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Electronically FILED by
Superior Court of California,
County of Los Angeles
7/13/2023 3:22 PM
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Executive Officer/Clerk of Court,
By J. Nunez, Deputy Clerk

8 *Attorneys for Plaintiffs Salud Gonzalez and Joana*
9 *Diaz*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 SALUD GONZALEZ, an individual; and
13 JOANA DIAZ, an individual,

14 Plaintiffs,

15 v.

16 INTERNATIONAL CHURCHES OF
17 CHRIST, INC., an unincorporated association
and former California nonprofit corporation;
18 THE INTERNATIONAL CHRISTIAN
CHURCH, INC., a California nonprofit
19 corporation; CITY OF ANGELS
20 INTERNATIONAL CHRISTIAN CHURCH,
a California nonprofit corporation; THOMAS
21 (“KIP”) McKEAN, an individual;
FERNANDO SANCHEZ, an individual;
22 SELINA ANN BOQUET, an individual;
RICARDO GONZALEZ, an individual;
23 ALFREDO ALANIS, an individual; and
24 DOES 1 through 10, inclusive,

25 Defendants.

Case No. **23STCV16430**

COMPLAINT FOR:

1. **SEXUAL ASSAULT OF A MINOR**
2. **VIOLATION OF PENAL CODE 647.6(A)(1)**
3. **INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**
4. **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**
5. **NEGLIGENT SUPERVISION OF A MINOR**
6. **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE SECTION 11165. ET SEQ. BASED ON VICARIOUS LIABILITY**
7. **NEGLIGENCE**
8. **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**
9. **GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4**

JURY TRIAL DEMANDED

1 Plaintiffs SALUD GONZALEZ and JOANA DIAZ (collectively, “Plaintiffs”) hereby submit
2 this Complaint against Defendants INTERNATIONAL CHURCHES OF CHRIST, INC., THE
3 INTERNATIONAL CHRISTIAN CHURCH, INC., CITY OF ANGELS INTERNATIONAL
4 CHRISTIAN CHURCH, THOMAS “KIP” McKEAN, FERNANDO SANCHEZ, RICARDO
5 GONZALEZ, SELINA ANN BOQUET, ALFREDO ALANIS and all other named and unnamed
6 defendants (collectively, “Defendants”) and states as follows:

7 **INTRODUCTION**

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

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

12 3. This case arises from an ongoing and systemic scheme of abuse that shocks the
13 conscience from its appallingly epic proportions. The ICOC and its affiliate churches have created a
14 money-making enterprise through its psychological manipulation, tight control, and hierarchical
15 “discipleship” structure. That same structure fostered an environment fertile for sexual abuse. Sexual
16 predators gained unfettered access to manipulated women and children. They could abuse them
17 without fear of accountability. Instead of taking action, the ICOC and its affiliates did more than turn
18 a blind eye—they actively concealed the abuse in order to protect their mega-church tithing empire.
19 As a result, the ICOC and its leaders, from top to the bottom, aided and abetted the continued sexual
20 abuse of women, minors, and even children as young as 3 years old, some of whom were raped and
21 sexually abused with impunity by trusted church members.

22 **JURISDICTION AND VENUE**

23 4. This Court has jurisdiction pursuant to California Code of Civil Procedure
24 (hereinafter, “CCP”) § 410.10. This Court has jurisdiction over claims pertaining to Defendant ICOC
25 pursuant to CCP § 410.6. The amount in controversy exceeds the jurisdictional minimum of \$25,000.

26 5. Venue is proper in this Court pursuant to CCP section because a substantial part of
27 the events and omissions giving rise to the claims occurred in the State of California, County of Los
28 Angeles.

1 California. Joana Diaz was a minor, citizen of the United States of America, and resident of California
2 when she first became a victim and survivor of Defendants’ sexual abuse and coverup.

3 **B. Defendants**

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

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

19 13. Defendant City of Angels - International Christian Church (“City of Angels”) is a
20 religious non-profit corporation organized and existing under and by virtue of the laws of the State
21 of California. City of Angels purposefully conducts substantial religious and affiliated programs and
22 activities in the County of Los Angeles, State of California. City of Angels has ecclesiastical,
23 governmental, and administrative authority over the business and conduct of all locations worldwide.
24 This authority includes, but is not limited to, the selection of ministers, the direction of liturgical
25 interpretation, the collection of tithings and additional funds, and the issuance of behavioral and
26 commercial directives for members worldwide.

27 14. Defendant Thomas “Kip” McKean (“Kip” or “McKean”), upon information and
28 belief, is a United States citizen, currently residing in Pacific Palisades, California. At all times

1 relevant to the events that form the basis of this Complaint, Defendant Kip was a member of ICOC's
2 Los Angeles regional branch, and later, the City of Angels International Church of Christ in Los
3 Angeles, California. Defendant Kip resided in California for extended periods while conducting
4 business in California on behalf of Defendant ICOC and Defendant ICC. Defendant Kip's
5 supervision, direction, and control over Defendants forms the basis of his personal liability.

6 15. Defendant Fernando Sanchez ("Sanchez"), upon information and belief, is a United
7 States citizen, currently residing in California. At all times relevant to the events that form the basis
8 of this Complaint, Sanchez was a resident of Los Angeles, California.

9 16. Defendant Selina Ann Boquet ("Selina" or "Boquet"), upon information and belief, is
10 a United States citizen, currently residing in Texas. At all times relevant to the events that form the
11 basis of this Complaint, Boquet was a resident of California.

12 17. Defendant Ricardo Gonzalez ("Gonzalez"), upon information and belief, is a United
13 States citizen, currently residing in California. At all times relevant to the events that form the basis
14 of this Complaint, Gonzalez was a resident of California.

15 18. Defendant Alfredo Alanis ("Alfredo"), upon information and belief, is a United States
16 citizen, currently residing in Portland, Oregon. At all times relevant to the events that form the basis
17 of this Complaint, Alfredo Alanis was a leader of the Los Angeles and Portland ICOC locations.
18 Alfredo Alanis's active concealment of Joana Diaz's abuse, along with his supervision, direction, and
19 control over Defendants forms the basis of his personal liability.

20 19. 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 Plaintiffs'
26 losses and damages are the result of their wrongful conduct.

27 20. The actions and omissions of Defendants and each of them were done with conscious
28 and reckless disregard of the rights and safety of others, including Plaintiff. Defendants, and each of

1 them, were guilty of malice, fraud and oppression as defined in California Civil Code section 3294,
2 and Plaintiff should recover from Defendants, in addition to actual damages, punitive damages to
3 make an example of and punish defendants.

4 **GENERAL ALLEGATIONS¹**

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

7 21. In 1979, Kip McKean officially broke off from the traditional Church of Christ—the
8 proto-organization that helped spawn the ICOC.

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

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

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

26 25. Chuck Lucas, one of the original founding ministers with Kip in Florida, was
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28 ¹ For the convenience of the reader, these general allegations are common to the pleadings in each of the following related cases before the Court: 22-cv-09467, 22-cv-09472, 23-cv-0064, 23-cv-00765, 23-cv-00999, and 23-cv-01192.

1 eventually paid off to leave the group because of his deviant behavior. Early on, the ICOC and
2 McKean strategically downplayed Lucas’s pattern of abuse by labeling his conduct as “recurring
3 sins.” Sadly enough, those “recurring sins” were never investigated by ICOC. McKean and other
4 ICOC leaders were acutely aware of Lucas’s disturbing pattern of abuse, but nevertheless, they
5 actively concealed Lucas’s misdeeds to avert discovery by the police or church members. Covering
6 up for Lucas became the blueprint for the ICOC moving forward, integrating coverups and
7 concealment into its organizational DNA.

8 26. In 2006, McKean spun off a derivative church, dubbed the International Christian
9 Church (or “the ICC”), after he was forced out of the ICOC. The ICC was registered in California
10 as a nonprofit religious corporation in October 2006. As of December 2022, the ICC listed 104
11 affiliate churches on its website. Its Articles of Incorporation, filed with the California Secretary of
12 State, included references to affiliates. One part stated that upon dissolution of ICC, “the assets of
13 this Corporation shall be distributed to other nonprofit funds, foundations or corporations affiliated
14 with the International Christian Church.”²³

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

17 27. Under the direction and control of McKean, the ICOC (and, later, the ICC) has
18 collectively exploited everything good and noble in their trusting and loyal members by callously
19 robbing them of their childhood innocence through psychological coercion and manipulation,
20 pervasive sexual abuse of children as young as three years old, and shameful financial abuse. Each
21 of the foregoing abuses was actively concealed by ICOC and its members to avert discovery by
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24 ² 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 ³ 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 child protective services and the police.

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

6 29. McKean co-designed the specific discipling pyramid that would later become the
7 foundational structure of both the ICOC and the ICC as organizations. That pyramid structure
8 served as the mechanism of control and coercion frequently exerted over their members.⁴

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

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

17 32. Only those members named as “disciplers” were allowed to provide any counseling
18 to church members. Abuses were reported only to the “disciplers.” ICOC church members and
19 leadership discouraged reporting those abuses to outside authorities by routinely branding abuse
20 victims as “disobedient” and blaming them for the abuse they suffered. Many incidents, which
21 could have reported, therefore never were.

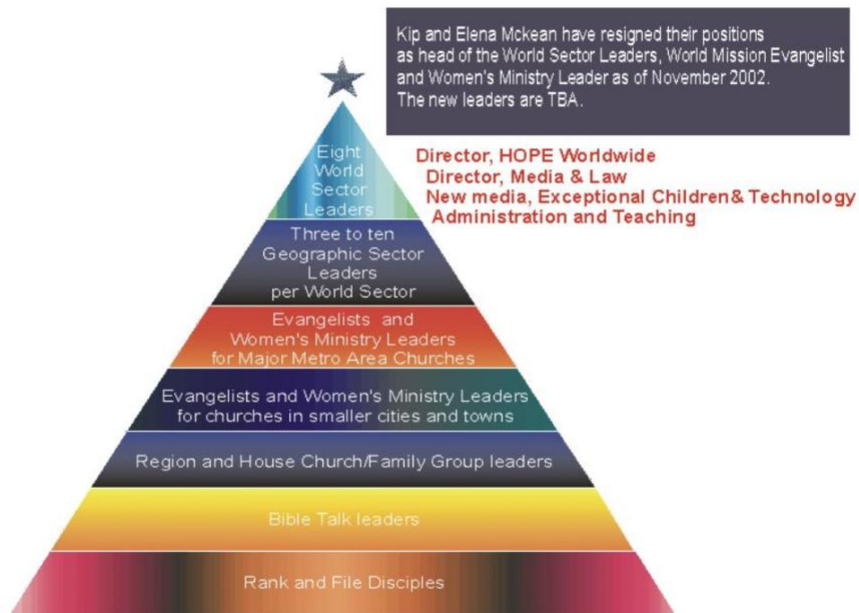
22 33. McKean and the ICOC created a religious practice that required victims to confess
23 their “sins” daily. “Disciplers” would then share the specifics of those “sins” with other groups and
24 leaders to reinforce their control over the victim. This pattern of practice allowed McKean and the
25 ICOC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

26 _____

27 ⁴ Flavil R Yeakley Jr. documented the “disciplining” movement in a book titled *The Discipling Dilemma*. The ICOC
28 and 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 34. An illustration of the ICOC’s hierarchical model of authority is depicted below:

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



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

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

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

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

33 37. The ICOC trains each new member to understand that “compliance was the path of

1 least resistance.” Members genuinely and wholeheartedly believed that they needed to follow the
2 Bible verbatim, and that the ICOC’s leadership were the only “true” modern-day disciples on Earth.

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

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

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

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

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

24 “For reasons I still don’t fully understand, my ‘discipler’ met
25 with me and two other teen boys at one of the boys’ houses.
26 In the basement we sat in a circle, and the goal of my
27 discipler was to break me down and to get me to fully
28 understand the horrors of Hell: Meaning what I had to look

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forward to if I didn't enter the Kingdom (the ICOC) before 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 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

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an exhaustive letter to God, documenting every single sin they had ever committed in their entire lives and asking for forgiveness. The letter was usually meant to be read aloud in a group setting. I was only 14.

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

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

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

We had to meet in one-on-one and group D-times, where we

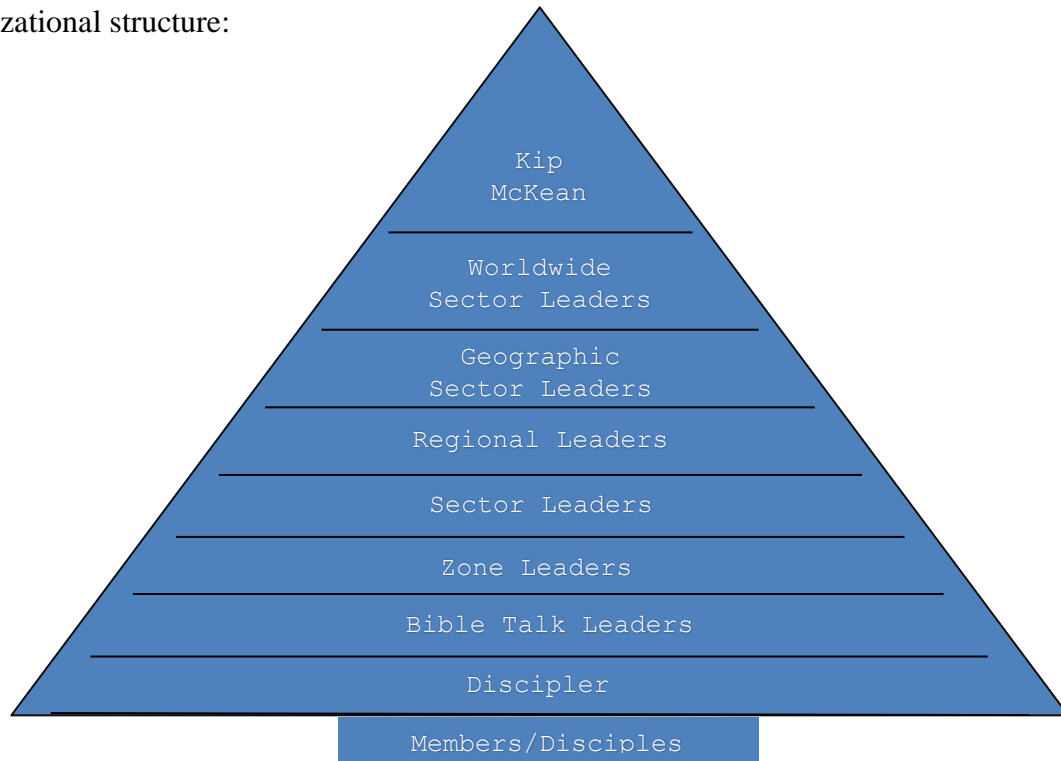
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had to confess our sins (especially sexual sins) in a group setting, and the disciplers (teen leaders) would sometimes confess sins as well. During one such meeting, an adult discipler confessed to a group of four or five boys that he had had a wet 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."

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

2 40. 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 41. 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 42. 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
23 heaven in the afterlife. Conversely, non-members will not go to heaven because they are not “true
24 disciples.” That doctrine engendered an insider-outsider mindset, which allowed scores of sexual
25 predators within the churches to abuse children without fear of criminal prosecution.

26 43. 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
28 marriages, which ultimately gives it an incredible degree of control—and power—over each of its

1 members.

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

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

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

21 47. It is commonly understood that McKean was acutely aware of the physical,
22 psychological, and sexual abuses that church leaders (like Chuck Lucas and others) wrought upon
23 both children and adult parishioners of the church. Academic writings, journals, recovered
24 correspondence, newspaper articles, eyewitness accounts, and publications like the book Toxic
25 Christianity—written by former ICOC leading members under the collective pseudonym “Mr.

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1 X”⁵—corroborate that fact. These are but a fraction of the litany of sources of information depicting
2 the practices and abuses that the ICOC institutionalized to the point of normalcy within the church.

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

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

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

25 **E. McKean Grew the ICOC’s Ranks to Feed Its Financial Operation.**

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28 ⁵ 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 51. McKean and other ICOC leaders were obsessed with growing church membership
2 because more members meant more revenue from income tithing and other coerced, uncompensated
3 labor from adults and minors.

4 52. Accordingly, they imposed recruiting quotas on members to help grow their ranks.
5 The ICOC requires all its members to recruit a certain number of new members on regular intervals,
6 as well as to bring visitors to all church events. Tolerating, concealing, and hiding sexual abusers
7 (while at the same time inviting more abusers into the ICOC's ranks) simply became a cost of doing
8 business.

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

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

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

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

1 57. Children were also asked to contribute, including their labor for events like car
2 washes or baby-sitting.

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

5 59. If the tithing budget was not satisfied, the ICOC forced its leaders or “disciplers” to
6 contribute the financial shortfall themselves. Examples of the ICOC’s pattern of coercive tactics to
7 enforce non-consensual tithing include, but are not limited to, the following:

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

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

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

19 d. A former member (who only wishes to go by Tina C.) witnessed Non-
20 Disclosure Agreements being forced upon parishioners, claiming that they could never talk about
21 the true finances of the Defendants despite evidence that ICOC opened offshore accounts containing
22 massive quantities of cash.⁶

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

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26 ⁶ Top leaders of the ICOC put “different ICOC assets and properties in their names” in order shelter and hide those
27 assets “so that the church didn’t specifically own them.” For example, The Bay Area Christian Church listed its address
28 at the 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 61. In furtherance of efforts to protect the church and its primary source of revenue (*i.e.*,
2 its members) at all costs, McKean and the ICOC used psychological manipulation to conceal the
3 incidents of abuse. ICOC members routinely read scripture to discourage “dragging brothers into
4 court.” For example, McKean told members of the ICOC, including the mother of Jane Roe 8, that:

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

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

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

11 “We need to forgive our brothers who sin and realize that they are a
12 new creation in Christ, and give them a chance to make things right.

13 If we report them, it will destroy their lives and hurt the church.”

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

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

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

24 65. Plaintiffs are aware that the ICOC and the ICC have also benefitted from millions in
25 governmental support through SBA loans, authorized under the

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1 Coronavirus Aid, Relief, and Economic Security Act (CARES Act).⁷ Through their abuse of the
2 corporate form and systematic exploitation of their members, the ICOC and the ICC have created
3 literal cash cows built upon layers of lies and deceit.

4 **Here are my charges for the USA Churches:**
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6 1. Call your members to give their stimulus checks ASAP.
7 Americans are known to spend everything in their accounts. The great Chicago Church has called these \$1,200 checks "Manna from Heaven!"
8
9 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.

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

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17 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.

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27 ⁷ During the COVID-19 pandemic, branches of ICOC received 77 Paycheck Protection Program (PPP) loans, totaling
28 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 67. HOPE, a sham charity organization, is one example of a tax-exempt corporation under
2 the ICOC’s and the ICC’s corporate umbrellas. HOPE has generated over \$100 million in revenue
3 over the last six years. It continues to generate a substantial share of its tax-free revenue from its
4 members using substantially similar methods of the ICOC and the ICC, which are characterized by
5 the tax-deductible contributions from third-party corporations and high-net-worth individuals.

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

7 68. The ICOC’s children’s ministry, named the “Kids Kingdom,” further insinuated the
8 ICOC into the lives of its members and their children.

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

12 70. Those policies, practices, and norms allowed the ICOC and its Kids Kingdom, in
13 particular, to become fertile grounds for sexual predators. Countless instances of abuse happened
14 within the Kids Kingdom ministries themselves, during its hosted mission trips (*e.g.*, HOPE
15 Worldwide trips), and other related religious and social events.

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

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

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

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1 73. 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:



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21 74. 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 75. 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 76. 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 77. 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
6 danger arises primarily because the church insidiously masquerades as the approachable 'church
7 next-door' with deeply rooted Biblical foundations. On its face, this public image of the church
8 seems innocent. But the church's internal machinations are characterized by unmitigated systemic
9 and chronic physical and sexual abuse of children and women within the church.

10 78. 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*,⁸ she made the following
14 comments regarding the ICOC based on her personal experience: "Women [in the ICOC] are getting
15 ground up, and I mean tons of people, it's not an isolated case here and there . . . And I think about
16 these women now, after all these years . . . So I'm gonna bring up something here. . . . There has
17 been sexual abuse, there has been emotional abuse, and there has been some physical abuse of
18 women . . . and part of that is the issue of patriarchy. We developed a system and a way that was not
19 safe for women . . . There are women that have been very damaged and ground up by that. The fruit
20 of this is so obvious, how can you miss it? How many women have been told to stay with their
21 physically abusive husbands and how many women have been sexually abused?"

22 b. In a 2022 podcast with Steve Johnson,⁹ another ICOC defector, James Lloyd,
23 explained the irony of Lucas's pedophilia with young men when the ICOC had implemented its own
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26 ⁸ The podcast may be accessed from YouTube from [https://m.youtube.com/watch?v=mqhs4GJ1D-
s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIEhpc2EgbXkgTGlzYSBhbmQgU2hhcmk%3D](https://m.youtube.com/watch?v=mqhs4GJ1D-s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIEhpc2EgbXkgTGlzYSBhbmQgU2hhcmk%3D). The statements begin
27 at the 44:40-minute mark and last for about four minutes.

28 ⁹ 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-IO_S_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:

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

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

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

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

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

5 **1. David Saracino**

6 80. In January 2012, Defendant David Iburg, *a/k/a* David Saracino (“Saracino”), was
7 sentenced to 40 years of hard labor in the State of Louisiana, the maximum sentence, for the **forcible**
8 **rape of a 4-year-old girl in 2004**.¹⁰ The prosecutor, Cynthia Guillory, told the judge that he was
9 among the worst of the worst. Saracino purposefully sought out women with financial problems so
10 he could gain access to their small children, who became his victims. He had charges and convictions
11 in Texas, Utah, and Louisiana, where he received the 40-year sentence.¹¹

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

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

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

23 84. Had the ICOC assisted in his arrest or alerted their congregations, Saracino could not
24 have continued abusing children with reckless abandon. On information and belief, the ICOC
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27 ¹⁰ *State v. Iburg*, 12-2720 (La. 5/17/13), 118 So.3d 372.

28 ¹¹ 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 intentionally, willfully, maliciously, and recklessly knew of his proclivities without warning parents,
2 concealed his whereabouts, and enabled his escape from authorities.

3 **2. Waldo Milla-Guerra**

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

8 **3. Benjamin Samuel Speights**

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

11 87. Speights’ unlawful conduct included forceable participation of a 14-year-old girl to
12 create pornographic videos that he sold.

13 88. In December 2020, Speights was convicted in Arizona in connection with a Class 2
14 felony of sexual exploitation of a minor as part of a negotiated plea deal related to child pornography
15 charges. Speights was a leader in the “Kid’s Kingdom” ministry in the El Segundo South Region of
16 the Los Angeles ICOC church. Several children at this ministry reported his physical abuse, but
17 neither the ICOC nor its ever reported the abuse that those children endured or attempted to prevent
18 future abuses.

19 **4. Nicholas Griffin Lombardi**

20 89. Nicholas Griffin Lombardi is another example of a known pedophile abusing children
21 within the ICOC’s churches. He was a long-standing member of the ICOC, as were his parents.

22 90. On or about November 27, 2022, Lombardi posted on his personal Facebook page “I
23 kind of have a fantasy of fucking a child ha[.]”

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

27 **5. William (Bill) Thomas McLaughlin**

28 92. In approximately August 2011, one ICOC abuser, William (Bill) Thomas

1 McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for various counts
2 of felony sexual assault on a child by a person in a position of trust.¹² He abused approximately ten
3 to fifteen individuals, all of whom were expelled or in some fashion pushed out of the Denver ICOC
4 as punishment for failing to comply with the leaders' commands.

5 **6. Tomotaka Andrews Wilton**

6 93. Tomotaka ("Tom") Andrews Wilton of the Portland, Oregon ICC location raped a
7 child for years.¹³

8 94. Church leaders, including McKean, were acutely aware of the abuse but did nothing
9 to warn anyone regarding this despicable predator's presence.

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

13 **7. Karim Torres**

14 96. Karim Torres was convicted of indecency with a child by contact.

15 97. On information and belief, he is currently a registered sex offender.

16 98. On information and belief, he serves as a Bible talk leader at several Texas ICOC
17 locations. He and his wife are known to frequently visit other ICOC churches as speakers at family
18 retreats.

19 **8. Warren Inman**

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

23 100. He was a worship leader and allowed college students to live in his home, as he
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26 ¹² For more information, see Rhonda Moore, "Denver man sentenced in Douglas County for sex assault on child" *Castle
27 Rock News-Press* (Aug. 16, 2011), last accessed June 13, 2023 from [https://castlerocknewspress.net/stories/denver-man-
28 sentenced-in-douglas-county-for-sex-assault-on-child.117951](https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child.117951).

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

1 regularly had college worship group meetings at his home. Inman has been in and out of prison and
2 was finally arrested for child molestation. On information and belief, the ICOC neglected to report
3 him to the police.

4 **9. Joseph Ursini**

5 101. Joseph Ursini has multiple arrests and has been in and out of the ICOC fellowship
6 over the years. On information and belief, none of the Texas ICOC churches, including the Dallas
7 location, have ever reported Ursini's criminal conduct to the relevant authorities.

8 **10. Luis Miguel Quiroz**

9 102. Luis Miguel Quiroz was the subject of several individuals' reports to ICOC regarding
10 extreme sexual abuse of several minors. However, the church did nothing.
11 He was finally arrested approximately ten years after the reports were made to the church. Luis is
12 the brother of Dr. Carlos Quiroz, an ICOC pediatrician

13 **SPECIFIC ALLEGATIONS**

14 **A. McKean Forms the ICC, A Carbon Copy of the ICOC, to Continue the Abuse**
15 **Enterprise.**

16 103. In or around 2003, McKean formally split from the ICOC, prompted by an internal
17 uprising. He officially formed the ICC in October 2006. Its current membership is believed to
18 include approximately 7,000 individuals

19 104. The ICC encompasses the same guiding principles and culture as the ICOC.

20 105. McKean currently oversees ICC operations from its Los Angeles headquarters
21 church, also known as the City of Angels.

22 106. From its inception, the ICC became a much more effective tool of mass
23 exploitation.¹⁴ McKean vowed to learn from any past incidents of dissent or divisiveness in the
24 ICOC, making sure that such uprisings or challenges to his authority never happened in his new
25 "movement of God".

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28 ¹⁴ Writings from former members and ICOC leaders, in addition to information about the ICOC (and ICC) churches
organizational structure, religious dogma, and their associated analyses can be found at
<http://www.reveal.org/library/psych/stumpk.html>.

1 107. For instance, take the story of Coltin Rohn. A former leader of the ICC, Rohn
2 oversaw the ICC congregation in the Columbus, Ohio. On or about December 24, 2022, Coltin
3 became aware of an ICC letter, sent out to every single person in their ICC church, “marking” him
4 and his wife. He was ultimately fired for publicly voicing concerns surrounding child exploitation.¹⁵

5 108. McKean, the ICC, and its affiliate entities have continued to threaten anyone who
6 speaks out against the church with vexatious legal actions, disfellowship, and/or “marking.”

7 109. Furthermore, McKean continues to use the ICC to generate income. He is so brazen
8 that he publicly admitted to defrauding students by handing out unearned, illegitimate, and meritless
9 doctoral degrees designed to both inflate the importance of its senior members and extract unearned
10 pecuniary gains.

11 **B. The Sexual Abuse of Salud Gonzalez**

12 110. Plaintiff Salud Gonzalez was born in 1992

13 111. Salud’s parents were baptized as members of the ICOC in 1995 when Salud was 3
14 years old.

15 112. Salud’s parents attended church at the Los Angeles location, where Salud was forced
16 to attend the church’s Sunday School program also known as Kid’s Kingdom.

17 113. Salud was systematically and intentionally indoctrinated by ICOC to believe that: only
18 members of ICOC were to be trusted; she must comply with any requests she received from adults;
19 all counseling and/or therapy must occur within the ICOC by its members; and any reports to the
20 authorities, including Child Protective Services, would result in children being taken into foster care
21 custody where she would be raped daily.

22 114. Beginning at the age of 4, Salud was sexually assaulted at the hands of Defendant
23 Fernando Sanchez, the Kid’s Kingdom Teacher at her local ICOC church. He molested her by
24 fondling her under her dress and inserting his fingers into her vagina on numerous occasions. Sanchez

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26 ¹⁵ Coltin also criticized the ICC’s tactic of bullying members to give a specific amount of money to the church. He was
27 deeply concerned about the ICC’s practice of threatening a member’s salvation and standing within the community if
28 they did not give 10-40% of their annual income to the ICC. The New York Daily News stated that “dozens” of former
members of ICOC “call it a destructive sect that is more concerned with drawing in new members and draining their
money than in matters of faith.” One ex-member of ICOC described ICOC as a “pyramid scheme” in which members
“were all giving 10% to 40% of our income.”

1 also baby-sat for Salud, at which time he would bathe her and fondle her genitalia. He would even
2 ask her to “show me your body” after she came out of the bath. The abuse continued for five years.

3 115. When Salud was 9, McKean recruited her parents to start an ICOC church in Portland,
4 Oregon.

5 116. In or about 2004, when Salud was approximately 12 years old and living in Portland,
6 Sanchez contacted Salud by telephone. Salud could no longer keep secret the abuse she endured, and
7 she informed her parents of the sexual abuse Sanchez committed.

8 117. Upon learning of the sexual abuse by Fernando Sanchez, Salud’s father informed
9 ICOC leadership and demanded that they take action. At the minimum, he asked them remove
10 Sanchez from his role at Kid’s Kingdom. The ICOC leadership took no action. Sanchez continued
11 to teach at Kid’s Kingdom—potentially abusing other children.

12 118. In 2007, at the age of 15, Salud moved back to Los Angeles with her parents. By this
13 time, Salud’s parents had left the ICOC and followed McKean to the ICC.

14 119. Salud had begun experiencing serious substance dependency issues. Salud’s parents
15 demanded that she participate in the “Chemical Recovery” rehabilitation program, offered through
16 the ICC.

17 120. ICC leaders Russ and Lana Preston, Omar Valdavinos, and Defendant Selina Ann
18 Boquet (“Selina”) ran the Chemical Recovery program. At the time, Selina was a kindergarten
19 teacher. On information and belief, she is currently employed by a school district in Texas.

20 121. Once Salud enrolled in the “Chemical Recovery” program, Salena was assigned to
21 Salud’s rehabilitation process, despite having no training in substance rehabilitation.

22 122. Instead of assisting Salud with her substance dependency, Selina would supply alcohol
23 to Salud at the “rehab” meetings and then sexually assault her. Specifically, Selina taught Salud “
24 how to be a lesbian.” Selina instructed her on how to do a sexual practice between females known
25 as “scissoring,” where they would join their bodies and rub their vaginas together. Salud has very
26 specific memories of this because she said that Selina was so aggressive and rough with her that Salud
27 would feel raw for days and in pain. Selina would also perform oral sex on her and penetrate her with
28 foreign objects and her fingers.

1 123. In 2008, Selina confessed to her then sister-in-law, Aurora, that she had engaged in
2 sexual activity with Salud. Aurora reported this information to ICC leadership and others, but the
3 ICC took no action against Selina.

4 124. Instead, ICC leadership in Los Angeles met and determined that Salud would be
5 blamed for the sexual abuse committed by Selina, smearing Salud as a “very powerful” 15-year-old
6 seductress. The ICC leaders who made this decision included Michael and Michele Williamson,
7 Michael Kirchner, Tony and Therese Untalan, Tim and Lianne Kernan, and Nick and Denise Bordieri.

8 125. Selina divorced Omar and left the ICC as well. Salud’s father was told by ICC leaders
9 that Salud would have to apologize to the church members for her “affair” with Selina in order to
10 return to the ICC.

11 126. In 2008, Salud’s father learned of the abuse perpetrated by Fernando Sanchez.
12 Although Salud’s family had left the ICOC and moved on the ICC by that time, her father attempted
13 to confront Sanchez, only to discover that Sanchez had moved. Immediately thereafter, Salud’s father
14 confronted Marty Fuqua, the leader of the Los Angeles ICOC, and demanded that action be taken in
15 connection with Fernando Sanchez. In response, Fuqua told Salud’s father, “What do you want me
16 to do about it?”

17 127. In 2009, Salud met fellow ICC leader Defendant Ricardo Gonzalez at a bible talk.
18 After one particular bible talk, held at an ICC church in Orange County, he offered to drive Salud
19 home. He appeared very intent on getting her into the car, so Salud obliged. On the way home, he
20 pulled over to “chat” with her, but then he violently raped her vaginally. Gonzalez was 30 at the time
21 and Salud was 17.

22 128. Gonzalez confessed the rape to Selina’s husband, Omar. On information and belief,
23 the ICC has not taken any action, except to slander her further as a temptress. On information and
24 belief, Gonzalez currently works at the Los Angeles ICC, also known as the Defendant City of Angels
25 church.

26 129. As a direct and proximate result of the abuse, at the hands of ICOC and ICC, and their
27 leadership, Salud suffered and continues to suffer a litany of injuries. Among other injuries, Salud
28 has experienced and will continue to experience for the rest of her life severe pain and suffering,

1 emotional distress, humiliation, mental anguish, loss of enjoyment of life, loss of educational
2 opportunity, loss of wages, loss of income, and loss of future wages. As evidence of the severity of
3 Salud's emotional distress, Salud attempted suicide by hanging herself.

4 **C. The Abuse and Torture of Joana Diaz**

5 130. Joana Diaz ("Joana") is a 29-year-old woman who suffered abuse at both ICOC and
6 ICC when she was a child. She first attended ICOC services in the mid-1990's when she was
7 approximately 3 years old.

8 131. Joana was first groomed by an ICOC member named Defendant Alfredo Alanis
9 ("Alfredo") when she was 9 years old in Montebello, California. Alfredo was, at the time, a man in
10 his late 30s.

11 132. At the time, her mother and father needed childcare for her and her one-year-old
12 brother while Joana's parents attended ICOC events. Alfredo and his wife, Rosy, were in the same
13 ministry as Joana's family in Montebello. Joana's parents decided to allow Rosy to care for the two
14 children, as Rosy had a one-year-old child of her own at the time and she needed the flexibility of
15 working from home.

16 133. Eventually Alfredo and his family moved into the same 4-unit apartment complex as
17 Joana's family and the two families instantly became neighbors. By this time, Joana had come to trust
18 Alfredo and Rosy, as she routinely spent time at their house watching movies and other recreational
19 time with both of them. Alfredo often helped Joana with her homework and school projects when her
20 parents did not have the time to help. Joana preferred being at the Alanis house, as she did not have
21 a good relationship with her mother, and she felt like she received more attention at the Alanis house.

22 134. The first time Joana noticed something that made her feel uncomfortable was when
23 she was 9 years old. She was asked to watch Rosy and Alfredo's son on a Saturday morning while
24 he slept so Rosy could attend Bible study and Alfredo could attend a soccer game. Joana's mother
25 woke her up Saturday morning around 6 a.m. and she went downstairs to the Alanis apartment unit.
26 When she arrived, Rosy had already left.

27 135. Since it was very early and she was still half asleep, Alfredo invited Joana to fall back
28 asleep in his bed. Without thinking, Joana climbed in bed and got under the covers to get comfortable

1 so she could go back to sleep. Suddenly, Alfredo, got into bed with Joana, spooned her, put his leg
2 over her and hugged her tightly. Unsure of how to react, she froze and pretended to be asleep. He
3 spooned her for what felt like an eternity before he finally left for the soccer game. Joana felt
4 something hard behind her, which she now knows, as an adult, was Alfredo's erection.

5 136. In 2004, when Joana was approximately 11 years old, her family moved to Gresham,
6 Oregon to join Kip McKean's new church, ICC. Alfredo, Rosy, and their family also moved to
7 Gresham. Joana recalls numerous instances of Alfredo touching her inappropriately under the guise
8 of an "accident" or "tickling," such as when he would touch or tickle her chest and thighs.

9 137. Around the age of 12, Alfredo's abuse escalated after he moved to Gresham. On
10 information and belief, Alfredo relocated to the same apartment complexes as Joana's family to give
11 him constant access to Joana and continue "grooming" her in the fashion of the ICC's (and ICOC's)
12 grooming culture.

13 138. Alfredo followed Joana everywhere she went. Whenever Alfredo knew she was home
14 alone, he called her to talk on the phone. He repeatedly tried to bait Joana into discussing
15 inappropriate and intimate matters. Joana lied and told Alfredo that her parents told her not to answer
16 the phone while they were not home.. To circumvent this rule, Alfredo told her that she would know
17 it was him calling because he would call and let the phone ring 3 times, hang up and call again. Joana
18 felt like she had no choice but to comply with this adult's instructions. Alfredo tried talking to her on
19 the phone for at least an hour on each call, and he often ended the calls by telling her that he loved
20 her and he forced her to say it back. On some occasions, he invited himself to Joana's family home
21 while her parents were away, under the pretext of having a playdate with his son and Joana's two
22 siblings. Joana hated these "playdates," as they always made her feel extremely unsafe around him.

23 139. Alfredo's pursuit of Joana heightened, as he began knocking on her bedroom window
24 every night to say goodnight. One night, Rosy caught him in this bedtime ritual and she was furious
25 with Alfredo and 12-year-old Joana.

26 140. Alfredo smoothed things over with Rosy, but took additional measures to conceal the
27 nature and extent of his harassment of Joana. One day around her birthday, she was startled awake
28 by his presence in her bedroom. Alfredo said he bought her some birthday gifts and wanted to give

1 them to her privately. While she was opening her gifts, Alfredo boldly asked her if he could kiss her
2 on the lips. After Joana rejected his sexual advance, Alfredo pulled out a Hershey's kiss and pretended
3 that he was referring to that instead of a physical kiss.

4 141. After Alfredo's failed bedroom kiss incident on Jane Roe's 13th birthday, Alfredo
5 began calling Joana by phone more frequently when he knew her parents were not home. On one
6 occasion, he parked his car a couple blocks from the house and jumped the neighbors gate to get to
7 Joana's backyard without his wife noticing. He called Joana and asked her to open the back door for
8 him and she reluctantly acquiesced. Alfredo confessed his love for Joana, forcibly kissed her and
9 savagely molested her in her parent's bedroom (adjacent to the back door). Stunned and scared, Joana
10 froze in terror, as she was confused and did not know how to react or what she should do. After he
11 left, she felt dirty and brushed her teeth aggressively to eliminate all traces of the man who had just
12 done horrible things to her. Joana recalls thinking at the time that she wanted to shower with bleach
13 to clean herself. Like many sexual assault survivors, Joana felt ashamed of what happened, as if she
14 was to blame for Alfredo's despicable abuse. She did not dare tell her parents what happened for fear
15 of being accused of causing the abuse.

16 142. The next day, Alfredo went to Joana's home and acted as though nothing happened
17 the night before. This made Joana sick to her stomach and she treated Alfredo very coldly as a result.

18 143. Two days after the bedroom molestation incident, Alfredo followed Joana to school
19 in his car as she walked on the sidewalk. She tried ignoring him, but he continued following her and
20 asking her to get in his car. Embarrassed because Alfredo was causing a scene in front of other
21 students, she angrily got into his car, Alfredo told Joana that she should skip school and spend the
22 day with him. He offered to take her to the movies and to Olive Garden for lunch, but she declined
23 and said she needed to go to school. Alfredo again confessed his love for Joana. He said he wanted
24 to run away with her. She asked about his wife and son, but Alfredo said they did not matter. Joana
25 declined the offer, jumped out of the car, and ran to her bus stop. Little did Joana know at the time,
26 but when Alfredo proposed "running away together," he actually intended to kidnap Joana and take
27 her away from her family.

28 144. Later that day, while Joana was walking with a friend, that friend pointed out to her

1 that a man was following them in a car and that he was calling Joana's name. Alfredo was the man
2 following the girls home from school. Joana stopped and talked to Alfredo, but she did not get into
3 his car out of sheer fear of her abuser. He told her that his offer to spend the day together was still
4 open. He then told her to get into the car. Joana declined and frantically rushed home as fast as she
5 could, uncertain if he would continue following her or if he was going to abuse her again.

6 145. After years of grooming, Joana was so afraid of Alfredo and his new stalking behavior
7 that she did not go to school for several days after he followed her and her friend home from school.
8 She pretended to go to school so her parents were not alerted, but she left the garage door ajar enough
9 to slide her little body in the crevice and get back inside. She was so frightened and disturbed by
10 Alfredo that she hid under her bed all day until it was time for her to "come back from school," which
11 she faked by going out through the garage and then walking through the front door with her backpack
12 on.

13 146. Thereafter, Joana would pretend to be upset about something, anything, to avoid going
14 to Alfredo's house. This evasive tactic worked for a short time, but Joana's father eventually accused
15 her of being selfish and forced her to make amends with Alfredo's family.

16 147. When she was 13 years old, McKean selected Joana's parents to participate in a
17 mission team back to Los Angeles. Alfredo's family was not chosen.

18 148. By the time Joana was 20 years old, her parents planned to move back to Gresham
19 with Joana and their new 5-year-old daughter. Joana fiercely protested. She finally disclosed myriad
20 harassment and abuse she suffered at Alfredo's hands over the years. She could not have forgiven
21 herself if Alfredo abused her little sister too.

22 149. After learning of the abuse for the first time, Joana's mother was outraged and she
23 immediately contacted her ICC "disciplers," Sal and Patty Velasco, to discuss the matter. Shortly
24 thereafter, Kip and Elena McKean became involved. They offered to have Alfredo call Joana and her
25 family to "apologize," as the only remedy for all the abuse, which the family declined.

26 150. Sal and Patty Velasco told Joana's mother that nothing would be done and there was
27 nothing they could do either, because ICC and McKean had more money and better lawyers than
28 Joana's family could afford, and their family would surely lose the case.

1 and, therefore, lacked the ability to consent to sexual contact with any person, including Defendants.

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

7 160. The conduct of Sanchez, Boquet, Gonzalez, and Alanis as described herein was
8 oppressive, malicious, and despicable in that it was intentional and done in conscious disregard for
9 the rights and safety rights of Plaintiffs, and with the substantial certainty that it would cause
10 Plaintiffs, to suffer humiliation, mental anguish, and emotional and physical distress.

11 161. The conduct of Sanchez, Boquet, Gonzalez, and Alanis as described herein as alleged
12 constitutes malice and oppression under California Civil Code section 3294. Plaintiffs are therefore
13 entitled to the recovery of punitive damages in an amount to be determined by the Court.

14 162. Furthermore, Defendants ICOC, ICC, City of Angels, and McKean (the “Church
15 Leader Defendants”) are vicariously liable and liable under *respondeat superior* because each
16 Defendant knew or should have known that Sanchez, Boquet, Gonzalez, and Alanis were molesting
17 children, including sexually assaulting the minor Plaintiffs.

18 163. The Church Leader Defendants are also liable insofar as they helped Sanchez,
19 Boquet, Gonzalez, and Alanis elude accountability and engaged in a cover up, as the term is defined
20 pursuant to Cal. Civ. Proc. Code § 340.1(b)(2).

21 164. The Church Leader Defendants are liable because they intentionally caused to exist a
22 hierarchical cult-like structure that aided and abetted the access to children and the concealment of
23 sexual abuse of minors, which proximately caused each minor Plaintiff’s injuries at the hands of
24 known-abusers, *i.e.*, Sanchez, Boquet, Gonzalez, and Alanis.

25 **SECOND CLAIM FOR RELIEF**

26 **VIOLATION OF PENAL CODE 647.6(a)(1)**

27 *(Against All Defendants and Does 1-10)*

28 165. Plaintiffs re-allege and incorporate by reference herein each and every allegation

1 contained herein above as though fully set forth and brought in this cause of action.

2 166. California Penal Code § 647.6(a)(1) provides that "[every person who aims or molests
3 any child under 18 years of age shall be punished by a fine not exceeding five thousand dollars
4 (\$5,000), by imprisonment in a county jail not exceeding one year, or by both the fine and
5 imprisonment."

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

8 168. Under California law, victims of childhood sexual abuse are entitled to bring civil
9 actions for violations of Penal Code provisions that prohibit adults from engaging in sexual acts with
10 minors, including Penal Code § 647.6(a)(1). See *Angie M. v. Superior Court*, (1995) 37 6 Cal.App.4th
11 1217, 1224-1225.

12 169. The above-noted actions of Sanchez, Boquet, Gonzalez, and Alanis were the
13 proximate and legal causes of physical, psychological, emotional, and economic damages Plaintiffs
14 have suffered and continues to suffer to this day. It also has resulted in Plaintiffs incurring, and will
15 require Plaintiffs to incur into the future, expenses for medical and psychological treatment, therapy,
16 and counseling.

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

23 171. Defendants ICOC, ICC, City of Angels, and McKean (the "Church Leader
24 Defendants") aided and abetted Sanchez, Boquet, Gonzalez, and Alanis's respective sexual
25 molestation because they knew and/or should have known that Sanchez, Boquet, Gonzalez, and
26 Alanis were molesting the Plaintiffs and would continue to molest the Plaintiffs; the Church Leader
27 Defendants gave them substantial assistance (*e.g.*, in the form of concealment, cover, and social or
28 financial support); the Church Leader Defendants' support was a substantial factor in allowing

1 Sanchez, Boquet, Gonzalez, and Alanis to abuse the minor Plaintiffs unchecked.

2 **THIRD CAUSE OF ACTION**

3 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

4 *(Against All Defendants and Does 1-10)*

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

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

10 174. A reasonable person would not expect or tolerate the sexual assault, molestation, or
11 harassment committed by Sanchez, Boquet, Gonzalez, and Alanis.

12 175. Defendants' conduct exceeded all bounds of that usually tolerated in a civilized
13 community.

14 176. Defendants intended to cause Plaintiffs injury when they sexually assaulted Plaintiffs,
15 manipulated and brainwashed Plaintiffs into silence and actively concealed Plaintiffs' abuse.

16 177. Plaintiffs have suffered severe and/or extreme distress as a result.

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

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

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

1 **FOURTH CAUSE OF ACTION**

2 **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**

3 *(Against ICOC, ICC, Thomas “Kip” McKean, Fernando Sanchez, Selina Ann Boquet, Alfredo*
4 *Alanis and Does 1-10)*

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

7 182. At all times relevant, a special relationship existed among ICOC, ICC, City of Angels,
8 and McKean (the “Church Leader Defendants”) and Sanchez, Boquet, and Alanis, because Sanchez,
9 Boquet, and Alanis were the agents of the Church Leader Defendants, each of whom had the ability
10 to control of the conduct of Sanchez, Boquet, and Alanis, and yet failed to exert it. In doing so, the
11 Church Leader Defendants created a widespread culture of acceptance of the abuse of children, as
12 Defendants collectively brainwashed and manipulated Plaintiffs to remain silent about the abuse.
13 Defendants also actively concealed the abuse to avert discovery by the authorities.

14 183. At all times herein, the Church Leader Defendants, and each of them, negligently
15 supervised, managed, and controlled Sanchez, Boquet, and Alanis in their membership and
16 participation in the ICOC and ICC, and negligently failed to warn Plaintiffs, Plaintiffs’ parents, and
17 other members of the churches of the propensity and risk that Sanchez, Boquet, and Alanis would
18 sexually assault, sexually abuse, and/or molest minor children, a propensity and history of which
19 Defendants (and their agents and employees) had actual notice.

20 184. During the same time period, the Church Leader Defendants were negligent in failing
21 to exercise reasonable care to protect Plaintiffs, and other minors, who were members of, or
22 participants in, activities at the ICC and ICOC, from the risk of sexual assault, sexual abuse and
23 molestation by perpetrators, including Defendants.

24 185. The Church Leader Defendants were further negligent in failing to notify law
25 enforcement and other appropriate authority that Plaintiffs were and/or continued to be a victim of
26 child abuse/assault by Sanchez, Boquet, and Alanis when they learned of this fact. The Church Leader
27 Defendants' failed to report the known and/or reasonably suspected child abuse of Plaintiffs. Instead,
28 they facilitated the continued sexual abuse, sexual assault, sexual harassment, and molestation of

1 Plaintiffs by Sanchez, Boquet, and Alanis.

2 186. Had the Church Leader Defendants satisfied their duty to take reasonable steps to
3 protect Plaintiffs, all minor children, from known and/or foreseeable harm, including sexual assault,
4 including reporting the sexual assault and/or sexual abuse, and molestation to law enforcement, then
5 some or all of the Plaintiffs' injuries would have been avoided.

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

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

18 189. The Church Leader Defendants breached their duties by failing to use reasonable care
19 to protect Plaintiffs from Sanchez, Boquet, and Alanis—the ICOC's and ICC's employees,
20 volunteers, leaders, elders, and rehabilitation recovery program managers.

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

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

1 192. Plaintiffs are informed, believes, and thereupon alleges that the Church Leader
2 Defendants' failure to respond, investigate, terminate Sanchez's, Boquet's, or Alanis's employment,
3 report, or take any other action following Plaintiffs', other minor children's, and Plaintiffs parents'
4 report of sexual assault and/or abuse by Sanchez, Boquet, and Alanis was part of the Church Leader
5 Defendants' concerted effort to cover up and/or hide evidence related to childhood sexual assault of
6 minor children, including Plaintiffs.

7 193. Plaintiffs' damages as a result of Sanchez's, Boquet's, and Alanis's repeated sexual
8 assault, abuse, and molestation of Plaintiffs was a direct result of the Church Defendants' concealment
9 and cover-up. Therefore, Plaintiffs are entitled to treble damages against Defendants pursuant to Code
10 of Civil Procedure section 340.1(b)(2).

11 **FIFTH CAUSE OF ACTION**

12 **NEGLIGENT SUPERVISION OF A MINOR**

13 *(Against All Defendants and Does 1-10)*

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

16 195. Defendants ICOC, ICC, City of Angels, and McKean (the "Church Leader
17 Defendants") were responsible for the care, custody, control, supervision, and protection of the minor
18 children entrusted to them, including Plaintiffs. The Church Leader Defendants had a duty to
19 adequately and properly supervise, monitor, and protect Plaintiffs from known and knowable dangers,
20 such as those posed by Sanchez, Boquet, Gonzalez, and Alanis.

21 196. Sanchez, Boquet, Gonzalez, Alanis, and the Church Leader Defendants each
22 breached their duty to properly and adequately supervise, monitor, and protect Plaintiffs, in part
23 because officers, administrators, agents, and other supervisory employees knew or should have
24 known of the improper behavior of Sanchez, Boquet, Gonzalez, and Alanis, including that minor
25 children, including Plaintiffs, were frequently alone with Sanchez, Boquet, Gonzalez, Alanis
26 without any justification, that Sanchez, Boquet, Gonzalez, and Alanis would frequently touch and
27 sexually abuse minor children, including Plaintiffs at ICOC and ICC church premises, without any
28 justifiable reason for doing so, including when the minor children were by themselves, and

1 Defendants sexually abused, assaulted, and/or molested minor children, including but not limited to
2 Plaintiffs.

3 197. Sanchez, Boquet, Gonzalez, Alanis, and Church Leader Defendants, acting through
4 their administrative and supervisory employees, knew or should have known that Plaintiffs were
5 unattended and unsupervised with Sanchez, Boquet, Gonzalez, and Alanis on numerous occasions,
6 without any justification. It should have been obvious to any officer, agent, administrator, employee,
7 or staff member that there was no reason that neither Plaintiffs, nor any other child, should have been
8 alone with Sanchez, Boquet, Gonzalez, and Alanis. The employees and agents of the Church Leader
9 Defendants instead turned a blind eye to the fact that Sanchez, Boquet, Gonzalez, and Alanis were
10 spending time with minor children, including Plaintiffs, unattended and unsupervised without any
11 investigation into the matter.

12 198. After engaging in grooming activity of Plaintiffs while spending time alone with
13 Plaintiffs, Sanchez, Boquet, Gonzalez, and Alanis started sexually assaulting, sexually abusing,
14 and/or molesting Plaintiffs, including on the Church Defendants' premises and during their church
15 related services. The acts of sexual assaults and abuse occurred while Plaintiffs were left unattended
16 and unsupervised with Plaintiffs.

17 199. Had the Church Leader Defendants adequately and properly supervised, monitored,
18 and protected Plaintiffs, Plaintiffs would not have been harmed, or would not have been harmed to
19 the extent that Plaintiffs were.

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

23 201. Had the Church Leader Defendants, and each of them, adequately performed their
24 duties and responsibilities, then Plaintiffs would not have been subject to the sexual assault, assault
25 and harassment perpetrated by Sanchez, Boquet, Gonzalez, and Alanis.

26 202. Plaintiffs have been severely damaged emotionally and physically, and otherwise, in
27 amounts to be proven at the time of trial, but which exceed the jurisdictional limits of the Superior
28 Court as a direct and legal result of the acts and omissions of Defendants and Church Leader

1 Defendants, and each of them.

2 **SIXTH CAUSE OF ACTION**

3 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL**
4 **CODE SECTION 11165. ET SEP. BASED ON VICARIOUS LIABILITY**

5 *(Against All Defendants and Does 1-10)*

6 203. 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.

8 204. Defendants ICOC, ICC, City of Angels, and McKean (the “Church Leader
9 Defendants”), through their administrators and employees, knew or reasonably suspected that
10 Sanchez, Boquet, Gonzalez, and Alanis had, and/or were, engaged in the sexual assault of children
11 while the children were under their care, custody, and supervision. Each of them thus had a duty to
12 report Sanchez, Boquet, Gonzalez, and Alanis to the appropriate authorities under the California
13 Child Abuse and Neglect Reporting Law. (Penal Code §§ 11164-11174.3, "CANRA".)

14 205. At all times relevant herein and material hereto, Sanchez, Boquet, Gonzalez, and
15 Alanis were employees of the Church Leader Defendants’ churches or affiliates. Boquet was also a
16 school teacher and mandatory reporter. The Church Leader Defendants were responsible for hiring,
17 training, supervising, and retaining Defendants as part of their church and/or rehabilitation programs.
18 The Church Leader Defendants’ staff, employees, and administrators were required to report any
19 suspected child or sexual abuse as part of their duties and responsibilities as employees and/or agents
20 of Defendants and Church Leader Defendants.

21 206. The Church Leader Defendants’ administrators, board members, and employees are
22 mandated reporters under Penal Code section 11165.7.

23 207. Penal Code section 11166(a) states that a mandated reporter shall make a report to an
24 agency whenever he/she, in his/her professional capacity or within the scope of his/her employment,
25 has knowledge of or observes a child whom the mandated reporter knows, or reasonably suspects has
26 been a victim of child abuse or neglect. "Reasonable suspicion" does not require certainty that child
27 abuse or neglect has occurred but looks to if it is objectively reasonable for a person to entertain a
28 suspicion to suspect child abuse or neglect. *See* Penal Code § 11166(a)(l).

1 208. As set forth in this Complaint, the Church Leader Defendants, through their
2 administrators, board members, and employees knew and/or reasonably suspected that children had
3 been sexually assaulted by Sanchez, Boquet, Gonzalez, and Alanis, including at times prior to their
4 sexual assault of Plaintiffs, thus giving rise to a duty to report such conduct under CANRA.

5 209. The Church Leader Defendants, through their administrators, board members, and
6 employees knew that in the absence of the exercise of reasonable diligence, that an undue risk to
7 minors, including the Plaintiffs, existed because Defendants' administrators, board members, and/or
8 employees did not comply with California's mandatory reporting requirements.

9 210. The Church Leader Defendants, through their administrators, board members, and
10 employees, including but not limited to and Church Leader Defendants, failed to report the known
11 and/or reasonably suspected child molestations and assaults, created the risk and danger contemplated
12 by CANRA, and a result, unreasonably and wrongfully exposed Plaintiffs and other minors to sexual
13 molestation and abuse,

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

17 212. As a direct result of all of the Defendants' failure to comply with CANRA's mandatory
18 reporting requirements, through their administrators, board members, and employees, Defendants
19 wrongfully denied the Plaintiffs the intervention of child protection services and constituted a per se
20 breach of Defendants, through their administrators, board members, and employees, duties to
21 Plaintiffs.

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

27 ///

28 ///

1 **SEVENTH CAUSE OF ACTION**

2 **NEGLIGENCE**

3 *(Against All Defendants and Does 1-10)*

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

6 215. Defendants owed a duty of care to the minor Plaintiffs or had a duty to control the
7 conduct of Defendants by way of the special relationship existing between those individuals and
8 Plaintiffs.

9 216. Defendants knew or should have known, reasonably suspected, and/or were otherwise
10 on notice, of the misconduct and sexually predatory behavior of Sanchez, Boquet, Gonzalez, and
11 Alanis directed towards minor children, including Plaintiffs.

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

16 218. As a direct and legal result of Defendants' negligence, Plaintiffs were sexually
17 assaulted, sexually abused, sexually harassed, and assaulted by the Defendants.

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

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

25 **EIGHTH CLAIM FOR RELIEF**

26 **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**

27 *(Against All Defendants and Does 1-10)*

28 221. Plaintiffs re-allege and incorporate by reference herein each and every allegation

1 contained herein above as though fully set forth and brought in this cause of action.

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

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

9 224. As alleged herein, Plaintiffs the victim of sexual battery as a minor perpetrated by
10 Sanchez, Boquet, Gonzalez, and Alanis. Sanchez, Boquet, Gonzalez, and Alanis subjected Plaintiffs
11 to this sexual battery while Plaintiffs were minors.

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

16 226. Plaintiffs were minors when Sanchez, Boquet, Gonzalez, and Alanis sexually
17 battered them.

18 227. Each Defendant knowingly conspired and/or aided and abetted to create conditions of
19 coercion and control that allowed Plaintiffs to be repeatedly subjected to private, egregiously
20 offensive sexual contact with Sanchez, Boquet, Gonzalez, and Alanis, all in furtherance of McKean's,
21 the ICOC's, and the ICC's parishioner enterprise.

22 228. The sexual battery of Plaintiffs by Sanchez, Boquet, Gonzalez, and Alanis was the
23 result of Defendants' collective cover up, as statutorily defined by California Code of Civil Procedure
24 § 340.1(b).

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

27 230. The aforementioned conduct was willful, wanton, and malicious. At all relevant
28 times, Defendants acted with conscious disregard of Plaintiffs' rights and safety as a minor in their

1 care. Defendants also acted with the knowledge of or with reckless disregard for the fact that their
2 conduct was certain to cause injury and/or humiliation to Plaintiffs.

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

6 **NINTH CLAIM FOR RELIEF**

7 **GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4**

8 *(Against Defendants and Does 1-10)*

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

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

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

18 235. As alleged herein, Plaintiffs were the victims of multiple instances of sexual battery
19 as minors, perpetrated by Sanchez, Boquet, Gonzalez, and Alanis, and facilitated by all Defendants
20 herein. Defendants subjected Plaintiffs to these multiple incidents of sexual battery at the hands of
21 Sanchez, Boquet, Gonzalez, and Alanis while Plaintiffs were minors.

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

25 237. As alleged herein, Plaintiffs were repeatedly the victim of acts of gender violence by
26 Sanchez, Boquet, Gonzalez, and Alanis while they were minors.

27 238. Each Defendant herein knowingly conspired and/or aided and abetted to create
28 conditions of coercion and control that caused Plaintiffs to be repeatedly subjected to private,

1 egregiously offensive sexual contact with Defendants, all in furtherance of committing acts of gender
2 violence against Plaintiffs.

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

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

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

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

14 **PRAYER FOR RELIEF**

15 WHEREFORE Plaintiffs respectfully pray for relief as follows:

- 16 (a) Compensatory and special damages in an amount to be proven at trial;
17 (b) Statutory penalties and liquidated damages according to proof at time of
18 trial;
19 (c) Punitive and exemplary damages in an amount according to proof at the
20 time of trial;
21 (d) Treble damages;
22 (e) Pre- and post- judgment interest;
23 (f) Reasonable attorney's fees and costs; and
24 (g) Such other and further relief as the Court deems just and proper.

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

SAMINI BARIC APC

Date: July 13, 2023

By:  _____

Bobby Samini, Esq.
Nicole C. Prado, Esq.
Ignacio Lazo, Esq.
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