

# **Superior Court of California**

## **County of Orange**



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Case Number : 30-2012-00577733-CU-PO-CJC

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County of Orange  
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE**

CARRA CROUCH,

Plaintiff,

vs.

TRINITY CHRISTIAN CENTER OF SANTA  
ANA, INC., a corporation; and DOES 1-20  
inclusive,

Defendants.

Case No: 30-2012-00577733-CU-PO-CJC (unlimited)

**COMPLAINT FOR:**

- 1. BATTERY;**
  - 2. SEXUAL BATTERY;**
  - 3. INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS;**
  - 4. NEGLIGENCE PER SE; AND**
  - 5. NEGLIGENCE;**
- DEMAND FOR JURY TRIAL**

Plaintiff alleges:

Judge Thierry Patrick Colaw

**PARTIES**

1. Plaintiff Carra Crouch (“**Plaintiff**”) is a competent adult. At the time of the incident giving rise to this complaint, Carra Crouch was a thirteen year old minor.

2. The true names and capacities of defendants DOES 1-20 inclusive (“**Defendant Does**”) are unknown to Plaintiff, and Plaintiff will seek leave of court to amend this complaint to allege such names and capacities as soon as they are ascertained.

3. Defendants Trinity Christian Center of Santa Ana, Inc. (“**Trinity Broadcasting**”), is a CA corporation. Trinity Broadcasting does business as “Trinity Broadcasting Network.”

4. Jan Crouch (“**Jan**”) is a director of Trinity Broadcasting, Vice President of Trinity Broadcasting, an ordained minister, and grandmother of Plaintiff.

5. Paul Crouch, Sr. (“**Paul**”) is a director of Trinity Broadcasting, President of Trinity

Broadcasting, an ordained minister, and grandfather of Plaintiff. Paul and Jan are husband and wife.

6. Stephen L. Smith (“**Smith**”) was an employee of Trinity Broadcasting and was 30 years old at the time of the incident giving rise to this complaint.

7. John Casoria (“**John**”) is an officer of Trinity Broadcasting, an attorney, an ordained minister, and second cousin of Plaintiff. John is the nephew of Paul and Jan.

8. Jan, Paul, and John are collectively referred to as “**Participating Individuals.**”

9. Plaintiff is informed, believes, and based thereon alleges that each of the Participating Individuals and Smith were acting within the course and scope of their employment with Trinity Broadcasting.

### **GENERAL ALLEGATIONS**

#### ***The Battery and Sexual Battery of Plaintiff***

10. In April 2006, at the request of Jan, Plaintiff attended Trinity Broadcasting’s annual fundraiser called “telethon” as a guest. Trinity Broadcasting paid for Plaintiff’s air line tickets to attend the telethon, and Plaintiff was thirteen at the time.

11. Plaintiff was provided a hotel room by Trinity Broadcasting in Atlanta, GA. Plaintiff is informed, believes, and based thereon alleges that Trinity Broadcasting’s normal business practice is to provide hotel rooms to dozens of guests and employees, and business meetings frequently take place at the hotel among those guests and employees.

12. During the telethon one evening, Smith approached Plaintiff in the hotel and began talking to her about the telethon in general and how she thought everything was going. Smith coerced himself into Plaintiff’s hotel room in order to further discuss the telethon and other relevant Trinity Broadcasting business activity. Smith was motivated to serve Trinity Broadcasting because he knew Ms. Crouch was the granddaughter of his bosses, Paul and Jan. Although severely mistaken, Smith believed his actions were actually a benefit to Ms. Crouch and, therefore, what Paul and Jan wanted him to do for Trinity Broadcasting.

13. Once in Plaintiff’s room, Smith ordered a bottle of wine from room service on Trinity Broadcasting’s account. Plaintiff is informed, believes, and based thereon alleges that Trinity Broadcasting makes a regular practice of providing alcohol to its employees during business meetings.

1 Smith proceeded to coerce the Plaintiff to drink the wine in an attempt to get her intoxicated and  
2 Plaintiff, in fact, drank the wine under duress and became intoxicated.

3 14. Plaintiff began asking Smith to leave her room and he responded by giving her a glass of  
4 water to “help her feel better.” Plaintiff drank the glass of water and passed out immediately. Plaintiff  
5 believes the water contained a date rape drug which caused her to pass out.

6 15. Ms. Crouch awoke the next morning with Smith laying next to her, blood on her bed  
7 sheets, and severe pain and soreness in her body in places which indicated she had been molested and  
8 raped.

9 16. Ms. Crouch locked herself in the bathroom and screamed at Smith to leave her room,  
10 which he eventually did. Ms. Crouch boarded a flight later that day back to her home in CA.

11  
12 ***The Report of the Battery and Sexual Battery by Plaintiff***

13 17. Ms. Crouch was distraught over what happened, and upon the advice of her mother,  
14 decided to talk with Jan and John about what happened.

15 18. Plaintiff had a meeting with Jan in Jan’s TBN affiliate owned mansion located in  
16 Newport Beach, CA where she told her everything that had happened. In response, Jan became furious  
17 and began screaming at Ms. Crouch, a thirteen year old girl, and began telling her “it is your fault.”  
18 After being told by Jan Crouch that it was her fault she was raped, Plaintiff approached John Casoria  
19 about the incident.

20 19. John Casoria also became agitated at Plaintiff and told her he did not believe what she  
21 was saying to be true. He elaborated by stating he further believed she was already sexually active “so it  
22 did not really matter” and he “believed she may have propositioned him.” Ms. Crouch, a thirteen year  
23 old girl, had not been sexually active and was absolutely devastated about what happened and about how  
24 John and Jan responded to her.

25  
26 ***The Subsequent Cover Up of the Battery and Sexual Battery by Defendant***

27 20. Plaintiff is informed, believes, and based thereon alleges that Paul, Jan, and John actually  
28 did believe her accusations despite what they told her and fired Smith the next working day. Plaintiff is  
29 informed, believes, and based thereon alleges that Paul, Jan and John came up with a plan to lie to her

1 about their beliefs about what happened in order to intimidate Ms. Crouch so that they could “cover up”  
2 the incident and make sure it was never reported to police authorities or to the media, which would have  
3 brought negative publicity to Trinity Broadcasting during their annual fund-raiser.

4 21. Plaintiff is informed, believes, and based thereon alleges that John fired Smith over the  
5 telephone in which he stated: (1) the termination is a decision passed down directly from the president’s  
6 office (meaning that the decision came directly from Paul Crouch, Sr.); (2) the termination will be  
7 without cause even though Trinity Broadcasting has gathered enough evidence to terminate Smith with  
8 cause; (3) the evidence is most probably sufficient to bring criminal charges against Smith; (4) Trinity  
9 Broadcasting would not disclose the evidence to the police if Smith would not file an EEOC claim, file  
10 for unemployment, or file for workers compensation. Plaintiff is informed, believes, and based thereon  
11 alleges that John may have used the threat of criminal prosecution to gain an advantage in a civil matter  
12 and may have violated Model Code of Professional Responsibility DR 7-105.

13 22. Plaintiff is informed, believes, and based thereon alleges that Paul, Jan and John were all  
14 “ordained ministers” at the time of this incident and that they were mandated reporters under the Child  
15 Abuse and Neglect Reporting Act. Plaintiff is informed, believes, and based thereon alleges that neither  
16 Paul, Jan nor John made any report, as required, and in the alternative, deliberately covered up the  
17 incident to protect Trinity Broadcasting from negative publicity.

18 23. Plaintiff was not permitted to talk to the police about the incident, and was not permitted  
19 to seek the counsel of any third parties or sex abuse counselors at the time.

20  
21 **FIRST CAUSE OF ACTION FOR**  
22 **BATTERY**

23 24. Paragraphs 1-23 inclusive, of this complaint are incorporated by reference as though full  
24 set forth herein.

25 25. Smith acted intentionally and affirmatively when he gave Plaintiff a date rape drug in her  
26 glass of water.

27 26. Smith acted with intent to cause Plaintiff harmful and offensive contact because his intent  
28 was to get Plaintiff to ingest the date rape drug and pass out so he could sexually assault her.

29 27. A reasonable person would think that being forced to ingest a date rape drug would be

1 harmful and offensive, and Plaintiff, in fact, ingested a date rape drug.

2 28. Smith's act of placing the drug in the water glass and providing Plaintiff with the water  
3 glass thereby directly caused Plaintiff to ingest the drug and suffer harmful contact.

4 29. As the direct and proximate result of the conduct of Smith, Plaintiff has suffered general  
5 and special damages in an amount to be proven at trial including physical harm, severe emotional  
6 distress, and attorneys' fees and court costs incurred in connection with prosecuting this Action in  
7 excess of the \$25,000 jurisdictional threshold of this Court.

8 30. As set forth in the paragraphs above, Smith's conduct was done knowingly, willfully, and  
9 with malicious intent, and Plaintiff is entitled to punitive and exemplary damages from Defendant in an  
10 amount to be determined by proof at trial, and in excess of the jurisdictional threshold of this Court.  
11 Pursuant to *Code Civ. Proc.* § 425.14, punitive and exemplary damages are sought at this time from all  
12 Defendants other than Trinity Broadcasting, which Plaintiff is informed is a nonprofit corporation.  
13 Plaintiff intends to comply with Section 425.14 by filing the required motion to seek punitive and  
14 exemplary damages from Trinity Broadcasting following preliminary discovery as contemplated by  
15 Section 425.14.

16  
17 **SECOND CAUSE OF ACTION**  
18 **FOR SEXUAL BATTERY**

19 31. Paragraphs 1-23 inclusive, of this complaint are incorporated by reference as though full  
20 set forth herein.

21 32. Smith acted intentionally and affirmatively when he sexually molested and raped Plaintiff  
22 in her Trinity Broadcasting provided hotel room.

23 33. Smith acted with the intent to cause harmful or offensive contact with the intimate part of  
24 Plaintiff because his intention was to sexually molest Plaintiff by touching her breasts, buttocks and  
25 sexual organs ultimately leading to Smith raping Plaintiff.

26 34. Plaintiff was, in fact, sexually molested and raped by Smith because she was sore in areas  
27 which would indicate sexual assault, remembers him groping her before she passed out, found blood on  
28 her sheets the next morning, and found Smith laying next to her the next morning.

29 35. As the direct and proximate result of the conduct of Smith, Plaintiff has suffered general

1 and special damages in an amount to be proven at trial including physical harm, severe emotional  
2 distress, and attorneys' fees and court costs incurred in connection with prosecuting this Action in  
3 excess of the \$25,000 jurisdictional threshold of this Court.

4 36. As set forth in the paragraphs above, Smith's conduct was done knowingly, willfully, and  
5 with malicious intent, and Plaintiff is entitled to punitive and exemplary damages from Defendant in an  
6 amount to be determined by proof at trial, and in excess of the jurisdictional threshold of this Court.  
7 Pursuant to *Code Civ. Proc.* § 425.14, punitive and exemplary damages are sought at this time from all  
8 Defendants other than Trinity Broadcasting, which Plaintiff is informed is a nonprofit corporation.  
9 Plaintiff intends to comply with Section 425.14 by filing the required motion to seek punitive and  
10 exemplary damages from Trinity Broadcasting following preliminary discovery as contemplated by  
11 Section 425.14.

12  
13 **THIRD CASE OF ACTION**

14 **FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

15 37. Paragraphs 1-23 inclusive, of this complaint are incorporated by reference as though full  
16 set forth herein.

17 38. There existed, at all times relevant herein, a special relationship between Ms. Crouch and  
18 the Participating Individuals, who were Ms. Crouch's family members, adults during this situation, and  
19 ordained ministers.

20 39. As set forth in the paragraphs incorporated herein by reference, the actions and  
21 statements of the Participating Individuals were outrageous, intentional, unreasonable, and malicious.  
22 The Participating Individuals not only undertook these actions with, at the very minimum, reckless  
23 disregard of the fact that they would certainly cause Ms. Crouch to suffer severe emotion distress; the  
24 Participating Individuals undertook these actions with the intent and purpose to cause that harm to Ms.  
25 Crouch so she would not report the incident to the police or news media.

26 40. As adults, family members, and ordained ministers, the Participating Individuals were in  
27 a position of actual or apparent power over Ms. Crouch, and the Participating Individuals abused that  
28 position of trust and that relationship to protect Trinity Broadcasting's interests.  
29

1           41.     The Participating Individuals knew that Ms. Crouch was peculiarly susceptible to injuries  
2 through mental distress due to the circumstances because she was only thirteen years old; due to the  
3 terrible assault and rape she had just been subjected to; and due to the Participating Individuals  
4 abandonment of Ms. Crouch's interests in favor of the conflicting interests of Trinity Broadcasting.

5           42.     As a proximate result of the acts of the Participating Individuals, Ms. Crouch suffered  
6 severe emotional distress in the form of fear, nervousness, anxiety, worry, illness, and indignity. The  
7 experiences to which the Participating Individuals intentionally subjected Ms. Crouch have been the  
8 most traumatic and terrifying experiences of Ms. Crouch's life. The Participating Individuals have  
9 caused Ms. Crouch to live in constant fear, terror, anxiety, and depression. Ms. Crouch has been made  
10 physically ill as a result of the Participating Individuals actions, including loss of appetite, physical  
11 weakness, nausea, headaches, shortness of breath, heart palpitations, stomach and digestive problems,  
12 malnutrition, hair loss, severe insomnia, and suicidal thoughts requiring counseling and medication. Ms.  
13 Crouch is terrified and haunted by the Participating Individuals actions, including the cover up of the  
14 sexual assault, the repeated screaming and yelling at her over the incident, the constant stating that the  
15 rape was Ms. Crouch's own fault, their prevention of Ms. Crouch from speaking with local authorities or  
16 a rape counselor at the time, and the betrayal of trust and loyalty. The Participating Individuals actions  
17 have caused Ms. Crouch to fear and avoid placing trust in persons of authority, which has severely  
18 affected Ms. Crouch in her work and education. Plaintiff requires medication and counseling as a result  
19 of the Participating Individual's conduct.  
20

21           43.     As a direct and proximate result of the Participating Individuals conduct, Ms. Crouch has  
22 suffered general damages in an amount to be determined by proof at trial.

23           44.     As set forth in the paragraphs above, the Participating Individuals conduct was done  
24 knowingly, willfully, and with malicious intent, and Plaintiff is entitled to punitive and exemplary  
25 damages from Defendant in an amount to be determined by proof at trial, and in excess of the  
26 jurisdictional threshold of this Court. Pursuant to *Code Civ. Proc.* § 425.14, punitive and exemplary  
27 damages are sought at this time from all Defendants other than Trinity Broadcasting, which Plaintiff is  
28 informed is a nonprofit corporation. Plaintiff intends to comply with Section 425.14 by filing the  
29 required motion to seek punitive and exemplary damages from Trinity Broadcasting following



preliminary discovery as contemplated by Section 425.14.

**FORTH CAUSE OF ACTION  
FOR NEGLIGENCE PER SE**

45. Paragraphs 1-23, inclusive, of this complaint are incorporated by reference as though fully set forth herein.

46. The duty of the Participating Individuals here is established by Cal. Penal Code § 11166 which is the Child Abuse and Neglect Reporting Act. The Act states in relevant part:

A mandated reporter shall make a report to an agency specified in Section 11165.9 whenever the mandated reporter, in his or her professional capacity or within the scope of his or her employment, has knowledge of or observes a child whom the mandated reporter knows or reasonably suspects has been the victim of child abuse or neglect. The mandated reporter shall make an initial report to the agency immediately or as soon as is practicably possible by telephone and the mandated reporter shall prepare and send, fax, or electronically transmit a written follow-up report thereof within 36 hours of receiving the information concerning the incident. The mandated reporter may include with the report any non-privileged documentary evidence the mandated reporter possesses relating to the incident.

If a mandated reporter intentionally conceals his or her failure to report an incident known by the mandated reporter to be abuse or severe neglect under this section, the failure to report is a continuing offense until an agency specified in Section 11165.9 discovers the offense.

47. A mandatory reporter is defined by Cal. Penal Code § 11165.7 (32) as clergy member, which includes a minister.

48. Cal. Penal Code § 11166 and 11165.7 (32) establish a scenario of negligence per se on the part of the Participating Individuals. These statutes establish a duty on behalf of the Participating Individuals because they were mandated reports as ordained ministers, they were acting within the scope of their employment of Trinity Broadcasting because they were investigating the incident of an employee and deciding his possible termination, and they reasonably suspected Ms. Crouch had been subjected to sexual abuse because they fired Smith while stating they had gathered evidence against him to constitute a “for cause termination” and which would most probably be sufficient for criminal charges to be brought.

49. Plaintiff is informed, believes, and based thereon alleges that none of the Participating

1 Individuals breached their duty established by Cal. Penal Code § 11166 and 11165.7 (32) because they  
2 did not make the required report pursuant to Cal. Penal Code § 11166 at the time of the incident or  
3 anytime since then. To the contrary, the Participating Individuals covered up the incident to protect the  
4 publicly interests of Trinity Broadcasting by intimidating Ms. Crouch and telling her the terrible and  
5 unspeakable incident was her fault.

6 50. Since the participating Individuals did not make the mandated report, Ms. Crouch was  
7 not able to involve the policy to investigate her assault which could have brought her some closure and  
8 was not able to speak with a child abuse counselor which would have further brought her closure and  
9 helped her deal with such a tragedy, which is likely one of the worst that could happen to anyone.

10 51. Cal. Penal Code § 11166 was clearly established to prevent situations like the one here,  
11 where child sexual abuse goes un-reported and is therefore, not dealt with properly for the child. Further,  
12 the Code was established to ensure that children who are subject to sexual abuse are not put back in  
13 situations where sexual abuse might happen again, and to ensure that the victims of such abuse receive  
14 the proper care and treatment. Ms. Crouch did not receive such treatment which would have helped her  
15 deal with such a tragedy.

16 52. Ms. Crouch was the very person the statute was designed to protect because she was a  
17 thirteen year old girl, sexually abused by a 30 year old man, and she suffered severe emotional distress.

18 53. Ms. Crouch would not have suffered such severe emotional distress if the Participating  
19 Individuals had not covered up her rape and further told her it was her fault.

20 54. Ms. Crouch's injury of severe emotional distress was exactly what Cal. Penal Code §  
21 11166 was designed to protect against because the purpose of the Code was to ensure the victims of  
22 child abuse receive the proper care and treatment for their emotional distress by reporting such abuse to  
23 the proper authorities. Further, the code was specifically designed to protect Ms. Crouch because she  
24 was a minor child who was subjected to sexual abuse.

25 55. As a proximate result of the acts of the Participating Individuals, Ms. Crouch suffered  
26 severe emotional distress in the form of fear, nervousness, anxiety, worry, illness, and indignity. The  
27 experiences to which the Participating Individuals intentionally subjected Ms. Crouch have been the  
28 most traumatic and terrifying experiences of Ms. Crouch's life. The Participating Individuals have  
29

caused Ms. Crouch to live in constant fear, terror, anxiety, and depression. Ms. Crouch has been made physically ill as a result of the Participating Individuals actions, including loss of appetite, physical weakness, nausea, headaches, shortness of breath, heart palpitations, stomach and digestive problems, malnutrition, hair loss, severe insomnia, and suicidal thoughts requiring counseling and medication. Ms. Crouch is terrified and haunted by the Participating Individuals actions, including the cover up of the sexual assault, the repeated screaming and yelling at her over the incident, the constant stating the rape was Ms. Crouch's own fault, their prevention of Ms. Crouch from speaking with a rape counselor at the time, and the betrayal of trust and loyalty. The Participating Individuals actions have caused Ms. Crouch to fear and avoid placing trust in persons of authority, which has severely affected Ms. Crouch in her work and education. Plaintiff requires medication and counseling as a result of the Participating Individual's conduct.

56. As a direct and proximate result of the Participating Individuals conduct, Ms. Crouch has suffered general damages in an amount to be determined by proof at trial.

57. As set forth in the paragraphs above, the Participating Individuals conduct was done knowingly, willfully, and with malicious intent, and Plaintiff is entitled to punitive and exemplary damages from Defendant in an amount to be determined by proof at trial, and in excess of the jurisdictional threshold of this Court. Pursuant to *Code Civ. Proc.* § 425.14, punitive and exemplary damages are sought at this time from all Defendants other than Trinity Broadcasting, which Plaintiff is informed is a nonprofit corporation. Plaintiff intends to comply with Section 425.14 by filing the required motion to seek punitive and exemplary damages from Trinity Broadcasting following preliminary discovery as contemplated by Section 425.14.

### **FIFTH CAUSE OF ACTION FOR NEGLIGENCE**

58. Paragraphs 1-23, inclusive, of this complaint are incorporated by reference as though fully set forth herein.

59. Trinity Broadcasting had a duty to act reasonably under the circumstances toward Plaintiff. Trinity Broadcasting breached its duty to Plaintiff and acted unreasonably because they

1 required a thirteen year old girl to fly alone to Atlanta, because they provided a hotel room to a thirteen  
2 year old girl to stay in by herself, and by Trinity Broadcasting's own admittance, because they did not  
3 provide any supervision for Plaintiff while she was in Atlanta, GA away from her parents.

4 60. Plaintiff would not have been assaulted and raped if Trinity Broadcasting had not acted  
5 unreasonably as such. The supervision of one adult could have easily prevented this entire incident.

6 61. It is foreseeable that Plaintiff, a minor child, was susceptible to such injury and actions  
7 when left alone and unsupervised, especially in a non-familiar environment. The great risk of child  
8 assault and kid-napping by strangers is the very reason children are not left alone and unsupervised.

9 62. As a proximate result of the acts of the Trinity Broadcasting, Ms. Crouch suffered severe  
10 emotional distress in the form of fear, nervousness, anxiety, worry, illness, and indignity. The  
11 experiences to which the Participating Individuals intentionally subjected Ms. Crouch have been the  
12 most traumatic and terrifying experiences of Ms. Crouch's life. Trinity Broadcasting has caused Ms.  
13 Crouch to live in constant fear, terror, anxiety, and depression. Ms. Crouch has been made physically ill  
14 as a result of Trinity Broadcasting's actions, including loss of appetite, physical weakness, nausea,  
15 headaches, shortness of breath, heart palpitations, stomach and digestive problems, malnutrition, hair  
16 loss, severe insomnia, and suicidal thoughts requiring counseling and medication. Ms. Crouch is  
17 terrified and haunted by the incident, including assault and rape. Trinity Broadcasting's actions have  
18 caused Ms. Crouch to fear and avoid placing trust in persons of authority, which has severely affected  
19 Ms. Crouch in her work and education. Plaintiff requires medication and counseling as a result of the  
20 Trinity Broadcasting's conduct.

21 63. As a direct and proximate result of Trinity Broadcasting's conduct, Ms. Crouch has  
22 suffered general damages in an amount to be determined by proof at trial.  
23

### 24 **VICARIOUS LIABILITY**

25 64. Paragraphs 1-23, 48 inclusive, of this complaint are incorporated by reference as though  
26 full set forth herein.

27 65. Under Civ. Code § 2338 a principal may be held liable for the torts of its agents or  
28 employees when the agent's or employee's tortious conduct occurs while the agent or employee is  
29

1 acting within the scope of employment.

2 66. Plaintiff is informed, believes, and based thereon alleges that each of the Participating  
3 Individuals and Smith were employees of Defendant, and in doing the things alleged in this complaint  
4 were acting within the course and scope of their employment with Trinity Broadcasting.

5 67. Consequently, Plaintiff is informed, believes, and based thereon alleges that Defendant,  
6 Trinity Broadcasting, is liable for the torts of Smith and the Participating Individuals.

7 68. In addition to the above, Plaintiff is informed, believes, and based thereon alleges that  
8 Trinity Broadcasting has a general practice of covering up sexual scandals. Plaintiff is informed,  
9 believes, and based thereon alleges that Trinity Broadcasting has covered up other sexual scandals,  
10 including the cover-up and destruction of evidence concerning a bloody sexual assault involving Trinity  
11 Broadcasting and affiliated Holy Land Experience employees; the cover-up of director Janice Crouch's  
12 affair with a staff member at the Holy Land Experience; the attempted cover-up of director Paul  
13 Crouch's sexual affair with Enoch Lonnie Ford; the cover up of director Paul Crouch's sexual affairs  
14 with other Trinity Broadcasting employees, the cover-up following director Matthew Crouch's exposure  
15 of his genitals to cleaning staff on multiple occasions. Further, Plaintiff is informed, believes, and based  
16 thereon alleges that Trinity Broadcasting knowingly continues to employ individuals who are registered  
17 sex offenders and who have molested minor children before.

18  
19 WHEREFORE, Plaintiff prays for judgment from Defendants as follows:

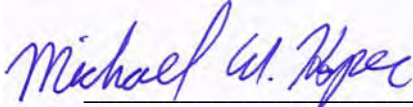
- 20 1. General and special damages according to proof at trial for physical harm and severe  
21 emotional distress in excess of the \$25,000 jurisdictional threshold of this Court;  
22 2. Punitive and exemplary damages in such amount as is determined proper at trial (except as  
23 against defendant Trinity Broadcasting until such time as Plaintiff obtains leave of the Court  
24 to seek punitive damages from Trinity Broadcasting pursuant to *Code Civ. Proc.* § 425.14).  
25 3. Interest according to law;  
26 4. Costs of this action; and  
27 5. Such other and further relief as this court may deem just and proper.

28 //

29 //

1 DATED: June 16, 2012

MICHAEL W. KOPER

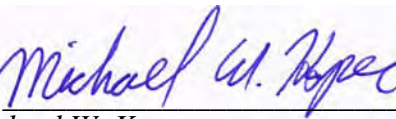
2  
3 By:   
4 Michael W. Koper  
5 Attorney for Plaintiff

6 **DEMAND FOR JURY TRIAL**

7 Plaintiff hereby demands a jury trial.  
8

9 DATED: June 16, 2012

MICHAEL W. KOPER

10 By:   
11 Michael W. Koper  
12 Attorney for Plaintiff  
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