

CAUSE NO. DC-14-12402

Tonya Pointer

JOHN DOE I, JANE DOE I, JANE DOE  
II, JANE DOE III, JANE DOE IV, and  
JANE DOE V,

Plaintiffs,

V.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.  
(and/or d/b/a or a/k/a, WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA, INC.), KINGDOM  
HALL JEHOVAH’S WITNESSES  
(CENTRAL ENGLISH) OF DALLAS,  
TEXAS, KINGDOM HALL  
JEHOVAH’S WITNESSES OF  
PLANO, TEXAS, KINGDOM HALL  
JEHOVAH’S WITNESSES OF  
GREENVILLE, TEXAS, and  
REGINALD TYRONE JACKSON,

Defendants.

§ IN THE DISTRICT COURT OF

§ DALLAS COUNTY, TEXAS

§ \_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFFS’ ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

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TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, John Doe I, Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V, and file this Original Petition and Request for Disclosure, complaining of Watchtower Bible and Tract Society of New York, Inc. (and/or d/b/a and/or a/k/a Watchtower Bible and Tract Society of Pennsylvania, Inc.), Kingdom Hall Jehovah's Witnesses (Central English) of Dallas, Texas, Kingdom Hall Jehovah's Witnesses of Plano, Texas, Kingdom-Hall Jehovah's Witnesses of Greenville, Texas, and Reginald Tyrone Jackson, Defendants, and would respectfully show the Court as follows:

### **I. DISCOVERY CONTROL PLAN**

Plaintiffs intend to conduct discovery under Level III of Texas Rule of Civil Procedure 190.4 because they seek monetary relief aggregating more than \$50,000, and request that the Court enter a Discovery Control Plan and place this case on Level III.

### **II. PARTIES**

1. Plaintiff John Doe I is a resident of Texas. His identity will be made known to Defendants when they answer or otherwise appear in this case.
2. Plaintiff Jane Doe I is a resident of Texas. Her identity will be made known to Defendants when they answer or otherwise appear in this case.

3. Plaintiff Jane Doe II is a resident of Texas. Her identity will be made known to Defendants when they answer or otherwise appear in this case.

4. Plaintiff Jane Doe III is a resident of Texas. Her identity will be made known to Defendants when they answer or otherwise appear in this case.

5. Plaintiff Jane Doe IV is a resident of Texas. Her identity will be made known to Defendants when they answer or otherwise appear in this case.

6. Plaintiff Jane Doe V is a resident of Texas. Her identity will be made known to Defendants when they answer or otherwise appear in this case.

7. Defendant Watchtower Bible and Tract Society of New York, Inc. (and/or d/b/a and/or a/k/a Watchtower Bible and Tract Society of Pennsylvania, Inc.) (“Watchtower”), is a corporation organized and existing under the laws of the State of New York, with a principal office located at 25 Columbia Heights, Brooklyn, New York 11201-2483. Said Defendant has conducted business within the State of Texas through its agents, representatives, and alter egos, and may be served with process through its registered agent, Mr. Tad Curtis, at 702 Orland Boulevard, Austin, Texas 78745-2144, or wherever said Defendant may be found.

8. Defendant Kingdom Hall Jehovah’s Witnesses (Central English) of Dallas, Texas (hereinafter “Dallas Congregation”) may be served with process through its elders at 2563 Sweetbriar Drive, Dallas, Texas, or wherever said Defendant may be found.

9. Defendant Kingdom Hall Jehovah's Witnesses of Plano, Texas (hereinafter "Plano Congregation") may be served with process through its elders at 1912 Hedgcoxe Road, Plano, Texas 75024, or wherever said Defendant may be found.

10. Defendant Kingdom Hall Jehovah's Witnesses of Greenville, Texas (hereinafter "Greenville Congregation") may be served with process through its elders at 3114 Terrell Road, Greenville, Texas 75412, or wherever said Defendant may be found.

11. Defendant Reginald Tyrone Jackson currently resides in Dallas County, Texas, and may be served with process at his place of residence, 1528 Hunterwood Drive, Dallas, Texas 75253, or wherever said Defendant may be found.

12. The Defendant entities are collectively referred to herein as the "Watchtower Defendants" because each is the alter ego of one another and collectively operate in concert as a single business enterprise.

### **III. VENUE AND JURISDICTION**

1. Venue is proper in Dallas County, Texas because a substantial part of the actions or omissions giving rise to Plaintiffs' lawsuit occurred in Dallas County, Texas, and because Defendants Reginald Jackson and Kingdom Hall

Jehovah's Witnesses (Central English) of Dallas are residents of Dallas County, Texas.

2. Jurisdiction is proper because the amount in controversy exceeds the minimum jurisdictional limits of this Court.

#### **IV. CLAIMS FOR RELIEF**

1. Plaintiff John Doe I seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

2. Plaintiff Jane Doe I seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

3. Plaintiff Jane Doe II seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

4. Plaintiff Jane Doe III seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

5. Plaintiff Jane Doe IV seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

6. Plaintiff Jane Doe V seeks monetary relief over \$1,000,000 in accordance with TEX. R. CIV. P. 47(c).

## **V. FACTUAL BACKGROUND**

1. The organizational structure of the Jehovah's Witness Church is hierarchical in nature. At all times material herein, the organizational head or leadership is the Watchtower Bible and Tract Society of New York, Inc. Authority flows down from it to the local levels of the Church, which is made up of congregations, and include the Dallas Congregation, Plano Congregation, and Greenville Congregation. Congregations consist of elders and members. Reginald Tyrone Jackson was an elder of the Greenville Congregation in the late-1980s and early-1990s.

2. Watchtower is led by a Governing Body, which controls each congregation through regional circuit overseers and congregation elders.

3. The Governing Body is at the top of a strict chain of command that extends over each congregation. The congregation, and its members, act as agents, servants, and alter egos of the Governing Body, and work or operate in concert with one another. Authority for any action by a congregation, its leaders, and/or its members, comes directly from the Governing Body, which has absolute authority over all persons and matters in or pertaining to a congregation. Watchtower's governing body provides instruction to circuit overseers and elders regarding day-to-day administration. It provides specific instruction on how to respond to



allegations of wrongdoing by elders or members, when to do so, if at all, and when to convene a judicial committee and on how to handle the wrongdoing, if at all.

4. Over each congregation is a regional circuit. Circuits are generally comprised of approximately 20 congregations, and are monitored by circuit overseers, who are appointed by the Watchtower's Governing Body.

5. Circuit overseers visit each congregation within their regional circuits. During each visit, they meet with elders and conference regarding the congregation's function and problems or issues within the congregation. They also address issues of wrongdoing, including any allegations of molestation or abuse by a member or its elders. The circuit overseer then reports back in full to the Governing Body after each visit in order to keep it informed or apprised of any issues.

6. Congregations operate with a body of elders, who are responsible for daily operations and governing the congregation. Elders are the highest authority at the congregational level and direct "field services" such as door-to-door activities. They also select potential candidates to become elders, organize weekly meetings, handle finances, and determine the guilt, repentance, and/or punishment of members or elders who commit wrongdoing.

7. In selecting an elder, the body of elders of a local congregation identify potential candidates and determine whether they are suitable and have the

appropriate morals and standards of the Religion. Once a candidate has been identified, the body of elders recommends that candidate to the national Governing Body, who then, ultimately, decides who will be appointed as an elder or overseer.

8. While elders are supervised by circuit overseers, ultimately, both elders and circuit overseers answer to the Governing Body. Every major decision as to leadership and function or operation is decided by Watchtower's Governing Body, and this was true as to the Dallas, Plano, and Greenville Congregations in the 1980s and 1990s. Membership in the Jehovah's Witness faith is strictly monitored and controlled through elders and overseers, by the Governing Body.

9. Members are encouraged to bring problems or issues to elders, and resolve them internally, rather than through outside intervention. In practice, when a member commits wrongdoing, such as abuse of another, that matter must be brought to an elder for resolution. Jehovah's Witness policy requires elders to investigate such a claim. If there are two witnesses to the wrongdoing, or if the accused confesses his wrongdoing, a judicial committee will be formed. If there are not at least two witnesses, and the accused denies the wrongdoing, then the accused is deemed innocent and treated as such, with no corrective, protective, or punitive action taken. In the absence of two witnesses willing to testify, and without a confession from the accused, the congregation or Governing Body will not conduct an investigation into the allegation of wrongdoing.

10. The Watchtower Defendants are so organized and controlled, and their affairs are so conducted, that they are the alter egos of Watchtower and operate as a sole business enterprise. Accordingly, all Defendants are agents and servants of each other and are vicariously liable for each other's acts.

11. Through its hierarchical structure, the Governing Body assumes complete control over and responsibility for the selection, development, protection, and discipline of members, including children. To further its goals, the Governing Body authorizes male members to develop relationships of trust with women, children, and families, and to assume the role of counselor for any problems or issues that arise, including claims of abuse or molestation.

12. Defendants, under the direction of the Governing Body, through the use of threats and/or under penalty of severe discipline or retaliatory action, prohibit any victim and/or accuser from warning others or speaking publicly about any matters to anyone. Victims are instructed and required not to report suspected or actual abuse to outside authorities, despite secular laws and duties regarding reporting. Violation of this policy usually carries severe penalties.

13. Around 1990, the Greenville Congregation's elders elected, and the Governing Body approved, Reginald Jackson to an elder position. As an elder, Reginald Jackson befriended children of the Greenville Congregation, and regularly took them on trips and other religious outings. While in this capacity,

Jackson “groomed” member children, and then, while acting in a position of authority and trust, sexually abused them. The children he sexually abused included Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V.

14. The Governing Body had reason to know, at least by the early-1990s, that Jackson was using his position of authority and trust to manipulate and engage in sexually inappropriate conduct with children, including Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V, who were youth members of the congregation. In spite of their knowledge of Jackson’s conduct with children, the Governing Body did not report this conduct to the authorities and did not otherwise warn members or the general public of Jackson’s wrongdoings. Instead, it remained silent, allowing Jackson to remain in a position of authority, trust, and control over children of the congregation, to repeatedly sexually abuse and molest them.

15. At all times material herein, the Watchtower Defendants prohibited these victims from warning others or speaking about their experiences to anyone under penalty of discipline or retaliatory action. These victims were not permitted to report their experiences to outside authorities or to other persons within the organization, aside from elders or overseers, despite secular laws and duties regarding the reporting of child abuse.

16. Around 1989, the Governing Body appointed a circuit overseer over the North Texas region that included the Dallas and Plano Congregations. This circuit overseer, hereafter referred to as Mr. “A,” whose identity is unknown at this time, befriended children of these congregations, including John Doe I, and like elder Jackson, this circuit overseer took them on trips and other religious outings. On multiple occasions, this circuit overseer took John Doe I to and from religious conventions and outings in Dallas, and elsewhere, and returned with “A” to the Dallas Congregation, and there, sexually abused him.

17. The Governing Body had reason to know, at least by the early-1990s, that “A” was using his position of authority and trust as circuit overseer to manipulate and engage in sexually inappropriate conduct with children, including John Doe I. In spite of their knowledge surrounding “A”’s conduct with children, the Governing Body did not report “A”’s conduct to the authorities and did not otherwise warn members or the general public of “A”’s wrongdoings. Instead, as with Jackson, it remained silent, allowing “A” to remain in a position of authority, so he could repeatedly sexually abuse and molest members of the congregations.

18. At all times material herein, the Watchtower Defendants prohibited this victim, as well as other victims, from warning others or speaking about their experiences to anyone under penalty of discipline or retaliatory action. These victims were not permitted to report their experiences to outside authorities or to

other persons within the organization, aside from elders or overseers, despite secular laws and duties regarding the reporting of child abuse.

## **VI. CAUSES OF ACTION AGAINST THE WATCHTOWER DEFENDANTS**

### **A. NEGLIGENCE**

1. The Watchtower Defendants directly and vicariously caused foreseeable harm to Plaintiffs by, among other things:

- a. aiding, abetting, and ratifying the abuse of children by overseers, elders, and other leaders in their congregation;
- b. blaming, humiliating, sanctioning and/or disciplining victims of sexual abuse instead of the perpetrators;
- c. negligently failing to report or requiring the congregations to report such sexual abuse, including the abuse by Defendants Jackson or this circuit overseer, to law enforcement and governmental child welfare agencies and requiring that publishers not make such reports;
- d. negligently misrepresenting to and/or failing to warn Plaintiffs, their families, and others of the risk of Jackson's and "A"'s abuse after they knew of their propensities to use their positions of leadership to engage in acts of sexual abuse with children;
- e. failing to train its overseers, elders, and other associated leaders in their local congregations to prevent, identify, investigate, respond to, and/or report child abuse;
- f. failing to adopt adequate policies and procedures for the protection of children and/or to implement and comply with such procedures if they did exist;
- g. failing to properly investigate matters brought to their attention involving child abuse and/or suspicions of child abuse;

- h. allowing Jackson and circuit overseer “A” to remain as appointed, trusted, agents and leaders, and in “good standing,” after they knew of their propensities to use their positions of leadership and trust to engage in acts of abuse with youth;
- i. failing to provide victims and their families information that what these minors were experiencing was, in fact, abuse, and harmful, and with assistance to cope with the trauma of abuse;
- j. preventing Plaintiffs and their families from reporting their experiences to outside authorities and obtaining outside help to deal with the trauma of abuse;
- k. concealing from Plaintiffs, and their families, that they had information that Jackson and circuit overseer “A” and other leaders were acting inappropriately with and/or abusing children;
- l. failing to undertake a sexual offender evaluation, provide sexual offender treatment, and/or obtain psychiatric evaluation and treatment of these perpetrators, even after they knew of their propensities to engage in acts of abuse with children; and
- m. failing to properly supervise them as leaders in the organizations or to monitor their activities when they knew or should have known of their propensities to use their positions of leadership to engage in acts of sexual abuse.

2. Accordingly, at a minimum, the Watchtower Defendants were negligent in hiring, retaining, and supervising these perpetrators, who were known to be using their positions of leadership and authority to engage in forbidden acts of sexual misconduct and/or abuse with children. The Watchtower Defendants were negligent in hiring, training, retaining, and supervising elders and circuit

overseers of their congregations, who were capable of investigating, reporting, and caring for and protecting the children entrusted in their care, custody, and control.

3. At all times material herein, the Watchtower Defendants had a duty to protect Plaintiffs from sexual predators within the Religion, particularly, when their inappropriate conduct with youth was known. The Watchtower Defendants knew Plaintiffs, as minors and vulnerable youth, were at risk of foreseeable harm by Jackson and “A” and failed to protect them from that harm. This was a breach of their duty to protect minor Plaintiffs who were entrusted into their care. The Watchtower Defendants are, therefore, liable for Plaintiffs’ sexual assaults and abuses under the legal theory of *respondeat superior*, agency, agency by estoppel, and ratification.

4. The relationship between Plaintiffs and Defendants, including the elders and overseers, was fiduciary in nature, which imposed on Defendants a duty to act in Plaintiffs’ best interests.

5. Because of this special or confidential relationship, Plaintiffs and their families trusted that Defendants would always act in their best interests and would never knowingly subject Plaintiffs to harm, and would warn them of any known danger. Defendants breached Plaintiffs’ trust by failing to act with the highest degree of trust and confidence to protect Plaintiffs from known harm, including sexual misconduct and abuse by these perpetrators within their Religion, and by



concealing the abuse when it had a fiduciary duty to disclose the wrongdoing and harm.

6. Defendants are further liable to Plaintiffs for premises liability. Plaintiffs were invitees on Defendants' premises and they owed a duty of care to those who may be harmed by criminal acts on their premises when the risk of such conduct was so great that it was both unreasonable and foreseeable. Defendants were aware of criminal and inappropriate conduct by Jackson and overseer "A" to minors on their property and breached the duty of care they owed to Plaintiffs.

7. Defendants' actions or omissions, stated herein or otherwise, through their officers, employees, representatives, and/or agents, constituted negligence, each and all of which were a proximate cause of the sexual misconduct and abuse in question and Plaintiffs' harm or damages resulting from that sexual misconduct.

## **B. FRAUD**

8. Defendants solicited and encouraged individuals to become members of their congregations, while representing to them that they had a safe and loving and wholesome religious environment for them and their children.

9. These representations were made to members and the general public, including the parents of John Doe I, Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V, and were material to their decision to allow their children to spend time alone with elders and overseers.

10. These representations were false because Jackson and “A” were pedophiles who victimized many children through their association with the Watchtower Defendants.

11. During these perpetrators’ tenure, the Watchtower Defendants represented them to the public as wholesome and safe, and as positive influence for children, when they knew they were unsafe to be alone with minors.

12. Defendants made these representations with the intent that the public and members, including Plaintiffs’ parents, would remain in the congregation and would continue to allow their children to be alone with Jackson and overseer “A.” The representations were false and fraudulently made. The result was the sexual abuse of John Doe I, Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V, which resulted in harm to them.

**C. FRAUD BY NON-DISCLOSURE**

13. Defendants committed fraud by non-disclosure and misrepresentation that proximately caused Plaintiffs’ injuries and damages when they represented to Plaintiffs and their families that their elders and overseers, including Jackson and “A,” were safe, all the while knowing of these perpetrators’ dangerous predatory tendencies and misconduct toward minors.

14. The Watchtower Defendants failed to disclose to Plaintiffs and their families, and to the general public, that Jackson and this circuit overseer “A” were

engaging in conduct that was wrong, hurtful, and harmful to children, for their lifetimes. Defendants were entrusted with the care and safety of minors and they owed them a duty to take all steps reasonably necessary to protect these youths from injury and harm – including foreseeable sexual misconduct and/or abuse by Jackson and circuit overseer “A” – whom Defendants knew to be a threat to children.

15. Had Defendants told Plaintiffs or their parents that nudity and sexual conduct with these perpetrators was against the law, and was injurious or harmful, Plaintiffs would not have been manipulated into being abused, and Plaintiffs’ families would not have allowed them to be alone with their abusers.

16. Defendants did everything possible to avoid disclosing these perpetrators’ inappropriate conduct and abuse of children and what they knew about their wrongful conduct with children. Defendants knew that Plaintiffs were ignorant of this inappropriate conduct and that it was potentially harmful to them, as innocent and sheltered children, and that the children did not understand the perpetrators, who were their spiritual leaders, and in a position of trust, would hurt them while satisfying the predators’ own sexual desires.

17. Plaintiffs, as youths, had no opportunity to discover the truth about these perpetrators’ violations of the law, that their behavior was wrong, or that

their behavior would be hurtful to Plaintiffs, or what Defendants knew about them and their past and ongoing inappropriate and illegal conduct with children.

18. Defendants acted in concert and engaged in a plan to cover up incidents of sexual misconduct and/or abuse of minors and prevent disclosure, prosecution, and civil litigation. They did so by denying the existence of the wrongful conduct and abuse, destroying evidence, transferring elders/overseers, and by use of religious duress and coercion, which was a breach of trust, confidence, and the special relationship that existed between them and their members.

## **VII. DEFENDANTS' FRAUDULENT CONCEALMENT BY CONSPIRACY**

1. Defendants entered into a civil conspiracy, accompanied by a meeting of the minds regarding concerted actions, the purposes of which were to conceal and minimize public knowledge of the widespread sexual misconduct and/or abuse of minors by elders, overseers, and other members or representatives of the Religion, and to take a uniform position and approach to the handling of known misconduct or abuse. This uniform position and approach was designed to avoid prosecution, prevent or minimize claims for damages, avoid public exposure of the sexual misconduct and/or abuse of children, protect the reputation of the Religion and congregations from scandal, and thus ensure continued financial

contributions in support of the Jehovah's Witnesses Religion. This conspiracy included spoliation of evidence.

2. This conspiracy and concert of action was carried out by Defendants to conceal and fraudulently conceal the fact that they individually and collectively, committed acts of neglect, gross neglect, fraud, and breached fiduciary duties.

3. Officials and agents or representatives of Defendants, acting in concert, engaged in this conspiracy to avoid prosecution, to cover up sexual misconduct and/or abuse, and to conceal claims arising from crimes or actions of their members. Plaintiffs plead this conspiracy tolls any statute of limitations. Plaintiffs also plead that exceptions to any statute of limitations, including fraud, fraudulent concealment, equitable estoppel, discovery rule, and unsound mind, apply for the same reasons stated herein.

### **VIII. CAUSE OF ACTION AGAINST DEFENDANT REGINALD JACKSON**

1. Reginald Jackson was an elder of the Jehovah's Witnesses Congregation in Greenville, Texas in the late-1980s and early-1990s.

2. Jackson knew of his own dangerous propensities, sexual and otherwise, to minor children.

3. Jackson, while acting as an elder in Watchtower, sexually molested and abused Plaintiffs Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane

Doe V on numerous occasions, from the late-1980's through the early-1990's, while employed or serving with the Greenville Congregation.

4. Jackson made sexual contact with these Plaintiffs, and thereby, assaulted them when he knew or should have reasonably believed or known that such contact would be provocative and/or offensive to them, and illegal.

5. Jackson's sexual abuse resulted in the infliction of emotional distress on these Plaintiffs when he engaged in sexual conduct with them.

6. Jackson violated Sections 21.11, 22.011, 22.021, 22.041, and 43.25 of the Texas Penal Code when he engaged in the above-described sexual conduct with Plaintiffs. Such violations constitute negligence *per se*.

7. Jackson was in a position of trust, confidence, and authority as an elder and leader in the Greenville Congregation and, at a minimum, negligently misused this trust, confidence, and/or fiduciary relationship to sexually violate Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, and Jane Doe V.

#### **IX. DAMAGES FOR PLAINTIFF JOHN DOE I**

1. Plaintiff John Doe I, during his ages 11 to 14 endured abuses consisting of, but not limited to:

a. Sexual abuse:

i. being forced to perform oral sex on 3 men when he was 12 years old;

- ii. being digitally penetrated, causing him extreme pain and bleeding;
  - iii. being molested by an elder, while he was forced to sexually abuse a young girl;
  - iv. being forced to solicit approximately dozens of other pre-pubescent boys to come to the organization, who were later sexually abused; and
  - v. being forced to watch approximately 12 other boys be sexually abused by elders.
- b. Physical abuse:
- i. being slapped;
  - ii. being punched;
  - iii. being threatened with death if he did not perform physically and sexually as instructed;
  - iv. being threatened with death of his family if he did not perform physically and sexually as instructed; and
  - v. being threatened with ex-communication from the organization and by members if he did not perform physically and sexually as instructed.
- c. Emotional abuse:
- i. witnessing other children and adults being physically and sexually abused;
  - ii. being taught that sexual abuse was natural; and
  - iii. being threatened with ex-communication, or death.
- d. As a result, Plaintiff John Doe I has experienced:
- i. distrust;

- ii. episodes of self-mutilation;
- iii. fear of men;
- iv. difficulty with relationships with women;
- v. depression and post-traumatic stress disorder;
- vi. substance abuse;
- vii. shame and guilt; and
- viii. severe flashbacks and nightmares.

2. Moreover, as a result of the conduct and incidents described herein, Plaintiff has sustained medical and counseling expenses in the past, and in all reasonable probability will sustain medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained loss of earning capacity in the past, and in all reasonable probability will sustain loss of earning capacity in the future.



## **X. DAMAGES FOR PLAINTIFF JANE DOE I**

1. Plaintiff Jane Doe I, during her ages 6 to 8, endured abuses consisting of, but not limited to:

a. Sexual abuse:

i. being groped, fondled, touched, and digitally penetrated in the 3rd grade.

b. Physical abuse:

i. being physically hit and punished; and

ii. being forced to work long hours for the Elders over several months, while a minor, without pay.

c. Emotional abuse:

i. being forced to watch others being physically abused.

2. Moreover, as a result of the conduct and incidents described herein, in all reasonable probability, Plaintiff will incur medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained a loss of earning capacity in the past, and in all reasonable probability will sustain a loss of earning capacity in the future.

## **XI. DAMAGES FOR PLAINTIFF JANE DOE II**

1. Plaintiff Jane Doe II, during her ages 7 to 9, endured abuses consisting of, but not limited to:

a. Sexual abuse:

- i. being sexually groped, touched, and fondled;
- ii. being forced to perform oral sex, and to remain silent;
- iii. being exposed to sex and sex acts; and
- iv. being forced to grab elder Jackson's penis.

b. Emotional abuse:

- i. being forced to watch others being physically and sexually abused.

2. Moreover, as a result of the conduct and incidents described herein, in all reasonable probability, Plaintiff will incur medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained a loss of earning capacity in the past, and in all reasonable probability will sustain a loss of earning capacity in the future.

## **XII. DAMAGES FOR PLAINTIFF JANE DOE III**

1. Plaintiff Jane Doe III, during her ages 4 to 12, endured abuses consisting of, but not limited to:

a. Sexual abuse:

i. being sexually touched and fondled;

ii. being exposed to sex and sex acts; and

2. Moreover, as a result of the conduct and incidents described herein, in all reasonable probability, Plaintiff will incur medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained a loss of earning capacity in the past, and in all reasonable probability will sustain a loss of earning capacity in the future.

### **XIII. DAMAGES FOR PLAINTIFF JANE DOE IV**

1. Plaintiff Jane Doe IV, during her ages 5 to 10, endured abuses consisting of, but not limited to:

a. Sexual abuse:

- i. being sexually touched, fondled, and groped by Jackson; and
- ii. being forced to kiss adult males.

b. Emotional abuse:

- i. being forced by Jackson to watch others being physically and sexually abused.

2. Moreover, as a result of the conduct and incidents described herein, in all reasonable probability, Plaintiff will incur medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained a loss of earning capacity in the past, and in all reasonable probability will sustain a loss of earning capacity in the future.

#### **XIV. DAMAGES FOR PLAINTIFF JANE DOE V**

1. Plaintiff Jane Doe V, during ages 6 to 13, endured abuses consisting of, but not limited to:

a. Sexual abuse:

- i. being sexually fondled, touched, and groped by Jackson;
- ii. being exposed to sex and sex acts by Jackson; and
- iii. being forced by Jackson to perform oral sex while being groped.

b. Emotional abuse:

- i. being forced by Jackson to watch others being sexually abused.

2. Moreover, as a result of the conduct and incidents described herein, in all reasonable probability, Plaintiff will incur medical and counseling expenses in the future.

3. Plaintiff has experienced severe psychological pain and suffering in the past and in all reasonable probability will sustain severe psychological pain and suffering in the future as a result of his psychological injuries.

4. Plaintiff has suffered mental anguish in the past and in all reasonable probability will sustain mental anguish in the future.

5. Plaintiff has sustained a loss of earning capacity in the past, and in all reasonable probability will sustain a loss of earning capacity in the future.

#### **XV. EXEMPLARY DAMAGES**

Plaintiffs seek punitive and exemplary damages in order to punish and deter the outrageous conduct taken in heedless and reckless disregard for the safety of Plaintiffs and, as a result of each Defendant's conscious indifference to the rights, welfare, and safety of Plaintiffs in violation of the laws of the State of Texas. Plaintiffs allege that the conduct of each Defendant amounted to fraud, gross neglect, and/or malice.

#### **XVI. CLAIM FOR PREJUDGMENT AND POST-JUDGMENT INTEREST**

Plaintiffs herein claim interest in accordance with Texas Finance Code §304.001 *et seq.* and any other applicable law.

#### **XVII. JURY DEMAND**

Plaintiffs demand a jury trial and tender the appropriate fee with this Petition.

### **XVIII. NOTICE PURSUANT TO T.R.C.P. 193.7**

Plaintiffs provide notice to Defendants pursuant to Rule 193.7 of the Texas Rules of Civil Procedure that Plaintiffs may utilize as evidence during the trial of this lawsuit all documents exchanged by the parties in written discovery in this case.

### **XIX. REQUEST FOR DISCLOSURE AND PRESERVATION**

1. Under Texas Rules of Civil Procedure 194, Plaintiffs request that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

2. The Defendants are hereby given notice that any document or other material, including electronically stored information, that may be evidence or relevant to any issue in this case is to be preserved in its present form until this litigation is concluded.

### **XX. PRAYER**

WHEREFORE PREMISES CONSIDERED, Plaintiffs pray that Defendants be cited to appear and answer herein and upon final hearing of this cause, Plaintiffs have judgment against Defendants, jointly and severally, for damages described

herein, for costs of suit, pre-judgment and post judgment interest permitted by law,  
and for such other relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

TURLEY LAW FIRM

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