

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF PINE

FIRST JUDICIAL DISTRICT

Jane Doe 118,

Case Type: Personal Injury
Court File No.:

Plaintiff,

COMPLAINT

v.

Victor Arden Barnard; River Road Fellowship
d/b/a and/or Trace Mark River Road Fellowship
Jesus Christ the Same, Yesterday, Today and Forever
and The Shepherds' Corps.; The Shepherd's Corps.;
The Shepherd's Camp; Waymarks; David A. Larsen;
Amy Pacanowski; Kenneth R. Pacanowski; Randal L.
Roark; Pamela A. Roark; Susan K. Elmblad; Craig A.
Elmblad; Jean Frontczak; Mark A. Frontczak; Donald
Bankey; Diane Bankey; Stephanie Barnard; Doe
Defendants 1 – 50; And Entity Defendants 1 – 15,

Defendants.

Plaintiff brings this action to seek justice, to visit accountability on those who caused her child sexual abuse and to deter others in our society from engaging in like conduct so that other children will not be exposed to the sexual horrors that she endured. To that end, and for her cause of action against Defendants, Plaintiff alleges as follows:

THE PARTIES

1. Plaintiff Jane Doe 118. At times relevant to this Complaint Plaintiff Jane Doe 118 was a child residing in the state of Minnesota, where Defendant Victor Arden Barnard ("Defendant Barnard") sexually violated Plaintiff. Said sexual violations included multiple occasions of penile-vaginal penetration and sexually perverted acts. Each Defendant is jointly and severally liable for said sexual violations that caused permanent and life-long damage to Plaintiff. Plaintiff was 13-years-old when Defendants took Plaintiff within their custody and control and negligently and

tortiously permitted Plaintiff to be brainwashed to believe Plaintiff was a surrogate for Mary Magdalene and like the concubines of King Solomon, destined to satisfy the sexual pleasures of Defendant Barnard, a surrogate Jesus and King Solomon. Plaintiff, a brainwashed, cult child did not understand at the time that such conduct was wrongful, harmful and damaging; she did not know, and still does not fully know, nor did she have reason to know, that she incurred personal injuries and damages as a result of the sexual abuse alleged herein. Plaintiff was under the belief that she was duty-bound by God to sexually satisfy Defendant Barnard and must do so to avoid God's wrath and to prevent harm and damage to her, her parents and her religious community. Under Minnesota's "Delayed Discovery Statute", the statute of limitations on Plaintiff's claims against Defendants have not run, and under the child protection laws of Minnesota, and the State's compelling interest in the protection of children, Plaintiff has the legal right to seek redress in court and hold each Defendant accountable for the harm they caused her. Jane Doe 118 is currently a resident of the State of New Jersey. Plaintiff Jane Doe 118's name has, or will be, disclosed under separate cover to Defendants on the grounds that Jane Doe 118 was a victim of child sexual abuse described herein when Jane Doe 118 was a minor.

2. Defendant Victor Arden Barnard. At all times material, Defendant Victor Arden Barnard was a child sexual predator of the worst kind who used the medium of religion, cult and his professed status as a religious leader, and even Jesus Christ Himself, to brainwash parents to serve up their first-born daughters, including Plaintiff, to live with him in Defendants' camp where he sexually violated them, routinely, repeatedly and perversely. At the time of the negligence and sexual abuse described herein, Defendant Victor Arden Barnard was a resident of the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

3. Defendants River Road Fellowship d/b/a and/or Trade Marked River Road Fellowship Jesus Christ The Same, Yesterday, Today and Forever, and The Shepherd's Corps.; The Shepherd's Corp.; The Shepherd's Camp; and Waymarks. At all times material hereto, Defendants River Road Fellowship d/b/a and/or Trade Marked River Road Fellowship Jesus Christ The Same, Yesterday, Today and Forever, and The Shepherd's Corps.; The Shepherd's Corp.; The Shepherd's Camp; and Waymarks were each entities who negligently and tortiously cause the child sexual abuse of Plaintiff alleged herein. Each entity acted negligently and tortiously through its principals, employees, volunteers and/or other agents. Each entity is both directly liable for its own wrongful conduct and liable under the doctrine of respondeat superior for any and all negligent and tortious acts and omissions of its principals, employees, volunteers and agents.

4. Defendant David A. Larsen. Defendant David A. Larsen was a co-founder of the Shepherd's Camp along with Victor Barnard. At the time of the abuse alleged herein, Defendant David A. Larsen was an elder in the River Road Fellowship. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called "Maidens", to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant David A. Larsen was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

5. Defendant Amy Pacanowski. At the time of the abuse alleged herein, Defendant Amy Pacanowski was an elder in the River Road Fellowship. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called "Maidens", to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the

negligence and sexual abuse described herein, Defendant Amy Pacanowski was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

6. Defendant Kenneth R. Pacanowski. At the time of the abuse alleged herein, Defendant Kenneth Pacanowski was an elder in the River Road Fellowship. At all times material hereto, Said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Kenneth R. Pacanowski was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

7. Defendant Randal L. Roark. At the time of the abuse alleged herein, Defendant Randal was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Randal L. Roark was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

8. Defendant Pamela A. Roark. At the time of the abuse alleged herein, Defendant Pamela A. Roark was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed

Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Pamela A. Roark was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

9. Defendant Craig A. Elmblad. At the time of the abuse alleged herein, Defendant Craig A. Elmblad was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Craig A. Elmblad was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

10. Defendant Susan K. Elmblad. At the time of the abuse alleged herein, Defendant Susan K. Elmblad was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Susan K. Elmblad was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

11. Defendant Jean Frontczak. At the time of the abuse alleged herein, Defendant Jean Frontczak was an elder in the River Road Fellowship. At all times material hereto, said Defendant

resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Jean Frontczak was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

12. Defendant Mark A. Frontczak. At the time of the abuse alleged herein, Defendant Mark A. Frontczak was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Mark A. Frontczak was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

13. Defendant Donald Bankey. At the time of the abuse alleged herein, Defendant Donald Bankey was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Donald Bankey was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

14. Defendant Dianna Bankey. At the time of the abuse alleged herein, Defendant Dianna Bankey was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Dianna Bankey was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

15. Defendant Stephanie Barnard. Defendant Stephanie Barnard is the wife of Victor Barnard. At the time of the abuse alleged herein, Defendant Stephanie Barnard was an elder in the River Road Fellowship. At all times material hereto, said Defendant resided in Finlayson, Minnesota. Said Defendant negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard and is liable for the harm to Plaintiff alleged herein. At the time of the negligence and sexual abuse described herein, Defendant Stephanie Barnard was a resident of the State of Minnesota and owned, used and possessed real or personal property within the State of Minnesota. All of the negligence and sexual abuse described herein occurred in the State of Minnesota.

16. Doe Defendants 1-50. The true names of Doe Defendants 1-50, if they exist, are unknown to Plaintiff. Said Defendants, and each of them, negligently and tortiously exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard, and each of them is jointly and severally liable for the harm to Plaintiff alleged herein.

17. Doe Entity Defendants 1-15. The true names of Doe Entity Defendants 1-50, if they exist, are unknown to Plaintiff. Said Defendants, and each of them, negligently and tortiously

exposed Plaintiff and other girls, called “Maidens”, to the sexual perversions of Defendant Barnard, and each of them is jointly and severally liable for the harm to Plaintiff alleged herein.

18. Relationship of Defendants. The exact relationship of Defendants is unknown to Plaintiff, and Plaintiff therefore alleges each Defendant is a partner, joint venturer, employee, volunteer and/or agent of each other Defendant, or has some other legal relationship, such that each Defendant is jointly and severally liable for the negligent and tortious acts and omissions alleged herein.

JURISDICTION AND VENUE

19. Jurisdiction and venue are properly with this Court pursuant to Minn. Stats. §543.19 and 542.09, in that: the cause of action arose in the County of Pine, Minnesota; Defendants own, use or possess real and personal property situated in the County of Pine, Minnesota; Defendants transacted business in the County of Pine, Minnesota; and/or Defendants each committed acts that caused injury and damage to Plaintiff in the County of Pine, Minnesota.

FACTS

20. Plaintiff incorporates all paragraphs of this Complaint as if set forth fully herein.

21. Defendant Barnard brainwashed and sexually abused Plaintiff Jane Doe 118, beginning when she was a minor child at the age of thirteen (13) and continuing until age twenty-two (22).

22. At all times material, Defendant Barnard was the creator, cult leader and authority of the River Road Fellowship located in Minnesota. He used his persuasive power to manipulate and control the cult members.

23. In 1996, Defendant Barnard and the congregation of the River Road Fellowship purchased a wooded eighty-five (85) acre campground in Finlayson, Minnesota. The campground was called Shepherd's Camp and much of the River Road Fellowship congregation soon sold their homes and moved there to live under Defendant Barnard's guidance and follow Defendant Barnard's religious teachings.

24. Shepherd's Camp was an isolated, self-sustaining community where most families lived in old cabins. The congregation raised cows, sheep, and chickens as well as planted gardens, canned vegetables, and sewed their own clothes. Plaintiff had no access to internet or cell phones.

25. In 1998, Plaintiff and her family moved to Shepherd's Camp when she was eleven (11) years old in order to follow Defendant Barnard's teachings and ministry in the River Road Fellowship. She lived there in isolation, cut off from the rest of the world.

26. Plaintiff and her family viewed Defendant Barnard as a religious authority and believed they needed to obey him in all things.

27. In 2000, Defendant Barnard assembled his entire congregation and called out the names of ten daughters, whom he had chosen to live apart from their families at his and Defendant's private camp. He used his position of religious authority and manipulated scripture to convince his congregation that the first-born daughters were to be sacrificed to God.

28. Plaintiff and her family believed that Defendant Barnard was inviting her to a summer camp. She did not know that she was being asked to permanently reside with Defendant Barnard.

29. Plaintiff and her parents believed it was an honor for Plaintiff to be chosen, based upon the teachings and ministry of Defendant Barnard.

30. Defendant Barnard referred to the group of girls he selected as "Maidens."

31. Plaintiff's parents dropped her off at Defendant Barnard's private camp on July 23, 2000.

32. The girls that Defendant Barnard selected were required to serve Defendant Barnard, including cleaning and cooking for Defendant Barnard.

33. Defendant Barnard's "Maidens" ranged in age from twelve (12) to twenty-four (24). Plaintiff was thirteen (13).

34. Defendant Barnard had Plaintiff and the other girls participate in a "Salt Ceremony," where the girls took a vow of celibacy and promised never to marry and to devote their lives to Defendant Barnard until they died. At the ceremony, Plaintiff was required to wear a veil on her head and was given a ring to wear on her ring finger. Plaintiff's parents, as well as Defendants Amy Pacanowski, Kenneth R. Pacanowski, Randal L. Roark, Pamela A. Roark, Susan K. Elmblad, Craig A. Elmblad, Jean Frontczak, and Mark A. Frontczak were in attendance.

35. Defendant Barnard eventually persuaded Plaintiff to believe her relationship with him was comparable to the relationship between Mary Magdalene and Jesus, or King Solomon and his concubines.

36. Approximately one month after having arrived at the private camp, Defendant Barnard called Plaintiff to his separate quarters and asked what she knew about masturbation. When Plaintiff responded that she did not know what masturbation was, Defendant Barnard struck her and sexually penetrated her. Plaintiff understood that her compliance with his sexual acts would save her from damage and harm and would lift her up in the eyes of God.

37. After that initial encounter, Defendant Barnard engaged Plaintiff in sexual intercourse every month up to five (5) times a month, while acting as her minister and spiritual

adviser and teaching her that it was her duty to have sex with him because he was a man of God and doing so would save her from harm and help save her soul.

38. In 2001, after repeatedly coercing Plaintiff to engage in sexual intercourse, Defendant Barnard met with Plaintiff and her parents to tell them that he “may or may not have sex with her,” referring to Plaintiff, and that “it was his way of being able to show [her] God’s love.” Defendant Barnard further manipulated religious scripture to explain why he could righteously engage in sexual intercourse with Plaintiff and the other “Maidens,” stating “if these girls decided that they really wanted to keep their vows and to not be married but to have sexual desires and they were the aggressors – scripturally, I would have the right to do that.”

39. Defendant Barnard initially required Plaintiff to use a female contraceptive; however Defendant Barnard eventually had surgery that prevented him from siring children in order to continue his sexual abuse of the young girls in his camp without the risk of pregnancy.

40. Defendant Barnard repeatedly told Plaintiff that he represented Christ in the flesh. He explained to Plaintiff that Jesus Christ had Mary Magdalene and other women who followed him to meet his needs, that King Solomon slept with many concubines, that the firstborn child was to be sacrificed to God, and that it was normal for him to have sex with her because it was in God’s Word.

41. Defendant Barnard told Plaintiff that she could remain a virgin even though they were having sex because he was Christ in the flesh and that it was both spiritual and natural for him to take care of her that way.

42. After sexually abusing Plaintiff, Defendant Barnard told her she could not tell anyone because if she did she would receive “damnation from God.”

43. Defendant Barnard continually and repeatedly used religion and his position of authority to coerce Plaintiff and the other girls to engage in sexual intercourse with him. Plaintiff believed, and was trained to follow, Defendant Barnard's teachings.

44. Defendant Barnard restricted Plaintiff's access to her parents, limiting her interactions with everyone aside from himself and the other "Maidens."

45. Defendant Barnard told Plaintiff's parents that she could consent to having sex with him because she was to remain unmarried and he was the head of the church.

46. Plaintiff told Defendant Pam Roark that she wanted to leave Defendant Barnard's group because she did not approve of the adultery Defendant Barnard was engaging in with married women. Defendant Roark contacted Defendant Barnard and told Plaintiff that she should forgive Defendant Barnard for his indiscretions and remain with Defendant Barnard.

47. Defendant Barnard, while acting as her minister and spiritual adviser, told Plaintiff that it was her duty to have sex with him because he was a man of God and doing so would protect her from harm.

48. Plaintiff believed that she was required to engage in sexual intercourse with Defendant Barnard in order to serve her church; she believed sexual intercourse with him was a privilege and duty that would benefit the Church, her parents and her. She did not know it would damage her.

49. Defendant Barnard taught Plaintiff and the other girls that he was Jesus Christ in the flesh.

50. In 2002, Plaintiff attempted to leave Shepherd's Camp. In response, Defendant Barnard gave a sermon to encourage his followers to ask the Lord what He wants for them and, since Defendant Barnard represented Christ to them, that the congregation should ask him what

they should do. Plaintiff then asked Defendant Barnard what she should do, to which he told her to stay in Shepherd's Camp and continue to serve him.

51. Plaintiff was raised to believe that Defendant Barnard was the man of authority and that she must do what he asked or there would be consequences and judgment, including physical punishment. Thus, Plaintiff believed that satisfying Defendant Barnard's sexual desires was a way for her to avoid harm and damage.

52. Defendant Barnard has a history of using his religious teachings to manipulate and coerce his followers into engaging in sexually intimate activities with him. In 1997, Defendant Barnard told a married follower of his church that it was her responsibility to take care of him sexually because he had left his wife to serve the church.

53. Defendant Barnard told Plaintiff and the other girls that having sex with him was not wrong because he was a man of God and they were serving the church and taking care of him.

54. In 2008, a group of husbands confronted Defendant Barnard for having affairs with their wives. The husbands also reported the ongoing adultery to law enforcement in Minnesota.

55. This confrontation, and subsequent police investigation, caused Defendant Barnard to flee Minnesota with many of his followers.

56. Upon information and belief, Defendant Barnard and Defendants Randal Roark, Pamela Roark, Susan Elmblad, Craig Elmblad, Jean Frontczak, Mark Frontczak and Stephanie Barnard fled to Spokane, Washington, to avoid confrontation with law enforcement.

57. On April 11, 2014, Defendant Barnard was charged with 59 counts of criminal sexual conduct for the sexual abuse he inflicted on Plaintiff and another member of the "Maidens."

58. At all times material hereto, Defendants, and each of them, hired, retained, revered and followed Defendant Barnard. Each Defendant taught Plaintiff to revere, follow, and worship

Defendant Barnard and to do all that he told her to do. Defendants individually and collectively brainwashed Plaintiff and persuaded her that she would save herself from harm if she was compliant with Defendant Barnard.

COUNT I:
AGAINST DEFENDANT BARNARD
- CHILD SEXUAL ABUSE/BATTERY -

59. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth under this count.

60. Starting in approximately 2000, Defendant Barnard engaged in harmful sexual contact upon Plaintiff.

61. Said sexual contact was harmful, intentional, unpermitted and offensive to Plaintiff, although Plaintiff did not discover any harm, offense or damage related thereto until much later in life, and she still has not discovered all damage.

62. As a direct and proximate result of Defendant Barnard's wrongful conduct, Plaintiff suffered physical, mental, emotional and economic injuries and damages described herein.

COUNT II:
AGAINST EACH DEFENDANT
NEGLIGENCE; FAILURE TO PROTECT and JOINT AND SEVERAL
LIABILITY-

63. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth under this count.

64. At all times material hereto, Defendants, and each of them, had Plaintiff under their custody, control and protection.

65. At all times material hereto, Defendants, and each of them, were aware or should have been aware that Defendant Barnard posed a threat of sexual harm to Plaintiff.

66. At all times material hereto, Defendants Amy Pacanowski, Kenneth R. Pacanowski, Randal L. Roark, Pamela A. Roark, Susan K. Elmblad, Craig A. Elmblad, Jean Frontczak, and Mark A. Frontczak were elders within the River Road Fellowship and members of, or in some way affiliated with, Defendants River Road Fellowship d/b/a and/or Trade Marked River Road Fellowship Jesus Christ The Same, Yesterday, Today and Forever, and The Shepherd's Corps.; The Shepherd's Corp.; The Shepherd's Camp; and Waymarks.

67. At all times material hereto, Defendant Barnard was the religious leader of Defendants River Road Fellowship d/b/a and/or Trade Marked River Road Fellowship Jesus Christ The Same, Yesterday, Today and Forever, and The Shepherd's Corps.; The Shepherd's Corp.; The Shepherd's Camp; and Waymarks.

68. At all times material hereto, Plaintiff and her parents were members of one or more of the corporate and entity Defendants herein, including Defendant River Road Fellowship and The Shepherd's Corps.

69. At all times material hereto, Defendants, and each of them, were aware, or should have been aware, that Defendant Barnard intended to, and ultimately did, engage in sex acts with Plaintiff.

70. At all times material hereto, Defendants, and each of them, were aware, or should have been aware that Defendant Barnard was living with ten girls, as young as 12 and 13, including Plaintiff.

71. Defendants, and each of them, owed Plaintiff a duty of care based upon her status as a minor.

72. Defendants, and each of them, breached their duty reasonable care to Plaintiff by, inter alia:

- a. Exposing Plaintiff to a man, religious leader and cult leader whom each Defendant knew or should have known posed a risk of sexual harm to Plaintiff;
- b. Failing to protect Plaintiff from the pernicious sexual perversions of Defendant Barnard;
- c. Holding out Defendant Barnard as a safe, trusted and Godly religious leader whom Plaintiff must obey for the health and safety of herself, her parents and the congregation;
- d. Negligently investigating or failing to investigate whether Defendant Barnard was safe;
- e. Failing to protect the health and safety of Plaintiff;
- f. Failing to provide a safe environment for Plaintiff;
- g. Failing to abide by applicable laws and regulations designed to protect the health and safety of Plaintiff, specifically including the statutes, regulations and child abuse reporting laws;
- h. Failing to protect Plaintiff's moral integrity;
- i. Negligently hiring or engaging Defendant Barnard;
- j. Negligently retaining Defendant Barnard;
- k. Negligently supervising Plaintiff and Defendant Barnard; and
- l. Exposing Plaintiff to foreseeable risk of sexual harm.

73. Defendants, and each of them, further breached their duty to Plaintiff when they failed to report or otherwise intervene in the abuse that Defendant Barnard was inflicting upon Plaintiff.

74. Under the doctrines of respondeat superior and/or vicarious liability, each Defendant is alleged to jointly and severally liable for the acts and omissions of his/her/its co-Defendants.

75. As a direct and proximate result of the negligent, reckless and tortious conduct of each Defendant, Plaintiff has suffered injuries and damages. Plaintiff's discovery of said injuries and damages have been delayed, and still are not fully known, due to the cult belief system, cult structure, teachings and, ultimately, brainwashing caused by each Defendant's negligent, reckless and tortious acts and omissions.

76. As a direct and proximate result of Defendants' acts, omissions, negligence, gross negligence, recklessness and tortious conduct, and/or statutory violations, Plaintiff was tragically, seriously, and permanently injured and damaged. The existence, nature and extent of her damages were not known until recently, and are not fully known, such that their delayed discovery entitles Plaintiff to bring her claims at this time. Although supportive remedies have been resorted to, said injuries prevail and will continue to prevail for an indefinite time into the future. It is impossible to fix the full nature, extent, severity, and duration of said injuries, but they are alleged to be permanent, progressive, and disabling. Plaintiff has incurred and will likely continue to incur damages. These damages include both severe physical and emotion injury as Plaintiff suffered and continues to suffer physical manifestations of emotional distress. These damages include special and general damages to be proved at the time of trial, in an amount now unknown. Plaintiff's claimed damages specifically include all damages allowed by statute and common law.

JURY TRIAL REQUEST

77. Plaintiff requests a jury trial on all counts of this Complaint. Plaintiff specifically requests that a Jury be allowed to hold Defendants, and each of them, responsible for their wrongful

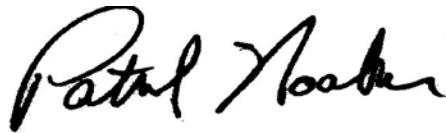
conduct, and requests that the assigned Judge allow a Minnesota Jury to hear all evidence and decide Plaintiff's claims on their merits.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants in an amount in excess of the jurisdictional limit, as will sufficiently compensate her for damages received, along with reasonable costs, interest, attorney fees, and such other relief as the Court may deem appropriate.

Dated: October 14, 2016

NOAKER LAW FIRM, LLC



By: Patrick Noaker, MN Bar # 274951

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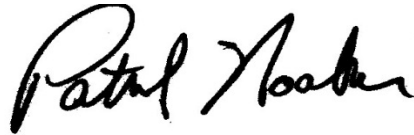
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ATTORNEYS FOR JANE DOE 118

ACKNOWLEDGMENT

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorney fees may be awarded pursuant to Minn. Stat Section 549.211 to a party against whom the allegations in this pleading are asserted.



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