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14 Ruiz*

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County of Los Angeles
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Executive Officer/Clerk of Court,
By J. Nunez, Deputy Clerk

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

12 DARLEEN DIAZ, an individual;
13 BERNICE PEREZ, an individual;
14 DESIREE PEREZ, an individual; JANE
15 ROE 8, an individual; and, ASHLEY
16 RUIZ, an individual,

17 Plaintiffs,

18 v.

19 INTERNATIONAL CHURCHES OF
20 CHRIST, INC., an unincorporated
21 association and former California nonprofit
22 corporation; THOMAS (“KIP”) McKEAN,
23 an individual; ROB KOSBERG, an
24 individual; CONNIE KOSBERG, an
25 individual; STEVE GANSERT-MORICI,
26 an individual; JACQUELINE GANSERT-
27 MORICI, an individual; DAVID
28 SARACINO, an individual; CHRIS DEL
ROSARIO, an individual; BRUCE
WILLIAMS, an individual; ROBIN
WILLIAMS, an individual; and DOES 1
through 10, inclusive,

Defendants.

Case No. **23STCV16423**

COMPLAINT FOR:

1. **SEXUAL ASSAULT OF A MINOR**
2. **VIOLATION OF PENAL CODE § 647.6(a)(1)**
3. **VIOLATION OF PENAL CODE §§ 288(a), (b)(1), (b)(2)**
4. **SEXUAL ASSAULT**
5. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
6. **SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5**
7. **GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4**
8. **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**
9. **NEGLIGENT SUPERVISION OF A MINOR**
10. **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF PENAL CODE SECTION §§ 11165 ET SEQ. BASED ON VICARIOUS**

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LIABILITY
11. NEGLIGENCE
JURY TRIAL DEMANDED

1 Plaintiffs DARLEEN DIAZ, BERNICE PEREZ, DESIREE PEREZ, JANE ROE 8,
2 and ASHLEY RUIZ (collectively, “Plaintiffs”) hereby submit this Complaint, against
3 Defendants INTERNATIONAL CHURCHES OF CHRIST, INC. (the “ICOC”), THOMAS
4 “KIP” McKEAN, ROB KOSBERG, CONNIE KOSBERG, STEVE GANSERT-MORICI,
5 JACQUELINE GANSERT-MORICI, DAVID SARACINO, CHRIS DEL ROSARIO,
6 BRUCE WILLIAMS, ROBIN WILLIAMS, and all other named and unnamed defendants
7 (collectively “Defendants”) and states as follows:

8 INTRODUCTION

9 1. This action is one to recover damages on behalf of adult victims of childhood
10 sexual assault. It governed by California’s Code of Civil Procedure section 340.01 (“section
11 340.01”). It is also an action to recover damages on behalf of adult victims of sexual assault
12 that occurred after the age of majority; to that extent, it is governed by California’s Code of
13 Civil Procedure section 340.16 (“section 340.16”).

14 2. The incidents of adult and childhood sexual assault against Plaintiffs alleged
15 herein were facilitated and actively concealed by Defendants, including while four of the
16 Plaintiffs were minors.

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

1 **JURISDICTION AND VENUE**

2 4. This Court has jurisdiction over Plaintiffs' claims pursuant to § 410.10 of the
3 Code of Civil Procedure. Additionally, this Court has jurisdiction over claims pertaining to
4 Defendant ICOC pursuant to California Code of Civil Procedure § 410.6.

5 5. Venue is proper in this Court because all or substantially all of the events
6 giving rise to the causes of action in this complaint occurred within the State of California,
7 County of Los Angeles.

8 6. Pursuant to California's Code of Civil Procedure § 340.1(a), actions for the
9 recovery of damages suffered as a result of childhood sexual assault shall be commenced
10 within 22 years of the date the plaintiff attains the age of majority or within five years of the
11 date the plaintiff discovers or reasonably should have discovered that psychological injury or
12 illness occurring after the age of majority was caused by the sexual assault, whichever
13 period expires later, for any of the following actions: (1) an action against any person for
14 committing an act of childhood sexual assault; (2) an action for liability against any person
15 or entity who owed a duty of care to the plaintiff, if a wrongful or negligent act by that
16 person or entity was a legal cause of the childhood sexual assault that resulted in the injury
17 to the plaintiff; or, (3) an action for liability against any person or entity if an intentional act
18 by that person or entity was a legal cause of the childhood sexual assault that resulted in the
19 injury to the plaintiff.

20 7. Additionally, pursuant to Code of Civil Procedure § 340.1(q), there is a three
21 (3) year window in which all civil claims of childhood sexual assault are revived if they have
22 not been litigated to finality. This provision provides that, "[n]otwithstanding any other
23 provision of law, any claim for damages described in paragraphs (1) through (3), inclusive,
24 of subdivision (a) that has not been litigated to finality and that would otherwise be barred as
25 of January 1, 2020, because the applicable statute of limitations, claim presentation deadline,
26 or any other time limit had expired, is revived, and these claims may be commenced within
27 three years of January 1, 2020. A plaintiff shall have the later of the three-year time period
28 under this subdivision or the time period under subdivision (a) as amended by the act that
29 added this subdivision." The claims herein have not been previously litigated to finality; thus,
30 they are timely under the revised provisions of Code of Civil Procedure §340.1(q).

1 8. Damages exceed the jurisdictional amount of \$25,000. Accordingly,
2 jurisdiction and venue is proper in this Court.

3 **THE PARTIES**

4 **A. Plaintiffs**

5 9. Plaintiff Darleen Diaz (“Plaintiff Darleen” or “Darleen”) is a citizen and
6 resident of Los Angeles, California. Plaintiff Darleen was a minor, citizen of the United States
7 of America, and resident of the State of California at the time that she first became a victim
8 and survivor of Defendants’ sexual abuse and trafficking.

9 10. Plaintiff Bernice Perez (“Plaintiff Bernice” or “Bernice”) is a citizen and
10 resident of Los Angeles, California. Plaintiff Bernice was a minor, citizen of the United States
11 of America, and resident of the State of California at the time that she first became a victim
12 and survivor of Defendants’ sexual abuse and trafficking.

13 11. Plaintiff Desiree Perez (“Plaintiff Desiree” or “Desiree”) is 49-year-old citizen
14 and resident of California. Desiree was a citizen of the United States of America, and resident
15 of the State of California when she first became a victim and survivor of Defendants’ sexual
16 abuse. She is a former member of the Los Angeles East Region ICOC.

17 12. Plaintiff Jane Roe 8 is a 29-year-old female citizen and resident of Los Angeles,
18 California. Jane Roe 8 was a minor, a citizen of the United States of America, and a resident
19 of California when she first became a victim and survivor of Defendants’ sexual abuse and
20 trafficking.

21 13. Plaintiff Ashley Ruiz (“Plaintiff Ashley” or “Ashley”) is a citizen and resident
22 of Los Angeles, California. Plaintiff Ashley was a minor, citizen of the United States of
23 America, and resident of the State of California at the time that she first became a victim and
24 survivor of Defendants’ sexual abuse and trafficking.

25 **B. Defendants**

26 14. Defendant International Churches of Christ, Inc. was a religious non-profit
27 corporation organized and existing under and by virtue of the laws of the State of California
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1 that dissolved in 2010.¹ On information and belief, the ICOC now operates as an
2 unincorporated association with its nerve center and leadership centralized in its churches
3 located in the County of Los Angeles. The ICOC purposefully conducts substantial religious
4 and affiliated programs and activities in the County of Los Angeles. The ICOC has
5 ecclesiastical, governmental, and administrative authority over the business and conduct of
6 all locations worldwide. This authority includes, but is not limited to, the selection of
7 ministers, the direction of liturgical interpretation, the collection of tithings and additional
8 funds, and the issuance of behavioral and commercial directives for members worldwide.

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

17 16. Defendant Chris Del Rosario (“Del Rosario”), upon information and belief, is
18 a United States citizen residing in California. At all times relevant to the events that form
19 the basis of this Complaint, Del Rosario was a United States citizen residing in California.

20 17. Defendant David Saracino (“Saracino”), upon information and belief, is
21 currently residing in Louisiana in a state penitentiary. At all times relevant to the events that
22 form the basis of this Complaint, Saracino was a resident of California, a member of the
23 ICOC in Los Angeles and Escondido, and a volunteer worker at the ICOC’s Kids Kingdom
24 children’s ministry.

25 18. Defendant Steve Gansert-Morici upon information and belief, is a United States
26 citizen, currently residing in Manhattan Beach, California. At all times relevant to the events
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28 ¹ On information and belief, the individuals who undersigned the dissolution—James Blough, David Malutinok, Jaime
29 DeAnda, and Tom McCurry—were the administrators and/or board members of the ICOC at the time of dissolution of
30 the ICOC’s formal entity. On information and belief, at all relevant times, James Blough was a resident of Lowell,
Massachusetts; David Malutinok was a resident of Marietta, Georgia; Jamie DeAnda was a resident of Irvine,
California; and Tom Curry was a resident of Pasadena, California.

1 that form the basis of this Complaint, Steve Gansert-Morici was a leader of the East Region
2 Los Angeles ICOC. Steve Gansert-Morici's active concealment of Jane Roe 8's abuse, along
3 with his supervision, direction, and control over Defendants forms the basis of her personal
4 liability. Steve Gansert-Morici is currently a lead evangelist with the South Bay ICOC.

5 19. Defendant Jacqueline Gansert-Morici upon information and belief, is a United
6 States citizen, currently residing in Manhattan Beach, California. She is the wife of Defendant
7 Steve Gansert-Morici. At all times relevant to the events that form the basis of this Complaint,
8 Jacqueline Gansert-Morici was a leader of the East Region Los Angeles ICOC. Jacqueline
9 Gansert-Morici's active concealment of Jane Roe 8's abuse, along with her supervision,
10 direction, and control over Defendants forms the basis of her personal liability. Jacqueline
11 Gansert-Morici is currently a lead evangelist with the South Bay ICOC.

12 20. Defendant Rob Kosberg, upon information and belief, is a United States
13 citizen residing in California. He served as a leader of the East Region ICOC church. His
14 authority, supervision, direction, and control over the East Region ICOC and his acts and
15 omissions regarding Saracino's and Del Rosario's abuse form the basis of his personal
16 liability.

17 21. Defendants Connie Kosberg, upon information and belief, is a United States
18 citizen residing in California. She served as a leader of the East Region ICOC church. Her
19 authority, supervision, direction, and control over the East Region ICOC and her acts and
20 omissions regarding Saracino's and Del Rosario's abuse form the basis of her personal
21 liability.

22 22. Defendant Bruce Williams upon information and belief, is a United States
23 citizen, currently residing in Denver, Colorado. At all times relevant to the events that form
24 the basis of this Complaint, Bruce Williams was an overseeing Elder of the East Region Los
25 Angeles ICOC. Bruce Williams's active concealment of Jane Roe 8's abuse, along with his
26 supervision, direction, and control over Defendants forms the basis of his personal liability.
27 On information and belief, Bruce Williams is retired but still retains a paid role with ICOC.

28 23. Defendant Robin Williams upon information and belief, is a United States
29 citizen, currently residing in Denver, Colorado. She is the wife of Defendant Bruce
30 Williams. At all times relevant to the events that form the basis of this Complaint, Robin

1 Williams was an overseeing Elder of the East Region Los Angeles ICOC. Robin Williams's
2 active concealment of Jane Roe 8's abuse, along with her supervision, direction, and control
3 over Defendants forms the basis of her personal liability.

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

12 25. The actions and inactions of Defendants and each of them were done with
13 conscious and reckless disregard of the rights and safety of others, including Plaintiff.
14 Defendants, and each of them, were guilty of malice, fraud and oppression as defined in
15 California Civil Code section 3294, and Plaintiff should recover from Defendants, in
16 addition to actual damages, punitive damages to make an example of and punish defendants.

17 **GENERAL ALLEGATIONS**

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

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

22 27. Around that time in Boston, McKean founded what would become the ICOC
23 under the moniker of the “Boston Movement.” McKean founded the Boston Movement with
24 29 other members, who seceded from the Church of Christ based out of Gainesville, Florida.
25 The fledgling “church” quickly grew, rabidly seeking out new members and enjoying
26 considerable expansion and success. After the Boston Movement obtained religious
27 recognition in the 1980s, it became the ICOC and grew into a multinational movement.

28 28. Over time, the ICOC morphed into an intricate and intentionally confusing
29 “network of over 700 non-denominational churches in about 150 countries.” Throughout its
30 history, the ICOC has gone by other names, including the Boston Movement, the Discipling

1 Movement, the Crossroads Movement, and Multiplying Ministries. Local ICOC churches or
2 assemblies would often append the name of their city, in which they were located, to their
3 name, *e.g.*, the Milwaukee Church of Christ or the Sarajevo Church of Christ.

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

10 30. Chuck Lucas, one of the original founding ministers with Kip in Florida, was
11 eventually paid off to leave the group because of his deviant behavior. Early on, the ICOC
12 and McKean strategically downplayed Lucas’s pattern of abuse by labeling his conduct as
13 “recurring sins.” Sadly enough, those “recurring sins” were never investigated by ICOC.
14 McKean and other ICOC leaders were acutely aware of Lucas’s disturbing pattern of abuse,
15 but nevertheless, they actively concealed Lucas’s misdeeds to avert discovery by the police
16 or church members. Covering up for Lucas became the blueprint for the ICOC moving
17 forward, integrating coverups and concealment into its organizational DNA.

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

26 _____
27 ² Between April 2020 and February 2021, eighteen branches of the ICC received Paycheck Protection Program (PPP)
28 loans. These loans totaled \$287,490, and a total of \$290,040 was forgiven, including accrued interest.

29 ³ Churches associated with the ICOC appeared to be incorporated into separate entities, according to a review of public
30 records. For instance, the Los Angeles International Church (LAICC), the largest ICOC church by membership, was
incorporated in California in December 1990, according to corporate records with the California Secretary of State. The

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

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

9 33. The ICOC was born out of a “disciplining” movement that arose among the
10 Churches of Christ during the 1970s. The ICOC has maintained this practice into present
11 times. It is a strict practice involving a “discipleship hierarchy” centered around a formal
12 discipleship tree—in other words, a top-down authoritarian hierarchy.

13 34. McKean co-designed the specific disciplining pyramid that would later become
14 the foundational structure of both the ICOC and the ICC as organizations. That pyramid
15 structure served as the mechanism of control and coercion frequently exerted over their
16 members.⁴

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

19 36. This carefully crafted “discipleship tree” was nothing short of a sophisticated
20 scheme, deeply rooted in psychological manipulation, accomplished by institutionally
21 normalizing the use of aggressive, abusive, and coercive tactics that brainwash members into
22 fearing the loss of salvation for menial transgressions. It allowed the ICOC and ICC to
23 execute and maintain considerable control over every aspect of every member’s life.
24 Members became systematically deindividualized, only to endure communal isolation from
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26 Los Angeles International Church (LAICC) described its structure on its website, noting that it is “organized into eight
27 self-supported regions.” “Each regional evangelist has been given the charge of equipping the brothers and sisters in his
28 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.”

29 ⁴ Flavil R Yeakley Jr. documented the “disciplining” movement in a book titled *The Disciplining Dilemma*. The ICOC
30 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 the world at large.

2 37. Only those members named as “disciplers” were allowed to provide any
3 counseling to church members. Abuses were reported only to the “disciplers.” ICOC church
4 members and leadership discouraged reporting those abuses to outside authorities by
5 routinely branding abuse victims as “disobedient” and blaming them for the abuse they
6 suffered. Many incidents, which could have reported, therefore never were.

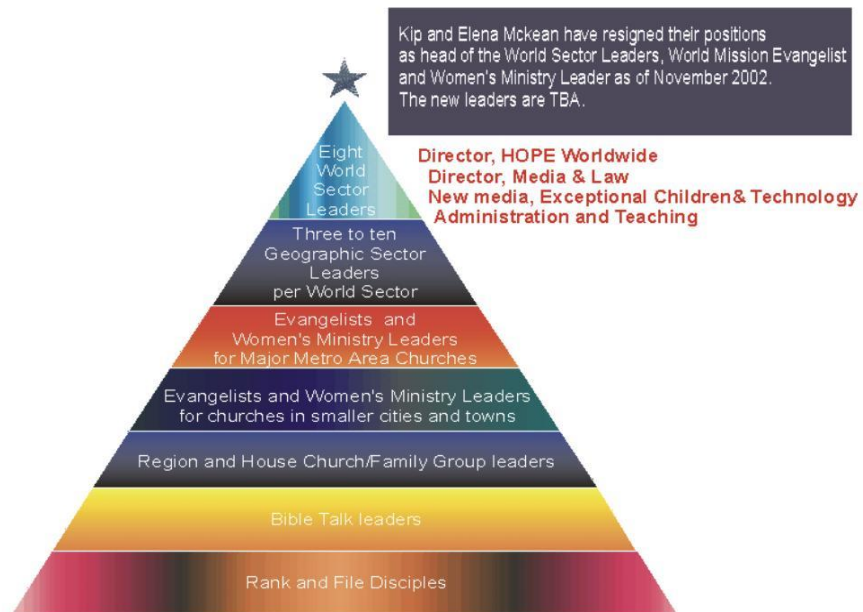
7 38. McKean and the ICOC created a religious practice that required victims to
8 confess their “sins” daily. “Disciplers” would then share the specifics of those “sins” with
9 other groups and leaders to reinforce their control over the victim. This pattern of practice
10 allowed McKean and the ICOC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

12 39. An illustration of the ICOC’s hierarchical model of authority is depicted
13 below:

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



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

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

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

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

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

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

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

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

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

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

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

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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

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

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

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

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

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

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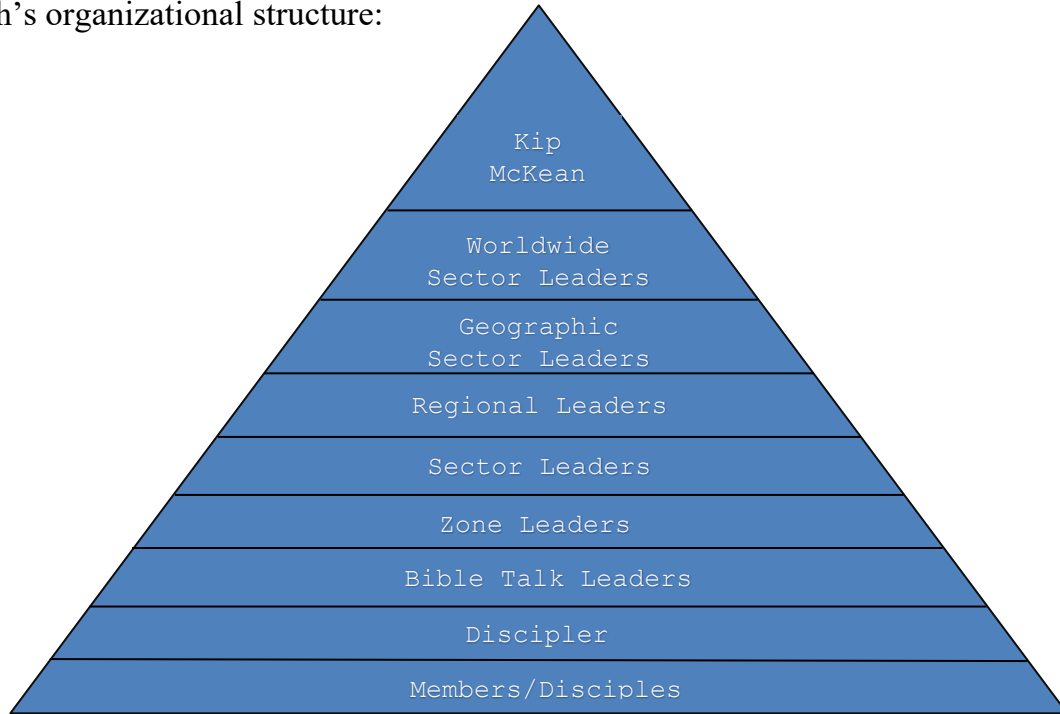
where we had to confess our sins (especially sexual sins) in a group setting, and the disciplers (teen leaders) would sometimes confess sins as well. During one such meeting, an adult discipler confessed to a group of four or five boys that he had had a wet dream (nocturnal emission) that week, and in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

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

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

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



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

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

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

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

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

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

22 52. It is commonly understood that McKean was acutely aware of the physical,
23 psychological, and sexual abuses that church leaders (like Chuck Lucas and others) wrought
24 upon both children and adult parishioners of the church. Academic writings, journals,
25 recovered correspondence, newspaper articles, eyewitness accounts, and publications like
26 the book Toxic Christianity—written by former ICOC leading members under the collective
27 pseudonym “Mr. X”⁵—corroborate that fact. These are but a fraction of the litany of sources

28 _____
29 ⁵ It is widely believed that Rick Bauer, a former ICOC member and whistleblower, co-published with another church
30 leader under the pseudonym “Mr. X” and can be accessed in its entirety here:
<http://www.reveal.org/library/theology/Toxic.pdf>

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

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

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

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

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

28 56. McKean and other ICOC leaders were obsessed with growing church
29 membership because more members meant more revenue from income tithing and other
30 coerced, uncompensated labor from adults and minors.

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

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

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

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

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

28 62. Children were also asked to contribute, including their labor for events like car
29 washes or baby-sitting.

30 63. On information and belief, the ICOC has collected upwards of \$10 to \$15

1 billion in tax free contributions over the past four decades.

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

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

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

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

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

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

25 66. In furtherance of efforts to protect the church and its primary source of revenue
26

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

5 “We cannot report these abuses, because it would hurt our
6 church, 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
10 important than the sin or the pain of a few individuals.”

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

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

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

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

26 70. Plaintiffs are aware that the ICOC and the ICC have also benefitted from
27 millions in governmental support through SBA loans, authorized under the Coronavirus Aid,
28
29
30

1 Relief, and Economic Security Act (CARES Act).⁷ Through their abuse of the corporate
2 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 71. McKean actively solicited church members to turn over their COVID-19 relief
5 money to the church. The following are excerpts of emails from McKean to various church
6 elders and leaders:

7
8 **Here are my charges for the USA Churches:**
9
10 1. Call your members to give their
11 stimulus checks ASAP.
12 Americans are known to spend
13 everything in their accounts. The
14 great Chicago Church has called
15 these \$1,200 checks "Manna
16 from Heaven!"
17
18 Presently, all around the world, if a
19 member misses 2 or 3 weeks –
20 usually recognized by missing 2
21 or 3 weeks of weekly contribution
22 – this is a red flag that they may
23 have become unfaithful. (There of
24 course are always exceptions.) It
25 is a fact that almost every USA
26 Disciple has the ability to give
27 online. So discipling in the COVID-
28 19 Era must include how to give
29 one's weekly contribution online.

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

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

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

26 73. The ICOC built a culture of child grooming. Children were taught from a very
27 young age to "obey" their ICOC elders or face corporal punishment. The ICOC indoctrinated

29 ⁷ During the COVID-19 pandemic, branches of ICOC received 77 Paycheck Protection Program (PPP) loans, totaling
30 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 the children under its control to therefore obey adults and authority figures unquestioningly.
2 74. Those policies, practices, and norms allowed the ICOC and its Kids Kingdom,
3 in particular, to become fertile grounds for sexual predators. Countless instances of abuse
4 happened within the Kids Kingdom ministries themselves, during its hosted mission trips
5 (e.g., HOPE Worldwide trips), and other related religious and social events.

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

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

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

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



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

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

29 79. McKean and his team of capable, well-educated henchmen convinced nearly
30 everyone within his churches to remain silent for the last 43 years. That silence has come to

1 an end.

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

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

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

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

24 b. In a 2022 podcast with Steve Johnson,⁹ another ICOC defector, James
25 Lloyd, explained the irony of Lucas's pedophilia with young men when the ICOC had
26

27 ⁸ The podcast may be accessed from YouTube from [https://m.youtube.com/watch?v=mqhs4GJ1D-](https://m.youtube.com/watch?v=mqhs4GJ1D-s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIExp2EgbXkgTGlzYSBhbmQgU2hhcmk%3D)
28 [s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIExp2EgbXkgTGlzYSBhbmQgU2hhcmk%3D](https://m.youtube.com/watch?v=mqhs4GJ1D-s&pp=ygUsU3RldmVuIGxlc2xpZSBqb2huc29uIExp2EgbXkgTGlzYSBhbmQgU2hhcmk%3D). The statements begin
at the 44:40-minute mark and last for about four minutes.

29 ⁹ The podcast may be accessed from Facebook at [https://www.facebook.com/watch/live/?extid=CL-UNK-UNK-UNK-](https://www.facebook.com/watch/live/?extid=CL-UNK-UNK-UNK-IO5_GK0T-GK1C&mibextid=2Rb1fB&ref=watch_permalink&v=1109647602942209)
30 [IO5_GK0T-GK1C&mibextid=2Rb1fB&ref=watch_permalink&v=1109647602942209](https://www.facebook.com/watch/live/?extid=CL-UNK-UNK-UNK-IO5_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 implemented its own a LGBTQ+ conversion therapy ministry:
2

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

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

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

27
28 **I. The ICOC and the ICC Refused to Report Numerous Pedophiles Who Were**
29 **Later Arrested.**

30 83. At least ten pedophiles have been arrested in connection with abuses linked to

1 the ICOC or ICC. Described below, these individuals committed numerous crimes before the
2 police intervened. On information and belief, they represent only miniscule fraction of the
3 true number of predators who have operated with impunity within the ICOC since 1979.

4 **1. David Saracino**

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

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

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

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

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

27
28 ¹⁰ *State v. Iburg*, 12-2720 (La. 5/17/13), 118 So.3d 372.

29 ¹¹ For more information, see Theresa Schmidt, *Prosecutor to child rapist: You’re the worst of the worst*, KPLC News
30 (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 **2. Waldo Milla-Guerra**

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

7 **3. Benjamin Samuel Speights**

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

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

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

18 **4. Nicholas Griffin Lombardi**

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

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

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

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

28 96. In approximately August 2011, one ICOC abuser, William (Bill) Thomas
29 McLaughlin, was sentenced to 6 years to life, followed by 10 years to life of parole for various
30

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

4 **6. Tomotaka Andrews Wilton**

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

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

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

12 **7. Karim Torres**

13 100. Karim Torres was convicted of indecency with a child by contact.

14 101. On information and belief, he is currently a registered sex offender.

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

18 **8. Warren Inman**

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

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

26
27 ¹² For more information, see Rhonda Moore, "Denver man sentenced in Douglas County for sex assault on child" *Castle*
28 *Rock News-Press* (Aug. 16, 2011), last accessed June 13, 2023 from <https://castlerocknewspress.net/stories/denver-man-sentenced-in-douglas-county-for-sex-assault-on-child,117951>.

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

1 **9. Joseph Ursini**

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

6 **10. Luis Miguel Quiroz**

7 106. Luis Miguel Quiroz was the subject of several individuals' reports to ICOC
8 regarding extreme sexual abuse of several minors. However, the church did nothing.

9 107. He was finally arrested approximately ten years after the reports were made to
10 the church. Luis is the brother of Dr. Carlos Quiroz, an ICOC pediatrician.

11 **SPECIFIC ALLEGATIONS**

12 **A. The Childhood Abuse of Plaintiff Bernice Perez**

13 108. Bernice Perez was born in November 1991 in California. Her mother is Desiree
14 Perez, and her sister is Darleen Diaz.

15 109. In the mid-1990s, Desiree's sister invited her to the East Region of the ICOC
16 church. Desiree, Bernice, and Darleen (Desiree's oldest daughter) began attending the East
17 Region ICOC congregation located in Los Angeles County.

18 110. At a very young age, Bernice was systematically and intentionally indoctrinated
19 by the ICOC to believe the following: only members of ICOC were to be trusted; she must
20 comply with any requests she received from adults; all medical treatment must occur within
21 the ICOC by its members; and if she made any reports to the authorities, including Child
22 Protective Services, her actions would result in Bernice being taken into foster care custody
23 where she would be raped daily.

24 111. From 1998 to 1999, Defendant David Saracino, a member of the ICOC,
25 sexually abused Bernice on numerous occasions by fondling her genitals, when Bernice was
26 about 7 to 8 years old. This abuse occurred at Saracino's house and on at least one occasion
27 in the backseat of a car.

28 112. As a direct and proximate result of Saracino's abuse, enabled by the ICOC and
29 its leadership, Bernice suffered and continues to suffer a litany of injuries. Among other
30 injuries, Bernice has experienced and will continue to experience for the rest of her life severe

1 pain and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life,
2 loss of educational opportunity, loss of wages, loss of income, and loss of future wages.

3 **B. The Childhood Abuse of Plaintiff Darleen Diaz**

4 113. Darleen Diaz was born on August 9, 1989, in California. Darleen is the older
5 sister of Bernice Diaz, mentioned above.

6 114. At only 9 years old, Darleen was sexually abused by David Saracino. From
7 1998 through 1999, Saracino routinely invited Darleen, her sister Bernice, and other young
8 girls to his home, which he shared with other male church members from the ICOC. Saracino
9 convinced the girls to go swimming in his pool, which was merely an excuse for the girls to
10 get undressed. He told the girls that they needed a bath, and he used that opportunity to
11 heavily fondle their naked bodies while they were bathing.

12 115. Similar to Bernice, Darleen was systematically and intentionally indoctrinated
13 by ICOC to believe that: only members of ICOC were to be trusted; she must comply with
14 any requests she received from adults; all medical treatment must occur within the ICOC by
15 its members; and any reports to the authorities, including Child Protective Services, would
16 result in Darleen being taken into foster care custody where she would be raped daily.

17 116. As with many children who suffered childhood sexual abuse, Darleen's internal
18 defense mechanisms repressed the abuse and as a result, discovery of the abuse was delayed
19 until Darleen reached middle school. In addition, as the eldest child, Darleen wanted to be the
20 "strong one" for her sister and took extra abuse from David Saracino to protect her sister.

21 117. One time in particular, Darleen laid on top of Bernice in the backseat of the car,
22 to try to protect her sister like a human shield, while Saracino attempted to sexually assault
23 Bernice. Saracino nevertheless managed to take Darleen's pants off and then fondle both
24 Darleen and Bernice, penetrating their vaginas with his fingers.

25 118. On other occasions, Saracino would forcefully perform oral sex on Darleen.

26 119. Darleen suffered in silence because she wanted her sister Bernice to receive all
27 of the counseling and help she needed. She did not want to take anything away from Bernice,
28 so she initially denied the sexual abuse.

29 120. In or about 1999, Desiree's friend advised her that her son had been a victim of
30 abuse. That conversation prompted Desiree to then ask her own children if they had been

1 victimized, too. When Desiree asked Bernice if she was abused, she learned that Saracino had
2 in fact sexually abused her daughter Bernice. When Desiree approached Darleen about the
3 same issue, Darleen herself initially denied experiencing any abuse. It was not until age 13
4 that Darleen told Bernice about the sexual abuse she suffered.

5 121. After an incident triggered Darleen during her early teen years, Darleen felt
6 compelled to disclose the abuse to her mother, too. Subsequently, Darleen tried to commit
7 suicide in her early teens by trying to jump out of the car on the freeway.

8 122. As a direct and proximate result of Saracino's abuse, enabled by the ICOC and
9 its leadership, Darleen suffered and continues to suffer a litany of injuries. Among other
10 injuries, Darleen has experienced and will continue to experience for the rest of her life severe
11 pain and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment of life,
12 loss of educational opportunity, loss of wages, loss of income, and loss of future wages.

13 **C. The Abuse and Anguish of Desiree Perez.**

14 123. In 1995, Desiree—the mother of Bernice and Darleen—joined the ICOC and
15 was immediately brainwashed by fellow members to believe she needed to be an ICOC
16 member to receive eternal salvation and avert hell.

17 124. Desiree was a single mother and had no support system outside of the church
18 because of ICOC's highly exclusive and indoctrinated community. Saracino fabricated
19 excuses to pick up or drop off Darleen and Bernice to and from school. Saracino often preyed
20 upon single mothers who worked full-time, as he sought to exploit their vulnerabilities by
21 offering to transport and/or babysit their children. Because the ICOC told Desiree that she
22 had to attend ICOC church functions three to four times a week in order to be considered
23 "saved," the ICOC gave Saracino the opportunity to insert himself into the lives of Desiree's
24 daughters. Otherwise, if she did not attend every event, the ICOC leadership would cast her
25 out.

26 125. In or about 1999, Desiree's friend confided in her that her son had been a victim
27 of abuse. That conversation prompted Desiree to ask her own children if they had been
28 victimized, too. When Desiree asked Bernice if she was abused, she learned that Defendant
29 David Saracino, a member of the ICOC, had in fact sexually abused Bernice by fondling her
30 genitals.

1 126. Upon learning of Saracino’s abuse inflicted upon Bernice, Desiree immediately
2 traveled to the East Region ICOC church in the hopes of getting answers, getting help, and
3 exposing Saracino’s abuse. There, she met with Defendants Rob and Connie Kosberg in a
4 room located within the church while service was being held, with Saracino in attendance.

5 127. During this time, Defendants Rob and Connie Kosberg served as leaders of the
6 East Region ICOC. During the time that Desiree’s daughters were being abused by David
7 Saracino, Steve and Jacqueline Gansert-Morici led the East Region ICOC in Los Angeles. On
8 information and belief, the abuse of a different 3-year-old girl by Saracino was reported to
9 Steve and Jacqueline Gansert-Morici and other church leaders approximately eighteen months
10 before Desiree’s daughters were abused. And yet, neither Steve, nor Jacqueline Gansert-
11 Morici, nor ICOC reported this danger to authorities. Worse yet, Steve and Jacqueline
12 Gansert-Morici implored other ICOC members not to report it. As a result, they and the ICOC
13 share culpability for Saracino’s repeated and shameless sexual abuse of innocent girls.

14 128. After Steve and Jacqueline Gansert-Morici left the East Region, Rob and Connie
15 Kosberg became the new leaders.

16 129. When Desiree turned to the ICOC for help regarding Saracino, she met with
17 Rob and Connie Kosberg. Rob and Connie told Desiree they had never heard of any other
18 reports of that nature. Rob and Connie stated that they did not know what to do with the
19 information Desiree brought to them. Rather than contact the police, Rob and Connie
20 Kosberg feigned helplessness to shield the church and its members from police scrutiny.

21 130. Rob and Connie Kosberg repeatedly instructed Desiree to refrain from
22 disclosing the abuse to other members because doing so would damage those members’ faith,
23 create a “struggle,” and encourage them to fall away from God. Crucially, Rob and Connie
24 Kosberg counseled Desiree that she needed to trust Saracino, as he was her “brother” in
25 Christ.

26 131. Rob and Connie Kosberg never warned the congregation about the predator in
27 their midst. On information and belief, they never bothered to inquire if any other children
28 were abused by Saracino, as he was a regular Kids Kingdom worker with access to numerous
29 children.

30 132. Frustrated, Desiree went to confront Saracino at his house, but he had already

1 fled. He relocated to Escondido, CA, to join the San Diego chapter of the ICOC and pursue
2 a romantic relationship with a single mother, who was part of that congregation.

3 133. After filing a police report with the West Covina Police Department, Desiree
4 kept asking Rob Kosberg for help—either to help find and apprehend Saracino, or, at the
5 very least, to get the phone numbers for ICOC leaders in Escondido to warn them and ask
6 for their assistance. Rob Kosberg refused. He stonewalled her during this crucial time,
7 ignoring her, dismissing her, and obstructing her efforts to find Saracino.

8 134. A week or so after Desiree filed the police report, West Covina detectives
9 attempted to find him at his new San Diego address, only to discover that he had fled once
10 again—now with the single mother and her two small children in tow, apparently to elope in
11 Las Vegas.

12 135. On information and belief, Rob Kosberg effected Saracino’s transfer to the
13 Escondido ICOC. His refusal to engage with Desiree was done intentionally to cover up
14 Saracino’s abuse of Bernice and Darleen, in line with the pattern of practice of concealment
15 inherited from Steve and Jacqueline Gansert-Morici, their disciplers Bruce and Robin
16 Williams, and ICOC leadership, *i.e.*, Kip McKean.

17 136. On information and belief, Rob Kosberg and/or other Doe defendants (ICOC
18 leaders) tipped off Saracino to flee Escondido from law enforcement’s pursuit.

19 137. As a direct and proximate result of Saracino’s abuse, enabled by the ICOC, Rob
20 Kosberg, Connie Kosberg, Steve Gansert-Morici, Jacqueline Gansert-Morici, and the ICOC’s
21 leadership, Desiree’s daughters Darleen and Bernice suffered and continues to suffer a litany
22 of injuries. Among other injuries, they have experienced and will continue to experience for
23 the rest of their lives severe pain and suffering, emotional distress, humiliation, mental
24 anguish, loss of enjoyment of life, loss of educational opportunity, loss of wages, loss of
25 income, and loss of future wages.

26 138. Furthermore, as a direct and proximate result of Saracino’s abuse and the
27 ICOC’s coverup, Desiree suffered untold emotional anguish. Word spread within the church
28 regarding the abuse of Desiree’s daughters; the congregation shunned Desiree and her
29 daughters as a result. In a cruel twist of irony, the congregation compounded the damage
30 Saracino already inflicted upon Desiree by treating her like a despicable outcast.

1 139. Approximately five to six months after Desiree discovered the abuse, she felt
2 extremely isolated, except for the comfort and companionship of a single ICOC “brother,”
3 Defendant Chris Del Rosario. Desiree and Chris received “permission to date” from church
4 leadership and did so within the church’s “pure dating” requirements.

5 140. One fateful night, Desiree needed a ride home from work. Chris showed up at
6 her place of work before her 12-hour shift ended, and he insisted on driving her home. Left
7 without any other transportation options, she reluctantly agreed to accept the ride home. Chris
8 dropped her off at home and asked to come inside to use the bathroom—on that pretense that
9 he would not make it home in time to use his restroom. She agreed and asked him to enter
10 from the back door, go straight to the bathroom, and lock the back door when he left.

11 141. After the couple said their goodbyes, Desiree went to her bedroom to change
12 and get ready for bed. All of the sudden, Chris abruptly kicked her bedroom door open.

13 142. Chris was a Karate black belt. He had also mastered other styles of martial arts,
14 so he was physically intimidating to Desiree. When he broke through her bedroom door, he
15 had a demonic look on his face that she had never witnessed before. He violently pushed her
16 onto the bed, all the while Desiree screamed, “STOP IT! GET OUT!” She desperately tried to
17 defend herself, which seemed to enrage Chris even more. She was no match for a Karate black
18 belt. He swiftly put her into “submission locks” using her hands and arms. He angrily told
19 her that if she moved, her wrists would break. In sheer desperation, Desiree cried and pleaded
20 with him to “please stop” to no avail. Chris choked her and taunted her by laughing maniacally
21 while she begged him to stop torturing her. Desiree eventually blacked out while Chris
22 sadistically raped her. After Chris finished, he left Desiree in a state of complete shock.

23 143. After she was raped, Desiree did not return to ICOC. She recalls hearing rumors
24 within the congregation that she was absent from church because she was “weak and
25 struggling.” Eventually, she received a phone call from the Women's Ministry leader at the
26 time, Kimberly Roscoe, asking her to attend a “discipleship” meeting because Chris
27 “confessed” that they were “immoral together.”

28 144. Knowing that the “immoral” conduct was categorically non-consensual,
29 Desiree reluctantly agreed to the meeting because she wanted everyone to know the truth, that
30 Chris had raped her. To her surprise and dismay, Desiree was horrified that not only was

1 Kimberly Roscoe’s husband John in attendance, but so was Chris.

2 145. Desiree bluntly told Kimberly and John that Chris raped her; however, they did
3 not believe her. Desiree insisted that she had been raped, which prompted Kimberly and John
4 to begin asking her a litany of revolting and humiliating questions. They asked her disgusting
5 questions like: “Did you get wet? Because if you did that means you enjoyed it!” They went
6 so far as to aggressively ask her if she had "an orgasm!?"

7 146. As the sickening questions continued, Desiree ended the conversation and got
8 up to leave. On the way out, John Roscoe arrogantly told her that she needed to “repent”
9 because she was “prideful.” The ICOC and its members treated women, like Desiree, as
10 second-class members, victim-shaming them and coercing them into silence by the church’s
11 repeated directive to “support and forgive the brothers.”

12 147. On one occasion, a female member told Desiree in a matter-of-fact manner, “it’s
13 always the woman’s fault because we seduce the men to fall into sin.” This particular
14 conversation was profoundly triggering and traumatizing for Desiree in light of her own rape
15 and the sexual abuse of her young children. These types of conversations were typical within
16 the ICOC; they made Desiree feel worthless and insignificant.

17 148. Desiree quickly realized that, although she had not personally disclosed her
18 rape or her daughters’ abuse throughout the church, numerous individuals knew what
19 happened and did nothing but gossip about it.

20 149. Since defecting from ICOC over 12 years ago, Desiree and her daughters have
21 suffered from PTSD. They have spent an enormous amount of time in therapy as a result of
22 the torture they suffered. Indeed, as a direct and proximate result of the abuse, at the hands of
23 ICOC, and its leadership, Desiree suffered and continues to suffer a litany of injuries. Among
24 other injuries, Desiree has experienced and will continue to experience for the rest of her life
25 severe pain and suffering, emotional distress, humiliation, mental anguish, loss of enjoyment
26 of life, loss of educational opportunity, loss of wages, loss of income, and loss of future wages.

27 **D. The Childhood Abuse of Jane Roe 8**

28 150. In 1996, when Jane Roe 8 was 3 years old and her parents were members of
29 the East Region Los Angeles ICOC, she was molested by Saracino, who, at the time, was a
30 regular Kids Kingdom volunteer worker and a well-liked ICOC member.

1 151. The molestation incident happened when Jane Roe 8 was in the Kids Kingdom
2 ministry during a midweek church service. When Jane Roe 8 went home that evening, she told
3 her mother that a man in Kids Kingdom had taken her into the closet and did things to her
4 “butt” and that her “private parts” hurt badly. Her mother talked with Jane Roe 8 about what
5 happened, and her mother was visibly upset and infuriated.

6 152. Jane Roe 8’s mother immediately called the leaders of the East Region, Steve
7 and Jacqueline Gansert-Morici. Steve and Jacqueline asked her to not call the police to report
8 the molestation of her 3-year-old daughter and said they first needed advice from the
9 overseeing Elders, Bruce and Robin Williams.

10 153. By 8:30 a.m. the next day, Jane Roe 8’s mother received a call from John
11 Bringardner, a California attorney and ICOC ministry leader, who had been recently hired as
12 General Counsel for ICOC. To Jane Roe 8’s mother’s complete surprise, attorney John
13 Bringardner warned her that reporting this type of child abuse to the police or authorities
14 would be a “huge mistake,” and would further traumatize Jane Roe 8. He explained that the
15 police might remove the child from the home while the investigation was happening, and that
16 the child might be further molested while in foster care. He further reasoned that disclosing
17 the child molestation to the police could cause people to lose their faith and leave God’s true
18 church. Acting as the ICOC’s representative, John Bringardner manipulated Jane Roe 8’s
19 mother into silence by also telling her, if the church endured a scandal and could not “make
20 budget” as a result, she would lose her full-time job in the ministry. The ultimate downfall of
21 the church would be her fault.

22 154. Attorney John Bringardner framed his advice to Jane Roe 8’s mother as though
23 he wanted to protect the family’s best interests and shield the child from additional trauma.
24 He also used guilt to silence Jane Roe 8’s mother by making insulting statements, such as a
25 “wise mother” would not subject her small child to a traumatic recounting of events that would
26 inevitably occur after the authorities were notified.

27 155. Attorney John Bringardner concluded this conversation by promising to
28 personally conduct an investigation regarding the abuse of Jane Roe 8.

29 156. The ensuing events were nothing short of a nightmare. Raul Dunn, the East
30 Region Kids Kingdom leader and a non-staff layperson, called Jane Roe 8’s mother and said,

1 “We asked the two male Kids Kingdom workers, this question: ‘Did you molest a kid last
2 night in Kids Kingdom?’” The two male workers were the only male workers the day Jane
3 Roe 8 was molested and, of course, they denied molesting Jane Roe 8.

4 157. Raul Dunn told Jane Roe 8’s mother, “Your daughter was not molested, we
5 asked the workers, and they said, no, so she must have been mistaken.” Jane Roe 8’s mother
6 was furious. When she inquired why no one was investigating her child’s horrific abuse
7 during a church service, Steve Gansert-Morici deflected and told her that he asked Raul Dunn
8 to investigate the incident.

9 158. Attorney John Bringardner called Jane Roe 8’s mother often for several weeks
10 under the pretense of calling to “check on their family to see how they were doing.” In reality,
11 he was keeping tabs on the family to ensure they never told anyone outside ICOC about Jane
12 Roe 8’s abuse at the hands of Saracino.

13 159. Jane Roe 8’s mother requested an opportunity for her daughter to see both men
14 and indicate which assaulted her. However, attorney John Bringardner refused the request
15 and had no interest in learning which man horrifically abused the innocent child. Attorney
16 John Bringardner said that since both brothers (*i.e.*, the two male workers) swore they did not
17 abuse Jane Roe 8, he was not comfortable subjecting them to such treatment. Jane Roe 8’s
18 mother was upset and disappointed with the church’s inaction, so she created an opportunity
19 for Jane Roe 8 to identify which “brother” molested her. That Sunday, Jane Roe 8 and her
20 mother stood behind a two-way mirror at the East Region Los Angeles ICOC building to try
21 and identify her assailant, but Jane Roe 8 became so nervous and fearful that she was unable
22 to look at both men and buried her head in her mom’s torso. As a result of her crippling fear,
23 no definitive identification of the assailant was made, although Jane Roe 8 knew his identity
24 at the time.

25 160. Jane Roe 8’s mother relayed this development to Steve and Jacqueline Gansert-
26 Morici. Steve responded in an “I told you so” manner, and ultimately told her to forgive
27 Saracino and move on.

28 161. Attorney John Bringardner, Steve Jacqueline Gansert-Morici, and Jacqueline
29 Gansert-Morici bullied, intimidated, and manipulated Jane Roe 8’s parents, discouraging
30 them from reporting the crime to the authorities and making them fear eternal consequences

1 for speaking out.

2 162. On information and belief, Attorney John Bringardner asked both of the male
3 workers, David Saracino and one other member, to visit the ICOC's downtown Los Angeles
4 headquarters office and write formal statements regarding the incidents of that fateful day.
5 Jane Roe 8's mother was never allowed to review their statements.

6 163. Five days after Jane Roe 8 was abused, her mother was at a church staff meeting
7 in Hollywood at a church owned facility called the "Upside Down Club." After the staff
8 meeting at the Upside-Down Club, she was called downstairs to participate in a meeting with
9 attorney John Bringardner, Bruce and Robin Williams (ICOC Elders), and Steve and
10 Jacqueline Gansert-Morici, to discuss the next steps in the ICOC led "investigation." The
11 Gansert-Morici's were "disciplined" by Bruce and Robin Williams, which meant the Gansert-
12 Moricis answered to Bruce and Robin and sought their advice regarding all church related
13 issues, including the molestation of Jane Roe 8. During the meeting, Kip McKean approached
14 the group, isolated Jane Roe 8's mother and gave her a tight, seemingly compassionate hug.
15 McKean stated that he was so proud of her for not going to the police, and made the statements:

16 "I'm so sorry for what you're going through, but **if the police**
17 **get a hold of this story, they will twist this story around and**
18 **use it to destroy Gods church.** Then innocent members of our
19 church will lose their salvation. I commend you for doing the
20 Godly thing and allowing us to handle it. On behalf of God's
21 church, I am grateful for your faith sister, and I promise you
22 that you did the right thing here!" (emphasis added)

23 164. Approximately three weeks later, attorney John Bringardner communicated to
24 Jane Roe 8's parents that because they reported the abuse to ICOC leaders, significant changes
25 were forthcoming in Kids Kingdom. Specifically, they implemented a "2 adults always" rule
26 whereby no one person was allowed to be alone with a child during Kids Kingdom. Attorney
27 John Bringardner told Jane Roe 8's mother, "Because you did not contact the police, we were
28 able to make the Kingdom of God safer."

29 165. Jane Roe 8's mother was deeply disturbed because neither Steve nor
30 Jacqueline Gansert-Morici warned the congregation about her daughter's molestation at the

1 hands of Saracino. Neither of them bothered to check in with the other ICOC children in
2 Kids Kingdom to determine if more abuse had occurred.

3 166. Approximately one year after Jane Roe 8's abuse, another mother in the Los
4 Angeles East Region discovered that her child was also molested by David Saracino and
5 reported it to Steve Gansert-Morici and Rob and Connie Kosberg. Steve suggested she call
6 Jane Roe 8's mother, presumably in hopes of Jane Roe 8's mother convincing the mother to
7 refrain from reporting the abuse to the police.

8 167. Jane Roe 8's family was utterly shocked and horrified to learn that Saracino
9 abused another child. Jane Roe 8's mother did not comply with the Defendants' "advice" to
10 further manipulate this woman, and advised the woman to immediately call the police
11 because Saracino had a history of abusing children in the church.

12 168. Because ICOC leaders refused to report David Saracino's child abuse to the
13 authorities, this deplorable predator escaped to San Diego where he abused many more
14 children until he was eventually captured in 2005 after appearing on an episode of
15 America's Most Wanted.

16 **E. The Childhood Abuse of Ashley Ruiz**

17 169. Plaintiff Ashley Ruiz was born in Los Angeles, California, in October 1991.
18 Ashley's parents were members of the East Region branch of ICOC beginning in
19 approximately 1994.

20 170. Like Bernice and Darleen, Ashley also experienced sexual abuse at the hands
21 of David Saracino.

22 171. Ashley's abuse is documented in a police report dated October 28, 2004, filed
23 by her mother Arlene approximately 8 years after the abuse occurred. During a conversation
24 with a family member on or about October 28, 2004, Ashley recalled the sexual assault she
25 had repressed for many years.

26 172. Saracino manipulated Ashley's mother Arlene to convince her to drop Ashley
27 off at his residence. He was consistently forcing himself into Arlene's life so that Saracino
28 could gain access to Ashley.

29 173. When Ashley was approximately 5 years old, Saracino would frequently pick
30 Ashley up from school, take her to his personal residence, and then intimidate her using a

1 consistent formula of sexual abuse. First, Saracino would force Ashley to watch pornographic
2 videos depicting females performing oral sex as a perverted version of a classroom scenario,
3 where he would also consistently tell her that she needed to learn to “please her man.”
4 Afterward, Saracino would then use the pretense of allowing her to swim in the pool he had
5 on-site. He had virtually no intention of simply “allowing” Ashley to use his swimming pool.
6 **Saracino would either physically undress her himself while fondling her developing**
7 **body, or he would intimidate her into fully undressing and then Saracino would**
8 **commonly lick her vagina.** After feigning ignorance over her lack of swimwear, David
9 would then force her to swim naked or in her underwear while he would watch intently. After
10 giving Ashley some time to swim, Saracino would take her inside his home, physically
11 “bathe” her, and forcefully perform oral sex on her. Before taking Ashley home, Saracino
12 always intimidated her into keeping quiet, including from her family, and lying to her that
13 “everything would be ok.”

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FIRST CLAIM FOR RELIEF
SEXUAL ASSAULT OF A MINOR

(Against Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, David Saracino, Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Does 1 through 10)

174. Plaintiffs Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the “minor Plaintiffs”) re-allege and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

175. Saracino intentionally, willfully, and maliciously sexually assaulted and/or sexually abused and molested (1) Bernice during the time that Bernice was a minor by fondling her naked body, (2) Darleen during the time that Darleen was a minor by fondling her naked body and sexually assaulting her in the backseat of a car, (3) Jane Roe 8 during the time that Jane Roe 8 was a minor by sodomizing her with his hands, and (4) Ashley Ruiz during the time that Ruiz was a minor by fondling her naked body and forcefully performing oral sex.

176. On information and belief, in committing the unlawful acts of sexual assault against Plaintiff, Saracino intended to put each minor Plaintiff in imminent apprehension of harmful or offensive contact.

177. Saracino put each minor Plaintiffs in imminent apprehension of such harmful offensive contact as she actually believed Saracino had the ability to make harmful or offensive contact with each minor Plaintiff’s person.

178. Each minor Plaintiff did not consent to Saracino’s intended harmful or offensive contact, Saracino’s intention to put each minor Plaintiff in fear of imminent apprehension of such contact, each minor Plaintiff was a minor during the time herein alleged and, therefore, lacked the ability to consent to sexual contact with any person, including Saracino.

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

1 limits of this Court.

2 180. Saracino’s conduct described herein was oppressive, malicious, and despicable
3 in that it was intentional and done in conscious disregard for the rights and safety rights of
4 minor Plaintiffs, and with the substantial certainty that it would cause each minor Plaintiff to
5 suffer humiliation, mental anguish, and emotional and physical distress.

6 181. Saracino’s conduct as alleged constitutes malice and oppression under
7 California Civil Code section 3294. Each minor Plaintiff is therefore entitled to the recovery
8 of punitive damages in an amount to be determined by the Court.

9 182. Defendants ICOC, Thomas McKean, Rob Kosberg, Connie Kosberg, Steve
10 Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Doe
11 Defendants (the “Church Leader Defendants”) are vicariously liable and liable under
12 *respondeat superior* because each Defendant knew or should have known that Saracino was
13 molesting children, including sexually assaulting the minor Plaintiffs, through his work at the
14 Kids Kingdom ministry.

15 183. The Church Leader Defendants are also liable insofar as they helped Saracino
16 elude accountability and engaged in a cover up, as the term is defined pursuant to Cal. Civ.
17 Proc. Code § 340.1(b)(2).

18 184. The Church Leader Defendants are liable because they intentionally caused to
19 exist a hierarchical cult-like structure that aided and abetted the access to children and the
20 concealment of sexual abuse of minors, which proximately caused each minor Plaintiff’s
21 injuries at the hands of known-abuser Saracino.

22 **SECOND CLAIM FOR RELIEF**

23 **VIOLATION OF CAL. PENAL CODE § 647.6(a)(1)**

24 *(Against Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, David*
25 *Saracino, Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin*
26 *Williams, and Does 1 through 10)*

27 185. Plaintiffs Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the “minor
28 Plaintiffs”) re-allege and incorporate by reference herein each and every allegation contained
29 herein above as though fully set forth and brought in this cause of action.

30 186. California Penal Code § 647.6(a)(1) provides that “[every person who aims or

1 molests any child under 18 years of age shall be punished by a fine not exceeding five
2 thousand dollars (\$5,000), by imprisonment in a county jail not exceeding one year, or by
3 both the fine and imprisonment."

4 187. As alleged herein, Saracino engaged in sexual molestation with the minor
5 Plaintiffs while they were under eighteen years of age, in violation of California Penal Code
6 § 647.6(a)(1).

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

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

16 190. Defendants ICOC, McKean, Rob Kosberg, Connie Kosberg, Steve Gansert-
17 Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Doe Defendants
18 (herein, the "Church Leader Defendants") aided and abetted Saracino because they knew
19 and/or should have known that Saracino was molesting the minor Plaintiffs and would
20 continue to molest the minor Plaintiffs; the Church Leader Defendants gave him substantial
21 assistance (*e.g.*, in the form of concealment, cover, and social or financial support); the
22 Church Leader Defendants' support was a substantial factor in allowing Saracino to abuse the
23 minor Plaintiffs unchecked.

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

1 **THIRD CLAIM FOR RELIEF**

2 **VIOLATION OF CAL. PENAL CODE §§ 288(a), (b)(1), (b)(2)**

3 *(Against Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, David*
4 *Saracino, Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin*
5 *Williams, and Does 1 through 10)*

6 192. Plaintiffs Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the
7 “minor Plaintiffs”) re-allege and incorporate by reference herein each and every allegation
8 contained herein above as though fully set forth and brought in this cause of action.

9 193. California Penal Code § 288(a) provides that a person who willfully and
10 lewdly commits any lewd or lascivious act upon or with the body, or any part or member
11 thereof, of a child who is under the age of 14 years, with the intent of arousing, appealing to,
12 or gratifying the lust, passions, or sexual desires of that person is guilty of a felony.
13 California Penal Code § 288(c)(1) states that a “person who commits an act described in
14 subdivision (a) with the intent described in that subdivision, and the victim is a child of 14 or
15 15 years, and that person is at least 10 years older than the child, is guilty of a public
16 offense.”

17 194. As alleged herein, Saracino engaged in lewd acts with the minor Plaintiffs
18 while they were under eighteen years of age, including fondling their naked bodies, in order
19 to stimulate and arouse his own sexual desires.

20 195. Under California law, victims of childhood sexual abuse are entitled to bring
21 civil actions for violations of Penal Code provisions that prohibit adults from engaging in
22 sexual acts with minors. *See Angie M. v. Superior Court*, (1995) 37 Cal.App.4th 1217, 1224-
23 1225.

24 196. Saracino’s above-noted lewd acts to the minor Plaintiffs was the proximate and
25 legal causes of physical, psychological, emotional, and economic damages the minor
26 Plaintiffs have suffered and continues to suffer to this day. It also has resulted in the minor
27 Plaintiffs incurring, and will require the minor Plaintiffs to incur into the future, expenses for
28 medical and psychological treatment, therapy, and counseling.

29 197. The ICOC, McKean, Rob Kosberg, Connie Kosberg, Steve Gansert-Morici,
30 Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Doe Defendants (herein,

1 the “Church Leader Defendants”) knew or should have known that Saracino commit lewd
2 acts on the minor Plaintiffs and would continue to commit lewd acts upon the minor Plaintiffs;
3 the Church Leader Defendants gave him substantial assistance (e.g., in the form of
4 concealment, cover, and social or financial support); the Church Leader Defendants’ support
5 was a substantial factor in allowing Saracino to conduct lewd acts on the minor Plaintiffs
6 unchecked.

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

14 **FOURTH CLAIM FOR RELIEF**

15 **SEXUAL ASSAULT**

16 *(Against Defendant Chris Del Rosario, the ICOC, Thomas “Kip” McKean, Rob Kosberg,*
17 *Connie Kosberg, and Does 1-10)*

18 199. Plaintiff Desiree Perez re-alleges and incorporates by reference herein each
19 and every allegation contained herein above as though fully set forth and brought in this
20 cause of action.

21 200. As used in Cal. Civ. Proc. Code § 340.16, “sexual assault” means any of the
22 crimes described in Section 243.4, 261, 264.1, 286, 287, or 289, or former Sections 262 and
23 288a, of the Penal Code, assault with the intent to commit any of those crimes, or an attempt
24 to commit any of those crime. Cal. Civ. Proc. Code § 340.16(b)(1).

25 201. Del Rosario intentionally, willfully, and maliciously sexually battered Desiree
26 in violation of California Penal Code § 234.4(a) by holding Desiree down and restraining her
27 while touching her for the purpose of his own sexual arousal and gratification.

28 202. In committing the unlawful acts of sexual battery and assault against Desiree,
29 Del Rosario intended to put her in imminent apprehension of harmful or offensive contact
30 before proceeding to engage in harmful contact of Desiree’s intimate parts.

1 203. Del Rosario put Desiree in imminent apprehension of such harmful offensive
2 contact as Desiree actually believed he had the ability to make harmful or offensive contact
3 with her person.

4 204. Desiree did not consent to Del Rosario's harmful and offensive contact.

5 205. As a direct and legal result of this conduct, Desiree suffered harm including,
6 but not limited to: physical, mental, and emotional injuries related to sexual abuse; medical
7 and other expenses for care, treatment, and counseling, and Desiree will continue to incur all
8 such damages in the future, and other damages, in an amount not yet ascertained, but which
9 exceed the minimum jurisdictional limits of this Court.

10 206. Del Rosario's conduct was oppressive, malicious, and despicable in that it was
11 intentional and done in conscious disregard for the rights and safety rights of Desiree, and
12 with the substantial certainty that it would cause Desiree, to suffer humiliation, mental
13 anguish, and emotional and physical distress. His conduct therefore as alleged constitutes
14 malice and oppression under California Civil Code section 3294. Desiree is, therefore,
15 entitled to the recovery of punitive damages, in an amount to be determined by the Court.

16 207. Furthermore, the ICOC, led by McKean and other Defendant church leaders,
17 directly inserted themselves into Desiree's dating life and the dating pool in general, not
18 only by holding the ICOC out as a trustworthy source to screen candidates for its members,
19 but also controlling its members, like Desiree, to date only within the ICOC and its approved
20 list.

21 208. Defendants ICOC, Thomas "Kip" McKean, Rob Kosberg, Connie Kosberg,
22 and Does 1-10 (herein, the "Church Leader Defendants") negligently screened Del Rosario
23 as an appropriate candidate and negligently represented that it had done, as it knew or should
24 have known that Del Rosario was dangerous. By endorsing Del Rosario, the Church Leader
25 Defendants gave Del Rosario the ICOC's imprimatur, thereby inducing Desiree to lower her
26 guard and misplace her trust in Del Rosario. As a result, the Church Leader Defendants'
27 individual and collective negligence is a legal and proximate cause of the damages Desiree
28 suffered at the hands of Del Rosario.

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1 **FIFTH CLAIM FOR RELIEF**

2 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

3 *(Against Saracino, Del Rosario, and Does 1-10)*

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

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

9 211. A reasonable person would not expect or tolerate the sexual assault committed
10 by Saracino and Del Rosario.

11 212. A reasonable person would not expect, accept, or tolerate Saracino's and Del
12 Rosario's unlawful sexual assault and/or sexual abuse, and molestation of Plaintiffs.

13 213. Saracino's and Del Rosario's respective conduct exceeded all bounds of that
14 usually tolerated in a civilized community.

15 214. Saracino and Del Rosario intended to cause Plaintiffs injury when they sexually
16 assaulted Plaintiffs.

17 215. Plaintiffs have suffered severe and/or extreme distress as a result.

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

24 217. Saracino's and Del Rosario's conduct described herein was oppressive,
25 malicious, and despicable in that it was intentional and done in conscious disregard for the
26 rights and safety rights of Plaintiffs, and with the substantial certainty that it would cause
27 Plaintiffs, to suffer humiliation, mental anguish and emotional and physical distress.

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

1 **SIXTH CLAIM FOR RELIEF**

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

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

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

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

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

13 Plaintiff Desiree brings this claim pursuant to Section 340.16(e)(1), which revives “any
14 claim seeking to recover damages suffered as a result of a sexual assault that occurred on or
15 after the plaintiff’s 18th birthday that would otherwise be barred before January 1, 2023,
16 solely because the applicable statute of limitations has or had expired, is hereby revived, and
17 a cause of action may proceed if already pending in court on January 1, 2023, or, if not filed
18 by that date, may be commenced between January 1, 2023, and December 31, 2023.”

19 222. As alleged herein, Plaintiffs are each the victims of sexual battery, perpetrated
20 by Saracino or Del Rosario.

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

25 224. Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg,
26 David Saracino, Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin
27 Williams (collectively, the “Church Leader Defendants”) knowingly conspired with Saracino
28 and Del Rosario, and/or aided and abetted them in their sexual battery, to allow or force
29 Plaintiffs into sexual battery with Saracino and Del Rosario, and such sexual battery did, on
30 multiple occasions, occur.

1 233. Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the “minor
2 Plaintiffs”) bring this claim pursuant to California Assembly Bill 218, amending Sections
3 340.1 and 1002 of the California Code of Civil Procedure and Section 905 of the Government
4 Code, relating to childhood sexual assault, reviving until December 31, 2023 the statute of
5 limitations for all previously extinguished claims for damages suffered as a result of
6 childhood sexual assault for victims within 22 years of the age of majority. Plaintiff Desiree
7 brings this claim pursuant to Section 340.16(e)(1), which revives “any claim seeking to
8 recover damages suffered as a result of a sexual assault that occurred on or after the plaintiff’s
9 18th birthday that would otherwise be barred before January 1, 2023, solely because the
10 applicable statute of limitations has or had expired, is hereby revived, and a cause of action
11 may proceed if already pending in court on January 1, 2023, or, if not filed by that date, may
12 be commenced between January 1, 2023, and December 31, 2023.”

13 234. As alleged herein, Plaintiffs were the victims of multiple instances of sexual
14 battery as a minor perpetrated by Saracino and Del Rosario and facilitated by the Church
15 Leader Defendants, as listed herein. The Church Leader Defendants subjected Plaintiffs to
16 these multiple incidents of gender violence at the hands of Saracino and Del Rosario,
17 including while the minor Plaintiffs were under the age of 18.

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

22 236. As alleged herein, Plaintiffs were repeatedly the victim of acts of gender
23 violence by Saracino and Del Rosario, for instance, from their acts of fondling their genitalia,
24 anus, and/or raping the Plaintiffs.

25 237. Each Church Leader Defendant herein knowingly conspired and/or aided and
26 abetted to create conditions of coercion and control that caused Plaintiffs to be repeatedly
27 subjected to private, egregiously offensive sexual contact with Saracino and Del Rosario, all
28 in furtherance of committing acts of gender violence against Plaintiffs.

29 238. The repeated sexual battery of Plaintiffs by Saracino and Del Rosario was the
30 result of the Church Leader Defendants’ collective cover up, as statutorily defined by

1 California Code of Civil Procedure § 340.1(b).

2 239. As a direct and proximate cause of each of the Defendants' collective and
3 individual actions, Plaintiffs have suffered severe emotional and mental distress and anxiety,
4 humiliation, embarrassment, and additional damages.

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

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

12 **EIGHTH CLAIM FOR RELIEF**

13 **NEGLIGENT HIRING, SUPERVISION, AND RETENTION**

14 *(Against Defendants ICOC, Thomas "Kip" McKean, Rob Kosberg, Connie Kosberg, Steve*
15 *Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Does 1-*
16 *10)*

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

19 242. At all times relevant, a special relationship existed between Defendants listed
20 herein to this cause of action (the "Church Leader Defendants") and Saracino and Del
21 Rosario, respectively, because Saracino and Del Rosario were the agents of the Church Leader
22 Defendants, each of whom had the ability to control of Saracino's and Del Rosario's conduct,
23 yet failed to exert it. In doing so, the Church Leader Defendants created a widespread culture
24 of acceptance of the abuse of children, as the Church Leader Defendants collectively
25 brainwashed and manipulated the Plaintiffs to remain silent about the abuse. Those Church
26 Leader Defendants also actively concealed the abuse to avert discovery by the authorities and
27 the community at large.

28 243. At all times herein, each Church Leader Defendant negligently supervised,
29 managed, and controlled Saracino and Del Rosario in their membership and participation in
30 the ICOC, and negligently failed to warn Plaintiffs, Plaintiffs' parents, and other members of

1 the ICOC church, of the propensity and risk that Saracino and Del Rosario would sexually
2 assault, sexually abuse, and/or molest adults and minor children, a propensity and history of
3 which Church Leader Defendants, and each of them, acting through their employees, agents,
4 and volunteers, had actual notice.

5 244. During the same time period, each Church Leader Defendant was negligent in
6 failing to exercise reasonable care to protect Plaintiffs, and other minors, who were members
7 of, or participants in, activities at the Church Leader Defendants' church, from the risk of
8 sexual assault, sexual abuse, and molestation by perpetrators, including Saracino and Del
9 Rosario.

10 245. In the case of Saracino, the Church Leader Defendants were negligent in failing
11 to exercise reasonable care on the premises of ICOC church property.

12 246. The Church Leader Defendants were further negligent in failing to notify law
13 enforcement and other appropriate authority that Plaintiffs were and/or continued to be a
14 victim of child abuse/assault or sexual assault and battery by Saracino and Del Rosario when
15 they learned of this fact. The Church Leader Defendants' failed report the known and/or
16 reasonably suspected child abuse and sexual assault of Plaintiffs. Instead, the Church Leader
17 Defendants perpetuated and facilitated Saracino's and Del Rosario's continued sexual abuse,
18 sexual assault, and molestation of Plaintiffs and others.

19 247. Had the Church Leader Defendants satisfied their duty to take reasonable steps
20 to protect Plaintiffs, including the Plaintiffs who were minor children, from known and/or
21 foreseeable harm, including sexual assault, including reporting the sexual assault and/or
22 sexual abuse, and molestation to law enforcement, then some or all of the Plaintiffs' injuries
23 would have been avoided.

24 248. Prior to, during, and after the sexual assault of Plaintiffs, the Church Leader
25 Defendants, through their administrators, employees, agents, and/or volunteers, had
26 knowledge, and/or were otherwise on notice, that Saracino and Del Rosario had and/or was
27 engaged in, and/or presented the risk of, sexual assault of Plaintiffs, and other minors.

28 249. Plaintiffs are informed, believe, and thereupon allege that prior to, and during
29 Saracino's and Del Rosario's sexual assault and/or sexual abuse, and molestation of Plaintiffs,
30 the Church Leader Defendants knew or should have known, reasonably suspected, and/or

1 were otherwise on notice, of the Defendants' unlawful conduct, as set forth in this Complaint,
2 but failed and/or refused to take any affirmative action, including but not limited to notifying
3 law enforcement. Instead, the Church Leader Defendants directed Plaintiffs and Plaintiffs'
4 parents to continue to have contact with Saracino and Del Rosario, thereby ratifying and
5 facilitating their continued sexual assault and/or sexual abuse and molestation of Plaintiffs.

6 250. The Church Leader Defendants breached their duties by failing to use
7 reasonable care to protect Plaintiffs from their disciples, employees, and/or agents, namely,
8 Saracino and Del Rosario.

9 251. Had the Church Leader Defendants fulfilled their duties and responsibilities,
10 then Plaintiffs would not have been subject to all or most of the misconduct perpetrated
11 against them and the resulting harm.

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

18 253. Plaintiffs are informed, believes, and thereupon alleges that the Church Leader
19 Defendants' failure to respond, investigate, terminate the Defendants' employment, report, or
20 take any other action following Plaintiffs, other minor children, and Plaintiffs parents' report
21 of sexual assault and/or abuse by the Church Leader Defendants was part of the Church
22 Leader Defendants' concerted effort to cover up and/or hide evidence related to childhood
23 sexual assault of minor children, including Plaintiffs.

24 254. Plaintiffs' damages as a result of Saracino's and Del Rosario's sexual assault,
25 abuse, and molestation of Plaintiffs was a direct result of the Church Leader Defendants'
26 concealment and cover-up. As such, Plaintiffs are entitled to treble damages against the
27 Defendants pursuant to Code of Civil Procedure section 340.1(b)(2).

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1 **NINTH CLAIM FOR RELIEF**

2 **NEGLIGENT SUPERVISION OF A MINOR**

3 *(Against Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, Steve*
4 *Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams, and Does 1-*
5 *10)*

6 255. Plaintiffs Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the “minor
7 Plaintiffs”) re-allege and incorporate by reference herein each and every allegation contained
8 herein above as though fully set forth and brought in this cause of action.

9 256. Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg,
10 Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, and Robin Williams (the
11 “Church Leader Defendants”) were responsible for the care, custody, control, supervision,
12 and protection of the minor children entrusted to them, including Plaintiffs. The Church
13 Leader Defendants had a duty to adequately and properly supervise, monitor, and protect
14 Plaintiffs from known and knowable dangers, such as those posed by Saracino.

15 257. Each Church Leader Defendant breached their duty to properly and adequately
16 supervise, monitor, and protect Plaintiffs, in part because the officers, administrators, agents,
17 and other supervisory employees knew or should have known of Saracino’s improper
18 behavior, including that the fact that minor children (like the minor Plaintiffs) were frequently
19 alone with Saracino without any justification, that Saracino would frequently touch and
20 sexually abuse minor children, including the minor Plaintiffs, at Church Leader Defendants’
21 premises without any justifiable reason for doing so, including when the minor children were
22 by themselves, and that Saracino sexually abused, assaulted, and/or molested minor children,
23 including but not limited to the minor Plaintiffs.

24 258. The Church Leader Defendants, acting through their administrative and
25 supervisory employees, knew or should have known that the minor Plaintiffs were unattended
26 and unsupervised with Saracino on numerous occasions, without any justification. It should
27 have been obvious to any officer, agent, administrator, employee, or staff member that there
28 was no reason that neither the minor Plaintiffs, nor any other child, should have been alone
29 with Saracino. The Church Leader Defendants and their employees and agents instead turned
30 a blind eye to the fact that Saracino was spending time with minor children, including the

1 minor Plaintiffs, unattended and unsupervised without any investigation into the matter.

2 259. After engaging in grooming activity of the minor Plaintiffs while spending time
3 alone with the minor Plaintiffs, Saracino started sexually assaulting, sexually abusing, and
4 molesting the minor Plaintiffs and other minor children on the Church Leader Defendants'
5 premises and during church related services. The acts of sexual assaults and abuse occurred
6 while the minor Plaintiffs were left unattended and unsupervised.

7 260. If each of the Church Leader Defendants adequately and properly supervised,
8 monitored, and protected the minor Plaintiffs, the minor Plaintiffs would not have been
9 harmed, or would not have been harmed to the extent that Plaintiffs were.

10 261. Each of the Church Leader Defendants also recklessly and negligently failed
11 to implement and/or enforce policies and procedures that were aimed at preventing or
12 detecting sexual assault and assault of their minor members.

13 262. Had each of the Church Leader Defendants adequately performed their duties
14 and responsibilities, then Plaintiffs would not have been subject to the sexual assault, assault
15 and harassment perpetrated by Saracino.

16 263. The minor Plaintiffs have been severely damaged emotionally and physically,
17 and otherwise, in amounts to be proven at the time of trial, as a direct and legal result of the
18 acts and omissions of the Church Leader Defendants, and each of them.

19 **TENTH CLAIM FOR RELIEF**

20 **FAILURE TO REPORT SUSPECTED CHILD ABUSE IN VIOLATION OF**
21 **PENAL CODE §§ 11165 ET SEQ. BASED ON VICARIOUS LIABILITY**

22 *(Against Defendants Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, Steve*
23 *Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams and*
24 *Does 1-10)*

25 264. Plaintiffs Darleen Diaz, Bernice Perez, Jane Roe 8, and Ashley Ruiz (the
26 “minor Plaintiffs”) re-allege and incorporate by reference herein each and every allegation
27 contained herein above as though fully set forth and brought in this cause of action.

28 265. Defendants Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg, Steve
29 Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams and Does 1-10
30 (herein, the “Individual Church Leader Defendants”), through their administrators and

1 employees knew or reasonably suspected that Saracino had, and or was, engaged in the sexual
2 assault of children while the children were under the care, custody, and supervision of the
3 Church Leader Defendants, and each of them, and thus had a duty to report Saracino to the
4 appropriate authorities under the California Child Abuse and Neglect Reporting Law. *See*
5 Penal Code §§ 11164-11174.3 (“CANRA”).

6 266. At all times relevant herein and material hereto, the Individual Church Leader
7 Defendants were agents, directors, or employees of Defendant ICOC and other Individual
8 Church Leader Defendants. The Individual Church Leader Defendants were responsible for
9 hiring, training, supervising, and retaining each other as part of their church and youth bible
10 studies program. The ICOC’s and the Individual Church Leader Defendants’ staff,
11 employees, and administrators were required to report any suspected child or sexual abuse as
12 part of their duties and responsibilities as employees and/or agents of the ICOC and Church
13 Leader Defendants.

14 267. On information and belief, the Individual Church Leader Defendants and the
15 ICOC’s administrators, board members, and employees are mandated reporters under Penal
16 Code section 11165.7.

17 268. Penal Code section 11166(a) states that a mandated reporter shall make a report
18 to an agency whenever he/she, in his/her professional capacity or within the scope of his/her
19 employment, has knowledge of or observes a child whom the mandated reporter knows, or
20 reasonably suspects has been a victim of child abuse or neglect. "Reasonable suspicion" does
21 not require certainty that child abuse or neglect has occurred but looks to if it is objectively
22 reasonable for a person to entertain a suspicion to suspect child abuse or neglect. (Penal Code
23 § 11166(a)(1).)

24 269. As set forth in this Complaint, the Individual Church Leader Defendants,
25 through their administrators, board members, and employees knew and/or reasonably
26 suspected that children had been sexually assaulted by Saracino and others, prior to Saracino’s
27 sexual assault of the minor Plaintiffs, giving rise to a duty to report such conduct under
28 CANRA.

29 270. The ICOC, through its administrators, board members, and employees,
30 including but not limited to the Individual Church Leader Defendants, knew that in the

1 absence of the exercise of reasonable diligence, that an undue risk to minors, including the
2 minor Plaintiffs, existed because the Individual Church Leader Defendants' administrators,
3 board members, and/or employees did not comply with California's mandatory reporting
4 requirements.

5 271. The ICOC, through its administrators, board members, and employees,
6 including but not limited to the Individual Church Leader Defendants, failed to report the
7 known and/or reasonably suspected child molestations and assaults, created the risk and
8 danger contemplated by CANRA, and a result, unreasonably and wrongfully exposed the
9 minor Plaintiffs and other minors to sexual molestation and abuse.

10 272. If the ICOC, through its administrators, board members, and employees,
11 including but not limited to the Individual Church Leader Defendants, complied with
12 CANRA's mandatory reporting requirements, then the minor Plaintiffs would not have been
13 harmed at all or to the extent that they were.

14 273. As a direct result of the Individual Church Leader Defendants' failure to comply
15 with CANRA's mandatory reporting requirements, through their administrators, board
16 members, and employees, the Individual Church Leader Defendants wrongfully denied the
17 minor Plaintiffs the intervention of child protection services and constituted a *per se* breach
18 of their duties to the minor Plaintiffs.

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

24 **ELEVENTH CLAIM FOR RELIEF**

25 **NEGLIGENCE**

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

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

29 276. Defendants owed a duty of care to the minor Plaintiffs or had a duty to control
30 the conduct of Saracino by way of the special relationship existing between those individuals

1 and Plaintiffs. Defendants also owed a duty of care to Desiree and had a duty to warn about
2 the conduct of Del Rosario by way of the special relationship existing between Desiree and
3 the ICOC regarding who they had “permission” to date.

4 277. Defendants ICOC, Thomas “Kip” McKean, Rob Kosberg, Connie Kosberg,
5 Steve Gansert-Morici, Jacqueline Gansert-Morici, Bruce Williams, Robin Williams and Does
6 1-10 (herein, the “Church Leader Defendants”) knew, or should have known, reasonably
7 suspected, and/or were otherwise on notice, of the misconduct and sexually predatory
8 behavior of Saracino and Del Rosario, especially directed towards minor children in the case
9 of Saracino.

10 278. Despite having knowledge of the misconduct of Saracino and Del Rosario, all
11 Defendants herein failed to take any preventative action to control, curb, and/or prevent that
12 conduct, failed to warn Plaintiffs or Plaintiffs’ parents of that wrongful conduct, and/or failed
13 to notify law enforcement, despite having a legal duty to do so.

14 279. As a direct and legal result of Defendants’ negligence, Plaintiffs were sexually
15 assaulted, sexually abused, sexually harassed, and assaulted by Saracino or Del Rosario.

16 280. Had the Church Leader Defendants fulfilled their duty and responsibility, then
17 Plaintiffs would not have been subject to all or most of the misconduct perpetrated against
18 them and the resulting harm.

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

24 282. Furthermore, the negligence of the Church Leader Defendants was a substantial
25 factor in causing each Plaintiff’s severe emotional distress, which includes their suffering,
26 anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame
27 from being sexually assaulted, sexually battered, and then being gossiped about, ostracized,
28 and humiliated by the ICOC, the Church Leader Defendants, and the ICOC community at
29 large. Each Church Leader Defendant intentionally took further actions to silence Plaintiffs
30 and isolate them, thereby knowingly and recklessly exacerbating the emotional distress that

1 Saracino and Del Rosario already inflicted as a result of their abuse.

2 **PRAYER FOR RELIEF**

3 WHEREFORE Plaintiffs respectfully pray for relief as follows:

- 4 (a) Compensatory and special damages in an amount to be proven at trial;
- 5 (b) Statutory penalties and liquidated damages according to proof at time
6 of trial;
- 7 (c) Punitive and exemplary damages in an amount according to proof at
8 the time of trial;
- 9 (d) Treble damages;
- 10 (e) Pre- and post- judgment interest;
- 11 (f) Reasonable attorney’s fees and costs; and
- 12 (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 5, 2023

By: /s Bobby Samini
Bobby Samini, Esq.
Nicole Prado, Esq.
Ignacio Lazo, Esq.
Attorneys for Plaintiffs