

FILED  
8/18/2022  
Timothy W Fitzgerald  
Spokane County Clerk

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR SPOKANE COUNTY

DERYK TERRIL; and DANIEL ENHOLM,

Plaintiffs,

vs.

SOUTH HILL CONGREGATION OF  
JEHOVAH'S WITNESSES; SOUTHEAST  
CONGREGATION OF JEHOVAH'S  
WITNESSES; and WATCH TOWER BIBLE  
AND TRACT SOCIETY OF  
PENNSYLVANIA,

Defendants.

NO. 22-2-02595-32

FIRST AMENDED SUMMONS

TO ALL NAMED DEFENDANTS:

A lawsuit has been started against you in the above-entitled court by the Plaintiffs. The Plaintiffs' claims are stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within 20 days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff is entitled to what

1 she or he asks for because you have not responded. If you serve a notice of appearance on the  
2 undersigned person, you are entitled to notice before a default judgment may be entered.

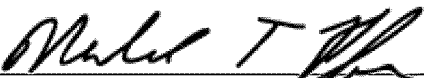
3 You may demand that the Plaintiffs file this lawsuit with the court. If you do so, the  
4 demand must be in writing and must be served upon the person signing this summons. Within 14  
5 days after you serve the demand, the Plaintiffs must file this lawsuit with the court, or the service  
6 on you of this summons and complaint will be void.

7 If you wish to seek the advice of an attorney in this matter, you should do so promptly so  
8 that your written response, if any, may be served on time.

9 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State  
10 of Washington.

11 SIGNED this 18th day of August 2022.

12 PFAU COCHRAN VERTETIS AMALA PLLC

13  
14 By  \_\_\_\_\_

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21 *Attorneys for Plaintiffs*

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NO. 22-2-02595-32

FIRST AMENDED COMPLAINT FOR  
DAMAGES

Plaintiffs Deryk Terril and Daniel Enholm, by and through their attorneys, Michael T. Pfau, Steven T. Reich, and Benjamin B. Watson of Pfau Cochran Vertetis Amala PLLC, respectfully allege for their complaint the following:

**I. INTRODUCTION**

1. This case arises from childhood sexual abuse and exploitation that Plaintiffs Deryk Terril and Daniel Enholm suffered at the hands of the Defendants' Ministerial Servant and Elder, John Earl Jones, who the Defendants knew or should have known posed a danger to Plaintiffs Deryk Terril and Daniel Enholm and other children. Despite their knowledge, the Defendants

1 failed to take reasonable steps to protect Plaintiffs Deryk Terril and Daniel Enholm from the  
2 danger of being sexually abused by John Earl Jones. As a result, John Earl Jones was able to use  
3 his positions as a Ministerial Servant and Elder with the Defendants to sexually abuse Plaintiffs  
4 Deryk Terril and Daniel Enholm.

## 5 II. PARTIES

6 2. Plaintiff Deryk Terril is an adult male who currently resides in Spokane,  
7 Washington.

8 3. Plaintiff Daniel Enholm is an adult male who currently resides in Spokane,  
9 Washington.

10 4. Plaintiffs Deryk Terril and Daniel Enholm are collectively referred to herein as  
11 “Plaintiffs.”

12 5. At all relevant times Plaintiffs were minor religious members of Defendants South  
13 Hill Congregation of Jehovah’s Witnesses; Southeast Congregation of Jehovah’s Witnesses; and  
14 Watch Tower Bible and Tract Society of Pennsylvania (all Defendants are collectively referred to  
15 herein as “the Defendants”).

16 6. At all relevant times John Earl Jones (“John Jones”) was a Ministerial Servant and  
17 Elder for the Defendants that the Defendants used and relied upon as a Ministerial Servant and  
18 Elder to serve Plaintiffs and other minor religious members.

19 7. During the time that John Jones served as a Ministerial Servant and Elder for the  
20 Defendants, he used those positions to groom and sexually abuse Plaintiffs.

21 8. At all relevant times Defendant South Hill Congregation of Jehovah’s Witnesses  
22 (the “South Hill Congregation”) was a nonprofit corporation incorporated in the State of  
23 Washington with its principal place of business located in Spokane, Washington.

24 9. At all relevant times the South Hill Congregation conducted business as “South Hill  
25 Congregation of Jehovah’s Witnesses,” “South Hill Congregation,” “South Hill Kingdom Hall of  
26 Jehovah’s Witnesses,” “South Hill Kingdom Hall,” “Southgate Congregation of Jehovah’s

1 Witnesses,” “Southgate Congregation,” “Southgate Kingdom Hall of Jehovah’s Witnesses,”  
2 “Southgate Kingdom Hall,” “South Perry Congregation of Jehovah’s Witnesses,” “South Perry  
3 Congregation,” “South Perry Kingdom Hall of Jehovah’s Witnesses,” “South Perry Kingdom  
4 Hall,” and “Jehovah’s Witnesses.”

5 10. To the extent that the South Hill Congregation was a different entity, corporation,  
6 or organization during the period of time in which John Jones used his positions as a Ministerial  
7 Servant and Elder to sexually abuse Plaintiffs, such entity, corporation, or organization is hereby  
8 on notice that it is intended to be a Defendant in this lawsuit and is named in the caption and in  
9 this complaint as South Hill Congregation of Jehovah’s Witnesses.

10 11. To the extent that the South Hill Congregation is a successor to a different entity,  
11 corporation, or organization which existed during the period of time during which John Jones  
12 used his positions as a Ministerial Servant and Elder to sexually abuse Plaintiffs, including any  
13 other entity, corporation, or organization that subsequently or eventually merged into the South  
14 Hill Congregation, such predecessor entity, corporation, or organization is hereby on notice that  
15 it is intended to be a Defendant in this lawsuit and is named in the caption and in this complaint  
16 as South Hill Congregation of Jehovah’s Witnesses.

17 12. All such South Hill Congregation-related entities, corporations, or organizations  
18 are collectively identified and referred to herein as the “South Hill Congregation.”

19 13. At all relevant times Defendant Southeast Congregation of Jehovah’s Witnesses  
20 (the “Southeast Congregation”) was a nonprofit corporation incorporated in the State of  
21 Washington with its principal place of business located in Spokane, Washington.

22 14. At all relevant times the Southeast Congregation conducted business as “Southeast  
23 Congregation of Jehovah’s Witnesses,” “Southeast Congregation,” “Southeast Kingdom Hall of  
24 Jehovah’s Witnesses,” “Southeast Kingdom Hall,” “Spokane Southeast Congregation of  
25 Jehovah’s Witnesses,” “Spokane Southeast Congregation,” “Spokane Southeast Kingdom Hall of  
26 Jehovah’s Witnesses,” “Spokane Southeast Kingdom Hall,” and “Jehovah’s Witnesses.”

1           15. To the extent that the Southeast Congregation was a different entity, corporation,  
2 or organization during the period of time in which John Jones used his positions as a Ministerial  
3 Servant and Elder to sexually abuse Plaintiffs, such entity, corporation, or organization is hereby  
4 on notice that it is intended to be a Defendant in this lawsuit and is named in the caption and in  
5 this complaint as Southeast Congregation of Jehovah's Witnesses.

6           16. To the extent that the Southeast Congregation is a successor to a different entity,  
7 corporation, or organization which existed during the period of time during which John Jones  
8 used his positions as a Ministerial Servant and Elder to sexually abuse Plaintiffs, including any  
9 other entity, corporation, or organization that subsequently or eventually merged into the  
10 Southeast Congregation, such predecessor entity, corporation, or organization is hereby on notice  
11 that it is intended to be a Defendant in this lawsuit and is named in the caption and in this  
12 complaint as Southeast Congregation of Jehovah's Witnesses.

13           17. All such Southeast Congregation-related entities, corporations, or organizations are  
14 collectively identified and referred to herein as the "Southeast Congregation."

15           18. Upon information and belief, the South Hill Congregation is a successor in interest  
16 to the Southeast Congregation.

17           19. Given their relationship, the South Hill Congregation and the Southeast  
18 Congregation are collectively referred to as the "South Hill Congregation."

19           20. At all relevant times Defendants Watch Tower Bible and Tract Society of  
20 Pennsylvania (the "Watch Tower") was a foreign corporation sole incorporated in the State of  
21 Pennsylvania that conducted business in Spokane County, Washington.

22           21. At all relevant times the Watch Tower conducted business as "Watch Tower Bible  
23 and Tract Society of Pennsylvania," "Watch Tower of Jehovah's Witnesses," and "Jehovah's  
24 Witnesses."

25           22. To the extent that the Watch Tower was a different entity, corporation, or  
26 organization during the period of time in which John Jones used his positions as a Ministerial

1 Servant and Elder to sexually abuse Plaintiffs, such entity, corporation, or organization is hereby  
2 on notice that it is intended to be a Defendant in this lawsuit and is named in the caption and in  
3 this complaint as Watch Tower Bible and Tract Society of Pennsylvania

4 23. To the extent that the Watch Tower is a successor to a different entity, corporation,  
5 or organization which existed during the period of time during which John Jones used his positions  
6 as a Ministerial Servant and Elder to sexually abuse Plaintiffs, including any other entity,  
7 corporation, or organization that subsequently or eventually merged into the Watch Tower, such  
8 predecessor entity, corporation, or organization is hereby on notice that it is intended to be a  
9 Defendant in this lawsuit and is named in the caption and in this complaint as Watch Tower Bible  
10 and Tract Society of Pennsylvania

11 24. All such Watch Tower-related entities, corporations, or organizations are  
12 collectively identified and referred to herein as "Watch Tower."

13 25. Each Defendant is the agent, servant and/or employee of other Defendants, and  
14 each Defendant was acting within the course and scope of his, her or its authority as an agent,  
15 servant and/or employee of the other Defendants. The Defendants, and each of them, are  
16 individuals, corporations, partnerships, and other entities which engaged in, joined in, and  
17 conspired with the other wrongdoers in carrying out the tortious and unlawful activities described  
18 in this Complaint, and the Defendants, and each of them, ratified the acts of the other Defendants  
19 as described in this Complaint. The Defendants were acting in a joint venture at the time of  
20 tortious and unlawful activities described in this Complaint.

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

22 26. This Court has jurisdiction over this action pursuant to RCW 2.08.010, RCW 4.96  
23 *et seq.*, and the Washington State Constitution.

24 27. Venue is proper pursuant to RCW 4.12.020 because a substantial part of the acts or  
25 omissions giving rise to Plaintiffs' claims occurred in Spokane County, Washington.  
26

1           28. Venue is proper pursuant to RCW 4.12.025 because at all relevant times the South  
2 Hill Congregation of Jehovah's Witnesses was a nonprofit corporation authorized to transact  
3 business in Washington with its principal place of business located in Spokane County,  
4 Washington.

5           29. Venue is proper pursuant to RCW 4.12.025 because at all relevant times the  
6 Southeast Congregation of Jehovah's Witnesses was a nonprofit corporation authorized to transact  
7 business in Washington with its principal place of business located in Spokane County,  
8 Washington.

9           30. Venue is proper because Plaintiff Deryk Terril currently resides in Spokane County,  
10 Washington.

11           31. Venue is proper because Plaintiff Daniel Enholm currently resides in Spokane  
12 County, Washington.

13                   **IV. STATEMENT OF FACTS AS TO ALL PLAINTIFFS**

14           32. Plaintiffs repeat and re-allege the above allegations.

15           33. At all relevant times Plaintiffs were minor religious members of the Defendants,  
16 participated in religious activities sponsored by the Defendants, and attended religious services at  
17 the South Hill Congregation.

18           34. At all relevant times John Jones was a Ministerial Servant and Elder for the  
19 Defendants, participated in religious activities sponsored by the Defendants, and attended  
20 religious services at the South Hill Congregation.

21           35. At all relevant times the Watch Tower, through its agents, servants, and employees,  
22 managed, maintained, operated, and controlled the Jehovah's Witnesses congregations in  
23 Washington, including the Jehovah's Witnesses congregation that Plaintiffs were religious  
24 members of when they were sexually abused by the Defendants' Ministerial Servant and Elder,  
25 John Jones.  
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1           36. At all relevant times the Watch Tower, through its agents, servants, and employees,  
2 managed, maintained, operated, and controlled the leaders, volunteers, and members of the  
3 Jehovah's Witnesses congregations in Washington, including the leaders, volunteers, and  
4 members of the Jehovah's Witnesses congregation that Plaintiffs were religious members of when  
5 they were sexually abused by the Defendants' Ministerial Servant and Elder, John Jones.

6           37. At all relevant times the Defendants, through their agents, servants, and employees,  
7 held out their agents, servants, and employees to the public as those who managed, maintained,  
8 operated, and controlled the Jehovah's Witnesses congregation that Plaintiffs were religious  
9 members of when they were sexually abused by one of the Defendants' Ministerial Servants and  
10 Elders, John Jones.

11           38. At all relevant times the Defendants were responsible for the hiring and staffing,  
12 and did the hiring and staffing, for the church volunteers, leaders, and employees of the Jehovah's  
13 Witnesses congregation that Plaintiffs were religious members of when they were sexually abused  
14 by the Defendants' Ministerial Servant and Elder, John Jones.

15           39. At all relevant times the Defendants were responsible for the recruitment and  
16 staffing of the leaders and volunteers of the Jehovah's Witnesses congregation that Plaintiffs were  
17 religious members of when they were sexually abused by the Defendants' Ministerial Servant and  
18 Elder, John Jones.

19           40. At all relevant times the Defendants were responsible for supervising the leaders,  
20 volunteers, and members of the Jehovah's Witnesses congregation that Plaintiffs were religious  
21 members of when they were sexually abused by the Defendants' Ministerial Servant and Elder,  
22 John Jones.

23           41. At all relevant times the Defendants held themselves out to the public as the owners  
24 of the Jehovah's Witnesses congregation that Plaintiffs were religious members of when they  
25 were sexually abused by the Defendants' Ministerial Servant and Elder, John Jones.  
26

1           42. At all relevant times the Defendants materially benefited from the operation of the  
2 Jehovah's Witnesses congregation that Plaintiffs were religious members of when they were  
3 sexually abused by the Defendants' Ministerial Servant and Elder, John Jones, including the  
4 services of John Jones and the services of those who managed and supervised John Jones.

5           43. At all relevant times the Defendants, through their agents, servants, and employees,  
6 managed, maintained, operated, and controlled the Jehovah's Witnesses congregation that  
7 Plaintiffs were religious members of when they were sexually abused by the Defendants'  
8 Ministerial Servant and Elder, John Jones, including the Jehovah's Witnesses congregation's  
9 leaders and volunteers.

10           44. At all relevant times the Defendants, through their agents, servants, and employees,  
11 managed, maintained, operated, and controlled the Jehovah's Witnesses congregation that  
12 Plaintiffs were religious members of when they were sexually abused by the Defendants'  
13 Ministerial Servant and Elder, John Jones, including the Jehovah's Witnesses congregation's  
14 policies and procedures regarding the sexual abuse of children.

15           45. At all relevant times John Jones was a Ministerial Servant and Elder of the  
16 Defendants who Plaintiffs believe held the positions of Ministerial Servant and Elder of the  
17 Jehovah's Witnesses congregation that Plaintiffs were religious members of when they were  
18 sexually abused by John Jones.

19           46. At all relevant times John Jones was on the staff of, was an agent of, or served as  
20 an employee or volunteer of the Defendants.

21           47. At all relevant times John Jones was acting in the course and scope of his positions  
22 with the Defendants.

23           48. At all relevant times the Defendants, through their agents, servants, and employees,  
24 held John Jones out to the public, to Plaintiffs, and to Plaintiffs' parents, as their agent.  
25  
26

1           49. At all relevant times the Defendants, through their agents, servants, and employees,  
2 held John Jones out to the public, to Plaintiffs, and to Plaintiffs' parents, as having been vetted,  
3 screened, and approved to serve as one of their Ministerial Servants and Elders.

4           50. At all relevant times Plaintiffs and Plaintiffs' parents reasonably relied upon the  
5 acts and representations of the Defendants, through their agents, servants, and employees, and  
6 reasonably believed that John Jones was one of their agents who was vetted, screened, and  
7 approved to serve as one of their Ministerial Servants and Elders.

8           51. At all relevant times Plaintiffs and Plaintiffs' parents trusted John Jones because  
9 the Defendants held him out as someone who was safe and could be trusted with the supervision,  
10 care, custody, and control of Plaintiffs.

11           52. At all relevant times Plaintiffs and Plaintiffs' parents believed that the Defendants  
12 would exercise such care as would a parent of ordinary prudence in comparable circumstances  
13 when the Defendants assumed supervision, care, custody, and control of Plaintiffs.

14           53. The Defendants were responsible for selecting and supervising the leaders,  
15 volunteers, and members of the South Hill Congregation, including the Defendants' Ministerial  
16 Servant and Elder, John Jones, when he used those positions with the Defendants to sexually  
17 abuse Plaintiffs.

18           54. When Plaintiffs were minors, John Jones used his positions as the Defendants'  
19 Ministerial Servant and Elder to sexually abuse them.

20           55. When Plaintiff Deryk Terril was approximately 8 to 15 years old, he was sexually  
21 abused by the Defendants' Ministerial Servant and Elder, John Jones.

22           56. When Plaintiff Daniel Enholm was approximately 11 to 12 years old, he was  
23 sexually abused by the Defendants' Ministerial Servant and Elder, John Jones.

24           57. Based on the representations of the Defendants that John Jones was safe and  
25 trustworthy, Plaintiffs and Plaintiffs' parents allowed Plaintiffs to be under the supervision of, and  
26

1 in the care, custody, and control of the Defendants, including when Plaintiffs were sexually abused  
2 by John Jones.

3 58. Neither Plaintiffs nor Plaintiffs' parents would have allowed Plaintiffs to be under  
4 the supervision of, or in the care, custody, or control of the Defendants, or John Jones, if the  
5 Defendants had disclosed to Plaintiffs or Plaintiffs' parents that John Jones was not safe and was  
6 not trustworthy, and that he in fact posed a danger to Plaintiffs in that John Jones was likely to  
7 sexually abuse Plaintiffs.

8 59. Neither Plaintiffs nor Plaintiffs' parents would have allowed Plaintiffs to be minor  
9 religious members of the Defendants, participate in religious activities sponsored by the  
10 Defendants, or attend religious services at the South Hill Congregation if the Defendants had  
11 disclosed to Plaintiffs or Plaintiffs' parents that John Jones was not safe and was not trustworthy,  
12 and that he in fact posed a danger to Plaintiffs in that John Jones was likely to sexually abuse  
13 Plaintiffs.

14 60. Neither Plaintiffs nor Plaintiffs' parents would have allowed Plaintiffs to be minor  
15 religious members of the Defendants, participate in religious activities sponsored by the  
16 Defendants, or attend religious services at the South Hill Congregation if the Defendants had  
17 disclosed to Plaintiffs or Plaintiffs' parents that they knew for years that sexual predators, like  
18 John Jones, were using their positions as ministerial servants and elders to groom and to sexually  
19 abuse children.

20 61. No parent of ordinary prudence in comparable circumstances would have allowed  
21 Plaintiffs to be under the supervision of, or in the care, custody, or control of the Defendants or  
22 John Jones if the Defendants had disclosed to Plaintiffs or Plaintiffs' parents that John Jones was  
23 not safe and was not trustworthy, and that he in fact posed a danger to Plaintiffs in that John Jones  
24 was likely to sexually abuse them.

25 62. From approximately 1973 through 1980, John Jones used his positions of trust and  
26 authority as a Ministerial Servant and Elder of the Defendants to groom and sexually abuse

1 Plaintiff Deryk Terill, including when Plaintiff Deryk Terill was under the supervision of, and in  
2 the care, custody, or control of, the Defendants.

3 63. The sexual abuse by the Defendants' Ministerial Servant and Elder, John Jones,  
4 against Plaintiff Deryk Terill included, but was not limited to, John Jones fondling, masturbating,  
5 and orally copulating Plaintiff Deryk Terill.

6 64. In approximately 1975, John Jones used his positions of trust and authority as a  
7 Ministerial Servant and Elder of the Defendants to groom and sexually abuse Plaintiff Daniel  
8 Enholm, including when Plaintiff Daniel Enholm was under the supervision of, and in the care,  
9 custody, or control of, the Defendants.

10 65. The sexual abuse by the Defendants' Ministerial Servant and Elder, John Jones,  
11 against Plaintiff Daniel Enholm included, but was not limited to, John Jones humping and  
12 fondling Plaintiff Daniel Enholm.

13 66. The sexual abuse by the Defendants' Ministerial Servant and Elder, John Jones,  
14 against Plaintiffs occurred using property that was owned, operated, and/or controlled by the  
15 Defendants.

16 67. The sexual abuse by the Defendants' Ministerial Servant and Elder, John Jones,  
17 against Plaintiffs occurred during activities that were sponsored by the Defendants or directly as  
18 a result of activities that were sponsored by the Defendants.

19 68. At all relevant times the Defendants, through their agents, servants, and employees,  
20 knew or should have known that John Jones was a sexual abuser of children who would use his  
21 positions with them to sexually abuse Plaintiffs and other children.

22 69. The Defendants knew or should have known that John Jones was likely to sexually  
23 abuse children, including Plaintiffs, because prior to John Jones' sexual abuse of Plaintiffs, the  
24 Defendants had received reports of John Jones' inappropriate and sexually abusive behavior  
25 against children.  
26

1           70.   Indeed, in approximately 1976, Plaintiff Deryk Terril reported to one of the  
2 Defendants' Elders that John Jones was sexually abusing him.

3           71.   Despite these alarming reports of sexual abuse, the Defendants continued allowing  
4 John Jones to have access to their minor religious members, including Plaintiffs, through his  
5 positions as a Ministerial Servant and Elder.

6           72.   At all relevant times it was reasonably foreseeable to the Defendants, through their  
7 agents, servants, and employees, that John Jones' sexual abuse of children would likely result in  
8 injury to others, including the sexual abuse of Plaintiffs and other children by John Jones.

9           73.   Before and during the time John Jones sexually abused Plaintiffs, the Defendants,  
10 through their agents, servants, and employees, knew or should have known that John Jones was  
11 sexually abusing Plaintiffs and other children.

12           74.   The Defendants, through their agents, servants, and employees, knew or should  
13 have known before and during John Jones' sexual abuse of Plaintiffs that leaders, volunteers,  
14 members, and other persons who worked with youth, including other ministerial servants and  
15 elders, had used their positions to groom and to sexually abuse children.

16           75.   The Defendants, through their agents, servants, and employees, knew or should  
17 have known before and during John Jones' sexual abuse of Plaintiffs that such leaders, volunteers,  
18 members, and other persons who worked with youth could not be "cured" through treatment or  
19 counseling.

20           76.   The Defendants, through their agents, servants, and employees, concealed the  
21 sexual abuse of children by John Jones in order to conceal their own bad acts in failing to protect  
22 children from him, to protect their own reputation, and to prevent victims of such sexual abuse by  
23 John Jones and other church volunteers from coming forward, despite knowing that John Jones  
24 and other abusers in their ranks would continue to molest children.

1           77. The Defendants, through their agents, servants, and employees, consciously and  
2 recklessly disregarded their knowledge that John Jones would use his positions with the  
3 Defendants to sexually abuse children, including Plaintiffs.

4           78. The Defendants, through their agents, servants, and employees, disregarded their  
5 knowledge that John Jones would use his positions with them to sexually abuse children, including  
6 Plaintiffs.

7           79. The Defendants, through their agents, servants, and employees, acted in concert  
8 with John Jones to conceal the danger that John Jones posed to children, including Plaintiffs, so  
9 that John Jones could continue serving the Defendants despite their knowledge of that danger.

10           80. The Defendants, through their agents, servants, and employees, knew that their  
11 negligent, willful, wanton, reckless, and outrageous conduct would inflict severe emotional and  
12 psychological distress, as well as personal physical injury, on others, including Plaintiffs, and they  
13 did in fact suffer severe emotional and psychological distress and personal physical injury as a  
14 result of the Defendants' wrongful conduct.

15           81. By reason of the wrongful acts of the Defendants as detailed herein, Plaintiffs  
16 sustained physical and psychological injuries, including but not limited to, severe emotional and  
17 psychological distress, humiliation, fright, dissociation, anger, depression, anxiety, family turmoil  
18 and loss of faith, a severe shock to their nervous systems, physical pain and mental anguish, and  
19 emotional and psychological damage, and, upon information and belief, some or all of these  
20 injuries are of a permanent and lasting nature, and Plaintiffs has and/or will become obligated to  
21 expend sums of money for treatment.

## 22                   **V. CAUSES OF ACTIONS AS TO ALL PLAINTIFFS**

### 23           **A. Negligence**

24           82. Plaintiffs repeat and re-allege all of their allegations above and below.

25           83. The Defendants had a duty to take reasonable steps to protect Plaintiffs from  
26 foreseeable harm when they were in the Defendants' care, custody, and control, including when

1 they were minor religious members of the Defendants, participating in religious activities  
2 sponsored by the Defendants, and attending religious services at the South Hill Congregation.

3 84. The Defendants also had a duty to take reasonable steps to prevent John Jones from  
4 using the tasks, premises, and instrumentalities of his positions as their Ministerial Servant and  
5 Elder to target, groom, and sexually abuse children, including Plaintiffs.

6 85. The Defendants had a duty to warn, train, or educate their leaders, volunteers, and  
7 members, including Plaintiffs, about the danger of sexual abuse by their leaders, volunteers, and  
8 members, and how to avoid or minimize such danger.

9 86. The Defendants breached each of the foregoing duties by failing to exercise  
10 reasonable care to prevent their Ministerial Servant and Elder, John Jones, from harming  
11 Plaintiffs, including sexually abusing them.

12 87. In breaching their duties, including hiring, retaining, and failing to supervise John  
13 Jones; giving John Jones access to children; entrusting their tasks, premises, and instrumentalities  
14 to John Jones; failing to train their personnel in the signs of sexual predation and to protect  
15 children from sexual abuse and other harm; failing to warn Plaintiffs, Plaintiffs' parents, and other  
16 parents of the danger of sexual abuse; and failing to create a safe and secure environment for  
17 Plaintiffs and other children who were under the Defendants' supervision and in the Defendants'  
18 care, custody, and control, the Defendants created a foreseeable risk that Plaintiffs would be  
19 sexually abused by John Jones.

20 88. As a direct and proximate result of the acts and omissions of the Defendants, their  
21 Ministerial Servant and Elder, John Jones, groomed and sexually abused Plaintiffs, which has  
22 caused Plaintiffs to suffer general and special damages in an amount to be proven at trial.

23 **B. Outrage**

24 89. Plaintiffs repeat and re-allege all of their allegations above and below.

25 90. The Defendants intentionally and/or recklessly caused severe emotional distress to  
26 Plaintiffs due to the Defendants' extreme and outrageous conduct that went beyond all possible



1 bounds of decency and can only be regarded as atrocious and utterly intolerable in a civilized  
2 community.

3 91. As a direct and proximate result of the acts and omissions of the Defendants, their  
4 Ministerial Servant and Elder, John Jones, groomed and sexually abused Plaintiffs, which has  
5 caused Plaintiffs to suffer general and special damages in an amount to be proven at trial.

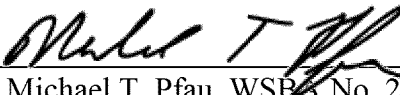
6 **VI. PRAYER FOR RELIEF**

7 92. Plaintiffs demand judgment against the Defendants named in their causes of action,  
8 together with compensatory and punitive damages to be determined at trial, and the interest, cost  
9 and disbursements pursuant to their causes of action, and such other and further relief as the Court  
10 deems just and proper.

11 93. Plaintiffs specifically reserve the right to pursue additional causes of action, other  
12 than those outlined above, that are supported by the facts pleaded or that may be supported by  
13 other facts learned in discovery.

14 DATED this 18th day of August 2022.

15 PFAU COCHRAN VERTETIS AMALA PLLC

16  
17 By   
18 Michael T. Pfau, WSBA No. 24649  
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