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Assigned for All Purposes
Judge Craig Griffin

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
UNLIMITED CIVIL

ISAAH VALDEZ,

Plaintiff,

vs.

THE DWELLING PLACE OF ANAHEIM;
VINEYARD USA, and DOES 1 through 75,
inclusive,

Defendants.

CASE NO. 30-2025-01492689-CU-PO-NJC

**PLAINTIFF'S COMPLAINT FOR
DAMAGES FOR:**

(1) NEGLIGENCE;
(2) NEGLIGENT SUPERVISION;
(3) NEGLIGENT RETENTION/HIRING;
(4) NEGLIGENT FAILURE TO WARN,
TRAIN OR EDUCATE;
(5) BREACH OF FIDUCIARY DUTY;
(6) CONSTRUCTIVE FRAUD (*CIVIL*
***CODE* §1573);**
(7) SEXUAL HARASSMENT (*CIVIL*
***CODE* §51.9);**
(8) SEXUAL BATTERY; and
(9) SEXUAL ASSAULT

[Filed pursuant to *C.C.P.* §340.1.]

DEMAND FOR JURY TRIAL

[AMOUNT DEMANDED EXCEEDS \$35,000]

“From our beginnings, the Vineyard has been committed to the proclamation of the kingdom of God and to bearing witness to the deeds of the kingdom through healing (physical, emotional, and social), doing justice, and delivering those held captive by evil.”

COMES NOW, Plaintiff ISAAH VALDEZ (hereinafter, “Plaintiff” or “ISAAH”), who hereby complains and alleges against Defendants DWELLING PLACE ANAHEIM, formerly known as VINEYARD CHRISTIAN FELLOWSHIP OF ANAHEIM (“VINEYARD ANAHEIM”), VINEYARD USA, and RYAN DOEZIE (“DOEZIE”), and DOES 1 through 50, inclusive (collectively, “Defendants”), as follows:

1. The instant action involves the sexual predation of former VINEYARD ANAHEIM and VINEYARD USA employee, agent, representative, and/or volunteer, RYAN DOEZIE (“DOEZIE”), who is alleged to have engaged in the repeated sexual harassment, sexual abuse, sexual molestation, and sexual assault of Plaintiff when Plaintiff was just 11 to 16 years of age.

PARTIES

(PLAINTIFF ISAIAH VALDEZ)

2. Plaintiff Isaiah Valdez (“Plaintiff”) is currently a resident of Orange County, California. Plaintiff was born on October 11, 1995 and was a minor throughout the period of childhood sexual assault alleged herein. He brings this action pursuant to *Code of Civil Procedure* § 340.1 for the childhood sexual assault he suffered at the hands of DOEZIE, which was enabled by VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50. During the abuse, Plaintiff was a resident of the State of California.

3. Plaintiff was a minor congregant with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 100, inclusive, during the time that he was subjected to childhood sexual assault by DOEZIE. By virtue of this relationship, VINEYARD ANAHEIM and VINEYARD USA stood *in loco parentis* with the Plaintiff and his parents, and created a special, trusting, fiduciary, and protective duty of care to the Plaintiff, who was a minor child in their custody, care, and control.

(DEFENDANT, VINEYARD ANAHEIM)

4. At all times mentioned herein, Defendant VINEYARD ANAHEIM was, and is, a

1 domestic nonprofit corporation, having its principal place of business in the County of Orange, State
2 of California. Defendant VINEYARD ANAHEIM is now known as the Dwelling Place Anaheim after
3 changing its name in or about January of 2023. At the time of the abuse described herein, Defendant
4 VINEYARD ANAHEIM was known as Vineyard Christian Fellowship of Anaheim.

5 5. Defendant VINEYARD ANAHEIM purposely conducted and conducts substantial
6 business activities in the State of California, and was the primary entity owning, operating and
7 controlling the activities and behavior of its employees, agents, volunteers, representatives and servants
8 including, but not limited to DOEZIE and DOES 1 through 50 and all other employees, agents,
9 agents, volunteers, representatives, servants and supervisors of those defendants.

10 6. Plaintiff is informed and believes, and based thereon alleges, that Defendant
11 VINEYARD ANAHEIM was an entity that supervised pastors, supervised youth group leaders,
12 supervised children, and understood that children would be in its programs, on its premises, and
13 in the care, custody, and control of Defendant VINEYARD ANAHEIM, including the Plaintiff
14 when he was a congregant and member of VINEYARD ANAHEIM.

15
16 **(DEFENDANT, VINEYARD USA)**

17 7. At all times mentioned herein, Defendant VINEYARD USA was, and is, a domestic
18 nonprofit corporation, having its principal place of business in the State of Texas. Plaintiff is
19 informed and believes, and based thereon alleges, that Defendant VINEYARD USA is divided into
20 regions, including a “SoCal Region,” which included VINEYARD ANAHEIM. Plaintiff is informed
21 and believes, and based thereon alleges, that the SoCal Region and VINEYARD ANAHEIM were
22 overseen by VINEYARD USA’s Regional Leaders and/or VINEYARD USA’s national leaders.

23 8. Defendant VINEYARD USA maintains 491 congregations throughout the country,
24 including 427 established churches.

25 9. Plaintiff is therefore informed and believes, and based thereon alleges, that Defendant
26 VINEYARD USA purposely conducts substantial business activities in the State of California, and
27 was an entity owning, operating and controlling the activities and behavior of its employees, agents,
28 volunteers, representatives and servants including, but not limited to, DOEZIE and DOES 1 through

1 50 and all other employees, agents, and supervisors of those defendants. Plaintiff is informed and
2 believes, and based thereon alleges, that Defendant VINEYARD USA was an entity that supervised
3 pastors, supervised youth group leaders, supervised children, and understood that children would be in
4 its programs, on its premises, and in its care and custody, including Plaintiff when he was a congregant
5 and member of VINEYARD ANAHEIM and VINEYARD USA.

6
7 **(RYAN DOEZIE)**

8 10. On information and therefore belief, DOEZIE was a congregant, member, employee,
9 agent, representative, volunteer and/or servant of VINEYARD ANAHEIM and VINEYARD USA, and
10 DOES 1 through 50, who was assigned to serve as a youth group leader at VINEYARD ANAHEIM.
11 During all instances of sexual assault outlined herein, DOEZIE was a resident of California and
12 perpetrated his repeated sexual assault against the Plaintiff while acting as a longstanding congregant,
13 member, employee, agent, representative, volunteer and/or servant of VINEYARD ANAHEIM,
14 VINEYARD USA, and DOES 1 through 50.

15 11. Plaintiff is informed and believes, and based thereon alleges, that the true names and
16 capacities, whether individual, corporate, associate or otherwise, of Defendants named herein as DOES
17 1 through 50, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such
18 fictitious names. Plaintiff will amend the Complaint to allege their true names and capacities when
19 such have been ascertained. Upon information and belief, each of the said DOE Defendants is
20 responsible in some manner under *Code of Civil Procedure* §§340.1(a)(1), (2), (3), and 340.1(c) for
21 the occurrences herein alleged, and were a legal cause of the childhood sexual assault which resulted
22 in injury to the Plaintiff as alleged herein.

23 12. Plaintiff is informed and believes, and on that basis alleges, that at all times
24 mentioned herein, there existed a unity of interest and ownership among Defendants and each of them,
25 such that any individuality and separateness between Defendants, and each of them, ceased to exist.
26 Defendants, and each of them, were the successors-in-interest and/or alter egos of the other
27 Defendants, and each of them, in that they purchased, controlled, dominated and operated each other
28 without any separate identity, observation of formalities, or other manner of division. To continue

1 maintaining the facade of a separate and individual existence between and among Defendants, and
2 each of them, would serve to perpetrate a fraud and an injustice.

3 13. Plaintiff is informed and believes, and on that basis alleges, that at all times
4 mentioned herein, Defendants and each of them were the agents, representatives and/or
5 employees of each and every other Defendant. In doing the things hereinafter alleged,
6 Defendants, and each of them, were acting within the course and scope of said alternative
7 personality, capacity, identity, agency, representation and/or employment and were within the scope
8 of their authority, whether actual or apparent. Plaintiff is informed and believes, and on that basis alleges,
9 that at all times mentioned herein, Defendants and each of them were the trustees, partners, servants,
10 joint venturers, shareholders, contractors, and/or employees of each and every other Defendant, and
11 the acts and omissions herein alleged were done by them, acting individually, through such
12 capacity and within the scope of their authority, and with the permission and consent of each
13 and every other Defendant and that said conduct was thereafter ratified by each and every other
14 Defendant, and that each of them is jointly and severally liable to Plaintiff.

15
16 **FACTUAL ALLEGATIONS OF PLAINTIFF'S CHILDHOOD**

17 **SEXUAL ASSAULT AND DAMAGES**

18 14. During the time the Plaintiff was approximately 11 years old (in or around 2006) to 16
19 years old (in or around 2011), he was repeatedly sexually assaulted by DOEZIE in multiple locations,
20 including instances of abuse on the premises of VINEYARD ANAHEIM, which was owned and
21 operated by VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50. The sexual abuse
22 of the Plaintiff by DOEZIE consisted of, but was not limited to: Plaintiff having his body, buttocks,
23 and genitals fondled by DOEZIE, DOEZIE masturbating Plaintiff's penis to ejaculation, DOEZIE
24 forcibly touching Plaintiff with his genitals, DOEZIE ejaculating onto Plaintiff's body, DOEZIE
25 forcibly orally copulating Plaintiff's genitals, and DOEZIE penetrating Plaintiff's anus. These acts
26 of childhood sexual assault occurred on numerous occasions and often involved DOEZIE engaging
27 in physical abuse of Plaintiff, including DOEZIE digging his nails into Plaintiff's skin to cause harm.

28 15. The sexual assault described herein was done for the sexual gratification of

DOEZIE, and was based, at least in part, on the gender of Plaintiff, who was a minor boy at the time.

16. The childhood sexual assault described herein was a violation of various provisions of the California *Penal Code* involving sexual assault of minors, including but not limited to *Penal Code* §§288(a), 647.6.

17. Given that Plaintiff was a minor child at the time of his sexual assault alleged herein, Plaintiff did not, and was unable to, give free or voluntary consent to the sexual acts perpetrated upon him as a child by DOEZIE.

18. As a direct and proximate result of his sexual assault by DOEZIE, which was enabled and facilitated by Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Plaintiff has suffered, and will continue to suffer personal psychological, mental and emotional distress, including but not limited to anger, sadness, anxiety, depression, re-experiencing of the trauma, guilt, shame, and fear. He has and will continue to incur expenses for mental, psychological, and psychiatric care due to the assault, according to proof at trial.

19. As a direct and proximate result of his sexual assault by DOEZIE, which was enabled and facilitated by Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Plaintiff has been damaged in his employment and educational trajectory, specifically losing wages, earnings and economic benefits according to proof at the time of trial. Plaintiff has lost wages as a result of the assault he suffered at the hands of Defendants and will continue to lose wages in an amount to be determined at trial. Plaintiff has suffered economic injury, all to Plaintiff's general, special and consequential damage in an amount to be proven at trial, but in no event less than the minimum jurisdictional amount of this Court.

**DOEZIE'S TENURE WITH THE VINEYARD AND WARNING SIGNS TO
DEFENDANTS, AND DUTIES OF DEFENDANTS VINEYARD ANAHEIM,
VINEYARD USA AND DOES 1-50 TO PROTECT THE PLAINTIFF**

20. DOEZIE was, based upon information and therefore belief, an employee, agent, volunteer and youth group leader with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, who was assigned to VINEYARD ANAHEIM and other VINEYARD USA congregations during the sexual abuse of Plaintiff. Based upon information, and therefore belief, the Plaintiff alleges that

1 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 knew, or had reason
2 to know, or were otherwise on notice of misconduct by DOEZIE that created a risk of sexual
3 assault to minors, including Plaintiff. Moreover, based upon information and therefore belief,
4 Plaintiff alleges that DOEZIE engaged in misconduct with minors that VINEYARD ANAHEIM,
5 VINEYARD USA, and DOES 1 through 50 knew, or had reason to know, posed a risk of childhood
6 sexual assault to Plaintiff and other minors in his presence, yet instead of reporting DOEZIE, allowed
7 him to remain in ministry.

8 21. As an employee, agent, volunteer, mentor and youth group leader with VINEYARD
9 ANAHEIM, VINEYARD USA, and DOES 1 through 50, DOEZIE was placed into a position of moral,
10 ethical, religious, and legal authority over Plaintiff and other youth congregants with whom he came
11 into contact. DOEZIE was a confidant to Plaintiff and his family, and as a result, there was a special,
12 trusting, confidential and fiduciary relationship between Plaintiff and DOEZIE, as well as between
13 the Plaintiff and Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50.
14 Through this relationship with Plaintiff, Defendants VINEYARD ANAHEIM, VINEYARD USA,
15 and DOES 1 through 50 stood *in loco parentis* with Plaintiff as well as with his family. Specifically,
16 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 took the Plaintiff
17 into their custody, care and control, which conferred upon Plaintiff, and his family, the reasonable
18 belief that Plaintiff—a minor child—would be protected and cared for, as if VINEYARD
19 ANAHEIM, VINEYARD USA and DOES 1 through 50 were Plaintiff's own parents.

20 22. As is set forth herein, Defendants and each of them have failed to uphold
21 numerous mandatory duties imposed upon them by state and federal law, and by written policies and
22 procedures applicable to Defendants, including but not limited to the following:

- 23 * Duty to protect minor children in their care, and provide adequate
24 supervision;
- 25 * Duty to ensure that any direction given to employees and agents is lawful,
26 and that adults act fairly, responsibly and respectfully towards other adults
and minor children;
- 27 * Duty to properly train teachers, youth group leaders, mentors, pastors,
28 supervisors and advisors so that they are aware of their individual
responsibility for creating and maintaining a safe environment;

- * Duty to supervise employees, volunteers, and minor children in its care, enforce rules and regulations prescribed for childcare organizations, exercise reasonable control over minor children in its care as is reasonably necessary to maintain order, protect property, or protect the health and safety of employees and minor children or to maintain proper and appropriate conditions conducive to learning and child development;
- * Duty to exercise careful supervision of the moral conditions in the youth programs set forth by Defendants VINEYARD ANAHEIM and VINEYARD USA;
- * Duty to properly monitor minor children, prevent or correct harmful situations or call for help when a situation is beyond their control;
- * Duty to ensure that personnel are actually on-hand and supervising minors;
- * Duty to provide enough supervision to minor children, including Plaintiff;
- * Duty to supervise diligently;
- * Duty to act promptly and diligently and not ignore or minimize problems;
- * Duty to refrain from violating Plaintiff's right to protection from bodily restraint or harm, from personal insult, from defamation, and from injury to his personal relations (*Civil Code* § 43);
- * Duty to abstain from injuring the person or property of Plaintiff, or infringing upon any of his rights (*Civil Code* § 1708); and
- * Duty to report suspected incidents of child assault and more specifically childhood sexual abuse (*Penal Code* §§ 11166, 11167).

23. During DOEZIE's tenure as an employee, agent, volunteer, mentor and youth group leader with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Plaintiff is informed, and therefore believes, that there were ample warning signs, reports, and/or investigations about DOEZIE's unfitness for this position of trust and misconduct in contact with minor parishioners, including Plaintiff. Among other things, Defendant DOEZIE engaged in open sexual grooming of Plaintiff, including, but not limited to:

- * DOEZIE taking an unusual interest and affinity in Plaintiff; and singling out Plaintiff by switching Plaintiff into DOEZIE's youth group;
- * DOEZIE driving Plaintiff in his personal vehicle to various places,

1 including fast food restaurants, other VINEYARD USA churches and
2 events, and parking with Plaintiff to seclude him;

3 * DOEZIE talking to Plaintiff about DOEZIE's personal life;

4 * DOEZIE asking Plaintiff about his personal life, including very private
5 things;

6 * DOEZIE engaging in sexual talk with Plaintiff, where DOEZIE often asked
7 and talked to Plaintiff about masturbation, including methods and how often
8 he would engage in that conduct;

9 * DOEZIE taking Plaintiff out to eat and giving gifts to Plaintiff;

10 * DOEZIE plying Plaintiff with alcohol and pornography;

11 * DOEZIE inviting and taking Plaintiff to DOEZIE's home; and

12 * DOEZIE desensitizing Plaintiff to DOEZIE's touch, starting with slight
13 touches on the shoulders and arms, escalating to "wrestling" as well as
14 regular hugs, touching of Plaintiff, and kissing of Plaintiff while at
15 VINEYARD ANAHEIM.

16 24. It is upon information, and therefore belief, that Defendants VINEYARD ANAHEIM,
17 VINEYARD USA, and DOES 1 through 50 knew or had reason to know, or were otherwise on notice,
18 of such misconduct that created a risk of childhood sexual assault by DOEZIE, and also, that
19 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 failed to take
20 reasonable steps, or to implement reasonable safeguards, to avoid acts of childhood sexual assault,
21 including but not limited to preventing or avoiding placement of DOEZIE in a function or
22 environment in which contact with children was an inherent part of that function or environment.

23 25. Defendants had a duty to disclose these facts to Plaintiff, his parents and others, but
24 negligently and/or intentionally suppressed, concealed or failed to disclose this information for the
25 express purposes of facilitating DOEZIE's sexual assaults of children, maintaining DOEZIE,
26 VINEYARD ANAHEIM, and VINEYARD USA's image as ethical, wholesome, safe, and trusted
27 spiritual providers at VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50. The
28 duty to disclose this information arose by the special, trusting, confidential, fiduciary, and *in loco*
parentis relationship between Defendants and Plaintiff.

29 26. As a minor at Defendant VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
30 through 50, where DOEZIE was employed, retained, and worked, Plaintiff was under the direct
31 supervision, care and control of DOEZIE, as well as VINEYARD ANAHEIM, VINEYARD USA, and

DOES 1 through 50, thus creating a special relationship, fiduciary relationship, and/or special care relationship with Defendants, and each of them. Additionally, as a minor child under the custody, care and control of Defendants, Defendants stood *in loco parentis* with respect to Plaintiff while he was at VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50. As the responsible parties, principals and/or employers controlling DOEZIE, Defendants were also in a special relationship with Plaintiff and owed special duties to Plaintiff.

27. Instead of upholding the special duties owed by them to Plaintiff, Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 ignored and/or concealed the sexual assault of Plaintiff and others by DOEZIE that had already occurred, and continued to allow numerous children, including Plaintiff, to be in private, secluded areas with DOEZIE, despite this knowledge of DOEZIE's prior unfitness and danger posed to minors. Plaintiff is informed and believes, and on that basis alleges, that Defendants and each of them were given notice of incidents of inappropriate conduct by DOEZIE, including such facts as those set forth in this Complaint.

28. Plaintiff is informed and believes, and on that basis alleges, that prior to and during the sexual harassment, molestation and assault of Plaintiff, Defendants knew or had reason to know that DOEZIE had violated his roles as teacher, mentor, youth group leader, supervisor, caretaker and advisor to minors, and used this position of authority and trust acting on behalf of Defendants to gain access to children, including Plaintiff, on the premises and grounds of Defendants as well as off premises, in which DOEZIE caused Plaintiff to touch him, to allow him (a grown man) to touch Plaintiff in a sexual manner, and engaged in sexual conduct and assault, including harassment and molestation, with such children including Plaintiff.

29. With actual or constructive knowledge that DOEZIE had previously engaged in dangerous and inappropriate misconduct, Defendants conspired to and did knowingly fail to take reasonable steps, and failed to implement reasonable safeguards to avoid acts of sexual assault by DOEZIE, including, but not limited to, preventing or avoiding placement of DOEZIE in a function or environment in which contact with children is an inherent aspect of that function or environment.

30. Plaintiff further alleges that Defendants failed to report and did hide and conceal from Plaintiff, Plaintiff's parents, other minor children in their care (and parents of those children), law

1 enforcement authorities, civil authorities and others, the true facts and relevant information necessary
2 to bring DOEZIE to justice for misconduct that created a risk of childhood sexual assault of children,
3 including the Plaintiff.

4 31. Defendants also implemented various measures designed to, or which effectively, made
5 DOEZIE's conduct harder to detect including, but not limited to:

- 6 a. Permitting DOEZIE to remain in a position of authority and trust after Defendants
7 knew or had reason to know they engaged in misconduct that created a risk of
8 childhood sexual assault to be perpetrated by DOEZIE;
- 9 b. Placing DOEZIE in a separate and secluded environment, including placing him in
10 charge of young boys, where they purported to supervise the children, which
11 allowed DOEZIE to sexually and physically interact with and assault the
12 children, including Plaintiff;
- 13 c. Allowing DOEZIE to come into contact with minors, including Plaintiff, without
14 adequate supervision;
- 15 d. Failing to inform, or concealing from Plaintiff's parents and law
16 enforcement officials the fact that Plaintiff and others were or may have been
17 sexually assaulted after Defendants knew or had reason to know that DOEZIE
18 may have sexually assaulted Plaintiff or others, thereby enabling Plaintiff to
19 continue to be endangered and sexually assaulted, and/or creating the circumstance
20 where Plaintiff and others were less likely to receive medical/mental health
21 care and treatment, thus exacerbating the harm to Plaintiff;
- 22 e. Holding out DOEZIE to Plaintiff and his parents, other children and their parents,
23 and to the community as being in good standing and trustworthy;
- 24 f. Failing to take reasonable steps, and to implement reasonable safeguards to avoid
25 acts of unlawful sexual conduct by DOEZIE with students, who were minor
26 children; and
- 27 g. Failing to put in place a system or procedure to supervise or monitor
28 employees, volunteers, representatives or agents to ensure that they did not molest
or assault minors in Defendants' care, including Plaintiff.

32. By his position within the Defendants' institutions, Defendants and DOEZIE demanded
and required that Plaintiff respect DOEZIE in his positions of teacher, mentor, youth group leader,
supervisor, confidant, caretaker and spiritual advisor at Defendants VINEYARD ANAHEIM,
VINEYARD USA, and DOES 1 through 50.

33. Plaintiff is informed and believes, and on that basis alleges, that Defendants, and each of
them, were or had reason to have been aware of DOEZIE's wrongful conduct at or about the time it was

1 occurring, and thereafter, but took no action to obstruct, inhibit or stop such continuing conduct, or
2 to help Plaintiff endure the trauma from such conduct. Despite having the authority and ability to
3 do so, these Defendants negligently and/or willfully refused to, and/or did not act effectively to stop
4 the sexual assaults on Plaintiff, to inhibit or obstruct such assault, or to protect Plaintiff from the
5 results of that trauma.

6 34. During the period of assault of Plaintiff at the hands of DOEZIE, Defendants
7 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 had the authority and the ability
8 to obstruct or stop DOEZIE's sexual assaults on Plaintiff, but negligently and/or willfully failed to
9 do so, thereby allowing the assault to occur and to continue unabated. This failure was a part of
10 Defendants' plan and arrangement to conceal wrongful acts, to avoid and inhibit detection, to block
11 public disclosure, to avoid scandal, to avoid the disclosure of their tolerance of child sexual
12 molestation and assault, to preserve a false appearance of propriety, and to avoid investigation and
13 action by public authority including law enforcement. Plaintiff is informed and believes, and on that
14 basis alleges, that such actions were motivated by a desire to protect the reputation of Defendants and
15 each of them, and to protect the monetary support of Defendants while fostering an environment
16 where such assault could continue to occur.

17 35. Plaintiff is informed and believes, and on that basis alleges, that at the time
18 DOEZIE's violations of the *Penal Code* and other provisions of California Law, alleged herein-above
19 were committed, Defendants knew or had reason to know, or were or were otherwise on notice of,
20 misconduct that created a risk of childhood sexual assault by DOEZIE, and despite such
21 knowledge and/or notice, placed Plaintiff in DOEZIE's custody and/or made Plaintiff available to
22 DOEZIE and failed to take reasonable steps or implement reasonable safeguards to protect Plaintiff
23 from DOEZIE's acts of childhood sexual assault. Plaintiff is further informed and believes, and on that
24 basis alleges, that these acts and/or omissions on the part of Defendants were committed despite their
25 ability to exercise control over the personal and business affairs of DOEZIE. Accordingly, Defendants
26 are liable for DOEZIE's acts of childhood sexual assault in that their wrongful, intentional and/or
27 negligent acts were a legal cause of the childhood sexual assault.

28 36. Defendants owed Plaintiff a special duty of care. Plaintiff, as a minor at all relevant times

1 alleged herein, was placed in the physical custody, control, and dominion of Defendants and their
2 agents, employees, and/or servants, and was placed in such custody, control, and dominion in various
3 locations including, but not limited to, the premises of VINEYARD ANAHEIM. Plaintiff, as a minor
4 in the custody, control, and under the dominion of Defendants, stood *in loco parentis* with Defendants.
5 As entities responsible for the custody, supervision, care, and dominion of minor children in their
6 care, Defendants owed the Plaintiff a special duty of care, as they were entrusted with the Plaintiff's
7 safety, security and care.

8 **STATUTE OF LIMITATIONS AND ASSEMBLY BILL-218**

9 37. Effective January 1, 2020, California's statute of limitations for childhood sexual assault
10 cases has been amended pursuant to Assembly Bill 218, providing for a three (3) year window for
11 any and all claims of childhood sexual assault, which have not already been finally adjudicated, to be
12 brought. This lawsuit, involving acts of childhood sexual assault perpetrated by VINEYARD
13 ANAHEIM, VINEYARD USA, and DOES 1 through 50's agent, employee, volunteer, and/or
14 servant DOEZIE, falls within the scope of *Code of Civil Procedure* §340.1, and thus, is timely as an
15 "action commenced on or after the date of enactment of that act, and to any action filed before the date
16 of enactment, and still pending on that date, including any action or causes of action that would have
17 been barred by the laws in effect before the date of enactment." *Code of Civil Procedure* §340.1(r).
18 Regardless of the Plaintiff's age or date upon which the Plaintiff discovers or "reasonably should
19 have discovered that psychological injury or illness occurring after the age of majority was caused
20 by the sexual assault...", the Plaintiff's action is timely as it is pending before the Court and has been
21 filed prior to January 1, 2023.

22 38. Plaintiff is under the age of 40 years old, and thus, his claims are presumptively
23 timely under *Code of Civil Procedure* §340.1(a).

24 **VINEYARD USA'S SORDID HISTORY**

25 39. It is upon information, and therefore belief, that VINEYARD USA has encountered
26 multiple scandals relating to its staff and/or volunteers preying upon young churchgoers over the years.
27 This problem is not just centralized in California but is rather a nationwide epidemic.

28 40. It is further upon information and therefore belief, that VINEYARD USA has faced

1 significant scrutiny over its handling of childhood sexual abuse and leadership misconduct within its
2 network of churches.

3 41. Aside from Plaintiff's sexual abuse alleged herein, reports of sexual abuse within
4 VINEYARD USA churches date back to at least 2007. Specifically, Jackson Gatlin, son of senior leaders
5 at Duluth Vineyard Church, was accused of abuse in 2007, but his parents allegedly failed to report it
6 appropriately.

7 42. Over the years, more allegations surfaced, and in 2023, Jackson was convicted and
8 sentenced for multiple counts of sexual abuse also dating back years. A purported independent
9 investigation by GRACE (Godly Response to Abuse in the Christian Environment) found systemic
10 failures and misconduct by the Gatlins, including emotional abuse and cover-ups.

11 43. Carl Medearis, another former VINEYARD USA leader, has also faced credible
12 misconduct allegations involving grooming and abuse of authority, yet continued in ministry despite
13 these claims. Additional reports against him have since emerged, finally prompting VINEYARD USA
14 to recommend his removal from ministry.

15 44. Sexual abuse survivor Noa Elmberi shared her account of being sexually assaulted at 16
16 years old in a VINEYARD USA church. Her disclosure was poorly handled, involving victim-blaming
17 and privacy violations. GRACE later confirmed her story was credible and found leadership had
18 mishandled the situation with conflicts of interest and inadequate responses.

19 45. These cases reflect broader systemic issues and alleged institutional cover-ups within
20 VINEYARD USA, suggesting that deeper investigation may uncover even more misconduct.

21
22 **DEFENDANT VINEYARD ANAHEIM, VINEYARD USA, AND DOES 1-50'S COVER-UP**
23 **OF SEXUAL ABUSE THAT LED TO THE HARM TO PLAINTIFF**

24 46. It is upon information, and therefore belief, that the sexual assaults perpetrated upon
25 the Plaintiff as a child (as more fully described *supra*), were the result of a similar "cover-up" or "a
26 concerted effort to hide evidence relating to childhood sexual assault." *See Code of Civil Procedure*
27 §340.1(b). Specifically, it is based upon information, and therefore belief, that the Defendants
28 VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50 engaged in conduct to conceal

1 the sexually inappropriate behavior of DOEZIE and to hide facts from Plaintiff, which would have
2 apprised Plaintiff, his family, and those who could have intervened in DOEZIE's abusive behavior
3 and prevented Plaintiff's sexual assault as a child.

4 47. Specifically, it is upon information, and therefore belief, that the Defendants
5 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 were specifically aware, or should
6 have known based upon available information, that DOEZIE was a sexual threat to children in his
7 presence, including Plaintiff. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
8 through 50 were aware, or very well should have been aware, that DOEZIE had engaged in sexual
9 misconduct with minors previously.

10 48. Despite having this knowledge and prior warning about DOEZIE's risk of childhood
11 sexual assault posed to children, Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
12 through 50 did nothing to protect Plaintiff or inform his parents of the risk that Plaintiff was placed at,
13 and further, actively concealed this information from Plaintiff and his family. Regardless of their
14 knowledge about the danger posed to the Plaintiff (and other minors) by DOEZIE, Defendants
15 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 refused to inform Plaintiff or
16 his parents about the danger that DOEZIE posed to him.

17 49. This conduct constituted a "cover up" under the meaning of *Code of Civil*
18 *Procedure* §340.1(b)(1) and (b)(2). Therefore, Plaintiff is entitled to the enhanced remedy provided
19 for in *Code of Civil Procedure* §340.1(b)(1) and may recover up to treble damages.

20 **RESERVATION OF RIGHT TO PLEAD PUNITIVE DAMAGES AGAINST**

21 **VINEYARD ANAHEIM AND VINEYARD USA**

22 50. Defendant VINEYARD ANAHEIM and VINEYARD USA are, based on information and
23 belief, religious domestic nonprofit corporations, organized under the laws of California, and therefore,
24 are afforded the protection of *Code of Civil Procedure* §425.14. Upon such time as appropriate, the
25 Plaintiff expressly reserves his right to file a Motion to Amend the instant Complaint, in order to
26 allege facts sufficient to constitute punitive damages against Defendant VINEYARD ANAHEIM and
27 VINEYARD USA and in accord with evidence that substantiates a finding of the clear and convincing
28 evidentiary requirement of *Civil Code* §3294.

1 **FIRST CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA, AND DOES 1-50)**

4 51. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
5 through 50, inclusive, as though fully set forth herein.

6 52. As more fully set forth above, the conduct and actions of Defendants VINEYARD
7 ANAHEIM, VINEYARD USA, and DOES 1 through 50, served to create an environment in which
8 DOEZIE was afforded continuous secluded access to minor children, including Plaintiff. These
9 actions in arranging for the secluded access of DOEZIE to Plaintiff include, but are not limited
10 to, arranging for Plaintiff to be in DOEZIE's personal vehicle to/from VINEYARD ANAHEIM as well
11 as other VINEYARD USA churches and activities.

12 53. As more fully set forth above, Defendants VINEYARD ANAHEIM, VINEYARD USA,
13 and DOES 1 through 50, inclusive, were aware and/or on notice of DOEZIE's proclivities for engaging
14 in sexual acts with minors prior to the first occasion on which Plaintiff was placed in DOEZIE's
15 custody through the acts of Defendants. Accordingly, at the time DOEZIE and Defendants
16 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, performed the acts
17 alleged herein, it was or should have been reasonably foreseeable to Defendants that by continuously
18 exposing and making Plaintiff available to DOEZIE, Defendants were placing Plaintiff in grave risk
19 of being sexually assaulted by DOEZIE. By knowingly subjecting Plaintiff to such foreseeable danger,
20 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were
21 duty-bound to take reasonable steps and implement reasonable safeguards to protect Plaintiff
22 from DOEZIE. Furthermore, as alleged herein, Defendants VINEYARD ANAHEIM, VINEYARD
23 USA, and DOES 1 through 50, inclusive, at all times exercised a sufficient degree of control over
24 DOEZIE's personal and business affairs to prevent the acts of assault by keeping DOEZIE away
25 from Plaintiff. However, Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through
26 50, inclusive, failed to take any reasonable steps or implement any reasonable safeguards for Plaintiff's
27 protection whatsoever, and continued to make Plaintiff accessible to DOEZIE for the purposes of
28 sexual assault.

1 **NEGLIGENCE PER SE—PENAL CODE MANDATORY CHILD ABUSE REPORTING**

2 54. Under the Child Abuse and Neglect Reporting Act (“CANRA”), Defendants
3 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were child care
4 custodians and were under a statutory duty to report known or suspected incidents of sexual
5 molestation or abuse of minors to a child protective agency, pursuant to California *Penal Code* § 11166,
6 and/or not to impede the filing of any such report. Furthermore, Defendants VINEYARD
7 ANAHEIM and VINEYARD USA were under a statutory duty to provide their employees with various
8 acknowledgements of reporting requirements under *Penal Code* §11166.5.

9 55. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
10 inclusive, knew or should have known that one of their agents, employees, counselors, advisors,
11 youth group leaders, and mentors, DOEZIE, had sexually molested, abused or caused touching, battery,
12 harm, and other injuries to minors, including Plaintiff, giving rise to a duty to report such conduct under
13 California *Penal Code* §11166.

14 56. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
15 inclusive, knew, or should have known of in the exercise of reasonable diligence, that an undue risk
16 to minors, including Plaintiff, existed because Defendants VINEYARD ANAHEIM, VINEYARD
17 USA, and DOES 1 through 50 did not comply with California's mandatory reporting requirements.

18 57. By failing to report the continuing molestations and assaults, which Defendants
19 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, knew of or should
20 have known of, and by ignoring the fulfillment of the mandated compliance with the reporting
21 requirements provided under California *Penal Code* § 11166, Defendants VINEYARD ANAHEIM,
22 VINEYARD USA, and DOES 1 through 50, inclusive, created the risk and danger contemplated by
23 CANRA, and as a result, unreasonably and wrongfully exposed Plaintiff and other minors to sexual
24 molestation and abuse.

25 58. Plaintiff was a member of the class of persons for whose protection California *Penal*
26 *Code* § 11166 was specifically adopted to protect.

27 59. Had Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
28 inclusive, adequately reported the molestation of Plaintiff and other minors as required by California

1 *Penal Code* § 11166, further harm to Plaintiff and other minors would have been avoided.

2 60. As a proximate result of Defendants VINEYARD ANAHEIM, VINEYARD USA, and
3 DOES 1 through 50's, inclusive, failure to follow the mandatory reporting requirements of California
4 *Penal Code* § 11166, Defendants VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50,
5 inclusive, wrongfully denied Plaintiff and other minors the intervention of child protection services.
6 Such public agencies would have changed the then-existing arrangements and conditions that provided
7 the access and opportunities for the molestation of Plaintiff by DOEZIE.

8 61. The mental and emotional damages and injuries resulting from the sexual molestation
9 of Plaintiff by DOEZIE, were the type of occurrence and injuries that the CANRA was designed to
10 prevent.

11 62. As a result, Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
12 through 50's, inclusive, failure to comply with the mandatory reporting requirements of California *Penal*
13 *Code* § 11166 also constituted a *per se* breach of Defendants VINEYARD ANAHEIM, VINEYARD
14 USA's, and DOES 1 through 50's, inclusive duties to Plaintiff.

15 63. As a direct and proximate result of his sexual assault by DOEZIE, which was enabled
16 and facilitated by Defendant VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50,
17 Plaintiff has suffered, and will continue to suffer personal physical injury, as well as psychological,
18 mental and emotional distress, including but not limited to anger, sadness, anxiety, depression, suicidal
19 ideation, debilitating trust issues, flashbacks re-experiencing the trauma, guilt, shame, hypervigilance,
20 and fear. He has and will continue to incur expenses for mental, psychological, psychiatric, and medical
21 care due to the assault, according to proof at trial.

22 **SECOND CAUSE OF ACTION**

23 **NEGLIGENT SUPERVISION**

24 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA AND DOES 1-50)**

25 64. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
26 through 63, inclusive, as though fully set forth herein.

27 65. By virtue of Plaintiff's special relationship with Defendants VINEYARD ANAHEIM,
28 VINEYARD USA, and DOES 1 through 50, inclusive, and Defendants VINEYARD ANAHEIM,

1 VINEYARD USA, and DOES 1 through 50's, inclusive, relation to DOEZIE, Defendants VINEYARD
2 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, owed Plaintiff a duty to provide
3 reasonable supervision of the Plaintiff, to provide reasonable supervision of DOEZIE, to use
4 reasonable care in investigating DOEZIE 's background, and to provide adequate warning to Plaintiff,
5 his family, and other children, of DOEZIE's dangerous propensities and unfitness.

6 66. Plaintiff is informed and believes, and on that basis alleges, that Defendants
7 VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50, inclusive, by and through their
8 respective agents, servants and employees, knew or should have known of DOEZIE's dangerous and
9 exploitive propensities and/or that DOEZIE was an unfit agent. Despite such knowledge, Defendants
10 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, negligently failed to
11 supervise DOEZIE in their respective positions of trust and authority as authority figures and supervisors
12 of children, where they were able to commit wrongful acts against the Plaintiff. Defendants
13 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, failed to provide
14 reasonable supervision of DOEZIE, failed to use reasonable care in investigating DOEZIE, and
15 failed to provide adequate warning to Plaintiff of DOEZIE's dangerous propensities and unfitness.
16 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, further
17 failed to take reasonable measures to prevent sexual assault, harassment, and molestation of children,
18 including Plaintiff.

19 67. Plaintiff is informed and believes, and on that basis alleges, that Defendants
20 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were put on notice,
21 and knew or should have known, that DOEZIE had previously engaged and was continuing to engage
22 in unlawful sexual conduct with children and committed other felonies, for his own personal
23 gratification, and that it was, or should have been foreseeable that he was engaging, or would engage
24 in illicit sexual activities with Plaintiff, and others, under the cloak of his authority, confidence, and
25 trust, bestowed upon him through Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES
26 1 through 50, inclusive, and each of them.

27 68. Plaintiff is informed and believes, and on that basis alleges, that Defendants
28 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were placed on actual

1 or constructive notice that DOEZIE had assaulted children prior to, and/or during the time they
2 were in contact with Plaintiff. Plaintiff is informed, and thereon alleges, that Defendants VINEYARD
3 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were informed of sexual assault,
4 harassment and molestations committed by DOEZIE or of conduct that would put a reasonable person
5 on notice of such propensity to assault, harassment and molestation.

6 69. Even though Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
7 through 50, inclusive, knew or should have known of these activities by DOEZIE, Defendants
8 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, did nothing to
9 investigate, supervise or monitor DOEZIE to ensure the safety of the Plaintiff.

10 70. As an institution entrusted with the care of minors, where staff, employees, agents,
11 volunteers, and management, such as DOEZIE were placed in contact with minors, Defendants
12 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 expressly and implicitly
13 represented that these individuals, including DOEZIE, were not a sexual threat to children and
14 others who would fall under DOEZIE's influence, control, direction, and guidance.

15 71. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
16 inclusive, negligently failed to supervise DOEZIE in his positions of trust and authority as an
17 employee, agent, youth group leader, spiritual advisor, counselor and mentor, and/or other authority
18 figure, where DOEZIE was able to commit wrongful acts against the Plaintiff. Defendants VINEYARD
19 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, failed to provide reasonable
20 supervision of DOEZIE. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
21 through 50 further failed to take reasonable measures to prevent sexual harassment, molestation and
22 assault of minors, including Plaintiff.

23 72. At no time during the periods of time alleged did Defendants VINEYARD ANAHEIM,
24 VINEYARD USA, and DOES 1 through 50, inclusive, have in place a system or procedure to reasonably
25 investigate, supervise and monitor individuals in contact with minor children, including DOEZIE,
26 to prevent pre-sexual grooming and sexual harassment, molestation and assault of children, nor did
27 they implement a system or procedure to oversee or monitor conduct toward minors, students and
28 others in Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive,

1 care.

2 73. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
3 inclusive, were or should have known to be aware and understand how vulnerable children were to
4 sexual harassment, molestation and assault by mentors, advisors, and other persons of authority within
5 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive.

6 74. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's,
7 inclusive, conduct was a breach of their duties to the Plaintiff.

8 75. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
9 inclusive, breached their duty to the Plaintiff by, *inter alia*, failing to adequately monitor and
10 supervise DOEZIE and stopping DOEZIE from committing wrongful sexual acts with minors
11 including Plaintiff. This belief is founded on the fact that employees and staff of Defendants VINEYARD
12 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, had suspected the assault was
13 occurring at the time, and failed to investigate into the matter further. Based on these facts,
14 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, knew
15 or should have known of DOEZIE's incapacity to supervise and stop employees of Defendants
16 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive from committing
17 wrongful sexual acts with minors.

18 76. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
19 emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-
20 esteem, disgrace, humiliations, and loss of enjoyment of life; has suffered and continues to suffer
21 and was prevented and will continue to be prevented from performing daily activities and obtaining
22 the full enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and
23 will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

24 **THIRD CAUSE OF ACTION**

25 **NEGLIGENT RETENTION/HIRING**

26 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA, AND DOES 1-50)**

27 77. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
28 through 76, inclusive, as though fully set forth herein.

1 78. By virtue of Plaintiff's special relationship with Defendants VINEYARD ANAHEIM,
2 VINEYARD USA and DOES 1 through 50, inclusive and each of them, and Defendants VINEYARD
3 ANAHEIM, VINEYARD USA and DOES 1 through 50's, inclusive, relation to DOEZIE, Defendants
4 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, owed Plaintiff a duty
5 to not hire and/or retain and/or engage DOEZIE to serve on behalf of Defendants, given his dangerous
6 and exploitive propensities, which Defendants VINEYARD ANAHEIM, VINEYARD USA, and
7 DOES 1 through 50, inclusive, knew or should have known had they engaged in a meaningful and
8 adequate investigation of their backgrounds prior to their hiring.

9 79. As an institution entrusted with the care of minors, where staff, employees, agents,
10 volunteers, and youth group leaders, such as DOEZIE were placed in contact with minors, Defendants
11 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive, expressly and
12 implicitly represented that these individuals, including DOEZIE, were not a sexual threat to children
13 and others who would fall under DOEZIE's influence, control, direction, and guidance.

14 80. Plaintiff is informed and believes, and on that basis alleges, that at no time during the
15 periods of time alleged did Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
16 through 50's, inclusive, have in place a system or procedure to reasonably investigate, supervise and/or
17 monitor those individuals in direct contact with children, including DOEZIE, to prevent pre-sexual
18 grooming and/or sexual harassment, molestation and assault of congregants, nor did they implement
19 a system or procedure to oversee or monitor conduct toward patrons and others in Defendants
20 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive, care.

21 81. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's,
22 inclusive, and each of them were or should have been aware and understood how vulnerable minor
23 children were to sexual assault, harassment and molestation by persons of authority, including
24 DOEZIE, within the control of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
25 through 50, inclusive.

26 82. Plaintiff is informed and believes, and on that basis alleges, that other children and/or
27 employees of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
28 inclusive, complained of DOEZIE's sexual improprieties prior to the sexual assault of the Plaintiff.

1 Either Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive,
2 knew, or at the very least should have known, of DOEZIE's prior history of sexual misconduct
3 with minors, prior to Plaintiff's assaults.

4 83. Plaintiff is informed, and believes, and on that basis alleges, that the Defendants
5 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were put on notice, and
6 should have known that DOEZIE had previously engaged and continued to engage in unlawful sexual
7 conduct with patrons and other felons, for his own personal gratification, and that it was, or should
8 have been foreseeable that he was engaging, or would engage in illicit sexual activities with Plaintiff,
9 and others, under the cloak of his authority, confidence, and trust, bestowed upon him through
10 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive.

11 84. Plaintiff is informed and believes, and on that basis alleges that Defendants
12 VINEYARD ANAHEIM, VINEYARD USA. and DOES 1 through 50, inclusive, were placed on actual
13 and/or constructive notice that DOEZIE had abused, harassed, molested and/or was molesting
14 minor children, both before his sexual assault, molestation and harassment of the Plaintiff, and during
15 that same period. Plaintiff is informed, and thereon alleges, that other third parties, patrons,
16 congregants, and/or law enforcement officials informed Defendants VINEYARD ANAHEIM,
17 VINEYARD USA, and DOES 1 through 50, inclusive, of inappropriate conduct and molestations
18 committed by DOEZIE.

19 85. Even though Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
20 through 50, inclusive, knew or should have known of these activities by DOEZIE, Plaintiff is
21 informed that Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
22 inclusive, failed to use reasonable care in investigating DOEZIE and did nothing to investigate,
23 supervise or monitor DOEZIE to ensure the safety of the other minor children in his charge, including
24 Plaintiff.

25 86. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's,
26 inclusive, conduct was a breach of their duties to the Plaintiff.

27 87. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
28 great pain of mind and body, shock, emotional distress, physical manifestations of emotional

1 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of
2 life; has suffered and continues to suffer and was prevented and will continue to be prevented from
3 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and
4 earning capacity, and/or has incurred and will continue to incur expenses for medical and psychological
5 treatment, therapy, and counseling.

6 **FOURTH CAUSE OF ACTION**

7 **NEGLIGENT FAILURE TO TRAIN, WARN OR EDUCATE**

8 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA, AND DOES 1-50)**

9 88. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
10 through 87, inclusive, as though fully set forth herein.

11 89. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
12 inclusive, owed Plaintiff a duty to take reasonable protective measures to protect Plaintiff and other
13 minor children in their charge from the risk of sexual assault, harassment and molestation by DOEZIE
14 by properly warning, training or educating the Plaintiff and other minors about how to avoid such a risk.

15 90. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
16 inclusive, breached their duty to take reasonable protective measures to protect Plaintiff and other minor
17 children in their charge, from the risk of sexual assault, harassment and molestation by DOEZIE,
18 such as the failure to properly warn, train or educate Plaintiff and other minor children in his charge
19 about how to avoid such a risk.

20 91. Defendants breached their duty to take reasonable protective measures to protect
21 Plaintiff and other minor children in their charge from the risk of sexual harassment, molestation and
22 assault by DOEZIE, by failing to supervising and/or stop employees of Defendants VINEYARD
23 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, including DOEZIE, from
24 committing wrongful sexual acts with minor children, including Plaintiff.

25 92. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
26 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
27 distress, embarrassment, loss of self-esteem, disgrace, humiliations, and loss of enjoyment of
28 life; has suffered and continues to suffer and was prevented and will continue to be prevented from

1 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and
2 earning capacity, and/or has incurred and will continue to incur expenses for medical and psychological
3 treatment, therapy, and counseling.

4 **FIFTH CAUSE OF ACTION**

5 **BREACH OF FIDUCIARY DUTY**

6 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA, DOEZIE**

7 **AND DOES 1-50)**

8 93. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
9 through 92, inclusive, as though fully set forth herein.

10 94. As set forth more fully above, Defendants VINEYARD ANAHEIM, VINEYARD USA
11 and DOES 1 through 50, inclusive, in concert with DOEZIE, recruited, enticed, and encouraged
12 Plaintiff and Plaintiff's family to give their trust and confidence to Defendants and DOEZIE so that
13 Plaintiff could be taken from his family's care and supervision and placed under the care and
14 supervision of Defendants and DOEZIE. In so doing, Defendants VINEYARD ANAHEIM, VINEYARD
15 USA, DOEZIE and DOES 1 through 50, inclusive, entered into a fiduciary relationship with
16 Plaintiff whereby Defendants owed Plaintiff an *in loco parentis* duty of care to take all reasonable steps
17 and implement all reasonable safeguards to protect Plaintiff while he was in the custody of Defendants
18 and/or DOEZIE.

19 95. Plaintiff and his family agreed to place their trust and confidence in DOEZIE, as
20 well as Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive,
21 in the expectation that Defendants would properly supervise Plaintiff, regulate his activities and
22 behavior, and ensure his safety. Further, Plaintiff and his family agreed to this because they believed
23 in the integrity of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through
24 50, inclusive, and therefore felt comfortable in entrusting Plaintiff to the care and custody of
25 Defendants.

26 96. As alleged herein, DOEZIE breached his duty to Plaintiff by repeatedly subjecting
27 Plaintiff to acts of childhood sexual assault. As further alleged herein, Defendants VINEYARD
28 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, breached this duty to Plaintiff

1 by failing to take any reasonable steps or implement any reasonable safeguards to protect Plaintiff from
2 DOEZIE, and by allowing Plaintiff to be sexually assaulted by DOEZIE.

3 97. As a direct and proximate result of his sexual assault by DOEZIE, which was enabled
4 and facilitated by Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
5 Plaintiff has suffered, and will continue to suffer personal psychological, mental and emotional
6 distress, including but not limited to anger, sadness, anxiety, depression, suicidal ideation, debilitating
7 trust issues, flashbacks re-experiencing the trauma, guilt, shame, hypervigilance, and fear. He has and
8 will continue to incur expenses for mental, psychological, psychiatric, and medical care due to the
9 assault, according to proof at trial.

10 98. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
11 DOEZIE acted willfully and maliciously with the intent to harm Plaintiff, and in conscious disregard
12 of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code* section
13 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
14 determined by the court, against Defendants DOEZIE, in a sum to be shown according to proof. As
15 to Defendants VINEYARD ANAHEIM, VINEYARD USA, Plaintiff reserves the right to file a Motion
16 to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14 and as further reserved in
17 Paragraph 40, *supra*.

18 **SIXTH CAUSE OF ACTION**

19 **CONSTRUCTIVE FRAUD (CIVIL CODE §1573)**

20 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA, DOEZIE**

21 **AND DOES 1-50)**

22 99. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
23 through 98, inclusive, as though fully set forth herein.

24 100. By holding DOEZIE out as an agent of Defendants, and by allowing him to undertake
25 the spiritual and educational instruction of minor children such as Plaintiff, Defendants entered into
26 a confidential, fiduciary and special relationship with Plaintiff.

27 101. By holding themselves out as qualified institutions for the safety and supervision of
28 children, and by undertaking to provide for the wellness, spiritual guidance and mentorship of Plaintiff

1 and other minors, Defendants entered into a confidential, fiduciary and special relationship
2 with Plaintiff.

3 102. Defendants breached their confidential, fiduciary duty and special duties to
4 Plaintiff by the wrongful and negligent conduct described above and incorporated into this cause of
5 action, and in so doing, gained an advantage over Plaintiff in matters relating to Plaintiff's safety,
6 security and health. In breaching such duties as alleged, Defendants were able to sustain their status
7 as institutions of high moral repute, and preserve their reputation, all at the expense of Plaintiff's further
8 injury and in violation of Defendants' mandatory duties.

9 103. By virtue of their confidential, fiduciary and special relationship with Plaintiff,
10 Defendants owed Plaintiff a duty to:

- 11 a. Investigate or otherwise confirm or deny such claims of sexual assault;
- 12 b. Reveal such facts to Plaintiff, Plaintiff's family and caretakers, the community at
13 large, and law enforcement agencies;
- 14 c. Refuse to place Defendant DOEZIE and other molesters in positions of
15 trust and authority within Defendants' institutions;
- 16 d. Refuse to hold out Defendant DOEZIE and other molesters to the public, the
17 community, minors, parents and law enforcement agencies as being in good
18 standing and, trustworthy in keeping with his and their position as a teacher,
19 counselor, spiritual advisor, managing administrator and authority figure;
- 20 e. Refuse to assign Defendant DOEZIE and other molesters to positions of power
21 within the Defendants' institutions and over minors; and
- 22 f. Disclose to Plaintiff, his family, the public, the Defendants'
community, minors, and law enforcement agencies the wrongful,
23 tortious, and sexually exploitive acts that Defendant DOEZIE had
engaged in with children.

23 104. Defendants' breach of their respective duties included:

- 24 a. Not making reasonable investigations of Defendant DOEZIE;
- 25 b. Issuing no warnings about Defendant DOEZIE;
- 26 c. Permitting Defendant DOEZIE to routinely be alone with and in control of
27 minors, unsupervised;
- 28 d. Not adopting a policy to prevent Defendant DOEZIE from routinely having
minors in their unsupervised control;

- 1 e. Making no reports of any allegations of Defendant DOEZIE's assault
2 of minors prior to or during his employment and/or agency with
3 Defendants; and
4 f. Assigning and continuing to assign Defendant DOEZIE to duties which
5 placed him in positions of authority and trust over minors, positions in which
6 Defendant DOEZIE easily isolate and sexually assault minors.

7 105. At the time that Defendants engaged in such suppression and concealment of acts,
8 such acts were done for the purpose of causing Plaintiff to forbear on Plaintiff's rights.

9 106. Defendants' misconduct did reasonably cause Plaintiff to forbear on Plaintiff's rights.

10 107. The misrepresentations, suppressions and concealment of facts by Defendants were
11 intended to and were likely to mislead Plaintiff and others to believe that Defendants had no knowledge
12 of any complaints or reports against DOEZIE, or that there were no other complaints or reports of
13 unlawful or sexual misconduct against DOEZIE or others and that there was no need for them to take
14 further action or precaution.

15 108. The misrepresentations, suppressions and concealment of facts by Defendants was likely
16 to mislead Plaintiff and others to believe that Defendants had no knowledge of the fact that DOEZIE
17 was a molester and was known to commit wrongful sexual acts with minors, including Plaintiff.

18 109. Defendants knew or should have known at the time they suppressed and concealed the
19 true facts regarding others' sexual molestations, that the resulting impressions were misleading.

20 110. Defendants suppressed and concealed the true facts regarding DOEZIE with the
21 purpose of: preventing Plaintiff, Plaintiff's parents and family, and others, from learning that DOEZIE
22 and others had been and were continuing to sexually harass, molest and assault minors and others
23 under DOEZIE and Defendants' control, direction, and guidance, with complete impunity; inducing
24 people, including Plaintiff and other benefactors and donors to participate and financially support
25 Defendants' and other enterprises of Defendants; preventing further reports and outside
26 investigations into DOEZIE and Defendants' conduct; preventing discovery of Defendants' own
27 conduct; avoiding damage to the reputations of Defendants; protecting Defendants' power and status
28 in the community and the academic community; avoiding damage to the reputation of Defendants,
or Defendants' institutions; and avoiding the civil and criminal liability of Defendants, of

1 DOEZIE.

2 111. At all times mentioned herein, Defendants, and in particular DOEZIE and Defendants
3 VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50, with knowledge of the tortious
4 nature of their own and DOEZIE's conduct, knowingly conspired and gave each other substantial
5 assistance to perpetrate the misrepresentations, fraud and deceit alleged herein—covering up the past
6 allegations of sexual misconduct lodged against DOEZIE, and allowing DOEZIE to remain in his
7 positions as mentor, spiritual leader, youth group leader, and supervisor of children, so they could
8 maintain their reputations and continue to make a profit.

9 112. Plaintiff and others were misled by Defendants' suppressions and concealment of facts,
10 and in reliance thereon, were induced to act or induced not to act, exactly as intended by Defendants.
11 Specifically, Plaintiff and Plaintiff's family were induced to believe that there were no allegations of
12 criminal or sexual assault against DOEZIE and that they were safe to be around children. Had
13 Plaintiff and his family, and others, known the true facts about DOEZIE, they would have not
14 participated further in activities of Defendants VINEYARD ANAHEIM, VINEYARD USA, and
15 DOES 1 through 50, or continued to financially support Defendants' activities. They would have
16 reported the matters to the proper authorities, to other minors and their parents so as to prevent future
17 recurrences; they would not have allowed children, including Plaintiff, to be alone with, or have
18 any relationship with DOEZIE; they would not have allowed children, including Plaintiff, to attend or
19 be under the control of Defendants; they would have undertaken their own investigations which
20 would have led to discovery of the true facts; and they would have sought psychological counseling
21 for Plaintiff, and for other children molested and assaulted by DOEZIE.

22 113. By giving DOEZIE the position of spiritual guide, mentor, youth group leader,
23 confidant, and trusted individual, Defendants impliedly represented that DOEZIE was safe and
24 morally fit to give children direction and guidance.

25 114. When Defendants made these affirmative or implied representations and non-
26 disclosures of material facts, Defendants knew or should have known that the facts were
27 otherwise. Defendants knowingly and intentionally suppressed the material facts that DOEZIE had on
28 prior occasions sexually, physically, and mentally assaulted minors of Defendants, including Plaintiff,

1 and knew of or learned of conduct, or should have known of conduct by DOEZIE which placed
2 Defendants on notice that DOEZIE had previously been suspected of unlawful sexual conduct with
3 minors, and was likely abusing children.

4 115. Because of Plaintiff's young age, and because of the status of DOEZIE a spiritual guide,
5 spiritual leader, and authority figure to Plaintiff, Plaintiff was vulnerable to DOEZIE. DOEZIE sought
6 Plaintiff out and was empowered by and accepted Plaintiff's vulnerability. Plaintiff's vulnerability also
7 prevented Plaintiff from effectively protecting himself from the sexual advances of DOEZIE.

8 116. Defendants had the duty to obtain and disclose information relating to sexual
9 misconduct of DOEZIE.

10 117. Defendants misrepresented, concealed or failed to disclose information relating to sexual
11 misconduct of DOEZIE.

12 118. Defendants knew that they had misrepresented, concealed or failed to disclose
13 information related to sexual misconduct of DOEZIE.

14 119. Plaintiff justifiably relied upon Defendants for information relating to sexual
15 misconduct of DOEZIE.

16 120. Defendants VINEYARD ANAHEIM, VINEYARD USA, DOES 1 through 50, and
17 DOEZIE, in concert with each other and with the intent to conceal and defraud, conspired and
18 came to a meeting of the minds whereby they would misrepresent, conceal or fail to disclose information
19 relating to the sexual misconduct of DOEZIE, the inability of Defendants to supervise or stop
20 DOEZIE from sexually harassing, molesting and abusing Plaintiff, and their own failure to properly
21 investigate, supervise and monitor his conduct with minor children.

22 121. By so concealing, Defendants committed at least one act in furtherance of the
23 conspiracy.

24 122. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
25 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
26 distress, embarrassment, loss of self-esteem, disgrace, humiliations, and loss of enjoyment of
27 life; has suffered and continues to suffer and was prevented and will continue to be prevented from
28 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and

1 earning capacity, and/or has incurred and will continue to incur expenses for medical and psychological
2 treatment, therapy, and counseling.

3 123. In addition, when Plaintiff finally discovered the fraud of Defendants, and
4 continuing thereafter, Plaintiff experienced recurrences of the above-described injuries. In
5 addition, when Plaintiff finally discovered the fraud of Defendants, and continuing thereafter,
6 Plaintiff experienced extreme and severe mental anguish and emotional distress that Plaintiff had been
7 the victim of Defendants' fraud; that Plaintiff had not been able to help other minors being molested
8 because of the fraud, and that Plaintiff had not been able because of the fraud to receive timely medical
9 treatment needed to deal with the problems Plaintiff had suffered and continues to suffer as a result of
10 the sexual harassment, molestation and assault.

11 124. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
12 DOEZIE acted willfully and maliciously with the intent to harm Plaintiff, and in conscious disregard
13 of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code* section
14 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
15 determined by the court, against Defendant DOEZIE, in a sum to be shown according to proof. As
16 to Defendants VINEYARD ANAHEIM and VINEYARD USA, Plaintiff reserves the right to file a
17 Motion to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14 and as further reserved
18 in Paragraph 40, *supra*.

19 **SEVENTH CAUSE OF ACTION**

20 **SEXUAL HARASSMENT (CIVIL CODE §51.9)**

21 **(AGAINST DEFENDANT DOEZIE AND DOES 1-50)**

22 125. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
23 through 124, inclusive, as though fully set forth herein.

24 126. During Plaintiff's time as a minor at Defendants VINEYARD
25 ANAHEIM, VINEYARD USA, and DOES 1 through 50, DOEZIE intentionally, recklessly and
26 wantonly made sexual advances, solicitations, requests, and demands for sexual compliance of a
27 hostile nature based on Plaintiff's gender that were unwelcome, pervasive and severe, including but
28 not limited to DOEZIE, all under the supervision of Defendants, who were acting in the course and

1 scope of their agency with Defendants and each of them. The sexual harassment and assault included
2 but was not limited to acts of sexual abuse described *supra*.

3 127. During Plaintiff's time as a minor at Defendants VINEYARD ANAHEIM,
4 VINEYARD USA, and DOES 1 through 50, DOEZIE intentionally, recklessly and wantonly
5 did acts which resulted in harmful and offensive contact with intimate parts of Plaintiff's person,
6 including but not limited to, using his position of authority and age to force Plaintiff to give into
7 DOEZIE's sexual suggestions.

8 128. Because of Plaintiff's relationship with DOEZIE, as well as his relationship with
9 Defendants VINEYARD ANAHEIM, VINEYARD USA,, and DOES 1 through 50, and Plaintiff's
10 young age as a minor boy, Plaintiff was unable to easily terminate the relationship he had with the
11 Defendants.

12 129. Because of DOEZIE's age and position of authority, physical seclusion of Plaintiff,
13 Plaintiff's mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was
14 unable to, and did not, give meaningful consent to such acts.

15 130. Defendants' conduct (and the conduct of their agents) was a breach of their duties to
16 Plaintiff.

17 131. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
18 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
19 distress, embarrassment, loss of self-esteem, disgrace, humiliations, and loss of enjoyment of
20 life; has suffered and continues to suffer and was prevented and will continue to be prevented from
21 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and
22 earning capacity, and/or has incurred and will continue to incur expenses for medical and psychological
23 treatment, therapy, and counseling.

24 132. In subjecting the Plaintiff to the wrongful treatment herein described, Defendants
25 DOEZIE acted willfully and maliciously with the intent to harm Plaintiff, and in conscious disregard
26 of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code* section
27 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
28 determined by the court, against Defendants DOEZIE, in a sum to be shown according to proof.

1 **EIGHTH CAUSE OF ACTION**

2 **SEXUAL BATTERY**

3 **(AGAINST DEFENDANT DOEZIE AND DOES 1-50)**

4 133. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
5 through 132, inclusive, as though fully set forth herein.

6 134. During Plaintiff's time as a congregant, student and participant at Defendants
7 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Defendant DOEZIE
8 intentionally, recklessly and wantonly did acts which were intended to, and did result in harmful and
9 offensive contact with intimate parts of Plaintiff's person. Plaintiff was subjected to numerous
10 instances of sexual battery by Defendant DOEZIE, during Plaintiff's time as a minor with
11 Defendants DOES 1 through 50, specified *supra*.

12 135. Defendant did the aforementioned acts with the intent to cause a harmful or
13 offensive contact with an intimate part of Plaintiff's person and would offend a reasonable sense of
14 personal dignity. Further, said acts did cause a harmful or offensive contact with an intimate part of
15 Plaintiff's person that would offend a reasonable sense of personal dignity.

16 136. Because of Defendant DOEZIE's positions of authority over Plaintiff, and Plaintiff's
17 mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was unable to,
18 and did not, give meaningful consent to such acts.

19 137. As a direct, legal, and proximate result of the acts of Defendant DOEZIE, Plaintiff
20 sustained serious and permanent injuries to his person, all of his damage in an amount to be shown
21 according to proof and within the jurisdiction of the Court.

22 138. As a direct result of the sexual battery by Defendant DOEZIE, Plaintiff has difficulty in
23 reasonably or meaningfully interacting with others, including those in positions of authority over
24 Plaintiff including teachers, and supervisors, and in intimate, confidential and familial
25 relationships, due to the trauma of childhood sexual assault inflicted upon him by Defendants. This
26 inability to interact creates conflict with Plaintiff's values of trust and confidence in others, and has
27 caused Plaintiff substantial emotional distress, anger, sadness, anxiety, depression, suicidal ideation,
28 debilitating trust issues, flashbacks re-experiencing the trauma, guilt, shame, hypervigilance, and fear.

1 139. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
2 DOEZIE, acted willfully and maliciously with the intent to harm Plaintiff, and in conscious disregard
3 of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code* section
4 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
5 determined by the court, against Defendant DOEZIE, in a sum to be shown according to proof.

6 **NINTH CAUSE OF ACTION**

7 **SEXUAL ASSAULT**

8 **(AGAINST DEFENDANT DOEZIE AND DOES 1-50)**

9 140. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
10 through 139, inclusive, as though fully set forth herein.

11 141. During Plaintiff's time as a congregant, student and participant at Defendants
12 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Defendants DOEZIE
13 intentionally, recklessly and wantonly did acts which were intended to, and did result in harmful and
14 offensive contact with intimate parts of Plaintiff's person. Plaintiff was subjected to numerous
15 instances of sexual assault by Defendant DOEZIE, during Plaintiff's time as a minor with
16 Defendants DOES 1 through 50, specified *supra* in Paragraphs 14 through 17.

17 142. Defendant did the aforementioned acts with the intent to cause a harmful or
18 offensive contact with an intimate part of Plaintiff's person and would offend a reasonable sense of
19 personal dignity.

20 143. Defendant DOEZIE's conduct was a substantial factor in causing Plaintiff's harm and
21 offense, as it offended Plaintiff's reasonable sense of personal dignity.

22 144. Because of Defendant DOEZIE's positions of authority over Plaintiff, and Plaintiff's
23 mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was unable to,
24 and did not, give meaningful consent to such acts.

25 145. As a direct, legal, and proximate result of the acts of Defendant DOEZIE, Plaintiff
26 sustained serious and permanent injuries to his person, all of his damage in an amount to be shown
27 according to proof and within the jurisdiction of the Court.

28 146. As a direct result of the sexual battery by Defendant DOEZIE, Plaintiff has difficulty in

1 reasonably or meaningfully interacting with others, including those in positions of authority over
2 Plaintiff including teachers, and supervisors, and in intimate, confidential and familial
3 relationships, due to the trauma of childhood sexual assault inflicted upon him by Defendants. This
4 inability to interact creates conflict with Plaintiff's values of trust and confidence in others, and has
5 caused Plaintiff substantial emotional distress, anger, sadness, anxiety, depression, suicidal ideation,
6 debilitating trust issues, flashbacks re-experiencing the trauma, guilt, shame, hypervigilance, and fear.

7 147. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
8 DOEZIE, acted willfully and maliciously with the intent to harm Plaintiff, and in conscious disregard
9 of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code* section
10 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
11 determined by the court, against Defendant DOEZIE, in a sum to be shown according to proof.


12 **PRAYER FOR RELIEF**

13 Wherefore, Plaintiff prays for Judgment against Defendants as follows:

- 14 1. For past, present and future general damages in an amount to be determined at trial;
15 2. For past, present and future special damages, including but not limited to past, present
16 and future lost earnings, economic damages and others, in an amount to be determined at trial;
17 3. Any appropriate statutory damages;
18 4. For costs of suit;
19 5. For interest as allowed by law;
20 6. For treble damages, as provided within *Code of Civil Procedure* §340.1(b);
21 7. For attorney's fees pursuant to California *Code of Civil Procedure* § 1021.5, *Code of Civil*
22 *Procedure* §1021.4, *Civil Code* §52.4, *Civil Code* §52, or otherwise as allowable by law; and
23 8. For such other and further relief as the court may deem proper.

24
25 Dated: June 25, 2025

EASTON & EASTON, LLP

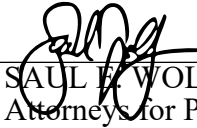
26
27 By: 
28 SAUL E. WOLF
Attorneys for Plaintiff,
ISAIAH VALDEZ

DEMAND FOR JURY TRIAL

A trial by jury is hereby demanded by Plaintiff.

Dated: June 25, 2025

EASTON & EASTON, LLP

By: 
SAUL E. WOLF
Attorneys for Plaintiff,
ISAIAH VALDEZ