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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SACRAMENTO
CIVIL UNLIMITED

JANE DOE; J.J., a minor; A.J., a minor; and
R.J., a minor;

Plaintiffs,

vs.

GRACE COMMUNITY CHURCH OF THE
VALLEY; CLINTON JUNG; and DOES 1
through 50, inclusive,

Defendants.

Case No.: **25CV023130**

COMPLAINT FOR DAMAGES

[ACTION BASED ON CODE OF CIVIL
PROCEDURE SECTION 367.3]

1. Childhood Sexual Abuse
2. Negligence
3. Domestic Violence
4. Aiding and Abetting Domestic Violence

JURY TRIAL DEMANDED

1 Plaintiffs JANE DOE (“Plaintiff”) ; J.J., a minor; A.J., a minor; and R.J., a minor,
2 (collectively, “Plaintiffs”), bring this action against Defendants GRACE COMMUNITY
3 CHURCH OF THE VALLEY, CLINTON JUNG, and DOES 1 through 50, (collectively
4 "Defendants") and alleges as follows:

5 1. Plaintiff reported to Grace Community Church that her husband Clinton Jung had sexually
6 abused their toddler daughter. She also reported that Clinton had physically abused their kids and
7 subjected her to domestic violence. Church leadership—mandated reporters under the law—
8 purposefully concealed Clinton’s conduct, refusing to report the abuse and foreseeable future
9 neglect to authorities. Instead, Church leadership spent many months coercing Plaintiff to “submit”
10 to Clinton and his obviously wrongful conduct, and to keep the children in the same house as
11 Clinton, even going so far as to rebuke Plaintiff when she called law enforcement after an incident
12 in which Clinton put her life and the life of the kids at risk. Clinton, emboldened by the Church’s
13 protection, abused their daughter again and again—something that could have been prevented
14 many times over had Church leadership done its duty to report the abuse to authorities.

15 2. Plaintiff and Clinton were members of Grace Community Church. During that time,
16 Plaintiff spent years under Clinton’s control. He manipulated, coerced, and isolated her through
17 emotional and physical force. But that paled in comparison to what he did to their kids. He took his
18 anger at Plaintiff out on the kids—toddlers under the age of five. He physically abused and
19 neglected them and threatened violence. Then he began sexually abusing their eldest daughter, J.J.

20 3. When J.J. was two, Clinton started taking series of sexually suggestive and naked
21 photographs of her. He tongue-kissed her. He physically stopped Plaintiff from taking J.J. to visit
22 family so he could share a bed with her. After Plaintiff and the children left Clinton for good, and
23 Clinton was only allowed to see the children during supervised visitation under a family court
24 order, Clinton took his child into the bathroom of an ice cream store and forced her to touch his
25 penis. Several months later, during another visitation, Clinton did it again, forcing his child into
26 the bathroom of a hotel room and forcing her to look at his penis—despite her protestations.

27 4. Throughout this time, Grace Community Church colluded with Clinton to prevent Plaintiff
28 from reporting the abuse to the authorities, to force Plaintiff to remain in an abusive relationship

with him, and to force the children to remain under the control of a man Church leadership knew was abusive.

5. Beginning in early 2021, Plaintiff had reported physical abuse, emotional abuse, and—most critically—sexual abuse of a minor and inappropriate behavior with a minor to Church leadership. In fact, Clinton had *admitted* most of this behavior to Church leadership. Yet time after time, Church leadership continued to pressure Plaintiff to “submit” to her husband and, when she tried to involve the authorities, Church leaders chastised and rebuked her.

6. At numerous points, the Church’s mandated reporting requirements were triggered by information Plaintiff provided and admissions Clinton made about physical, emotional, and sexual abuse of the children. Yet the Church violated its legal duties time and time again.

7. At numerous points, the Church colluded with Clinton to force Plaintiff to remain in the home with him and under his control despite knowing he had engaged in domestic violence and was likely to do it again in the future.

8. As a result of the Church’s failure to report suspected child abuse, and its aiding and abetting of Clinton’s domestic violence, Clinton was emboldened to repeatedly engage in his conduct, including by sexually abusing his toddler again and again—conduct that a single report by the Church to proper authorities, at any of the numerous points during which the Church became aware of suspected abuse, could have prevented.

9. A brief timeline of the most critical events and the Church’s knowledge of those events is listed below:

~3/18/21	After years of emotional abuse and manipulation by her husband Clinton, Plaintiff learns Clinton has been GPS tracking her and has opened up several secret credit cards using her SSN. She and the children separate from Clinton.
5/1/21	Plaintiff discovers and reports to Church leadership that Clinton took sexually suggestive photos of J.J. when she was 2 and 3 years old. Plaintiff provides the photos. (She also discovers he has been searching for pornography and suggestive photographs depicting underage girls, including incest porn between fathers and daughters.)

5/1/21	Plaintiff presents a 10-page document to Church leaders detailing Clinton's physical harm, neglect, and threats of physical abuse to the children; Clinton's internet searches for incest pornography; infidelity; financial coercion; surveillance/tracking; and aggression and physical threats towards Plaintiff. Church leaders disregard their mandated reporter duties, failing to report suspected child abuse or neglect to appropriate authorities.
5/5/21-5/6/21	Plaintiff informs additional Church leaders about the sexually suggestive images Clinton has taken of J.J. Church leadership tells her not to send the photographs to them to avoid triggering mandated reporter duties.
5/25/21	Plaintiff learns that Clinton tongue-kissed J.J. and informs Church leadership. Church leadership again chooses not to report.
5/27/21	Church leadership pressures Plaintiff—separated from Clinton at the time—to return “home” to Clinton with the kids, telling her: “If you’re that concerned for your children’s safety, [Jane], just never leave him alone with the kids.”
6/1/21-6/15/21	Church leadership pressures Plaintiff to send the children on visits with Clinton, supervised by Church leaders.
7/16/21	After months of pressure from Church leaders, Plaintiff and the children move back in with Clinton.
9/24/21	Clinton gets enraged at a pregnant Plaintiff on their way to Bible study. While she is in the back unbuckling the children from their car seats, he suddenly accelerates the car and drives dangerously to intimidate her, placing her life, the life of the children, and the life of their unborn child at risk. Plaintiff calls 911 and the operator convinces Clinton to stop the car. Clinton immediately calls Church leaders. Police advise Plaintiff not to go home with Clinton, so she stays at a friend’s house with the kids. Church leadership calls Plaintiff that night and rebukes her for involving the police instead of “submitting” to her husband, and tells her she must return home to Clinton in the morning.
8/8/22	In a conversation between Clinton and Church leaders, Clinton admits to tongue-kissing J.J. Church leadership again chooses not to report.

8/18/22	Plaintiff initiates family court proceedings to seek a DVRO and custody. Church leadership testifies in support of Clinton and Clinton is permitted weekly visitation under the supervision of his family members.
2/19/23	During a custody visitation, Clinton evades supervision, brings J.J. into the bathroom of a Cold Stone Creamery ice cream store, and forces her to touch his penis. J.J. discloses this on 4/1/23.
8/15/23	After a lengthy investigation, the district attorney is unable to file charges due to an inability to prove intent beyond a reasonable doubt. The prosecutor writes a scathing letter pointing at the Church's interference, collusion with Clinton, muddling of the evidence, and attempted circumvention of its mandated reporting duties, as potentially preventing the discovery and use of information that could have resulted in a successful prosecution.
1/8/24	During another supervised visitation, Clinton takes J.J. into a hotel bathroom and forces her to look at his penis, despite her protests. She reports this to her first-grade teacher, as well as to Plaintiff, who both inform the police.

JURISDICTION AND VENUE

10. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure § 410.10.

11. Venue is proper in Sacramento County pursuant to California Code of Civil Procedure § 395(a) because events giving rise to this complaint occurred in this county.

PARTIES

12. Plaintiff Jane Doe is an individual residing in California with her minor children, Plaintiffs J.J., A.J., and R.J. Plaintiff brings this lawsuit under a pseudonym pursuant to Code of Civil Procedure section 367.3, as an active participant in the Secretary of State's Safe at Home program for the protection of domestic violence survivors.

13. Defendant Grace Community Church of the Valley is a religious nonprofit corporation located in Los Angeles County, California.

14. Defendant Clinton Jung is an individual residing in Los Angeles County.

15. DOES 1 through 50 are individuals or entities whose identities are currently unknown to

1 Plaintiff but who, upon information and belief, were agents, employees, or representatives of
2 named Defendants who participated in, authorized, or ratified the conduct alleged herein.

3 **FACTUAL ALLEGATIONS**

4 16. Plaintiff and Clinton married in 2014. They have three children, J.J (born in 2017), A.J.
5 (born in 2020), and R.J. (born in 2022). Plaintiff and Clinton were both long-time members of the
6 congregation at Grace Community Church.

7 17. After J.J. was born, Clinton began to exhibit controlling and abusive tendencies towards
8 Plaintiff. He expected Plaintiff to obey his every demand and would become angry if she questioned
9 him. Clinton monitored Plaintiff's purchases and required her to ask for permission to purchase
10 anything that cost more than five dollars. When Plaintiff purchased items for the children that cost
11 more than five dollars without prior permission, Clinton made her return them. If Plaintiff was not
12 home by the time Respondent arrived from work, he repeatedly contacted her until she answered
13 to tell him her location. He constantly made Plaintiff feel like everything was her fault.

14 18. Grace Community Church was complicit in Clinton's abusive behavior. Church leaders
15 routinely told Plaintiff that she was required to "submit" to her husband, and that such submission
16 was ordained by God.

17 19. Over the years, Clinton's abusive behavior towards Plaintiff escalated, and he began
18 abusing their children as well.

19 20. For example, on one occasion during the summer of 2020, Clinton lost his patience with
20 J.J.—three years-old at the time—and barricaded her in a closet by placing furniture in front of it
21 so she could not escape. She was locked in the closet, to the point where she urinated and defecated
22 on herself and cried until she fell asleep. His reason? It was "her fault" for interrupting a work call.

23 21. Clinton physically abused their children, using excessive force to discipline them to the
24 point of leaving bruises and marks on their skin. When Plaintiff confronted him on one occasion,
25 he responded: "You think that was too hard? I could break the skin and draw blood if I wanted to!"

26 22. When Plaintiff went to Church leaders for guidance, support, and help, Church leadership
27 attempted to circumvent its mandated reporting requirements, supported Clinton despite
28 knowledge of his conduct, and repeatedly directed Plaintiff to put herself and her children in

1 situations in which Church leadership knew were likely to result in harm at Clinton's hands.

2 **A. Plaintiff Leaves With the Children After Discovering Clinton Has Been Tracking Her**

3 23. On March 17, 2021, Plaintiff drove the children to a park. She told Clinton which park she
4 was going to. On the way there, J.J. asked to go to a different park, so Plaintiff drove to that park
5 instead. As she drove, Clinton called multiple times, but she did not answer. Clinton had no reason
6 to know which park Plaintiff and the children were going to, since she had only told him their
7 intended location before J.J. had changed the plan. Yet as Plaintiff and the children arrived at the
8 new location, Clinton appeared in his car, aggressively swerved in front of her, and parked. Plaintiff
9 was shocked and confused at how Clinton had known where they were going.

10 24. Prompted by a credit report that showed unusual activity, Plaintiff learned from Chase bank
11 on March 18, 2021, that Clinton had opened six credit cards using Plaintiff's social security
12 number, without her consent. He also had additional hidden bank accounts that Plaintiff could not
13 access. She was able to view a credit card statement for one of the accounts and discovered a
14 recurring charge for "Bouncie."

15 25. Bouncie is a tracking device for vehicles. Bouncie advertises its surveillance capabilities,
16 including location tracking, curfew monitoring, and the ability to track driving habits.

17 26. After an internet search for Bouncie, Plaintiff suspected that Clinton was tracking her,
18 especially given the park incident a few days earlier. Sure enough, when she searched her car, she
19 discovered a Bouncie device under the steering wheel, plugged into the car's on-board diagnostic
20 port—a connector typically used by mechanics to access the vehicle's self-diagnostic system.

21 27. The bank statements showed that Clinton had been paying a monthly fee for multiple
22 trackers since 2018.

23 28. Alarmed at the violation and concerned her safety and the safety of the children, Plaintiff
24 called a friend for help, took the children with her, and separated from Clinton.

25 **B. Plaintiff Discovers Clinton's Sexually Inappropriate Conduct With Their Toddler,**
26 **J.J. and Reports it to Church Leaders, Who Dissuade Her from Involving the**
27 **Authorities**

28 29. On March 28, 2021, while Plaintiff and the children were living separated from Clinton,
Plaintiff realized that Clinton had signed into his Google account on her phone and was therefore

1 able to see his online activity.

2 30. Plaintiff discovered that Clinton had accounts on multiple dating apps and had been sexting
3 multiple individuals through those dating apps. His accounts were filled with images of partially
4 nude women. Clinton had engaged in affairs with tens of different women, booking short-term
5 hourly stays at local hotels and disappearing for hours on end at night. He had also taken sexually
6 inappropriate photographs of women at work, at the gym, at church, and near their home—images
7 he later admitted he used for masturbation.

8 31. Plaintiff was also able to view Clinton’s browsing history and discovered that he had
9 searched for incest pornography, specifically sex between fathers and daughters.

10 32. Putting that search into stark context, Plaintiff then discovered a series of 9 photos taken on
11 May 30, 2019, in which Clinton was sitting down on his home office chair with his zipper down,
12 and J.J.—just under two years-old at the time—was posed standing between his legs with her mouth
13 open and hand on his crotch. She observed a series of 6 photos taken immediately afterwards with
14 J.J. being sprayed with a bottle of water on her face in a manner that—paired with the earlier set—
15 appeared sexually suggestive. Plaintiff also observed a series of 17 fully nude photos of J.J. on
16 Clinton’s home office couch. These photos appeared to have been taken approximately a year later,
17 when J.J. was nearly three. Finally, Plaintiff observed a series of 7 selfies Clinton had taken with
18 his arm around J.J. while J.J. was fully nude.

19 33. Alarmed, Plaintiff immediately contacted Church leaders for guidance (who are mandated
20 reporters under California law). On May 1, 2021, Plaintiff showed the inappropriate images to
21 “Shepherd” Dave Bierhorst—a leader of the Church-commissioned Bible study group. Shepherd
22 Bierhorst and his wife confirmed the images were sexually suggestive but brushed them off, stating:
23 “Oh, that’s weird. It looks like she’s unzipping his zipper and then he’s spraying her with water
24 right after. It’s insinuating oral sex. Did you find evidence of Clinton using child pornography? If
25 not, don’t worry about the pictures. Every guy is obsessed with his parts down there.” Plaintiff was
26 made to feel as if she was overreacting and was not sure whether to take further action.

27 34. A few days later, Plaintiff contacted “Elder” Brad Klassen—one of the governing
28 decisionmakers at the top of the Church’s ecclesiastical hierarchy, and currently an officer of the

Church and a member of its Executive Committee—to ask for advice relating to the nude and sexually suggestive photographs Clinton had taken of J.J. Elder Klassen warned her to be careful about sharing information with him because he could be required to inform law enforcement depending on the nature of the concerns. But Elder Klassen was already aware at this point—through internal conversations with other Church leaders—of the nature of Plaintiff’s concerns. β

35. After speaking to Elder Bill Shannon, the head of Grace Community Church’s counseling department, who had been involved in numerous past instances of counseling misconduct, Elder Klassen told Plaintiff he would not look at any photos. As the Sacramento County District Attorney would later note, his refusal to look at photos was apparently motivated by a desire to avoid triggering mandated reporting requirements.

36. On May 24, 2021, Plaintiff learned that J.J.—then four years old—had asked her grandmother if she could kiss her grandmother by putting her tongue inside her grandmother’s mouth. When questioned, J.J. responded that “dada likes to put his tongue inside my mouth.” J.J. revealed to Plaintiff that Clinton played a game with J.J. in which he put his tongue in her mouth. She said it was “dada’s idea” and that he was “just being silly with me.”

37. The very next day, Plaintiff reported the incident to Elder Klassen by text message, stating:

My mom last night also brought to m[y] attention some odd comments that our older daughter has made. When I was gone and she was babysitting, [J.J.] asked my mom whether she could put her tongue inside her (my mom’s) tongue...my mom thought it was really strange cuz she was dead serious about it, so she mentioned it to me. I asked [J.J.] about it this morning, and she said she learned it from dada, and she says Clinton likes to put his tongue inside her mouth, that he says it’s “to be like a frog or something”...that it was C’s idea and he is “just being silly with her”. I personally don’t think that’s normal behavior between dads and their daughters[.]

38. Neither Elder Klassen nor any Church leader reported this to external authorities, in blatant violation of their and the Church’s mandated reporting requirements.

C. Church Leaders Pressure Plaintiff to Move Back in With Clinton Despite Documented Abuse

39. Between March and July 2021, as Plaintiff reported Clinton’s abuse and sexually inappropriate to Church leadership, Church leaders minimized the severity of the conduct and pressured Plaintiff to move back home with Clinton. Indeed, during this time, Church leaders

1 learned directly from Clinton that he was continuing to track Plaintiff through a dashboard camera
2 installed in her car and also using Plaintiff's old cellphone to surveil her iCloud account and see
3 whom she had contacted and who had contacted her.

4 40. On May 1, 2021, Plaintiff sent Church leaders a 10-page document detailing instances of
5 infidelity, manipulation, and abuse perpetrated by Clinton towards Plaintiff and the children.
6 Specifically, she shared the document with Elder Klassen and Elder Rodney Andersen, as well as
7 Shepherd Bierhorst. Then she met with Elder Klassen over Zoom and screenshared the document
8 as she went through it with him.

9 41. The document shared with Church leaders included numerous reports of Clinton's abusive
10 and manipulative conduct towards Plaintiff, including:

- 11 • "inappropriate anger (out of proportion to the circumstances) when questioned about
12 finances, upon my discovery of secret accounts"
- 13 • "Screams in my face to intimidate me, name-calling/ridicule"
- 14 • "When he's in a rage, he takes out his anger on physical objects"
- 15 • "Physically blocks me from leaving the home – stands at the door and closes the garage
16 door if I try to open it, stands behind my car so I can't back out of the garage"
- 17 • "Bullies me into submission to his desires/final decisions, because he's 'bigger and
18 stronger.' Does this to my children as well, physically pries her off my leg so she can't see
19 my relatives—stood there in the garage to oversee my departure, to physically enforce that
20 my daughter could not attend my aunt's funeral. Insisted that I leave her home alone with
21 him, that she couldn't go on the 10-day trip, so that he could share a bed with her.

22 42. The document shared with Church leaders also included numerous reports of Clinton's
23 abuse towards the children, including:

- 24 • "Takes out anger towards me on the kids."
- 25 • "Verbal threats: 'you think that was excessive force? I could break [J.J.'s] skin if I wanted
26 to.'"
- 27 • "'[J.J.], I'm going to draw blood if you don't obey me right now.'"
- 28 • "threatens [J.J.] when angry with me"
- "Physically barricaded our daughter into our bedroom closet for 30 minutes over the
summer June/July 2020. She was crying so hard out of fear that I found her asleep on the
closet floor, in her own urine and feces. When confronted about the inappropriateness of
doing this as a parent, he stated, 'it's her own fault, she did this to herself because she kept
interrupting my work call.'"

43. The document shared with Church leaders also detailed Clinton's manipulation, emotional abuse, and control exerted over Plaintiff:

- "Retaliates/ridicules me if I ask to be looped in about our finances"
- "If I asked him to help with taking out the trash or domestic chores, he would answer, 'That's women's work. I don't ask you to do my job, do I? Why are you asking me to do yours? I never asked you to go to grad school or work outside the home.'"
- "Guilt tripped me for working one day a week after our eldest daughter J.J. was born, making comments like, 'See, J.J.? Mommy would rather work than spend time with you.'"
- "stalked my whereabouts using 3 modalities [...] Would physically show up at places such as parks [...] swerve in front of my vehicle to intimidate me."
- "asked me to schedule a hysterectomy, then later claimed it was all a misunderstanding [...] threatens to 'bring it to the elders' and get me church disciplined if I object"

44. The document shared with Church leaders also detailed Clinton's coercive control over the couple's finances:

- "I've been isolated from our finances for the entire course of our marriage"
- "I told him I wanted to have input, to have equal knowledge of where and how our finances were handled, to sit down and budget together. He screamed, 'I handle all the finances, because I'm just SO much better at it than you are! Just like I delegate housework and cooking to you, because I'm not good at that! I'm not hiding anything [...] He got so angry and verbally enraged, I just had to drop it.'"
- "Lied for years about where his paychecks have been deposited – they've been going to his private secret accounts, never to our joint checking account"
- "Makes extravagant purchases for himself that I would not approve of on his personal secret credit cards, yet excessively scrutinizes every expense I make for myself or the children. Demands that I return purchases, will confiscate items and lock them in his car if they cannot be returned [...], frequently threatens to 'take it to the elders'"

45. The document shared with Church leaders also detailed Clinton's infidelity and searches for pornography depicting minors, including:

- "refused to go to evening service and Bible study with me and the children for 3+ months (11/2020-2/2021), when asked why he didn't want to come and what he was going to do instead, he said, 'I don't know, sleep?' When timestamps and google browsing history reflects he was spending hours looking at pornography instead. [...] **Has searched specifically for videos of sons and their mothers, stepfathers and daughters**, erotic literature"
- "Facebook search terms: 'the baddest teens/girls' (April 2018)"
- "Has admitted to sexual attraction to female coworkers, gym trainers, receptionists at his office, and has taken inappropriate photos and videos of them without their knowledge (10/5/18, 10/23/19, 10/27/2020, 11/6/2020, 11/12/2020, 1/27/21, 2/11/21). Summer 2019, spent

1 afternoons at our HOA community pool, taking 100+ photographs of the same woman in a
2 bikini without her knowledge (See folder entitled ‘Inappropriate photos/videos’). Confessed to
3 Brad Klassen and Rodney Andersen that these photos and videos were then used in private for
4 masturbation, without the knowledge or consent of these women.”

- 5 • “he confessed to multiple extramarital relationships (though he has denied physical adultery)
6 with women he meets over social media ([listing 16 different accounts]). Has looked into
7 paying women using his Venmo account for them to send explicit photos of themselves to him,
8 and has admitted to talking on the phone with them in a sexual manner. Found sexual
9 transcripts from his google voice number in his trash folder of his email”
- 10 • “Has booked daytime hotels using dayuse.com ([listing 11 different hotel stays]), whether they
11 have whirlpools and pools or not. Has google searched different birth control methods, how to
12 delay menstrual periods using hormonal contraception”
- 13 • [list of over 20 women with whom Clinton was cheating]

14 46. On May 27, 2021—a few days after Plaintiff reported the tongue-kissing to Church
15 leadership—Elder Klassen called to tell her she did not have biblical grounds for divorce because
16 it appeared Clinton’s affairs were digital only, and did not involve any skin-to-skin contact. Elder
17 Klassen instructed Plaintiff that there were no grounds to continue her physical separation from
18 Clinton, and that she needed to reconcile the marriage by moving back home. This despite the
19 documented physical abuse to herself and the children she had provided just a few weeks earlier.

20 47. When Plaintiff brought up the sexually suggestive photos and tongue kissing comments,
21 Elder Klassen responded: “If you’re that concerned for your children’s safety, [Jane], just never
22 leave him alone with the kids. I’ve talked to Dave Bierhorst who did see the photos, and he was
23 also not concerned.”

24 48. A week later, Church leaders convened a meeting with Plaintiff and Clinton, where Clinton
25 admitted to the infidelity, excessive financial control over Plaintiff, and abuse towards Plaintiff and
26 the children that Plaintiff had documented in her presentation to Church leadership the month prior.

27 49. But still Church leaders pushed and pushed for Plaintiff to bring herself and the children
28 back into their home and under Clinton’s control. The following week, at Church leaders’ repeated
urging, Plaintiff allowed her children to visit Clinton in a group setting supervised by Elder Klassen
and Shepherd Bierhorst and his wife.

50. During counseling sessions with Church leaders, Plaintiff brought up Clinton’s controlling
behavior and discussed, among other things, that she wanted more control over finances and

1 budgeting. On June 15, 2021, Elder Andersen told Plaintiff that that it was unreasonable for her to
2 be in charge of financial budgeting, as a wife, since control of finances is a “leadership role” that
3 belongs to husbands.

4 51. At the direction of Church leaders, Plaintiff allowed one-hour weekly visitations for the
5 children with Clinton over the course of four weeks, during which Shepherd Bierhorst supervised.

6 52. Church leaders told Plaintiff that there had been no child abuse and that it was simply a
7 misunderstanding. They continued to pressure Plaintiff to move back in with Clinton, including by
8 warning her that she would be harming her children by continuing the separation. On July 16, 2021,
9 after months of pressure from the Church, Plaintiff and the children moved back in with Clinton.

10 **D. When Clinton Recklessly Puts the Lives of Plaintiff and the Children at Risk, Church**
11 **Leadership Rebukes Plaintiff for Calling the Police**

12 53. On September 24, 2021, Plaintiff, Clinton, and their children J.J. and A.J. were on their way
13 to Bible study. At the time, Plaintiff was pregnant with R.J. Clinton asked Plaintiff to navigate on
14 her phone. They took a wrong turn, and Clinton drove into a dead end. He became enraged at
15 Plaintiff and, in anger, recklessly performed a U-turn, hitting a curb in the process. Plaintiff then
16 told Clinton she did not feel safe being in the car with him and would prefer to walk to Bible study
17 with the children. She opened the passenger door and got out of the car. As soon as she closed the
18 door, Clinton locked the car doors so she could not access the children in the back seat. She knocked
19 on the window and asked Clinton to unlock the doors. In response, Clinton asked if Plaintiff was
20 going to get back into the car. He subsequently unlocked the doors, and Plaintiff went into the back
21 seat with J.J. and A.J. to remove them from the car.

22 54. As Plaintiff was unbuckling A.J. from her car seat with the rear passenger door still open,
23 Clinton stepped on the gas pedal, swerving and driving recklessly while Plaintiff pleaded with him
24 to stop—1 year-old A.J. clutched in her arms and both children crying. Clinton drove so recklessly
25 that the rear passenger door closed on its own. In that moment Plaintiff believed they were going
26 to die if Clinton collided with something. Plaintiff tried to get Clinton’s attention and continued to
27 plead with him to stop the car. When he refused, Plaintiff called 911. The 911 operator asked
28 Plaintiff to put her on speaker and was able to convince Clinton to stop the car to let Plaintiff and

1 the children out. As soon as Clinton pulled over to the side, Plaintiff immediately got the children
2 out of the car. Clinton called Elder Andersen.

3 55. When the police arrived, they interviewed Plaintiff and Clinton separately and advised
4 Plaintiff not to go back home with Clinton for the night. The police waited with Plaintiff until her
5 friend arrived to pick her and the children up.

6 56. That night, at 11:00 p.m., Elder Andersen called Plaintiff to chastise her for involving law
7 enforcement. Elder Andersen told her she could not be separated from Clinton, despite her fear for
8 her life and despite what the police officers had advised her to do. When Plaintiff expressed her
9 fear for her safety and the children's safety, Elder Andersen sternly rebuked her for not getting
10 back into the front passenger seat to help navigate to Bible study. He accused Plaintiff of
11 "overreacting" by calling 911 and told Plaintiff that she should have "submitted" to her husband
12 instead of "escalating" the situation. When Plaintiff questioned whether wives should submit to
13 husbands when their safety or the safety of their children is threatened, she was accused of being
14 resentful of God's ordained roles in marriage.

15 **E. Plaintiff Remains with Clinton Under Fear of Church Retaliation**

16 57. For nearly a year after the Bible study incident, Plaintiff did what she could to make sure
17 the children were safe while she and they lived together with Clinton. She lived in constant fear of
18 excommunication by the Church if she took steps to report to the authorities or leave Clinton.

19 58. Church leadership had done this before to another woman, Eileen Gray—publicly shaming
20 her for leaving a husband who had abused her and their children. (That man, David Gray, was later
21 convicted of aggravated child molestation, corporal injury to a child, and child abuse.)

22 59. Plaintiff was terrified that if she went against the Church's clear wishes to submit to Clinton
23 despite past and anticipated abuse, she and her children would face retaliation.

24 **F. Grace Community Church Defends Clinton's Conduct in Family Court, in Support of
Custody and Visitation**

25 60. On August 4, 2022, Plaintiff observed a lesion around J.J.'s mouth. As a nurse, Plaintiff
26 became concerned because she knew Clinton had herpes, and because of J.J.'s prior statement that
27 Clinton liked to tongue-kiss her.

28 61. On August 7, 2022, Plaintiff walked into the children's room to find J.J. naked on her bed

1 with her legs spread out as Clinton rubbed lotion on her abdominal area. Plaintiff felt uncomfortable
2 and, given Clinton's history of inappropriate conduct with J.J., she told Clinton she could take
3 things from there so he would stop. He then left the room.

4 62. On August 8, 2022, Church leaders, including Elder Andersen, met with Clinton. Elder
5 Andersen called Plaintiff during the meeting and put her on speakerphone. During the conversation,
6 Clinton admitted to kissing and sticking his tongue inside J.J.'s mouth. Another Church leader
7 present at the meeting later submitted testimony under penalty of perjury confirming that, during
8 the meeting, "Clinton admitted to us that he kissed his young daughter [J.J.] with his tongue."

9 63. Ten days later, Plaintiff sought filed for a Temporary Restraining Order, which was granted.

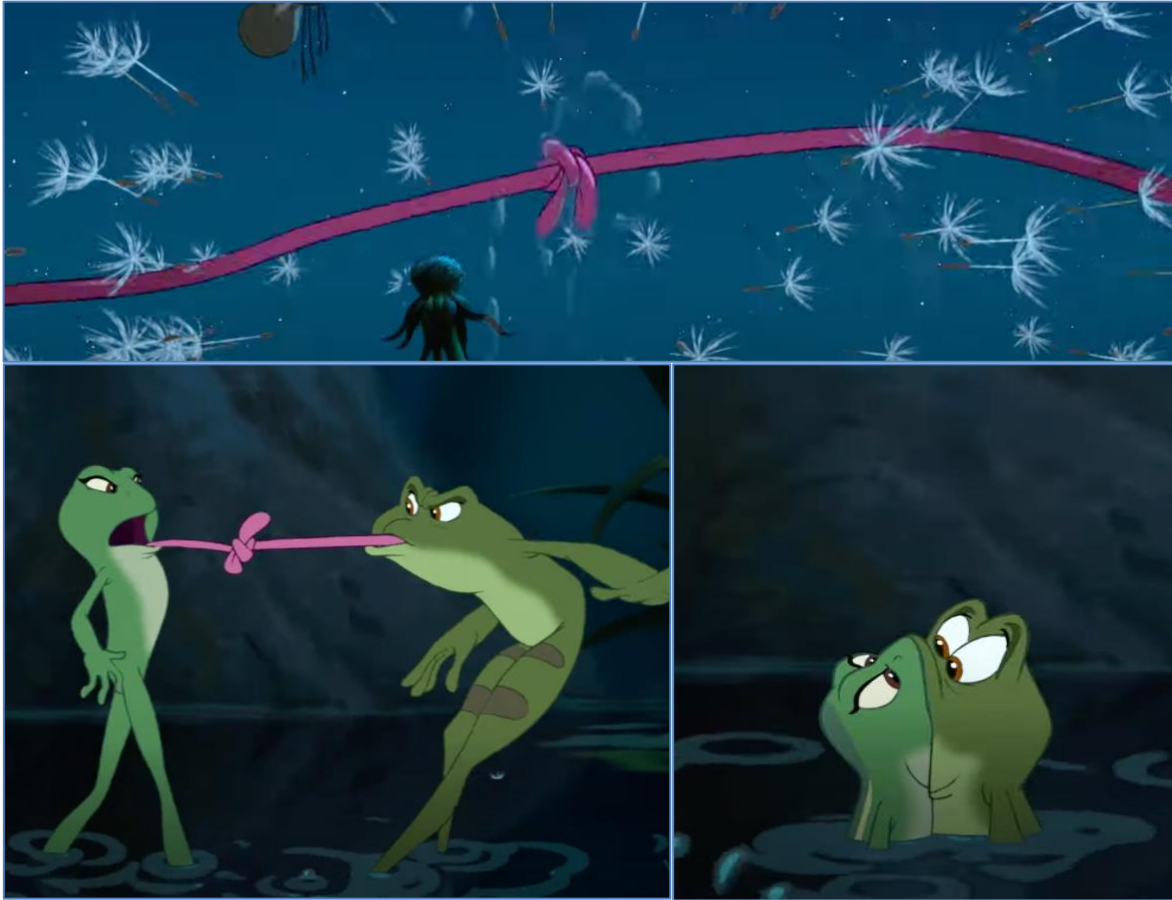
10 64. In subsequent court proceedings relating to custody and visitation, Church leadership
11 defended Clinton's behavior, submitting multiple declarations supporting Clinton and suggesting
12 Plaintiff was not credible. The highest levels of Church leadership—including Elder Chris
13 Hamilton (Chairman) and Elder George Crawford (Vice-Chairman), and Elder Mark Zhakevich
14 (Pastor of Administration)—reviewed and approved these declarations. For example, Elder
15 Andersen submitted a declaration under penalty of perjury minimizing the tongue-kissing incident,
16 stating that "only the tips" of Clinton's and J.J.'s tongues had touched and explaining that,
17 according to Clinton, "he and his daughter were watching a movie called 'The Princess and the
18 Frog' and the touching of the tips of the tongue was depicted in the movie, which [J.J.] playfully
19 wanted to imitate."

20 65. The referenced scene from the film depicts two characters' tongues becoming tied in a knot
21 amidst flying saliva, followed by an open-mouthed kiss. While humorous when depicted between
22 two cartoon frogs, it is perverse in the context of a father and his toddler daughter.

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66. Clinton's characterization of the tongue-kissing incident as merely imitating a "silly" movie scene exemplifies a well-documented grooming tactic employed by child sexual abusers. Forensic psychology research has established that child molesters commonly frame sexually inappropriate conduct as games, play, or movie imitation to normalize abuse and create plausible deniability. This tactic desensitizes the child to inappropriate contact, provides the perpetrator with a seemingly innocent explanation if discovered, and exploits the child's natural curiosity and trust.

67. That Church leadership reviewed and approved of Elder Andersen's support for Clinton's "movie imitation" explanation in a sworn declaration—without recognizing this classic grooming pattern—demonstrates either Church leadership's dangerous ignorance about child sexual abuse dynamics or its willful blindness to Clinton's predatory behavior. Either interpretation underscores the Church's catastrophic failure to protect J.J. and fulfill its duties as mandated reporters who should have been trained to recognize these warning signs.

68. On April 1, 2023, J.J. informed Plaintiff that, during one of the court-ordered, supervised

visitations with Clinton, Clinton had taken her into the bathroom (alone) and ordered her to touch his penis, over her protest, which made her hands dirty and required her to wash them afterwards.

The conversation went as follows:

J.J.: Yeah, I know what Dada's private parts look like.

Plaintiff: Have you ever seen Dada's private parts?

J.J.: Yes.

Plaintiff: How did this happen? When did this happen?

J.J.: Dada took me to an ice cream store. Dada had to go to the bathroom and so Dada took me, too.

Plaintiff: What happened next?

J.J.: Dada asked me do I want to see his private parts.

Plaintiff: What did you answer?

J.J.: No.

Plaintiff: What did Dada say?

J.J.: Dada said "You have to."

Plaintiff: What are Dada's private parts?

J.J.: The middle of his butt! It's all red and it has something black—like a worm sticking down. He asked me to touch his private parts, but I said 'no, no,' but Dada kept saying 'yes, yes,' so I did touch. I had to wash my hands because my hands were so dirty.

69. J.J. later relayed additional information to Plaintiff regarding the encounter, describing Clinton's penis as being covered in semen or pre-ejaculate:

J.J.: I had to wash my hands because it felt like slippery poop.

Plaintiff: What do you mean, slippery?

J.J.: It was slippery because it was covered in clear pee, not just the tip where the hole is, but the whole reddish-brown thing.

70. Plaintiff immediately reported the incident to law enforcement, who investigated and referred the case to the Sacramento County District Attorney for prosecution.

G. The District Attorney's Office Excoriates Grace Community Church for Interfering and Muddling Evidence

71. On August 15, 2023, the Sacramento County District Attorney's Office sent a letter to the investigating officers, declining to file charges due to an inability to prove beyond a reasonable doubt that Clinton directed J.J., with sexual intent, to touch his penis. Specifically, the prosecutor strongly rebuked the Church for muddling evidence in a manner that prevented the prosecutor from using probative information in the prosecution.

72. The investigating deputy district attorney (DDA) noted that the Church's interference

1 prevented Plaintiff from reporting her discovery of sexually suggestive photos to the authorities:

2 Ms. [Doe] related that the pastor of their church, Grace Community Church, assured
3 her that they could assist with resolving the issue. During their four month
4 separation, the church declined to look at any of the photos that concerned her (as
5 they are mandated reporters and did not want to get the government involved!), yet
6 the church determined ‘there was no child abuse’ and advised the mom that, per
7 suspect, there were innocent explanations, it was all a misunderstanding, and it was
8 her duty to reconcile and move back in with him.

9 73. The DDA further noted that investigators were unable to conduct a suspect interview with
10 Clinton because he had retained an attorney in family court proceedings for custody. She observed
11 that, based on a letter sent to the district attorney’s office by Clinton’s attorney, it is “clear that the
12 pastor of Grace Community Church, Pastor Klassen, cooperated with the private attorney since the
13 letter contains information that could only come from the church.”

14 74. The DDA stated that, while the photographs of Clinton and J.J. discovered by Plaintiff do
15 not rise to the level of child pornography, they are “disturbing,” “unsettling,” and “the purpose of
16 taking these photos is highly suspect.”

17 75. The DDA also noted that, during an interview with the Special Assault Forensic Evaluation
18 (SAFE) Center in April 2023, J.J. corroborated earlier statements about touching Clinton’s penis,
19 stating that, while in the bathroom, Clinton told her she “had” to look at his private part and that
20 she touched his butt once and his “dangly” part one time.

21 76. The DDA specifically faulted the Church for its role in interfering with timely reporting of
22 Clinton’s conduct and insinuated that the Church had attempted to circumvent its mandated
23 reporting obligations:

24 [T]he pastor and elders at Grace Community Church muddled what could have
25 been helpful evidence as to [Clinton’s] intent. Their arrogance in attempting to
26 handle such a delicate—and potentially criminal—matter, in house, and without the
27 due diligence that certainly would have triggered their mandatory reporting edicts,
28 hinders our ability to use the prior events to ascertain the suspect’s intent in the
bathroom of the Coldstone on the date in question.

**H. Following Church Leadership’s Muddling of Evidence Undermining Clinton’s
Prosecution, Clinton Again Abuses J.J.**

77. On January 8, 2024, J.J. asked Plaintiff to read a book entitled “I Said No!” The book details
medical terms for private parts. When Plaintiff read the definition for the word “penis,” J.J.

1 exclaimed: "Mama, I know exactly what that is!" Plaintiff asked her how she knew, to which J.J.
2 replied: "Dada likes to show me his."

3 78. J.J. recounted a weekend during supervised visitations with Clinton when, while J.J. was
4 playing a game with A.J. in Clinton's hotel room, Clinton whispered in her ear: "Come here, I want
5 to show you something. I'm going to show you my private parts." J.J. responded: "No, that's not
6 nice." In response, Clinton directed her to "just do it."

7 79. J.J. told Plaintiff: "I was scared he was going to get angry because last time I said no, he
8 made me sit in a chair for 30 minutes by myself on time out. So I said 'okay, fine.' But I didn't
9 even have to go potty, Mama." She then told Plaintiff that Clinton had taken her into the hotel
10 bathroom alone (in violation of a court order), closed the door, pulled down his pants, showed J.J.
11 his penis, and then urinated. Clinton then told J.J., "good job," and let her leave the bathroom.

12 80. J.J. later recounted the incident to her first-grade teacher, who immediately notified the
13 police and Child Protective Services.

14 81. Clinton was emboldened to engage in such blatant abuse after multiple law enforcement
15 investigations and court proceedings precisely because Church leadership had enabled his conduct
16 to go unpunished. On information and belief, Clinton engaged in sexual conduct with J.J. in January
17 2024 for two purposes: (1) to satisfy his own perverse sexual desires, and (2) to exert control over
18 Plaintiff and send her a message that even under court-ordered supervised visitation restraints, she
19 was powerless to restrict him from doing what he wanted to do. The latter was a message that had
20 been reinforced through years of directives by Church leaders to Plaintiff that she must submit to
21 Clinton's will—including directives given after Church leadership was aware that Clinton had
22 abused Plaintiff and the children and had reason to suspect he would do it again.

23 **I. Grace Community Church Covered Up Clinton's Abuse**

24 82. The Church's actions were calculated and purposeful. Church leaders acted to circumvent
25 their mandated reporting obligations and to interfere with the evidence, collude with Clinton, and
26 pressure and intimidate Plaintiff from alerting law enforcement to prevent police and prosecutors
27 from proving intent beyond a reasonable doubt and holding Clinton criminally accountable.

28 83. The civil burden of proof, however, is not so exacting.

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FIRST CAUSE OF ACTION

**Childhood Sexual Abuse
(Code Civ. Proc. § 340.1)**

By J.J. Against Clinton

84. J.J. realleges and incorporate by reference the prior paragraphs as though fully set forth herein.

85. Clinton intended to cause sexually offensive contact with J.J. by directing her to touch his penis on multiple occasions, and a sexually offensive contact resulted.

86. Clinton intended to cause sexually offensive contact with J.J. by initiating a kiss involving tongues, and a sexually offensive contact resulted.

87. On multiple occasions, Clinton engaged in lewd and lascivious behavior with J.J., including kissing her with tongue, showing her his penis, and forcing her to touch his penis, in violation of Penal Code section 288.

88. On at least one occasion, Clinton transported J.J. to a separate location—an ice cream store—for the purpose of engaging in a lewd and lascivious act in violation of Penal Code section 266j.

89. Clinton engaged in a pattern of sexually improper behavior with J.J. constituting annoyance and molestation in violation of Penal Code section 647.6.

90. J.J., at all times a minor under the age of 16, was incapable of consenting to Clinton's conduct. Nevertheless, she did, in fact, express that she did not consent on at least one occasion.

91. J.J. was harmed by Clinton's conduct.

SECOND CAUSE OF ACTION

Negligence

By J.J., A.J., and R.J., Against Grace Community Church

92. J.J., A.J., and R.J., reallege and incorporate by reference the prior paragraphs as though fully set forth herein.

93. Grace Community Church's leaders were mandated reporters under Penal Code section 11165.7. As mandated reporters, GCC leaders were required under Penal Code section 11166 to make a report to the appropriate state agency whenever they knew or reasonably suspected that a child had been the victim of child abuse or neglect.

1 94. Child abuse or neglect, for the purpose of mandated reporting, includes—but is not limited
2 to— lewd and lascivious conduct with a child under the age of 16, unlawful corporal punishment
3 or injury that exceeds a reasonable and necessary amount of force, and placing a child in a position
4 that endangers their health or safety, a including serious emotional damage.

5 95. GCC had reason to believe between May 2021 and July 2021 that J.J had been a victim of
6 child abuse or neglect. Specifically, by that time, Plaintiff had informed GCC leaders about tongue-
7 kissing that Clinton had engaged in with J.J., the incident in which Clinton had barricaded J.J. in a
8 closet, the instances of corporal punishment he had meted out to J.J., the sexually suggestive images
9 Clinton had taken with J.J., and Clinton’s search history for father-daughter pornography. Yet GCC
10 never made any reports as required.

11 96. As a result of GCC’s failure to report suspected abuse and neglect it learned about between
12 May 2021 and July 2021, and GCC’s insistence that Plaintiff return to an abusive home, Plaintiff
13 and her children—J.J., A.J., and R.J.—were subject to further abuse.

14 97. GCC had reason to believe in September 2021 that J.J. and A.J. had been victims of child
15 abuse or neglect, after the incident in which Clinton drove recklessly and dangerously to scare
16 Plaintiff, placing the children’s lives at risk. Yet GCC never made any reports as required. Instead,
17 GCC leaders rebuked Plaintiff for involving police and directing her once again to submit to her
18 husband.

19 98. As a result of GCC’s failure to report suspected abuse and neglect in September 2021, and
20 GCC’s insistence that Plaintiff submit to her husband, Plaintiff and her children were subject to
21 further abuse.

22 99. GCC had reason to believe in August 2022 that J.J. had been the victim of child abuse or
23 neglect, after Clinton admitted to kissing J.J. with his tongue in her mouth and physically and
24 emotionally abusing his family members. Yet GCC never made any reports as required.

25 100. As a result of GCC’s failure to report suspected abuse and neglect in 2021 and 2022, J.J.
26 was subjected to sexual abuse when, in 2023, Clinton took her into a bathroom and forced her to
27 touch his penis.

28 101. As a result of GCC’s failure to report suspected abuse and neglect in 2021 and 2022, J.J.

1 was subjected to sexual abuse when, in 2024, Clinton took her into a bathroom and forced her to
2 look at his penis against her will.

3 102. GCC also failed to properly train its leadership, including mandated reporters, on
4 recognizing and reporting signs of child sexual abuse, including common grooming tactics.

5 103. Had GCC properly trained, or its leaders properly reported suspected and known child
6 abuse and neglect *at any point* at which it became aware or developed a reasonable suspicion that
7 such abuse was occurring, the authorities would have gotten involved far earlier and been able to
8 conduct a proper investigation, as well as prevent the subsequent abuse.

9 104. Instead, GCC acted in concert with Clinton to prevent Plaintiff from reporting Clinton's
10 conduct to the proper authorities. GCC's intent was that Plaintiff should submit to her husband
11 regardless of the threat he posed to the physical and emotional well-being of her or her children.
12 GCC's conduct was intentional, malicious, and committed with conscious disregard for J.J., A.J.,
13 and R.J.'s rights, safety, and wellbeing, justifying an award of punitive damages under Civil Code
14 Section 3294. GCC's conduct constituted a "cover up" under Code of Civil Procedure section
15 340.1.

16 105. GCC's conduct was a substantial factor in causing harm to J.J., A.J., and R.J.

17 **THIRD CAUSE OF ACTION**
18 **Domestic Violence**
19 **(Civ. Code § 1708.6)**
20 *By Jane Doe Against Clinton*

21 106. Plaintiff Jane Doe realleges and incorporate by reference the prior paragraphs as though
22 fully set forth herein.

23 107. At all times relevant herein, Plaintiff and Clinton were married spouses.

24 108. Between 2017 and 2021, Clinton engaged in a pattern of abuse in which he exerted coercive
25 control over every aspect of Plaintiff's life, within the meaning of Family Code section 6320.

26 109. In September 2021, Clinton drove his car in a reckless and dangerous manner while
27 Plaintiff—pregnant at the time—was removing her children from the backseat of the car to escape
28 Clinton's anger. Clinton's actions were intentional and placed Plaintiff at risk of great bodily injury
or death within the meaning of Penal Code section 13700.

1 110. In January 2024, Clinton forced J.J. to follow him into the bathroom, alone, during a
2 visitation, and showed her his penis against her will and in violation of a court order. Clinton did
3 this knowing that Plaintiff would find out (because she had found out about the prior instances)
4 and did so intending to destroy Plaintiff's mental and emotional calm through a third party (J.J.),
5 within the definition of abuse under Family Code sections 6203 and 6320.

6 111. Clinton's conduct was intentional, malicious, and committed with conscious disregard for
7 Plaintiff's rights, safety, and wellbeing, justifying an award of punitive damages under Civil Code
8 Section 3294.

9 112. Clinton's conduct was a substantial factor in causing Plaintiff harm.

10 **FOURTH CAUSE OF ACTION**
11 **Aiding and Abetting Domestic Violence**
12 **(Civ. Code § 1708.6)**
By Jane Doe Against GCC

13 113. Plaintiff Jane Doe realleges and incorporate by reference the prior paragraphs as though
14 fully set forth herein.

15 114. GCC knew, based on Plaintiff's reporting of Clinton's conduct and based on conversations
16 with Clinton himself, that Clinton was going to perpetrate domestic violence on Plaintiff.

17 115. As early as June 2021, GCC knew through conversations with Clinton that he was likely to
18 perpetrate domestic violence on Plaintiff. For example, GCC learned from Clinton that he was
19 continuing to surveil her location and phone activity while they were separated—coercive control
20 constituting abuse under Family Code sections 6203 and 6320.

21 116. GCC leaders also reprimanded Plaintiff for seeking to assert control over her finances, and
22 assisted Clinton in maintaining coercive control over finances, constituting abuse under Family
23 Code sections 6203 and 6320.

24 117. After Clinton drove recklessly and placed Plaintiff's life at risk in September 2021, his first
25 call was to GCC. Later that night, after GCC pastors had spoken with Clinton, Pastor Andersen
26 called Plaintiff to rebuke her for involving the authorities and pressured her to return to Clinton—
27 knowing full well that Clinton was likely to continue his abusive conduct.

28 118. Indeed, GCC engaged in a pattern of providing substantial assistance and encouragement

1 to Clinton in perpetrating domestic violence by pressuring Plaintiff not to seek law enforcement
2 assistance and repeatedly pressuring her to stay with Clinton and submit to his demands and will.

3 119. GCC's conduct was perpetrated through its managing agents, ratified by its managing
4 agents—including Elders who held the highest decision-making authority within the
5 organization—and was intentional, malicious, and committed with conscious disregard for
6 Plaintiff's rights, safety, and wellbeing, justifying an award of punitive damages under Civil Code
7 Section 3294.

8 120. GCC's conduct was a substantial factor in causing harm to Plaintiff. Had GCC not offered
9 Clinton substantial assistance and encouragement in perpetrating domestic violence, Plaintiff
10 would have reported the abuse earlier and been able to avoid future abuse.

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 3 A. For actual, and compensatory damages according to proof;
- 4 B. For past and future medical expenses and incidental expenses according to proof;
- 5 C. For general damages for fear, worry, annoyance, discomfort, disturbance, inconvenience,
- 6 mental anguish, emotional distress, and loss of quiet enjoyment of property;
- 7 D. For pre-judgment and post-judgment interest;
- 8 E. For an award of attorneys' fees, costs and expenses as authorized by applicable law;
- 9 F. For treble damages pursuant to Code of Civil Procedure section 340.1;
- 10 G. For punitive damages;
- 11 H. For injunctive relief requiring Grace Community Church to implement mandated reporter
- 12 training; and
- 13 I. For such other and further relief as this Court may deem just and proper.

14 **JURY DEMAND**

15 Plaintiffs demand a trial by jury on all causes of action so triable.

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17 Date: September 29, 2025



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19 Shounak S. Dharap
20 Counsel for Plaintiffs
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