUS LIABILITY**
9 *(Against All Defendants and Does 1-10)*

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

12 346. the Church Leader Defendants knew or reasonably suspected that Marty Wilkinson,
13 Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan
14 Chung and Allen Phillips had, or were, engaged in the sexual assault of Plaintiffs as children while
15 the Plaintiffs were under the care, custody, and supervision of the Church Leader Defendants, and
16 thus each Church Leader Defendant had a duty to report the abuse to the appropriate authorities under
17 the California Child Abuse and Neglect Reporting Law. *See* Penal Code §§ 11164-11174.3
18 ("CANRA").

19 347. At all times relevant herein and material hereto, the Church Leader Defendants were
20 responsible for the supervision of Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new
21 recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips as part of their
22 church and related ICOC programs. The Church Leader Defendants and their staff, employees, and
23 administrators were required to report any suspected child or sexual abuse as part of their duties and
24 responsibilities as employees and/or agents of the Church Leader Defendants.

25 348. The Church Leader Defendants and their administrators, board members, and
26 employees are mandated reporters under Penal Code section 11165.7.

27 349. Penal Code section 11166(a) states that a mandated reporter shall make a report to an
28 agency whenever he/she, in his/her professional capacity or within the scope of his/her employment,
has knowledge of or observes a child whom the mandated reporter knows, or reasonably suspects has
been a victim of child abuse or neglect. "Reasonable suspicion" does not require certainty that child

1 abuse or neglect has occurred but looks to if it is objectively reasonable for a person to entertain a
2 suspicion to suspect child abuse or neglect. *See* Penal Code § 11166(a)(1).

3 350. As set forth in this Complaint, the Church Leader Defendants knew and/or reasonably
4 suspected that children had been sexually assaulted by Marty Wilkinson, Nancy Wilkinson, the
5 Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen
6 Phillips. After Plaintiffs notified the Church Leader Defendants, Marty Wilkinson, Nancy Wilkinson,
7 the Rocks' son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen
8 Phillips abuse continued, giving rise to a duty to report such conduct under CANRA.

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

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

17 353. If the Church Leader Defendants, through their administrators, board members, and
18 employees complied with CANRA's mandatory reporting requirements, then Plaintiffs would not
19 have been harmed at all or to the extent that they were.

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

25 355. As a direct and legal result of Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the
26 new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips' conduct, and
27 the act and omissions of the Church Leader Defendants, Plaintiffs suffered severe and permanent
28 injuries including, but not limited to, physical and mental pain and suffering, severe emotional

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

3 **SEVENTH CLAIM FOR RELIEF**
4 **AGGRAVATED SEXUAL ABUSE ACROSS STATE LINES IN VIOLATION OF 18 U.S.C.**
5 **§§ 2241(c) & 2255**

6 *(Against the ICOC, Mission Point, Thomas “Kip” McKean, Mark Wilkinson, Cindy*
7 *Wilkinson, Nancy and Does 1-10)*

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

10 357. In 1990, Nancy Wilkinson crossed state lines with the intent to engage in a sexual acts
11 with Jane Roe 4 and Jane Roe 5, neither of whom had yet attained the age of 12 years at the time.

12 358. Nancy Wilkinson knowingly engaged in sexual acts, including fondling of genitalia
13 and forcible kissing, with both Jane Roe 4 and Jane Roe 5.

14 359. Both Jane Roe 4 and Jane Roe 5 suffered physical, emotional, and psychological
15 damages, including physical and mental pain and suffering, severe emotional distress, physical
16 injuries, past and future costs of medical care and treatment, and other damages, in an amount not yet
17 ascertained. Jane Roe 4 and Jane Roe 5 are entitled to actual damages the cost of the action, including
18 reasonable attorney's fees and other litigation costs reasonably incurred.

19 360. Mark and Cindy Wilkinson aided and abetted this aggravated sexual abuse because
20 they knew of Nancy Wilkinson’s sexual proclivities, they substantially assistance to allow Nancy
21 Wilkinson to carry out that abuse by putting Jane Roe 4 and Jane Roe 5 in a position to be abused by
22 their daughter, and those actions—whether putting them in the back of a truck with a camper or
23 lodging them together at the ICOC convention—was a substantial factor in Nancy Wilkinson’s abuse,
24 as it allowed her the means, access, endorsement, and opportunity to abuse Plaintiffs. Furthermore,
25 on information and belief, the ICOC, Mission Point, and McKean intentionally concealed these
26 crimes, continue to protect the Wilkinson Family, and failed to report them to the relevant authorities.

27 361. In view of the orchestrated nature of the Wilkinson Family’s prolonged abuse of the
28 Plaintiffs when they were children, in tandem with their and the Church Leader Defendants’
intentional acts to cover up any wrongdoing, the Court, in its discretion, should award punitive
damages to Plaintiffs.

EIGHTH CLAIM FOR RELIEF
NEGLIGENT SUPERVISION OF A MINOR

(Against the ICOC, the LA ICOC, Mission Point, Thomas “Kip” McKean, Mark Wilkinson, Cindy Wilkinson, Mike Taliaferro, Mike Rock, Libby Rock, Steve Lounsbury, Carrie Lounsbury, Jay Minor, Traci Minor, Kevin Holland, David Bruce, Ed Townsend, Karen Townsend and John Unzueta and Does 1-10)

362. 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.

363. The Church Defendants were collectively and individually responsible for the care, custody, control, supervision, and protection of the minor children entrusted to them, including Plaintiffs. The Church Leader Defendants had a duty to adequately and properly supervise, monitor, and protect Plaintiffs from known and knowable dangers, such as those posed by Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips.

364. The Church Leader Defendants each breached their duty to properly and adequately supervise, monitor, and protect Plaintiffs, in part because officers, administrators, agents, and other supervisory employees knew or should have known of Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips’ improper behavior, including that minor children, including Plaintiffs, were frequently alone with them without any justification, that Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips would frequently touch and sexually abuse minor children, including Plaintiffs, at the Church Leader Defendants’ churches without any justifiable reason for doing so, including when the minor children were by themselves, Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips sexually abused, assaulted, harassed, and/or molested minor children, including but not limited to Plaintiffs.

365. The Church Leader Defendants, acting through their administrative and supervisory employees, knew or should have known that Plaintiffs were unattended and unsupervised with Marty Wilkinson, Nancy Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips on numerous occasions, without any justification.

1 366. It should have been obvious to any officer, agent, administrator, employee, or staff
2 member that there was no reason that neither Plaintiffs, nor any other child, should have been alone
3 with Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's "friend" (Jane Roe 9 and
4 Jane Roe 10), Nathan Chung and Allen Phillips. The employees and agents of the Church Leader
5 Defendants instead turned a blind eye to the fact that Marty Wilkinson, Nancy Wilkinson, the Rocks'
6 son, the new recruit's "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips were
7 spending time with minor children, including Plaintiffs, unattended and unsupervised without any
8 investigation into the matter.

9 367. With the exception of Jane Roe 9 and Jane Roe 10, Marty Wilkinson, Nancy
10 Wilkinson, the Rocks' son, Nathan Chung and Allen Phillips sexually assaulted, abused, harassed,
11 and molested the Plaintiffs on the Church Defendants' premises and during the Church Defendants'
12 church related services. Some of the acts of sexual assaults and abuse occurred while Plaintiffs were
13 left unattended and unsupervised with Marty Wilkinson, Nancy Wilkinson, the Rocks' son, Nathan
14 Chung and Allen Phillips.

15 368. Jane Roe 9 and Jane Roe 10 were sexually assaulted, abused, harassed, and molested
16 during an ICOC sanctioned sleepover visit at a new recruit's home.

17 369. If the Church Leader Defendants, and each of them, adequately and properly
18 supervised, monitored, and protected Plaintiffs, Plaintiffs would not have been harmed, or would not
19 have been harmed to the extent that Plaintiffs were.

20 370. The Church Leader Defendants also recklessly and negligently failed to implement
21 and/or enforce policies and procedures that were aimed at preventing or detecting sexual assault and
22 assault of their minor members.

23 371. If the Church Leader Defendants had adequately performed their duties and
24 responsibilities, then Plaintiffs would not have been subject to the sexual assault, assault and
25 harassment perpetrated by Marty Wilkinson, Nancy Wilkinson, the Rocks' son, the new recruit's
26 "friend" (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen Phillips.

27 372. Plaintiffs have been severely damaged emotionally and physically, and otherwise, in
28 amounts to be proven at the time of trial, as a direct and legal result of the acts and omissions of the

1 Church Leader Defendants, and each of them.

2 **NINTH CLAIM FOR RELIEF**
3 **NEGLIGENCE**

4 *(Against the ICOC, the LA ICOC, Mission Point, Thomas “Kip” McKean, Mark Wilkinson, Cindy*
5 *Wilkinson, Mike Taliaferro, Mike Rock, Libby Rock, Steve Lounsbury, Carrie Lounsbury, Jay*
6 *Minor, Traci Minor, Kevin Holland, David Bruce, Ed Townsend, Karen Townsend and John*
7 *Unzueta and Does 1-10)*

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

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

13 375. Defendants knew or should have known, reasonably suspected, and/or were otherwise
14 on notice, of the misconduct and sexually predatory behavior of by Marty Wilkinson, Nancy
15 Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung
16 and Allen Phillips directed towards minor children, including Plaintiffs.

17 376. Despite having knowledge of the misconduct of by Marty Wilkinson, Nancy
18 Wilkinson, the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung
19 and Allen Phillips, all Defendants herein failed to take any preventative action to control, curb, and/or
20 prevent that conduct, failed to warn Plaintiffs or Plaintiffs’ parents of that wrongful conduct, and/or
21 failed to notify law enforcement, despite having a legal duty to do so.

22 377. As a direct and legal result of Defendants’ negligence, Plaintiffs were sexually
23 assaulted, sexually abused, sexually harassed, and assaulted by Marty Wilkinson, Nancy Wilkinson,
24 the Rocks’ son, the new recruit’s “friend” (Jane Roe 9 and Jane Roe 10), Nathan Chung and Allen
25 Phillips.

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

28 379. As a direct and legal result of Defendants’ conduct, Plaintiffs suffered severe and
permanent injuries including, but not limited to, physical and mental pain and suffering, severe
emotional distress, physical injuries, past and-future costs of medical care and treatment, and other

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

3 **PRAYER FOR RELIEF**


4 WHEREFORE Plaintiffs respectfully pray for relief as follows:

- 5 (a) Compensatory and special damages in an amount to be proven at trial;
- 6 (b) Statutory penalties and liquidated damages according to proof at time of
7 trial;
- 8 (c) Punitive and exemplary damages in an amount according to proof at the
9 time of trial;
- 10 (d) Treble damages;
- 11 (e) Pre- and post- judgment interest;
- 12 (f) Reasonable attorney’s fees and costs; and
- 13 (g) Such other and further relief as the Court deems just and proper.

14
15 Plaintiffs respectfully demand a trial by jury on all claims so triable.

16
17 Date: October 6, 2023

SAMINI BARIC APC

18
19 By: 
20 Bobby Samini
21 Nicole Prado
22 Ignacio Lazo
23 Attorneys for Plaintiffs
24
25
26
27
28