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SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE

UNLIMITED CIVIL

DANISHA KEATING,
Plaintiff,

vs.

THE DWELLING PLACE OF ANAHEIM;
VINEYARD USA; DANIEL MAYFIELD;
BONNIE MAYFIELD COTTLE; and DOES 1
through 75, inclusive,
Defendants.

CASE NO. 30-2025-01519164-CU-PO-WJC

Assigned for all purposes to:

Judge Judge Sheila Recio

Dept.:

Filed:

Trial: None Set

**PLAINTIFF DANISHA KEATING'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]

1 Do not think your sin will not catch up
2 with you, or that because you've been
3 forgiven that you will not have to suffer
4 the penalty for your sins. Learn to stop
5 sin before it starts, while it is still a thought
6 in your mind, or a desire in your heart.
7

8 These were the words of Defendant DANIEL MAYFIELD in a letter he wrote to his family
9 following his arrest on 19 counts of childhood sexual assault, including charges for violations of
10 Penal Code sections 288A(c), 288A(f), 288.5, and 288.7.
11

12 COMES NOW, Plaintiff DANISHA KEATING (hereinafter, "Plaintiff" or "DANISHA"),
13 who hereby complains and alleges against Defendants DWELLING PLACE ANAHEIM, formerly
14 known as VINEYARD CHRISTIAN FELLOWSHIP OF ANAHEIM ("VINEYARD ANAHEIM"),
15 VINEYARD USA, and DANIEL MAYFIELD, BONNIE MAYFIELD COTTLE and DOES 1 through
16 50, inclusive (collectively, "Defendants"), as follows:

17 1. The instant action involves the sexual predation of former VINEYARD ANAHEIM and
18 VINEYARD USA employee, agent, representative, and/or volunteer, DANIEL MAYFIELD
19 ("MAYFIELD"), who is alleged to have engaged in the repeated sexual harassment, sexual abuse, sexual
20 molestation, and sexual assault of Plaintiff when Plaintiff was 8 to 14 years of age, from approximately
21 1999-2005.

22 PARTIES

23 (PLAINTIFF DANISHA KEATING)

24 2. Plaintiff DANISHA KEATING was born on October 12, 1989, and was a minor
25 throughout the period of childhood sexual assault alleged herein. He brings this action pursuant to *Code*
26 *of Civil Procedure* § 340.1 for the childhood sexual assault she suffered at the hands of
27 MAYFIELD, which was enabled by VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
28 through 50. During the abuse, Plaintiff was a resident of the State of California.

3. At the times relevant to the allegations stated herein, Plaintiff was a resident of the Counties of Orange and County of San Bernardino.

4. Plaintiff was a minor congregant and student with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 100, inclusive, during the time that she was subjected to childhood sexual assault by MAYFIELD.

5. By virtue of this relationship with Plaintiff as a student and congregant, 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)

6. At all times mentioned herein, Defendant VINEYARD ANAHEIM was, and is, a domestic nonprofit corporation, having its principal place of business in the County of Orange, State of California and also conducting business in the County of San Bernardino. Defendant VINEYARD ANAHEIM is now known as the Dwelling Place Anaheim after changing its name in or about January of 2023. At the time of the abuse described herein, Defendant VINEYARD ANAHEIM was known as Vineyard Christian Fellowship of Anaheim.

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

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

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9. Plaintiff is further informed and believes, and based thereon alleges, that Defendant VINEYARD ANAHEIM was an entity that operated, facilitated, and/or implemented Vineyard Christian School, which included a homeschooling program option.

(DEFENDANT, VINEYARD USA)

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

11. Defendant VINEYARD USA maintains 491 congregations throughout the country, including 427 established churches.

12. Plaintiff is therefore informed and believes, and based thereon alleges, that Defendant VINEYARD USA purposely conducts substantial business activities in the State of California, and was an entity owning, operating and controlling the activities and behavior of its employees, agents, volunteers, representatives and servants including, but not limited to, MAYFIELD and DOES 1 through 50 and all other employees, agents, and supervisors of those defendants. Plaintiff is informed and believes, and based thereon alleges, that Defendant VINEYARD USA was an entity that supervised pastors, supervised youth group leaders, supervised children, and understood that children would be in its programs, on its premises, and in its care and custody, including Plaintiff when he was a congregant and member of VINEYARD ANAHEIM and VINEYARD USA.

(DEFENDANT, DANIEL MAYFIELD)

13. At all times relevant to this Complaint, MAYFIELD was a congregant, member, employee, agent, representative, volunteer and/or servant of VINEYARD ANAHEIM and VINEYARD USA, and DOES 1 through 50, who was assigned to serve as a Worship Leader for Children's Ministry at VINEYARD ANAHEIM.

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1 14. During all instances of sexual assault outlined herein, MAYFIELD was a resident
2 of California and perpetrated his repeated sexual assault against the Plaintiff while acting as a
3 longstanding congregant, member, employee, agent, representative, volunteer and/or servant of
4 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50.

5 15. At all times relevant to this Complaint, MAYFIELD was also the biological father of
6 Plaintiff and the former husband of Defendant BONNIE MAYFIELD COTTLE.

7 16. MAYFIELD was born on October 24, 1961 and was the father of eleven children,
8 including Plaintiff.

9 17. MAYFIELD is currently incarcerated at the California Medical Facility in San
10 Bernardino County, California. MAYFIELD is serving a prison sentence for engaging in sexual
11 molestation of a child.

12 **(DEFENDANT, BONNIE MAYFIELD COTTLE)**

13 18. At all times relevant to this Complaint, Defendant BONNIE MAYFIELD COTTLE
14 (“COTTLE”) was a teacher, volunteer, member, congregant, employee, agent, representative, and/or
15 servant of VINEYARD ANAHEIM and VINEYARD USA, and DOES 1 through 50, who was assigned
16 to serve as a Sunday School teacher for children at VINEYARD ANAHEIM. During all instances of
17 sexual assault outlined herein, COTTLE was a resident of California and allowed for the repeated sexual
18 assault against the Plaintiff while COTTLE was acting as a longstanding teacher, volunteer, member,
19 congregant, employee, agent, representative, and/or servant of VINEYARD ANAHEIM, VINEYARD
20 USA, and DOES 1 through 50.

21 19. At all times relevant to this Complaint, COTTLE was also the biological mother of
22 Plaintiff and the former wife of Defendant MAYFIELD.

23 20. Plaintiff is informed and believes, and based thereon alleges, that the true names and
24 capacities, whether individual, corporate, associate or otherwise, of Defendants named herein as DOES
25 1 through 50, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such
26 fictitious names. Plaintiff will amend the Complaint to allege their true names and capacities when
27 such have been ascertained. Upon information and belief, each of the said DOE Defendants is
28 responsible in some manner under *Code of Civil Procedure* §§340.1(a)(1), (2), (3), and 340.1(c) for

1 the occurrences herein alleged, and were a legal cause of the childhood sexual assault which resulted
2 in injury to the Plaintiff as alleged herein.

3 21. Plaintiff is informed and believes, and on that basis alleges, that at all times
4 mentioned herein, there existed a unity of interest and ownership among Defendants and each of them,
5 such that any individuality and separateness between Defendants, and each of them, ceased to exist.
6 Defendants, and each of them, were the successors-in-interest and/or alter egos of the other
7 Defendants, and each of them, in that they purchased, controlled, dominated and operated each other
8 without any separate identity, observation of formalities, or other manner of division. To continue
9 maintaining the facade of a separate and individual existence between and among Defendants, and
10 each of them, would serve to perpetrate a fraud and an injustice.

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

23
24 **FACTUAL ALLEGATIONS OF PLAINTIFF'S CHILDHOOD**
25 **SEXUAL ASSAULT AND DAMAGES**

26 23. During the time the Plaintiff was approximately 8 years old (in or around 1999) to 14
27 years old (in or around 2005), she was repeatedly sexually assaulted by MAYFIELD in multiple
28 locations, including instances of abuse at Plaintiff's homes in Anaheim, California, Fontana, California

1 and Carson, California, as well as on the premises of VINEYARD ANAHEIM which was owned
2 and operated by VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50.

3 24. The sexual abuse of the Plaintiff by MAYFIELD consisted of, but was not limited to:
4 Plaintiff having her body, buttocks, and breasts fondled by MAYFIELD both over and under her
5 clothes; MAYFIELD fondling Plaintiff's vagina both over and under her clothes; MAYFIELD rubbing
6 his body and penis against Plaintiff's body; MAYFIELD forcibly touching Plaintiff with his genitals;
7 MAYFIELD inappropriately kissing Plaintiff; MAYFIELD forcing Plaintiff to massage his upper thighs
8 and areas underneath Plaintiff's clothes; and MAYFIELD placing a hidden camera in Plaintiff's room
9 to record Plaintiff in various stages of undress. These acts of childhood sexual assault occurred on
10 numerous occasions and often involved MAYFIELD engaging in emotional abuse of Plaintiff.

11 25. The sexual assault described herein was done for the sexual gratification of
12 MAYFIELD, and was based, at least in part, on the gender of Plaintiff, who was a minor girl at the
13 time.

14 26. The childhood sexual assaults described herein, and which was and permitted to
15 continue, were violations of various provisions of the California *Penal Code* involving sexual
16 assault of minors and child endangerment, including but not limited to *Penal Code* §§ 273A(a), 288(a),
17 and 647.6.

18 27. Given that Plaintiff was a minor child at the time of her sexual assaults alleged herein,
19 Plaintiff did not, and was unable to, give free or voluntary consent to the sexual acts perpetrated upon
20 her as a child by MAYFIELD.

21 28. As a direct and proximate result of his sexual assaults by MAYFIELD and
22 endangerment by COTTLE, which was enabled and facilitated by Defendants VINEYARD ANAHEIM,
23 VINEYARD USA, and DOES 1 through 50, Plaintiff has suffered, and will continue to suffer personal
24 psychological, mental and emotional distress, including but not limited to shame, embarrassment, post-
25 traumatic stress disorder, suicide attempts, suicidal ideation, self-harm, substance abuse disorders, eating
26 disorders, promiscuous behaviors, inability to trust males and persons in positions of authority, anxiety
27 and depression. She has and will continue to incur expenses for mental, psychological, and psychiatric
28 care due to the assaults, according to proof at trial.

1 29. As a direct and proximate result of her sexual assaults by MAYFIELD, which were
2 enabled and facilitated by Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and
3 DOES 1 through 50, Plaintiff has been damaged in her employment and educational trajectory,
4 specifically losing wages, earnings and economic benefits according to proof at the time of trial. Plaintiff
5 has lost wages as a result of the assault she suffered at the hands of Defendants and will continue to
6 lose wages in an amount to be determined at trial. Plaintiff has suffered economic injury, all to
7 Plaintiff's general, special and consequential damage in an amount to be proven at trial, but in no event
8 less than the minimum jurisdictional amount of this Court.

9
10 **MAYFIELD AND COTTLE'S INVOLVEMENT WITH THE VINEYARD AND**
11 **WARNING SIGNS TO DEFENDANTS, AND DUTIES OF DEFENDANTS**
12 **TO PROTECT PLAINTIFF**

13 30. MAYFIELD was an employee, agent, volunteer and leader as a Worship Leader for
14 Children's Ministry with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, who
15 was assigned to VINEYARD ANAHEIM during the sexual abuse of Plaintiff. Plaintiff alleges that
16 Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 knew, or
17 had reason to know, or were otherwise on notice of misconduct by MAYFIELD that created a risk
18 of sexual assault to minors, including Plaintiff, all while COTTLE was assigned to VINEYARD
19 ANAHEIM. Moreover, based upon information and therefore belief, Plaintiff alleges that
20 MAYFIELD engaged in misconduct with minors that COTTLE, VINEYARD ANAHEIM,
21 VINEYARD USA, and DOES 1 through 50 knew, or had reason to know, posed a risk of childhood
22 sexual assault to Plaintiff and other minors in his presence, yet instead of reporting MAYFIELD,
23 allowed him to remain in his position with VINEYARD ANAHEIM and VINEYARD USA.

24 31. As an employee, agent, volunteer, mentor and Worship Leader for Children's Ministry
25 with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, MAYFIELD was placed
26 into a position of moral, ethical, religious, and legal authority over Plaintiff and other youth students
27 and congregants with whom he came into contact. Through this relationship with Plaintiff,
28 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 stood *in loco*

1 *parentis* with Plaintiff as well as with her family. Specifically, Defendants VINEYARD ANAHEIM,
2 VINEYARD USA, and DOES 1 through 50 took the Plaintiff into their custody, care and control,
3 which conferred upon Plaintiff, and her family, the reasonable belief that Plaintiff—a minor
4 child—would be protected and cared for, as if VINEYARD ANAHEIM, VINEYARD USA and
5 DOES 1 through 50 were Plaintiff’s own parents.

6 32. As is set forth herein, Defendants VINEYARD ANAHEIM, VINEYARD USA and
7 DOES 1 through 50 and each of them have failed to uphold numerous mandatory duties imposed
8 upon them by state and federal law, and by written policies and procedures applicable to Defendants,
9 including but not limited to the following:

- 10 * Duty to protect minor children in their care, and provide adequate
11 supervision;
- 12 * Duty to ensure that any direction given to employees and agents is lawful,
13 and that adults act fairly, responsibly and respectfully towards other adults
14 and minor children;
- 15 * Duty to properly train teachers, youth group leaders, mentors, pastors,
16 supervisors and advisors so that they are aware of their individual
17 responsibility for creating and maintaining a safe environment;
- 18 * Duty to supervise employees, volunteers, and minor children in its care,
19 enforce rules and regulations prescribed for childcare organizations,
20 exercise reasonable control over minor children in its care as is
21 reasonably necessary to maintain order, protect property, or protect
22 the health and safety of employees and minor children or to maintain
23 proper and appropriate conditions conducive to learning and child
24 development;
- 25 * Duty to exercise careful supervision of the moral conditions in the programs
26 set forth by Defendants VINEYARD ANAHEIM and VINEYARD USA;
- 27 * Duty to properly monitor minor children, prevent or correct harmful
28 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).

33. As is set forth herein, Defendant COTTLE further had further duties, as the parent of Plaintiff and agent of VINEYARD ANAHEIM and VINEYARD USA, to provide support, care, health, safety and welfare of Plaintiff as well as a duty to take reasonable steps to protect Plaintiff from foreseeable harm and avoid endangering Plaintiff. At all relevant times herein, because Plaintiff was dependent on COTTLE, in her role as parent and agent of VINEYARD ANAHEIM and VINEYARD USA, COTTLE stood in a fiduciary role over Plaintiff, required to put Plaintiff's welfare first in decisions about health, safety, and support; and avoid endangering Plaintiff.

34. During MAYFIELD's tenure as an employee, agent, volunteer, mentor and Worship 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 MAYFIELD's unfitness for this position of trust and misconduct in contact with minor students and congregants, including Plaintiff and Plaintiff's family members.

35. Among other things, prior to 1999 and prior to his placement in this position of trust and access to children with VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, MAYFIELD had previously engaged in sexual assault of children, including the sexual assault of his own sisters.

36. Information regarding MAYFIELD's prior abuse of his own family members was known to COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, yet MAYFIELD was nevertheless placed in this position of Worship Leader for Children's Ministry at VINEYARD ANAHEIM.

37. Further, among other things, Defendant MAYFIELD engaged in open sexual grooming of Plaintiff, including, but not limited to:

- * MAYFIELD engaging in inappropriate kissing of Plaintiff while he was in his underwear;
- * MAYFIELD having Plaintiff sleep in his bed, even while Plaintiff was no longer a toddler and had entered adolescence;
- * MAYFIELD forcing Plaintiff to massage his back, legs and feet;
- * MAYFIELD constantly making comments to Plaintiff about her body and clothing;

38. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 therefore knew or had reason to know, or were otherwise on notice, of such misconduct that created a risk of childhood sexual assault by MAYFIELD, and also, that Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 failed to take reasonable steps, or to implement reasonable safeguards, to avoid acts of childhood sexual assault, including but not limited to preventing or avoiding placement of MAYFIELD in a function or environment in which contact with children was an inherent part of that function or environment.

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

40. As a minor congregant and student at Defendant VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, where MAYFIELD and COTTLE were employed, retained, and worked, Plaintiff was under the direct supervision, care and control of MAYFIELD and COTTLE, 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

1 employers controlling MAYFIELD, Defendants were also in a special relationship with Plaintiff
2 and owed special duties to Plaintiff.

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

10 42. Plaintiff is informed and believes, and on that basis alleges, that prior to and during the
11 sexual harassment, molestation and assault of Plaintiff, Defendants knew or had reason to know that
12 MAYFIELD had violated his roles as a parent, teacher, mentor, youth group leader, supervisor,
13 caretaker and spiritual advisor to minors, and used this position of authority and trust acting on behalf
14 of Defendants to gain access to children, including Plaintiff, on the premises and grounds of
15 Defendants as well as off premises, in which MAYFIELD caused Plaintiff to touch him, to allow him
16 to touch Plaintiff in a sexual manner, and engaged in sexual conduct and assault, including harassment
17 and molestation, with such children including Plaintiff.

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

24 44. Plaintiff further alleges that Defendants failed to report and did hide and conceal from
25 Plaintiff, and other minor children in their care (and parents of those children), law enforcement
26 authorities, civil authorities and others, the true facts and relevant information necessary to bring
27 MAYFIELD to justice for misconduct that created a risk of childhood sexual assault of children,
28 including the Plaintiff.

1 45. Defendants also implemented various measures designed to, or which effectively, made
2 MAYFIELD's conduct harder to detect including, but not limited to:

- 3 a. Permitting MAYFIELD to remain in a position of authority and trust after
4 Defendants knew or had reason to know they engaged in misconduct that created
5 a risk of childhood sexual assault to be perpetrated by MAYFIELD;
6
7 b. Placing MAYFIELD in a separate and secluded environment, including placing him
8 in charge of young children, both his own and others, where Defendants purported
9 to supervise the children, which allowed MAYFIELD to sexually and physically
10 interact with and assault the children, including Plaintiff;
11
12 c. Allowing MAYFIELD to come into contact with minors, including Plaintiff,
13 without adequate supervision;
14
15 d. Failing to inform, or concealing from child protective agencies 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 MAYFIELD
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
23 e. Holding out MAYFIELD to Plaintiff, other children and their parents, and to the
24 community as being in good standing and trustworthy;
25
26 f. Failing to take reasonable steps, and to implement reasonable safeguards to avoid
27 acts of unlawful sexual conduct by MAYFIELD with other students and
28 congregants, who were minor children; and
29
30 g. Failing to put in place a system or procedure to supervise or monitor
31 employees, volunteers, representatives or agents to ensure that they did not molest
32 or assault minors in Defendants' care, including Plaintiff.

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

37 47. Plaintiff is informed and believes, and on that basis alleges, that Defendants, and each of
38 them, were or had reason to have been aware of MAYFIELD's wrongful conduct at or about the time it
39 was occurring, and thereafter, but took no action to obstruct, inhibit or stop such continuing conduct,
40 or to help Plaintiff endure the trauma from such conduct. Despite having the authority and ability
41 to do so, these Defendants negligently and/or willfully refused to, and/or did not act effectively to

1 stop the sexual assaults on Plaintiff, to inhibit or obstruct such assault, or to protect Plaintiff from the
2 results of that trauma.

3 48. During the period of assault of Plaintiff at the hands of MAYFIELD, Defendants
4 COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 had the authority and
5 the ability to obstruct or stop MAYFIELD's sexual assaults on Plaintiff, but negligently and/or
6 willfully failed to do so, thereby allowing the assault to occur and to continue unabated.

7 49. These failures were a part of Defendants' plan and arrangement to conceal wrongful
8 acts, to avoid and inhibit detection, to block public disclosure, to avoid scandal, to avoid the disclosure
9 of their tolerance of child sexual molestation and assault, to preserve a false appearance of
10 propriety, and to avoid investigation and action by public authority including law enforcement. Plaintiff
11 is informed and believes, and on that basis alleges, that such actions were motivated by a desire to
12 protect the reputation of Defendants and each of them, and to protect the monetary support of
13 Defendants while fostering an environment where such assault could continue to occur.

14 50. Plaintiff is informed and believes, and on that basis alleges, that among the bases for
15 protecting the reputation of Defendants, at all times relevant to the conduct alleged herein, MAYFIELD
16 was an agent and/or principal with the anonymous crime reporting organization known as WeTip. Plaintiff
17 is further informed and believes, and thereon alleges, that WeTip supported MAYFIELD, VINEYARD
18 ANAHEIM and/or VINEYARD USA and, therefore, Defendants' plan and arrangement to conceal
19 MAYFIELD's wrongful acts, to block public disclosure, to avoid scandal, to avoid the disclosure of
20 their tolerance of child sexual molestation and assault, to preserve a false appearance of propriety,
21 and to avoid investigation and action by public authority including law enforcement related to
22 Defendants' intent and motivations to protect the reputation of Defendants and WeTip.

23 51. Plaintiff is informed and believes, and on that basis alleges, that at the time
24 MAYFIELD's violations of the *Penal Code* and other provisions of California Law, alleged herein-
25 above were committed, Defendants knew or had reason to know, or were or were otherwise on notice
26 of, misconduct that created a risk of childhood sexual assault by MAYFIELD, and despite such
27 knowledge and/or notice, allowed and/or placed Plaintiff in MAYFIELD's custody and/or made
28 Plaintiff available to MAYFIELD and failed to take reasonable steps or implement reasonable

1 safeguards to protect Plaintiff from MAYFIELD's acts of childhood sexual assault. Plaintiff is further
2 informed and believes, and on that basis alleges, that these acts and/or omissions on the part of
3 Defendants were committed despite their ability to exercise control over the personal and business
4 affairs of MAYFIELD. Accordingly, Defendants are liable for MAYFIELD's acts of childhood
5 sexual assault in that their wrongful, intentional and/or negligent acts were a legal cause of the childhood
6 sexual assault.

7 52. Defendants owed Plaintiff a special duty of care. Plaintiff, as a minor at all relevant times
8 alleged herein, was placed in the physical custody, control, and dominion of Defendants and their
9 agents, employees, and/or servants, and was placed in such custody, control, and dominion in various
10 locations including, but not limited to, the premises of COTTLE and VINEYARD ANAHEIM. Plaintiff,
11 as a minor in the custody, control, and under the dominion of Defendants, stood *in loco parentis* with
12 Defendants. As entities responsible for the custody, supervision, care, and dominion of minor
13 children in their care, Defendants owed the Plaintiff a special duty of care, as they were entrusted
14 with the Plaintiff's safety, security and care.

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

16 53. Effective January 1, 2020, California's statute of limitations for childhood sexual assault
17 cases has been amended pursuant to Assembly Bill 218, providing for a three (3) year window for
18 any and all claims of childhood sexual assault, which have not already been finally adjudicated, to be
19 brought. This lawsuit, involving acts of childhood sexual assault perpetrated by VINEYARD
20 ANAHEIM, VINEYARD USA, and DOES 1 through 50's agent, employee, volunteer, and/or
21 servant MAYFIELD, falls within the scope of *Code of Civil Procedure* §340.1, and thus, is timely as
22 an "action commenced on or after the date of enactment of that act, and to any action filed before the
23 date of enactment, and still pending on that date, including any action or causes of action that would
24 have been barred by the laws in effect before the date of enactment." *Code of Civil Procedure*
25 §340.1(r). Regardless of the Plaintiff's age or date upon which the Plaintiff discovers or "reasonably
26 should have discovered that psychological injury or illness occurring after the age of majority was
27 caused by the sexual assault...", the Plaintiff's action is timely as it is pending before the Court and
28 has been filed prior to January 1, 2023.

1 54. Plaintiff is under the age of 40 years old, and thus, her claims are presumptively
2 timely under *Code of Civil Procedure* §340.1(a).

3 **MAYFIELD'S PAST OF SEXUAL PREDATION AND**
4 **VINEYARD USA'S SORDID HISTORY**

5 55. As referenced herein, in addition to his sexual abuse of Plaintiff, MAYFIELD engaged
6 in sexual harassment, abuse and assaults of children that pre-dates and post-dates his assaults of
7 DANISHA.

8 56. More specifically, MAYFIELD was known to COTTLE, VINEYARD ANAHEIM and
9 VINEYARD USA to have "a history of sexual predation," with multiple molestation investigations into
10 MAYFIELD's family. This history includes, but is not limited to, MAYFIELD molesting his biological
11 sisters, MAYFIELD molesting his other daughters, and MAYFIELD forcing his children to engage in
12 unusual and suggestive acts, including giving MAYFIELD massages and scrubbing MAYFIELD's feet.

13 57. Plaintiff reported abuse by MAYFIELD to COTTLE and also reported abuse and
14 negligent to employees and volunteers with VINEYARD ANAHEIM and VINEYARD USA during the
15 course of the sexual abuse by MAYFIELD.

16 58. It is upon information, and therefore belief, that COTTLE also reported MAYFIELD's
17 abuse by MAYFIELD to employees and volunteers with VINEYARD ANAHEIM and VINEYARD
18 USA during the course of the sexual abuse by MAYFIELD.

19 59. It is upon information, and therefore belief, that the neglect, sexual abuse and sexual
20 assault of Plaintiff by MAYFIELD, as well as the failure to report and cover-up, is only one example of
21 a history of sexual misconduct and cover-up within VINEYARD USA congregations and community.

22 60. It is upon information, and therefore belief, that VINEYARD ANAHEIM and
23 VINEYARD USA have encountered multiple scandals relating to parents, staff and/or volunteers
24 preying upon young churchgoers over the years. This problem is not just centralized in California but
25 is rather a nationwide epidemic.

26 61. It is further upon information and therefore belief, that VINEYARD ANAHEIM and
27 VINEYARD USA have faced significant scrutiny over its handling of childhood sexual abuse and
28 leadership misconduct within its network of churches.

62. Aside from Plaintiff's sexual abuse alleged herein, reports of sexual abuse within VINEYARD ANAHEIM and VINEYARD USA churches date back to at least 2005.

63. Upon information and belief, prior to and through 2005, there were at least three different families within VINEYARD ANAHEIM and VINEYARD USA wherein allegations of father-daughter sexual abuse was ongoing and/or reported, including the prosecution and imprisonment of certain perpetrators.

64. Recent allegations have also surfaced against VINEYARD ANAHEIM and VINEYARD USA relating to alleged sexual misconduct by a former youth group leader from the Vineyard churches, Ryan Doezie, committed against a minor, Isaiah Valdez, with the abuse alleged to have occurred from 2006-2011.

65. Additionally, Jackson Gatlin, son of senior leaders at Duluth Vineyard Church, was accused of abuse in 2007, but his parents allegedly failed to report it appropriately.

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

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

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

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

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

70. It is upon information, and therefore belief, that the sexual assaults perpetrated upon the Plaintiff as a child (as more fully described *supra*), were the result of a similar “cover-up” or “a concerted effort to hide evidence relating to childhood sexual assault.” *See Code of Civil Procedure* §340.1(b). Specifically, it is based upon information, and therefore belief, that the Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50 engaged in conduct to conceal the sexually inappropriate behavior of MAYFIELD and to hide facts from Plaintiff, which would have apprised Plaintiff and those who could have intervened in MAYFIELD’s abusive behavior and prevented Plaintiff’s sexual assault as a child.

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

72. Despite having this knowledge and prior warning about MAYFIELD’s risk of childhood sexual assault posed to children, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 did nothing to protect Plaintiff of the risk that Plaintiff was placed at, and further, actively concealed this information from Plaintiff, child protective agencies and law enforcement. Regardless of their knowledge about the danger posed to the Plaintiff (and other minors) by MAYFIELD, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 refused to inform Plaintiff, child protective agencies or law enforcement about the danger that MAYFIELD posed to Plaintiff.

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

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1 **MAYFIELD AND COTTLE’S INCARCERATION**

2 74. MAYFIELD was, and remains, incarcerated in State Prison, at the California Medical
3 Facility in San Bernardino County, California, serving a prison sentence for engaging in sexual
4 molestation of a child.

5 75. COTTLE was incarcerated after being charged with multiple counts and violations of
6 Child Endangerment pursuant to *California Penal Code* section 273A.

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

8 **VINEYARD ANAHEIM AND VINEYARD USA**

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

16 **FIRST CAUSE OF ACTION**

17 **NEGLIGENCE**

18 **(AGAINST DEFENDANTS COTTLE, VINEYARD ANAHEIM, VINEYARD USA,**

19 **AND DOES 1-50)**

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

22 78. As more fully set forth above, the conduct and actions of Defendants COTTLE,
23 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, served to create an environment
24 in which MAYFIELD was afforded continuous secluded access to minor children, including
25 Plaintiff, and was afforded continuous unsupervised access to Plaintiff to engage in sexual abuse.

26 79. As more fully set forth above, Defendants COTTLE, VINEYARD ANAHEIM,
27 VINEYARD USA, and DOES 1 through 50, inclusive, were aware and/or on notice of MAYFIELD’s
28 proclivities for engaging in sexual acts with minors prior to the first occasion on which Plaintiff was

1 placed in MAYFIELD's custody, and throughout the time that MAYFIELD had access to Plaintiff
2 through the acts of Defendants.

3 80. Accordingly, at the time MAYFIELD and Defendants COTTLE, VINEYARD
4 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, performed the acts alleged herein,
5 it was or should have been reasonably foreseeable to Defendants that by continuously exposing and
6 making Plaintiff available to MAYFIELD, Defendants were placing Plaintiff in grave risk of being
7 sexually assaulted by MAYFIELD. By knowingly subjecting Plaintiff to such foreseeable danger,
8 Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
9 inclusive, were duty-bound to take reasonable steps and implement reasonable safeguards to
10 protect Plaintiff from MAYFIELD. Furthermore, as alleged herein, Defendants COTTLE,
11 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, at all times exercised
12 a sufficient degree of control over MAYFIELD's personal and business affairs to prevent the acts
13 of assault by keeping MAYFIELD away from Plaintiff. However, Defendants COTTLE, VINEYARD
14 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, failed to take any reasonable steps
15 or implement any reasonable safeguards for Plaintiff's protection whatsoever, and continued to make
16 Plaintiff accessible to MAYFIELD for the purposes of sexual assault.

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

18 81. Under the Child Abuse and Neglect Reporting Act ("CANRA"), Defendants COTTLE,
19 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were child care
20 custodians and were under a statutory duty to report known or suspected incidents of sexual
21 molestation or abuse of minors to a child protective agency, pursuant to California *Penal Code* § 11166,
22 and/or not to impede the filing of any such report. Furthermore, Defendants COTTLE,
23 VINEYARD ANAHEIM and VINEYARD USA were under a statutory duty to provide their agents,
24 volunteers, and employees with various acknowledgements of reporting requirements under *Penal Code*
25 §11166.5.

26 82. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
27 through 50, inclusive, knew or should have known that one of their agents, employees, counselors,
28 advisors, worship group leaders, volunteers, and spiritual advisors, MAYFIELD, had sexually molested,

1 abused or caused touching, battery, harm, and other injuries to minors, including Plaintiff, giving rise to
2 a duty to report such conduct under California *Penal Code* §11166.

3 83. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
4 through 50, inclusive, knew, or should have known of in the exercise of reasonable diligence, that an
5 undue risk to minors, including Plaintiff, existed because Defendants VINEYARD ANAHEIM,
6 VINEYARD USA, and DOES 1 through 50 did not comply with California's mandatory
7 reporting requirements.

8 84. By failing to report the continuing molestations and assaults, which Defendants
9 COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, knew of or
10 should have known of, and by ignoring the fulfillment of the mandated compliance with the reporting
11 requirements provided under California *Penal Code* § 11166, Defendants COTTLE, VINEYARD
12 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, created the risk and danger
13 contemplated by CANRA, and as a result, unreasonably and wrongfully exposed Plaintiff and other
14 minors to sexual molestation and abuse.

15 85. Plaintiff was a member of the class of persons for whose protection California *Penal*
16 *Code* § 11166 was specifically adopted to protect.

17 86. Had Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
18 through 50, inclusive, adequately reported the molestation of Plaintiff and other minors as required
19 by California *Penal Code* § 11166, further harm to Plaintiff and other minors would have been
20 avoided.

21 87. As a proximate result of Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD
22 USA, and DOES 1 through 50's, inclusive, failure to follow the mandatory reporting requirements of
23 California *Penal Code* § 11166, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA and
24 DOES 1 through 50, inclusive, wrongfully denied Plaintiff and other minors the intervention of child
25 protection services. Such public agencies would have changed the then-existing arrangements and
26 conditions that provided the access and opportunities for the molestation of Plaintiff by
27 MAYFIELD.

28 ///

1 88. The mental and emotional damages and injuries resulting from the sexual molestation
2 of Plaintiff by MAYFIELD, were the type of occurrence and injuries that the CANRA was designed to
3 prevent.

4 89. As a result, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and
5 DOES 1 through 50's, inclusive, failure to comply with the mandatory reporting requirements of
6 California *Penal Code* § 11166 also constituted a *per se* breach of Defendants COTTLE,
7 VINEYARD ANAHEIM, VINEYARD USA's, and DOES 1 through 50's, inclusive duties to Plaintiff.

8 90. As a direct and proximate result of his sexual assault by MAYFIELD, which was
9 enabled and facilitated by Defendant COTTLE, VINEYARD ANAHEIM, VINEYARD USA and DOES
10 1 through 50, Plaintiff has suffered, and will continue to suffer personal physical injury, as well as
11 psychological, mental and emotional distress, including but not limited to: shame, embarrassment,
12 post-traumatic stress disorder, suicide attempts, suicidal ideation, self-harm, substance abuse disorders,
13 eating disorders, promiscuous behaviors, inability to trust males and persons in positions of authority,
14 anxiety and depression. Plaintiff has and will continue to incur expenses for mental, psychological,
15 psychiatric, and medical care due to the assault, according to proof at trial.

16
17 **SECOND CAUSE OF ACTION**

18 **NEGLIGENT SUPERVISION**

19 **(AGAINST DEFENDANTS COTTLE, VINEYARD ANAHEIM, VINEYARD USA**

20 **AND DOES 1-50)**

21 91. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
22 through 90, inclusive, as though fully set forth herein.

23 92. By virtue of Plaintiff's special relationship with Defendants COTTLE, VINEYARD
24 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, and Defendants COTTLE,
25 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive, relation to
26 MAYFIELD, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through
27 50, inclusive, owed Plaintiff a duty to provide reasonable supervision of the Plaintiff, to provide
28 reasonable supervision of MAYFIELD, to use reasonable care in investigating and exploring

1 MAYFIELD's background, and to provide adequate warning to Plaintiff and other children, of
2 MAYFIELD's dangerous propensities and unfitness.

3 93. Plaintiff is informed and believes, and on that basis alleges, that Defendants COTTLE,
4 VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50, inclusive, by and through their
5 respective agents, servants and employees, knew or should have known of MAYFIELD's dangerous
6 and exploitive propensities and/or that MAYFIELD was an unfit agent, leader, representative, and
7 volunteer for VINEYARD ANAHEIM and VINEYARD USA.

8 94. Despite such knowledge, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD
9 USA, and DOES 1 through 50, inclusive, negligently failed to supervise MAYFIELD in his respective
10 positions of trust and authority as an authority figure and supervisor of children, where MAYFIELD
11 was able to commit wrongful acts against Plaintiff. Defendants COTTLE, VINEYARD ANAHEIM,
12 VINEYARD USA, and DOES 1 through 50, inclusive, failed to provide reasonable supervision
13 of MAYFIELD, failed to use reasonable care in investigating MAYFIELD, and failed to provide
14 adequate warning to Plaintiff, child protective agencies and law enforcement, of MAYFIELD's
15 dangerous propensities and unfitness. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD
16 USA, and DOES 1 through 50, inclusive, further failed to take reasonable measures to prevent sexual
17 assault, harassment, and molestation of children, including Plaintiff.

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

25 96. Plaintiff is informed and believes, and on that basis alleges, that Defendants COTTLE,
26 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were placed on actual
27 or constructive notice that MAYFIELD had assaulted children prior to, and/or during the time they
28 were in contact with Plaintiff. Plaintiff is informed, and thereon alleges, that Defendants COTTLE,

VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were informed of sexual assault, harassment and molestations committed by MAYFIELD or of conduct that would put a reasonable person on notice of such propensity to assault, harassment and molestation.

97. Even though Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, knew or should have known of these activities by MAYFIELD, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, did nothing to investigate, supervise or monitor MAYFIELD to ensure the safety of Plaintiff.

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

99. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, negligently failed to supervise MAYFIELD in his positions of trust and authority as an employee, agent, worship group leader, spiritual advisor, counselor and mentor, and/or other authority figure, where MAYFIELD was able to commit wrongful acts against Plaintiff. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, failed to provide reasonable supervision of MAYFIELD. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50 further failed to take reasonable measures to prevent sexual harassment, molestation and assault of minors, including Plaintiff.

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

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

102. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive, conduct was a breach of their duties to Plaintiff.

103. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, breached their duty to Plaintiff by, *inter alia*, failing to adequately monitor and supervise MAYFIELD and stopping MAYFIELD from committing wrongful sexual acts with minors including Plaintiff. This belief is founded on the fact that employees and staff of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, had suspected the assault was occurring at the time, and failed to investigate into the matter further. This belief is also founded on the fact that Defendant COTTLE had also suspected the assaults were occurring at the time, and failed to investigate into the matter further. Based on these facts, Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, knew or should have known of MAYFIELD's incapacity to supervise and stop agents and representatives of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive from committing wrongful sexual acts with minors.

104. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer personal physical injury, as well as psychological, mental and emotional distress, including but not limited to: shame, embarrassment, post-traumatic stress disorder, suicide attempts, suicidal ideation, self-harm, substance abuse disorders, eating disorders, promiscuous behaviors, inability to trust males and persons in positions of authority, anxiety and depression; has suffered and continues to suffer and was prevented and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and will continue to incur expenses for psychological treatment, therapy, and counseling.

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1 **THIRD CAUSE OF ACTION**

2 **NEGLIGENT RETENTION/HIRING**

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

4 105. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
5 through 104, inclusive, as though fully set forth herein.

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

14 107. As an institution entrusted with the care of minors, where staff, employees, agents,
15 volunteers, and worship group leaders, such as MAYFIELD were placed in contact with minors,
16 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's, inclusive,
17 expressly and implicitly represented that these individuals, including MAYFIELD, were not a
18 sexual threat to children and others who would fall under MAYFIELD's influence, control, direction,
19 and guidance.

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

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28 ///

1 109. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's,
2 inclusive, and each of them were or should have been aware and understood how vulnerable minor
3 children were to sexual assault, harassment and molestation by persons of authority, including
4 MAYFIELD, within the control of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES
5 1 through 50, inclusive.

6 110. Plaintiff is informed and believes, and on that basis alleges, that other children and/or
7 employees of Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
8 inclusive, complained of MAYFIELD's sexual improprieties prior to the sexual assault of the
9 Plaintiff. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive,
10 knew, or at the very least should have known, of MAYFIELD's prior history of sexual misconduct
11 with minors, prior to and during Plaintiff's assaults.

12 111. Plaintiff is informed, and believes, and on that basis alleges, that the Defendants
13 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, were put on notice, and
14 should have known that MAYFIELD had previously engaged and continued to engage in unlawful
15 sexual conduct with children, and that it was, or should have been foreseeable that he was engaging,
16 or would engage in illicit sexual activities with Plaintiff, and others, under the cloak of his
17 authority, confidence, and trust, bestowed upon him through Defendants VINEYARD ANAHEIM,
18 VINEYARD USA, and DOES 1 through 50, inclusive.

19 112. Plaintiff is informed and believes, and on that basis alleges that Defendants
20 VINEYARD ANAHEIM, VINEYARD USA. and DOES 1 through 50, inclusive, were placed on actual
21 and/or constructive notice that MAYFIELD had abused, harassed, molested and/or was molesting
22 minor children, both before his sexual assault, molestation and harassment of Plaintiff, and during that
23 same period. Plaintiff is informed, and thereon alleges, that other third parties, patrons, students, and/or
24 congregants, informed Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through
25 50, inclusive, of inappropriate conduct and molestations committed by MAYFIELD.

26 113. Even though Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1
27 through 50, inclusive, knew or should have known of these activities by MAYFIELD, Plaintiff is
28 informed that Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,

1 inclusive, failed to use reasonable care in investigating MAYFIELD and did nothing to investigate,
2 supervise or monitor MAYFIELD to ensure the safety of the other minor children in his charge,
3 including Plaintiff.

4 114. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50's,
5 inclusive, conduct was a breach of their duties to Plaintiff.

6 115. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
7 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
8 distress, shame, embarrassment, post-traumatic stress disorder, suicide attempts, suicidal ideation, self-
9 harm, substance abuse disorders, eating disorders, promiscuous behaviors, inability to trust males and
10 persons in positions of authority, anxiety and depression. She has suffered and continues to suffer and
11 was prevented and will continue to be prevented from performing daily activities and obtaining the
12 full enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and will
13 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

14 **FOURTH CAUSE OF ACTION**

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

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

17 116. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
18 through 115, inclusive, as though fully set forth herein.

19 117. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
20 inclusive, owed Plaintiff a duty to take reasonable protective measures to protect Plaintiff and other
21 minor children in their charge from the risk of sexual assault, harassment and molestation by
22 MAYFIELD by properly warning, training or educating the Plaintiff and other minors about how to
23 avoid such a risk.

24 118. Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50,
25 inclusive, breached their duty to take reasonable protective measures to protect Plaintiff and other minor
26 children in their charge, from the risk of sexual assault, harassment and molestation by MAYFIELD,
27 such as the failure to properly warn, train or educate Plaintiff and other minor children in his charge
28 about how to avoid such a risk.

1 119. Defendants breached their duty to take reasonable protective measures to protect
2 Plaintiff and other minor children in their charge from the risk of sexual harassment, molestation and
3 assault by MAYFIELD, by failing to supervising and/or stop employees of Defendants VINEYARD
4 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, including MAYFIELD, from
5 committing wrongful sexual acts with minor children, including Plaintiff.

6 120. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
7 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
8 distress, shame, embarrassment, post-traumatic stress disorder, suicide attempts, suicidal ideation, self-
9 harm, substance abuse disorders, eating disorders, promiscuous behaviors, inability to trust males and
10 persons in positions of authority, anxiety and depression. She has suffered and continues to suffer and
11 was prevented and will continue to be prevented from performing daily activities and obtaining the
12 full enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and will
13 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

14
15 **FIFTH CAUSE OF ACTION**

16 **BREACH OF FIDUCIARY DUTY**

17 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA,**

18 **COTTLE, MAYFIELD AND DOES 1-50)**

19 121. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
20 through 120, inclusive, as though fully set forth herein.

21 122. As set forth more fully above, Defendants entered and maintained a fiduciary relationship
22 with Plaintiff whereby Defendants owed Plaintiff an *in loco parentis* duty of care to take all reasonable
23 steps and implement all reasonable safeguards to protect Plaintiff while she was in the custody of
24 Defendants and/or MAYFIELD.

25 123. Plaintiff agreed to place her trust and confidence in MAYFIELD, as well as
26 Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive,
27 in the expectation that Defendants would properly supervise Plaintiff, regulate his activities and
28 behavior, and ensure his safety. Plaintiff believed in the integrity of Defendants VINEYARD

1 ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, and therefore felt comfortable
2 in her care and custody being entrusted to Defendants.

3 124. As alleged herein, MAYFIELD breached his duty to Plaintiff by repeatedly subjecting
4 Plaintiff to acts of childhood sexual assault. As further alleged herein, Defendants COTTLE,
5 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, inclusive, breached this duty
6 to Plaintiff by failing to take any reasonable steps or implement any reasonable safeguards to protect
7 Plaintiff from MAYFIELD, and by allowing Plaintiff to be sexually assaulted by MAYFIELD.

8 125. As a direct and proximate result of his sexual assault by MAYFIELD, which was
9 enabled and facilitated by Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through
10 50, Plaintiff has suffered, and will continue to suffer personal psychological, mental and emotional
11 distress, including but not limited to shame, embarrassment, post-traumatic stress disorder, suicide
12 attempts, suicidal ideation, self-harm, substance abuse disorders, eating disorders, promiscuous
13 behaviors, inability to trust males and persons in positions of authority, anxiety and depression. She has
14 and will continue to incur expenses for mental, psychological, psychiatric, and medical care due to the
15 assault, according to proof at trial.

16 126. In subjecting the Plaintiff to the wrongful treatment herein described, Defendants
17 COTTLE and MAYFIELD acted willfully and maliciously with the intent to harm Plaintiff, and in
18 conscious disregard of Plaintiff's rights, so as to constitute malice and oppression under California
19 *Civil Code* section 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an
20 amount to be determined by the court, against Defendants COTTLE and MAYFIELD, in a sum to be
21 shown according to proof. As to Defendants VINEYARD ANAHEIM, VINEYARD USA, Plaintiff
22 reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14
23 and as further reserved in Paragraph 74, *supra*.

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1 **SIXTH CAUSE OF ACTION**

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

3 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA,**

4 **COTTLE, MAYFIELD AND DOES 1-50)**

5 127. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
6 through 125, inclusive, as though fully set forth herein.

7 128. By holding MAYFIELD out as an agent of Defendants, and by allowing him to
8 undertake the spiritual and educational instruction of minor children such as Plaintiff, Defendants
9 entered into a confidential, fiduciary and special relationship with Plaintiff.

10 129. By holding themselves out as qualified institutions for the safety and supervision of
11 children, and by undertaking to provide for the wellness, spiritual guidance and mentorship of Plaintiff
12 and other minors, Defendants entered into a confidential, fiduciary and special relationship
13 with Plaintiff.

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

20 131. By virtue of their confidential, fiduciary and special relationship with Plaintiff,
21 Defendants owed Plaintiff a duty to:

- 22 a. Investigate or otherwise confirm or deny such claims of sexual assault;
23 b. Reveal such facts to Plaintiff, the community at large, and child protective and
24 law enforcement agencies;
25 c. Refuse to place Defendant MAYFIELD and other molesters in
26 positions of trust and authority within Defendants' institutions;
27 d. Refuse to hold out Defendant MAYFIELD and other molesters to the public, the
28 community, minors, parents and law enforcement agencies as being in good
standing and, trustworthy in keeping with his and their position as a counselor,
spiritual advisor, and authority figure;

- 1 e. Refuse to assign Defendant MAYFIELD and other molesters to positions of
2 power within the Defendants' institutions and over minors; and
3 f. Disclose to Plaintiff, the public, the Defendants' community, minors,
4 and law enforcement agencies the wrongful, tortious, and sexually
5 exploitive acts that Defendant MAYFIELD had engaged in with
6 children.

6 132. Defendants' breach of their respective duties included:

- 7 a. Not making reasonable investigations of Defendant MAYFIELD;
8 b. Issuing no warnings about Defendant MAYFIELD;
9 c. Permitting Defendant MAYFIELD to routinely be alone with and in control of
10 minors, unsupervised;
11 d. Not adopting a policy to prevent Defendant MAYFIELD from routinely having
12 minors in their unsupervised control;
13 e. Making no reports of any allegations of Defendant MAYFIELD's
14 assault of minors prior to or during his employment and/or
15 agency with Defendants; and
16 f. Assigning and continuing to assign Defendant MAYFIELD to duties which
17 placed him in positions of authority and trust over minors, positions in which
18 Defendant MAYFIELD easily isolate and sexually assault minors.

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

19 134. Defendants' misconduct did reasonably cause Plaintiff to forbear on Plaintiff's rights.

20 135. The misrepresentations, suppressions and concealment of facts by Defendants were
21 intended to and were likely to mislead Plaintiff and others to believe that Defendants had no knowledge
22 of any complaints or reports against MAYFIELD, or that there were no other complaints or reports
23 of unlawful or sexual misconduct against MAYFIELD or others and that there was no need for them to
24 take further action or precaution.

25 136. The misrepresentations, suppressions and concealment of facts by Defendants was likely
26 to mislead Plaintiff and others to believe that Defendants had no knowledge of the fact that MAYFIELD
27 was a molester and was known to commit wrongful sexual acts with minors, including Plaintiff.

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

3 138. Defendants suppressed and concealed the true facts regarding MAYFIELD with the
4 purpose of: preventing Plaintiff, and others, from learning that MAYFIELD and others had been
5 and were continuing to sexually harass, molest and assault minors and others under MAYFIELD
6 and Defendants' control, direction, and guidance, with complete impunity; inducing people, including
7 Plaintiff and other benefactors and donors to participate and financially support Defendants and other
8 enterprises of Defendants; preventing further reports and outside investigations into MAYFIELD
9 and Defendants' conduct; preventing discovery of Defendants' own conduct; avoiding damage to the
10 reputations of Defendants; protecting Defendants' power and status in the community and the
11 academic community; avoiding damage to the reputation of Defendants, or Defendants' institutions;
12 and avoiding the civil and criminal liability of Defendants, of MAYFIELD.

13 139. At all times mentioned herein, Defendants, and in particular MAYFIELD and
14 Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA and DOES 1 through 50, with
15 knowledge of the tortious nature of their own and MAYFIELD's conduct, knowingly conspired
16 and gave each other substantial assistance to perpetrate the misrepresentations, fraud and deceit alleged
17 herein—covering up the past allegations of sexual misconduct lodged against MAYFIELD, and
18 allowing MAYFIELD to remain in his positions as mentor, spiritual leader, worship group leader,
19 and supervisor of children, so they could maintain their reputations and continue to make a profit.

20 140. Plaintiff and others were misled by Defendants' suppressions and concealment of facts,
21 and in reliance thereon, were induced to act or induced not to act, exactly as intended by Defendants.
22 Specifically, Plaintiff was induced to believe that there were no allegations of criminal or sexual
23 assault against MAYFIELD and that he was safe to be around children. Had Plaintiff and others,
24 known the true facts about MAYFIELD, they would have not participated further in activities of
25 Defendants VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, or continued to
26 financially support Defendants' activities. They would have reported the matters to the proper
27 authorities, to other minors and their parents so as to prevent future recurrences; they would not have
28 allowed children, including Plaintiff, to be alone with, or have any relationship with MAYFIELD;

1 they would not have allowed children, including Plaintiff, to attend or be under the control of
2 Defendants; they would have undertaken their own investigations which would have led to discovery
3 of the true facts; and they would have sought psychological counseling for Plaintiff, and for other
4 children molested and assaulted by MAYFIELD.

5 141. By giving MAYFIELD the position of spiritual guide, mentor, worship group leader,
6 confidant, and trusted individual, Defendants impliedly represented that MAYFIELD was safe and
7 morally fit to give children direction and guidance.

8 142. When Defendants made these affirmative or implied representations and non-
9 disclosures of material facts, Defendants knew or should have known that the facts were
10 otherwise. Defendants knowingly and intentionally suppressed the material facts that MAYFIELD had on
11 prior occasions sexually, physically, and mentally assaulted minors, including Plaintiff, and knew of or
12 learned of conduct, or should have known of conduct by MAYFIELD which placed Defendants on
13 notice that MAYFIELD had previously been suspected of unlawful sexual conduct with minors, and
14 was likely abusing children.

15 143. Because of Plaintiff's young age, and because of the status of MAYFIELD as a spiritual
16 guide, spiritual leader, parent, and authority figure to Plaintiff, Plaintiff was vulnerable to MAYFIELD.
17 MAYFIELD sought Plaintiff out and was empowered by and accepted Plaintiff's vulnerability.
18 Plaintiff's vulnerability also prevented Plaintiff from effectively protecting herself from the sexual
19 advances of MAYFIELD.

20 144. Defendants had the duty to obtain and disclose information relating to sexual
21 misconduct of MAYFIELD.

22 145. Defendants misrepresented, concealed or failed to disclose information relating to sexual
23 misconduct of MAYFIELD.

24 146. Defendants knew that they had misrepresented, concealed or failed to disclose
25 information related to sexual misconduct of MAYFIELD.

26 147. Plaintiff justifiably relied upon Defendants for information relating to sexual
27 misconduct of MAYFIELD.

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1 148. Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, DOES 1 through
2 50, and MAYFIELD, in concert with each other and with the intent to conceal and defraud,
3 conspired and came to a meeting of the minds whereby they would misrepresent, conceal or fail to
4 disclose information relating to the sexual misconduct of MAYFIELD, the inability of Defendants
5 to supervise or stop MAYFIELD from sexually harassing, molesting and abusing Plaintiff, and their
6 own failure to properly investigate, supervise and monitor his conduct with minor children.

7 149. By so concealing, Defendants committed at least one act in furtherance of the
8 conspiracy.

9 150. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
10 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
11 distress, shame, embarrassment, post-traumatic stress disorder, suicide attempts, suicidal ideation, self-
12 harm, substance abuse disorders, eating disorders, promiscuous behaviors, inability to trust males and
13 persons in positions of authority, anxiety and depression; has suffered and continues to suffer and was
14 prevented and will continue to be prevented from performing daily activities and obtaining the full
15 enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and will
16 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

17 151. In addition, when Plaintiff finally discovered the fraud of Defendants, and
18 continuing thereafter, Plaintiff experienced recurrences of the above-described injuries. In
19 addition, when Plaintiff finally discovered the fraud of Defendants, and continuing thereafter,
20 Plaintiff experienced extreme and severe mental anguish and emotional distress that Plaintiff had been
21 the victim of Defendants' fraud; that Plaintiff had not been able to help other minors being molested
22 because of the fraud, and that Plaintiff had not been able because of the fraud to receive timely treatment
23 needed to deal with the problems Plaintiff had suffered and continues to suffer as a result of the sexual
24 harassment, molestation and assault.

25 152. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
26 MAYFIELD acted willfully and maliciously with the intent to harm Plaintiff, and in conscious
27 disregard of Plaintiff's rights, so as to constitute malice and oppression under California *Civil*
28 *Code* section 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount

1 to be determined by the court, against Defendants MAYFIELD and COTTLE, in a sum to be shown
2 according to proof. As to Defendants VINEYARD ANAHEIM and VINEYARD USA, Plaintiff
3 reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14
4 and as further reserved in Paragraph 74, *supra*.

5 **SEVENTH CAUSE OF ACTION**

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

7 **(AGAINST DEFENDANTS VINEYARD ANAHEIM, VINEYARD USA,**

8 **COTTLE, MAYFIELD AND DOES 1-50)**

9 153. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
10 through 152, inclusive, as though fully set forth herein.

11 154. During Plaintiff's time as a minor, MAYFIELD intentionally, recklessly and wantonly
12 made sexual advances, solicitations, requests, and demands for sexual compliance of a hostile
13 nature based on Plaintiff's gender that were unwelcome, pervasive and severe, including but not
14 limited to MAYFIELD, all under the supervision of Defendants, who were acting in the course and
15 scope of their agency with Defendants and each of them. The sexual harassment and assault included
16 but was not limited to acts of sexual abuse described *supra*.

17 155. During Plaintiff's time as a minor, MAYFIELD intentionally, recklessly and wantonly
18 did acts which resulted in harmful and offensive contact with intimate parts of Plaintiff's person,
19 including but not limited to, using his position of authority and age to force Plaintiff to give into
20 MAYFIELD's sexual suggestions.

21 156. Because of Plaintiff's relationship with MAYFIELD, as well as his relationship with
22 Defendants COTTLE, VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, and
23 Plaintiff's young age as a minor girl, Plaintiff was unable to easily terminate the relationship he had
24 with the Defendants.

25 157. Because of MAYFIELD's age and position of authority, physical seclusion of Plaintiff,
26 Plaintiff's mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was
27 unable to, and did not, give meaningful consent to such acts.

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1 158. Defendants' conduct (and the conduct of their agents) was a breach of their duties to
2 Plaintiff.

3 159. As a result of the above-described conduct, Plaintiff has suffered and continues to suffer
4 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
5 distress, shame, embarrassment, post-traumatic stress disorder, suicide attempts, suicidal ideation, self-
6 harm, substance abuse disorders, eating disorders, promiscuous behaviors, inability to trust males and
7 persons in positions of authority, anxiety and depression; has suffered and continues to suffer and was
8 prevented and will continue to be prevented from performing daily activities and obtaining the full
9 enjoyment of life; will sustain loss of earnings and earning capacity, and/or has incurred and will
10 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

11 160. In subjecting the Plaintiff to the wrongful treatment herein described, Defendant
12 MAYFIELD acted willfully and maliciously with the intent to harm Plaintiff, and in conscious
13 disregard of Plaintiff's rights, so as to constitute malice and oppression under California *Civil*
14 *Code* section 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount
15 to be determined by the court, against Defendants MAYFIELD and COTTLE, in a sum to be shown
16 according to proof. As to Defendants VINEYARD ANAHEIM and VINEYARD USA, Plaintiff
17 reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14
18 and as further reserved in Paragraph 74, *supra*.

19
20 **EIGHTH CAUSE OF ACTION**

21 **SEXUAL BATTERY**

22 **(AGAINST DEFENDANT MAYFIELD AND DOES 1-50)**

23 161. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
24 through 160, inclusive, as though fully set forth herein.

25 162. During Plaintiff's time as a congregant, student, and participant at Defendants
26 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Defendant MAYFIELD
27 intentionally, recklessly and wantonly did acts which were intended to, and did result in harmful and
28 offensive contact with intimate parts of Plaintiff's person. Plaintiff was subjected to numerous

1 instances of sexual battery by Defendant MAYFIELD, during Plaintiff's time as a minor with
2 Defendants DOES 1 through 50, specified *supra*.

3 163. Defendant MAYFIELD did the aforementioned acts with the intent to cause a
4 harmful or offensive contact with an intimate part of Plaintiff's person and would offend a reasonable
5 sense of personal dignity. Further, said acts did cause a harmful or offensive contact with an intimate
6 part of Plaintiff's person that would offend a reasonable sense of personal dignity.

7 164. Because of Defendant MAYFIELD's positions of authority over Plaintiff, and
8 Plaintiff's mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was
9 unable to, and did not, give meaningful consent to such acts.

10 165. As a direct, legal, and proximate result of the acts of Defendant MAYFIELD, Plaintiff
11 sustained serious and permanent injuries to his person, all of his damage in an amount to be shown
12 according to proof and within the jurisdiction of the Court.

13 166. As a direct result of the sexual battery by Defendant MAYFIELD, Plaintiff has difficulty
14 in reasonably or meaningfully interacting with others, including those in positions of authority over
15 Plaintiff including teachers, and supervisors, and in intimate, confidential and familial
16 relationships, due to the trauma of childhood sexual assault inflicted upon her by Defendants. This
17 inability to interact creates conflict with Plaintiff's values of trust and confidence in others, and has
18 caused Plaintiff substantial emotional distress, shame, embarrassment, post-traumatic stress disorder,
19 suicide attempts, suicidal ideation, self-harm, substance abuse disorders, eating disorders, promiscuous
20 behaviors, inability to trust males and persons in positions of authority, anxiety and depression.

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

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1 **NINTH CAUSE OF ACTION**

2 **SEXUAL ASSAULT**

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

4 168. Plaintiff repeats, re-alleges and incorporates herein by reference paragraphs 1
5 through 167, inclusive, as though fully set forth herein.

6 169. During Plaintiff's time as a congregant, student, and participant at Defendants
7 VINEYARD ANAHEIM, VINEYARD USA, and DOES 1 through 50, Defendant MAYFIELD
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 assault by Defendant MAYFIELD, during Plaintiff's time as a minor with
11 Defendants DOES 1 through 50, specified *supra* in Paragraphs 21 through 24.

12 170. 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.

15 171. Defendant MAYFIELD's conduct was a substantial factor in causing Plaintiff's harm and
16 offense, as it offended Plaintiff's reasonable sense of personal dignity.

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

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

23 174. As a direct result of the sexual battery by Defendant MAYFIELD, Plaintiff has difficulty
24 in reasonably or meaningfully interacting with others, including those in positions of authority over
25 Plaintiff including teachers, and supervisors, and in intimate, confidential and familial
26 relationships, due to the trauma of childhood sexual assault inflicted upon her by Defendants. This
27 inability to interact creates conflict with Plaintiff's values of trust and confidence in others, and has
28 caused Plaintiff substantial emotional distress, shame, embarrassment, post-traumatic stress disorder,

1 suicide attempts, suicidal ideation, self-harm, substance abuse disorders, eating disorders, promiscuous
2 behaviors, inability to trust males and persons in positions of authority, anxiety and depression.

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

9 **PRAYER FOR RELIEF**

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

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

21
22 Dated: October 14, 2025

EASTON & EASTON, LLP

23
24 By: _____

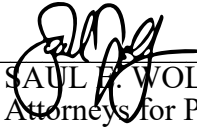
25 SAUL E. WOLF
26 Attorneys for Plaintiff,
27 DANISHA KEATING
28

DEMAND FOR JURY TRIAL

A trial by jury is hereby demanded by Plaintiff.

Dated: October 14, 2025

EASTON & EASTON, LLP

By: _____
SAUL E. WOLF
Attorneys for Plaintiff,
DANISHA KEATING