

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

**LYNSEY DOE, HANNAH FURBUSH,
CHEYENNE DOE, and JANE DOE**

Plaintiffs,

vs.

**ASSOCIATION FOR RESEARCH AND
ENLIGHTENMENT, INC.**

and

KEVIN TODESCHI,

Defendants.

CASE NO. _____

COMPLAINT

The Plaintiffs, Lynsey Doe, Hannah Furbush, Cheyenne Doe, and Jane Doe (hereinafter “Plaintiffs”) state as follows for their Complaint against Association for Research and Enlightenment, Inc. (“A.R.E.”) and Kevin Todeschi (“Todeschi”) (collectively “Defendants”):

I. NATURE OF THE CASE

1. This is an action for compensatory and punitive damages arising from acts of negligence, negligent retention of employees, negligence *per se*, and assault and battery. Defendant A.R.E. is directly liable and vicariously liable for the acts complained of herein. Defendant Todeschi is directly liable for the acts complained of herein.

II. JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction as the acts complained of herein occurred within the Commonwealth of Virginia. The Defendants’ primary place of business is within the City of Virginia Beach, Virginia, making venue in this Court proper.

III. PARTIES

3. Lyndsey Doe is a resident and citizen of the Commonwealth of Virginia and the United States. Ms. Doe is a female, born September 4, 1996. Lynsey participated in A.R.E. Camp as a minor camper from approximately 2005 until approximately 2013.

4. Hannah Furbush is a resident and citizen of the State of Ohio and the United States. Ms. Furbush is a female, born on May 23, 1993. Hannah participated in A.R.E. Camp as a minor family camper from birth, as her mother was on staff as a nurse and a cook and her father was on staff as a maintenance man and a cook at the A.R.E. Camp and Hannah would accompany her parents to the Camp sessions. Hannah attended the A.R.E. Camp as a minor camper from approximately 2003 to approximately 2009, she attended the A.R.E. Cayce's Fellows program in approximately 2010, and worked at A.R.E. Camp as a counselor and staff member from approximately 2012-2015, and again in 2017.

5. Cheyenne Doe is a resident and citizen of the Commonwealth of Virginia and the United States. Ms. Doe is a female, born August 4, 1993. Cheyenne participated in A.R.E. Camp as a minor camper from approximately 2009 until approximately 2010.

6. Jane Doe is a resident and citizen of the State of North Carolina and the United States. Jane Doe is a female, born in April of 1996. Jane Doe participated in A.R.E. Camp as a minor camper from approximately 2006 until approximately 2012, she attended the A.R.E. Cayce's Fellows program in approximately 2013, and worked at A.R.E. Camp as a counselor and staff member in approximately 2014 and 2015. Plaintiff brings suit herein under the pseudonym "JANE DOE" in light of the unusually sensitive nature of the allegations of this complaint.

7. Association for Research and Enlightenment, Inc., at all times mentioned herein was and is a corporation, having its principal place of business in the City of Virginia Beach,

Commonwealth of Virginia. A.R.E. purposely conducts substantial business in the Commonwealth of Virginia, and was the primary entity owning, operating, and controlling A.R.E. youth camp (hereinafter “A.R.E. Camp”) and the activities and behavior of its employee agents.

8. Kevin Todeschi is an individual who is and was at all relevant times the Chief Executive Officer of A.R.E. At all times herein alleged, Defendant Todeschi was an employee, agent, and servant of Defendant A.R.E.

IV. FACTS

A. A.R.E. Camp Background

9. Edgar Cayce founded the Association for Research and Enlightenment (A.R.E.) in 1931. A.R.E. has a stated mission of creating opportunities for personal change in the body, mind, and spirit using the Edgar Cayce readings and material. A.R.E.’s headquarters are in Virginia Beach and the A.R.E. Camp is located in Rural Retreat, Virginia. The camp is supposed to be a place where children can go to learn more about the Edgar Cayce principles and to explore spiritual growth and the “mind-body-spirit” connection. The Children’s Camp is offered for ten to sixteen-year-olds, though individuals who are not enrolled in the Camp have been allowed to attend Camp activities. There are also Young Adult Retreats, Family Camps, and activities on the A.R.E. Camp property throughout the year that are open to people of all ages. The minor campers at Children’s Camp are told Camp is for those who need it most, and that need is prioritized over the safety of the campers. Campers are taught to believe that Camp is their home, campers and others they meet are family, and that they must love and accept everyone at Camp without hesitation.

10. From a young and impressionable age, campers are taught that Camp is a place of love and acceptance. They are told Camp is a special place that they are lucky to be a part of and that Camp is the safest place for them to be. They are also led to believe that anyone who is at Camp is a good person, because Camp is such a good place. They are told to love and forgive everyone with no questions. They are taught that it is their responsibility and that doing so will bring peace to their souls and to the world. These children were told the world was depending on their unconditional love and forgiveness.

11. The culture created by the lack of boundaries and failure to hold anyone accountable for their actions led to a dangerous cycle of continued sexual abuse and cover-ups that has lasted generations. Those who have been abused are told they would be going against everything they had ever been taught if they spoke up. If sexual abuse and harassment was reported to Camp management and staff, the victim was silenced and told not to make any report to law enforcement. They were told they would lose the community they had grown up in often since birth, and quite frequently a community that stretched through generations of families. They were made to feel they would be left with no family and no home. They would have to carry the shame of not believing, not being able to reach enlightenment. And they were told it would be their fault, and their fault alone.

B. General Factual Allegations Applicable to All Claims

12. At all times relevant to this action, A.R.E. Camp was owned, operated, managed, and/or otherwise controlled by the A.R.E. The A.R.E. Camp is governed by the A.R.E.'s rules and regulations. The A.R.E. Camp is required to follow the A.R.E.'s Charter, Constitution, Laws, and Doctrines. Given this relationship, the A.R.E. Camp was, at all times relevant to this

action, an agent of A.R.E. The A.R.E. took contributions from members and charged tuition for enrollment in the A.R.E. Camp.

13. At all times relevant to this action, Kevin Todeschi was serving as Chief Executive Officer of A.R.E. Plaintiffs are informed and believe, and thereon allege that on multiple occasions, Kevin Todeschi was made aware of complaints and allegations of sexual abuse, molestation, and harassment at A.R.E. Camp. Plaintiffs are further informed and believe and thereon allege that Kevin Todeschi failed to report allegations of childhood sexual abuse to authorities in violation of Virginia's mandated reporting laws.

14. At all relevant times material to the allegations in this complaint, Plaintiffs were minor campers and/or were adult staff members of the A.R.E. Camp. At all relevant times, each Plaintiff was under the Defendants' care, control, and supervision.

15. By hiring the staff and management of the A.R.E. Camp, Defendant A.R.E. held each staff member out to the public and to the Plaintiffs and their families to be of high ethical and moral repute, and to be in good standing with Defendant A.R.E. Defendant A.R.E. represented to the public, Plaintiffs, and their families that the A.R.E. Camp staff were highly qualified to be A.R.E. Camp employees who would assist each Plaintiff through personal and spiritual issues each Plaintiff faced. Inherent in these representations was the understanding that each A.R.E. Camp employee was selected by Defendant A.R.E. to educate, lead, guide, and mentor the Plaintiffs and other minor campers. The Plaintiffs and each of their families reasonably believed that each A.R.E. Camp employee was worthy of their trust. As a result, A.R.E. Camp employees were put in the position of leadership, mentorship, and counselor for the Plaintiffs.

16. At all material times, A.R.E. Camp employees were employed by Defendant A.R.E. as counselors, A.R.E. Camp Staff, and A.R.E. Camp management. As such, these A.R.E. Camp employees were under the direct supervision, employ, agency, and control of Defendant A.R.E. The employment duties included providing supervision, counseling, advising, educational, spiritual, and emotional needs and well-being of minors at the A.R.E. Camp.

17. Through these positions with Defendant A.R.E., A.R.E. Camp employees were put into direct contact with Plaintiffs either as minor campers at the A.R.E. Camp or as staff at A.R.E. Headquarters and A.R.E. A.R.E. Camp employees were assigned by Defendant A.R.E. to teach, counsel, advise, guide, and mentor the Plaintiffs. It is under these circumstances that Plaintiffs came to be under the direction and control of A.R.E. Camp employees who used their positions of trust and authority over the Plaintiffs to sexually abuse, molest, and harass each of them.

18. A.R.E. Camp employees did sexually abuse, molest, and harass Plaintiffs, who were minors at the time. Such conduct was done with lascivious intent, knowingly and intentionally for the sexual gratification of A.R.E. Camp employees and was enacted without the consent of Plaintiffs. These actions constituted conduct in violation of Code of Virginia § 18.2-370.1, and potentially others.

19. As campers at the A.R.E. Camp, where A.R.E. Camp employees were employed, Plaintiffs were under A.R.E. Camp employees' supervision and in the custody of A.R.E. Camp employees, thus creating a supervisory relationship and fiduciary relationship with Defendants.

20. Before the Plaintiffs were sexually abused by A.R.E. Camp employees, Defendant A.R.E. knew or should have known that certain A.R.E. Camp employees had engaged in unlawful sexual conduct with minors in the past, and were continuing to engage in such conduct.

Defendants had a duty to disclose this information to Plaintiffs and each of their families, but instead Defendant A.R.E. suppressed, concealed, and failed to disclose the information.

21. Defendant A.R.E. failed to take reasonable steps necessary to avoid acts of unlawful sexual abuse by certain A.R.E. Camp employees on Plaintiffs. Defendant A.R.E. further failed to avoid placing certain A.R.E. Camp employees in roles in which contact with minor campers was an inherent part of their function and environment. Defendant A.R.E. ignored and concealed the sexual abuse of Plaintiffs and others by A.R.E. Camp employees.

22. Prior to and during the sexual abuse, molestation, and harassment of Plaintiffs and other minor children, Defendant A.R.E. knew or should have known that certain A.R.E. Camp employees had violated their roles as teachers, counselors, mentors, and advisors, and used their positions of trust and authority and their custodial and supervisory relationships acting on behalf of Defendant A.R.E. to gain access to children, including Plaintiffs, on A.R.E. Camp grounds and facilities, in which they sexually abused, molested and harassed Plaintiffs or caused them to be sexually abused, molested, and harassed by others.

23. Defendant A.R.E. failed to report to law enforcement and civil authorities and others, the true facts and relevant information necessary to bring these A.R.E. Camp employees to justice for the sexual abuse, molestations, and harassment committed against Plaintiffs and others.

24. Virginia law requires that allegations of child abuse must be reported immediately by phone to the local department of the county or city wherein the child resides or wherein the abuse or neglect is believed to have occurred. The initial report may be made by oral report, but such a report shall be reduced to writing by the child abuse coordinator of the local department on a form prescribed by the Board. Failure to make a report by a person who is required to do so

as soon as possible, but no more than 24 hours after learning of the allegations shall face a fine and may be guilty of a Class 1 misdemeanor. Code of Virginia §63.2-1509.

C. Defendant A.R.E.'s Pervasive History of Cover-Ups of Sexually Offending Employees

25. In June 2020, a Facebook post by Tyler Dewey, former A.R.E. Camper and Staff Member, and Camp Director, laid out several claims of inappropriate behavior on the part of both A.R.E. Camp Staff and Management. Several Facebook users commented on the post, and several past employees and former campers began sharing similar incidents of sexual abuse.

26. Staff members at the A.R.E. Camp have been using the A.R.E. Camp as an opportunity to sexually abuse, harass, and molest minor campers. The A.R.E. Camp has been described by employees and campers as one with a pervasive and systemic problem of sexual abuse and harassment.

27. A common thread among campers and staff is that the many incidents of sexual abuse taking place at A.R.E. Camp is the result of A.R.E. management's failure to stem the tide of increasing sexual assaults by A.R.E. employees and campers.

28. In addition to A.R.E.'s deliberate and intentional failure to investigate, terminate, and supervise all staff, A.R.E. failed to investigate credible reports of sexual abuse that management had been made aware of. The failure of A.R.E. to adequately investigate these reports proves a long-standing custom and practice by A.R.E. to harbor and protect predators at the expense of the children left in the custody and care of A.R.E.

29. A.R.E. made the decision not to keep records of suspected and reported child abuse, including childhood sexual abuse, by its employees. This decision by A.R.E. allowed A.R.E. to retain staff members who were known by management to have committed acts of sexual assault and abuse. In 2013 A.R.E. Camp Management was aware a camper had sexually

assaulted one of his fellow campers. Despite this knowledge, the camper who sexually assaulted someone was hired as an A.R.E. Camp counselor in 2018.

30. A.R.E. Management had been made aware of sexual abuse taking place at its camp as far back as the late 1980's and early 1990's when it was reported that an adult staff member sexually abused a minor camper. Additional reports of childhood sexual abuse were made to A.R.E. Camp Management up until Tyler Dewey made his Facebook post. Despite receiving numerous reports of childhood sexual abuse, A.R.E. management and employees never reported the allegations to the proper authorities, as required by Mandatory Reporting laws. The intentional decision not to report the allegations of sexual abuse shows a reckless disregard for the safety of the children at the A.R.E. Camp.

31. Virginia law requires that allegations of child abuse be reported immediately to law enforcement or Child Protective Services by phone, and a written report must be submitted to the appropriate agency within 36 hours.

32. Based upon information and belief, it has been the policy of A.R.E. management to cover up allegations of child abuse and childhood sexual abuse that occurs at the A.R.E. Camp. It has also been the continued policy of A.R.E. Management to fail to report the allegations of child abuse and childhood sexual abuse to the proper authorities. A.R.E.'s failure to record and failure to report instances of child abuse and childhood sexual abuse allows offenders to remain employed by A.R.E.

33. Based upon information and belief, Defendant A.R.E. had reason to know that children attending the A.R.E. Camp were being sexually abused and molested. Based upon information and belief, Defendant A.R.E. knew that children attending the A.R.E. Camp were at risk of being sexually abused and molested while attending the A.R.E. Camp. A.R.E.

management, specifically John LaPrelle, Rob LaPrelle, Suebee Sheldon, Tyler Dewey, and Malenka Kayden, and other unknown A.R.E. Camp management employees and staff members, were notified of several instances of sexual abuse, molestation, and harassment. Holly Jones, the Director of Human Resources at A.R.E. Headquarters was also made aware of several instances of child sexual abuse and harassment. Holly Jones was made aware of several instances of A.R.E. Camp staff and counselors' sexual assault and harassment of their fellow A.R.E. Camp employees and counselors. These same managers and employees failed to conduct any proper investigation of the reported incidents, allowing such conduct to continue up to the present. These same managers and employee's failure to immediately report the allegations to the proper authorities, violated their duties under Code of Virginia §63.2-1509, as each of them was a mandated reporter. Based upon information and belief, Plaintiffs allege that no one at the A.R.E. Camp and A.R.E. headquarters have followed through with their mandated reporter duties since a June 2020 Facebook post made several public allegations of sexual assault, molestation, harassment, and other inappropriate conduct. The posts have been viewed, and commented on, by A.R.E. management, including Kevin Todeschi, A.R.E.'s CEO.

34. Virginia law requires that allegations of child abuse be reported immediately by phone to the proper authorities, with a follow up written report submitted thereafter. However, in each instance reported to A.R.E. Camp management, and the subsequent public acknowledgment on Facebook, A.R.E. did not and has not followed the law. Due to Defendant A.R.E.'s failure to report suspected child abuse, the perpetrators of said abuse went unchecked and were allowed to continue employment at the A.R.E. Camp, giving them access to minor children and allowing them to continue to sexually abuse, molest, and harass children.

D. Allegations Specific to the Plaintiffs' Sexual Abuse

35. The incidents of abuse described herein took place while Plaintiffs were under the custody, control and supervision of A.R.E. Camp employees in their positions as mentors, counselors, advisors, and A.R.E. Camp staff at Defendant A.R.E.'s Camp, while acting specifically on behalf of Defendant A.R.E. The Defendants' acts complained of herein were committed intentionally and were outrageous.

36. A.R.E. Camp employees were at all relevant times counselors, advisors, mentors, and employees of Defendant A.R.E. While A.R.E. Camp employees sexually abused, molested, and harassed the Plaintiffs, Defendant A.R.E. was aware of allegations of sexual abuse, molestation, and harassment by certain A.R.E. Camp employees at Defendant A.R.E.'s Camp.

E. Facts Regarding the Sexual Abuse, Molestation, and Harassment of Plaintiff Lynsey Doe

37. Plaintiff Lynsey Doe was involved with A.R.E. Camp from the time she was born. She attended family camp with her parents and siblings as an infant and young child. From 2008 through 2013 she attended A.R.E. Children's Camp as a minor camper. During Plaintiff's time as a camper, Plaintiff was forced to participate in daily hugging sessions, wherein campers and staff were told to hug each other. Plaintiff was also forced to participate in massage sessions, referred to as "Massage Trains," wherein campers and A.R.E. Camp staff gave each other massages and back rubs.

38. During Plaintiff's time as a minor camper, Plaintiff became aware that adult counselors were having sex with minor campers. In 2009 when Plaintiff was 12, A.R.E. Camp Counselor Hayden Glassman who was then 18 or 19, sexually assaulted Plaintiff, forcing Plaintiff to play "Spin the Bottle" and forced Plaintiff to touch Glassman's genitals. He placed his hands under her clothing and her underwear and penetrated her vagina. Later that night, when

Lynsey was outside near the bathrooms, Glassman approached her and attempted to get her to go to a secluded place with him in an attempt to further sexually abuse her. Plaintiff told the A.R.E. Camp Manager about the sexual abuse. Yet Glassman was permitted to remain at A.R.E. Camp around minor children, including Plaintiff, and no report was made to authorities, which is a violation of Virginia's Mandatory Reporting laws. The two other male campers who participated in the "game" were 16 and 17 years old. The other two female participants were 12 and/or 13. The male campers were later hired as A.R.E. Camp counselors one and two years later, respectively, despite A.R.E. Camp management's knowledge that they had kissed female campers who were significantly younger than them, and that they had participated in playing Spin the Bottle and allowed their friend and adult counselor to sexually abuse young girls.

39. In 2014, When Plaintiff was 17, Plaintiff returned to A.R.E. Camp for a Young Adult Retreat. This retreat was facilitated by Fred Dewey and Dave Venable who are two long-time A.R.E. Camp attendees who had children attending and working for the Camp at the time. Fred Dewey has also been a board member at A.R.E. Lynsey was to participate in a "Forgiveness Ceremony." The curriculum for this particular Young Adult Retreat was far different from Young Adult Retreats in the past. Later, Lynsey found out that the curriculum was based on a program called "Lifestream" which has come under scrutiny for being a cult. During this ceremony, Lynsey was forced to "forgive" Glassman for his sexual assaults. She was forced to tell him she forgave him and was even forced to embrace Glassman.

40. In 2011 and 2012 when Plaintiff was 15 and 16 years old, A.R.E. Camp Counselor Edward Tyler Morgan (known as Tyler Morgan), who was 23 and then 24 years old, sexually assaulted Plaintiff and raped her. The sexual abuse and rape occurred at A.R.E. Camp, and off premises at a home for which Lynsey Doe had agreed to house sit. A.R.E. and the A.R.E.

Camp held out Tyler Morgan as a person appropriate to act as a counselor to minor children, including Lynsey Doe. A.R.E. and the A.R.E. Camp held Tyler Morgan out to the A.R.E. members and campers and their families as A.R.E. and the A.R.E. Camp's agent and employee. At all relevant times, Tyler Morgan was an agent or employee of A.R.E. and the A.R.E. Camp and was, at all relevant times, acting within the scope of his employment with A.R.E. and the A.R.E. Camp.

41. Defendants voluntarily took custody of Plaintiff, who was a minor, and subjected her to an association with Tyler Morgan, a person likely to harm her and therefore owed her a duty to exercise reasonable care to Plaintiff.

42. Defendants were aware that Lynsey Doe, a minor camper, was emotionally supporting Tyler Morgan, and Defendants were holding Tyler Morgan out as the guardian for Lynsey during a "family Camp" week because Lynsey Doe's family was not present. Defendants were aware that Tyler Morgan was spending one on one time with the plaintiff while she was a minor, and Defendants commended Plaintiff for "taking care of" Tyler Morgan, even though he was 24 and she was only 15 and then 16 years old. Lynsey and Tyler Morgan were allowed to be alone in a cabin at the A.R.E. Camp and were allowed to sleep in the same cabin with no other Camp staff to supervise. Tyler Morgan had sexual intercourse with Lynsey in cabins at the A.R.E. Camp. By allowing this to occur on the A.R.E. Camp premises, Defendants were ratifying the conduct of Tyler Morgan. Given this information, Defendants knew or should have known that Tyler Morgan presented a danger to Plaintiff who was a minor. Defendants were aware that Tyler Morgan was spending time alone with Plaintiff, that he was improperly acting as though he was her guardian, that Plaintiff was supporting Tyler Morgan, and that Tyler Morgan was in a position of trust and authority over Plaintiff. As such, Defendants had a duty to

terminate the employment of Tyler Morgan and prevent him from gaining access to Plaintiff or any other minor campers under their supervision.

43. Between 2011 and 2013 when Plaintiff Lynsey Doe was a minor, Tyler Morgan sexually abused her at the A.R.E. Camp and off A.R.E. Camp premises in the course of performing duties that were within the scope of his employment and or agency with A.R.E. and the A.R.E. Camp and in execution of the services for which he was employed to perform by those same Defendants, namely as a A.R.E. Camp counselor.

44. Tyler Morgan sexually abused Lynsey Doe whom he had come into contact with and gained her trust and friendship, as well as the trust and friendship of her parents and siblings, through his position as the A.R.E. Camp counselor. Lynsey Doe and her family trusted Tyler Morgan because of his employment and association with A.R.E.

45. Based on the above, A.R.E. and the A.R.E. Camp defendants breached the duty owed to Plaintiff Lynsey Doe by failing to exercise reasonable care in the protection of Plaintiff from Tyler Morgan whom Defendants knew or should have known was likely to cause bodily harm to others, after having voluntarily undertaken custody and control of Plaintiff while she was a minor as part of the A.R.E. Camp.

46. In 2014, when Plaintiff was 17, A.R.E. Camp Staff member Clark Hamann approached Lynsey in front of other staff members and A.R.E. Camp management and grabbed Lynsey's buttocks. Lynsey told Hamann not to ever touch her like that and that she did not consent to that kind of touching. Another Camp staff member who witnessed the assault laughed and said, "I think that was his intention." Nothing was done about this incident despite A.R.E. Camp management and staff witnessing the incident, and despite Lynsey sending an email about

the incident to the Camp Manager. Hamann was allowed to remain employed by A.R.E. and no report was made to authorities, which is a violation of Virginia's Mandatory Reporting laws.

47. Throughout Plaintiff's tenure at A.R.E. Camp, Plaintiff was forced to participate in numerous activities and events that Plaintiff was uncomfortable with, including times A.R.E. Camp staff and fellow campers touched Plaintiff's body against their free will. A.R.E. Camp is located in a rural area of western Virginia, and Plaintiff did not have a method to contact family or any way to leave the camp facility. As such, Plaintiff was restrained of their freedom of movement without a legal right by the intentional use of force, words, or acts which Plaintiff was afraid to ignore, and which Plaintiff reasonably believed they must submit.

48. Subsequent to Plaintiff's sexual abuse, molestation, and harassment at the hands of Defendant A.R.E. employees, staff, and volunteers, Plaintiff began to experience multiple mental, emotional, and psychological problems, due to the sexual abuse, molestation, and harassment, including but not limited to embarrassment, shame, humiliation, anxiety, fear, nervousness, isolation, depression, sleeplessness, and fatigue, as well as other physical manifestations of stress. Plaintiff was ostracized by fellow campers and Camp staff and experienced feelings of abandonment.

F. Facts Regarding the Sexual Abuse, Molestation, and Harassment of Plaintiff Hannah Furbush

49. Plaintiff Hannah Furbush was involved with A.R.E. Camp from the time she was a newborn baby, as her mother was the A.R.E. Camp nurse and cook, and her father worked at the A.R.E. Camp as a cook and a maintenance man. Hannah attended her first children's session as an enrolled camper in 2003 and continued until 2009. In 2010 she attended Cayce's Fellows. She worked as a counselor and staff member at the A.R.E. Camp from 2012-2015 and again in 2017. During Plaintiff's tenure at A.R.E. Camp. Plaintiff estimates she experienced sexual abuse,

molestation, and harassment at least one hundred (100) times. While Plaintiff was a minor, Plaintiff attended A.R.E. Camp. In or around 2005, during Plaintiff's time as a camper, Plaintiff was expected to participate in daily hugging sessions, wherein campers and staff were told to hug each other. Plaintiff was also expected to participate in massage sessions, wherein campers and camp staff gave each other massages and back rubs, an intentional restriction of a Plaintiff's freedom of movement without legal right; and by the intentional use of force, words, or acts which the Plaintiff was afraid to ignore, or to which Plaintiff reasonably believed she must submit. Plaintiff was also the subject of verbal harassment while she was a minor camper, with male A.R.E. Camp staff and counselors commenting on her looks and making inappropriate comments about what she was wearing. These comments were made in the presence of A.R.E. Camp management and staff members.

50. While Hannah was a minor camper, she was coerced into participating in what is referred to as the Liberated Underwear Movement. During this event, minor campers ran through the camp in their underwear. At times, male counselors would participate along with underage female campers. While Hannah was a minor camper, each session she attended the A.R.E. Camp, there was an event referred to as "Goddess Night" where female campers would run through a field naked, and the male campers would stand at the top of a hill watching and yelling at the girls. These events were considered to be a right of passage for young campers, and it was made clear that participation in the events was expected of each camper, including Plaintiff.

51. In and/or around the summer of 2013, Plaintiff made a written report to A.R.E. Camp Manager Malenka Kayden regarding being sexually assaulted by A.R.E. Camp kitchen manager Clark Hamman. Hamman trapped Plaintiff in the kitchen, an intentional restriction of a Plaintiff's freedom of movement without legal right; and by the intentional use of force, words,

or acts which the Plaintiff was afraid to ignore, or to which Plaintiff reasonably believed she must submit. Hamman was allowed to remain employed by A.R.E. Camp, and he continued to sexually harass, assault, and molest other campers and Camp staff.

52. While an adult staff member at A.R.E. Camp, Plaintiff was sexually harassed by A.R.E. Camp employee Perry Thompson. Thompson would massage Hannah against her will, touch her on her buttocks, and try to kiss her. Defendant A.R.E. and A.R.E. Camp management were aware that Thompson had been sexually inappropriate toward minor campers and staff previously. In fact, his employment with A.R.E. Camp had been terminated because of the sexual abuse, assaults, and harassment by Thompson, yet A.R.E. rehired him, despite having knowledge he had a propensity to sexually abuse minors and to sexually assault A.R.E. Camp staff members.

53. Subsequent to Plaintiff's sexual abuse, molestation, and harassment at the hands of Defendant A.R.E. employees, staff, and volunteers, Plaintiff began to experience multiple mental, emotional, and psychological problems, due to the sexual abuse, molestation, and harassment, including but not limited to embarrassment, shame, humiliation, anxiety, fear, nervousness, isolation, depression, sleeplessness, and fatigue, as well as other physical manifestations of stress.

G. Facts Regarding the Sexual Abuse, Molestation, and Harassment of Plaintiff Cheyenne Doe

54. Plaintiff Cheyenne Doe was involved with A.R.E. Camp in or around 2009 or 2010 as a minor camper. In or around 2009 or 2010 during Plaintiff's time as a camper, Plaintiff was expected to participate in daily hugging sessions, wherein campers and staff were told to hug each other. Plaintiff was also expected to participate in massage sessions, wherein campers and A.R.E. Camp staff gave each other massages and back rubs. Plaintiff was also expected to

participate in underwear walks and runs through the A.R.E. Camp, an intentional restriction of a Plaintiff's freedom of movement without legal right; and by the intentional use of force, words, or acts which the Plaintiff was afraid to ignore, or to which Plaintiff reasonably believed she must submit.

55. While Cheyenne was a minor camper, she was expected to participate in what is referred to as the Liberated Underwear Movement. During this event, minor campers ran through the camp at night in their underwear, or sometimes naked. At times, male counselors would participate along with underage female campers. While Cheyenne was a minor camper, each session she attended the A.R.E. Camp, there was an event referred to as "Goddess Night" where female campers would run through a field naked, and the male campers would stand at the top of a hill watching and yelling at the girls. These events were considered to be a rite of passage for young campers, and it was made clear that participation in the events was expected of each camper, including Plaintiff.

56. In and/or around the summer of 2010, while Plaintiff was 16 years old, A.R.E. Camp Counselor Hayden Glassman kissed Plaintiff. Eventually the following summer, Glassman and Cheyenne had sexual intercourse, and the experience of being sexually abused at such a young age traumatized Cheyenne. She felt betrayed by him and by A.R.E. Camp, the organization she was led to believe was a safe place where she would be protected.

57. Subsequent to Plaintiff's sexual abuse, molestation, and harassment at the hands of Defendant A.R.E. employees, staff, and volunteers, Plaintiff began to experience multiple mental, emotional, and psychological problems, due to the sexual abuse, molestation, and harassment, including but not limited to embarrassment, shame, humiliation, anxiety, fear,

nervousness, isolation, depression, sleeplessness, and fatigue, as well as other physical manifestations of stress.

H. Facts Regarding the Sexual Abuse, Molestation, and Harassment of Plaintiff Jane Doe

58. Plaintiff Jane Doe was involved with A.R.E. Camp from 2006 through 2015 as a minor camper. During Plaintiff's time as a camper, Plaintiff was expected to participate in daily hugging sessions, wherein campers and staff were told to hug each other. Plaintiff was also expected to participate in massage sessions, referred to as "Massage Trains," wherein campers and A.R.E. Camp staff gave each other massages and back rubs.

59. During Plaintiff's time as a minor camper, Plaintiff became aware that adult counselors were having sex with minor campers. In 2009, when Plaintiff was 13, Plaintiff played "Spin the Bottle" with other campers and one of her adult A.R.E. Camp Counselors, Hayden Glassman. The two other male campers who played this "game" were 17 and 16, and both later went on to become A.R.E. Camp counselors in subsequent years. During the game, Glassman kissed Plaintiff. Upon information and belief, A.R.E. Camp Manager Suebee Sheldon was told of this incident, yet Glassman was permitted to remain at A.R.E. Camp around minor children, including Plaintiff, and no report was made to authorities, which is a violation of Virginia's Mandatory Reporting laws. At the age of 15, Plaintiff consumed psychedelic mushrooms which were provided to her by A.R.E. Camp counselor Owen Morgan, who is believed to have been 20 years old at the time.

60. Throughout Plaintiff's tenure at A.R.E. Camp, Plaintiff was expected to participate in numerous activities and events that Plaintiff was uncomfortable with, including times A.R.E. Camp staff and fellow campers touched Plaintiff's body against their free will. A.R.E. Camp is located in a rural area of western Virginia, and Plaintiff did not have a method to

contact family or any way to leave the camp facility. As such, Plaintiff was restrained of their freedom of movement without a legal right by the intentional use of force, words, or acts which Plaintiff was afraid to ignore, and which Plaintiff reasonably believed they must submit.

61. Subsequent to Plaintiff's sexual abuse, molestation, and harassment at the hands of Defendant A.R.E. employees, staff, and volunteers, Plaintiff began to experience multiple mental, emotional, and psychological problems, due to the sexual abuse, molestation, and harassment, including but not limited to embarrassment, shame, humiliation, anxiety, fear, nervousness, isolation, depression, sleeplessness, and fatigue, as well as other physical manifestations of stress.

COUNT I

Negligence (Against All Defendants) Failure to Protect Against Harm from Sexual Abuse

62. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

63. At all times relevant to this action, A.R.E. has a special relationship with each Plaintiff which gives a right to protection to each Plaintiff. Additionally, a special relationship existed between A.R.E. and A.R.E. Camp staff members which imposed a duty upon A.R.E. to control the conduct of staff members and counselors.

64. While each Plaintiff was under the age of majority, each plaintiff was a vulnerable individual in a custodial relationship with A.R.E. Camp and A.R.E. A.R.E. and the A.R.E. Camp expressly assumed a duty of supervision of each Plaintiff by assuming the role of caretaker and protector during the two-week overnight camp. A.R.E. and the A.R.E. Camp voluntarily took the custody of the Plaintiffs while minors and subjected each to an association with A.R.E. Camp staff and counselors. It was while each Plaintiff was in the custody of A.R.E. defendants and the

A.R.E. Camp defendants that each was sexually harassed and abused, which A.R.E. and the A.R.E. Camp knew or should have known might occur based on previous allegations, complaints, and observations of A.R.E. Camp staff and counselors sexually abusing and harassing other minor campers.

65. Plaintiffs were sexually abused by A.R.E. Camp staff repeatedly beginning in 1993 and continuing to 2020. A.R.E. and the A.R.E. Camp held out their employees as people appropriate to act as counselors to minor children, including Plaintiffs. A.R.E. and the A.R.E. Camp held their employees out to the A.R.E. members and campers and their families as A.R.E. and the A.R.E. Camp's agent and employee. At all relevant times, The A.R.E. staff members mentioned herein were agents or employees of A.R.E. and the A.R.E. Camp and were, at all relevant times, acting within the scope of their employment with A.R.E. and the A.R.E. Camp.

66. Defendants voluntarily took custody of minor Plaintiffs and subjected each to an association with A.R.E. Camp staff, knowing some to be a person likely to harm Plaintiffs and therefore each Defendant owed Plaintiffs a duty to exercise reasonable care.

67. Defendants were aware that several A.R.E. Camp counselors and staff members had sexually abused, harassed, and molested minor campers, including Plaintiffs because the A.R.E. Camp Managers were told about the incident mentioned herein above. Defendants knew or should have known that several A.R.E. Camp staff members were dangerous and likely to harm others, including Plaintiffs. By allowing this to occur on the A.R.E. Camp premises, Defendants were ratifying the conduct of their employees and agents. Given this information, Defendants knew or should have known that their staff members presented a danger to each minor camper, including Plaintiffs. Defendants were aware that Camp staff members were spending time alone with Plaintiffs, and that these adult staff members were in a position of trust

and authority over Plaintiffs. As such, Defendants had a duty to terminate the employment of these staff members and prevent them from gaining access to Plaintiffs or any other minor campers under their supervision.

68. While Plaintiffs were minor campers, several A.R.E. Camp staff members sexually abused them and others at the A.R.E. Camp in the course of performing duties that were within the scope of their employment and or agency with A.R.E. and the A.R.E. Camp and in execution of the services for which they were employed to perform by those same Defendants, namely as a A.R.E. Camp counselor.

69. Based on the above, A.R.E. and the A.R.E. Camp defendants breached the duty owed to each Plaintiff by failing to exercise reasonable care in the protection of each Plaintiff from A.R.E. employees whom Defendants know or should have known were likely to cause bodily harm to others, after having voluntarily undertaken custody and control of each Plaintiff while she/they were minors as part of the A.R.E. Camp.

70. At all relevant times, the Campers were subject to the direct control and supervision of A.R.E. and A.R.E. Camp personnel.

71. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of

punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

COUNT II

Negligent Retention of Camp Employees (Against All Defendants)

72. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

73. At all relevant times to this action, Camp counselors, Camp staff members, and Camp directors and managers were the agents or employees of A.R.E. and the A.R.E. Camp. A.R.E. management held their Camp employees out to be upstanding members of society and as people who could be trusted to act in a position of youth leader, guide, and counselor to minor campers and Camp staff. Plaintiffs relied on this representation and trusted A.R.E.

74. While employed for Defendants, and during the course of carrying out the duties of being A.R.E. Camp counselors, Defendants' employees sexually abused, harassed, and assaulted minor campers, including Lynsey Doe and Cheyenne Doe. Camp management and A.R.E. management were aware of the complaints of sexual abuse and harassment by Defendants' employees.

75. By virtue of Plaintiffs' special relationship with Defendants, and Defendants' relationship to counselor employees, Defendants owed Plaintiffs a duty to not hire, re-hire, and/or retain the above-referenced employees, given their dangerous propensities, which Defendants knew or had reason to know about had they engaged reasonable, meaningful, and adequate investigation of their background prior to their hiring, re-hiring, and/or retention.

76. Defendants were put on notice that its counselor employees referenced hereinabove had engaged in dangerous and inappropriate conduct while they were employed at

A.R.E. Camp and before they were rehired to work at A.R.E. Camp. Defendants failed to use reasonable care to investigate its counselor employees and the allegations of sexual abuse, molestation, and harassment against them and did nothing to supervise and monitor the above-referenced employees or to ensure safety of the minors at the A.R.E. Camp who Defendants' employees had authority over.

77. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

COUNT III

Negligence Per Se (Against All Defendants)

78. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

79. Defendants A.R.E. and the A.R.E. Camp are liable for negligence per se for violating Virginia's mandated reporting laws of suspected child abuse because Defendants failed to report numerous instances of suspected child abuse after they knew or had reason to suspect, by and through their agents and employees that counselors and staff members had been sexually

abusing and harassing other staff members, counselors, and minor campers prior to the abuse of each plaintiff.

80. Virginia law requires that allegations of child abuse must be reported immediately by phone to the local department of the county or city wherein the child resides or wherein the abuse or neglect is believed to have occurred. The initial report may be made by oral report, but such a report shall be reduced to writing by the child abuse coordinator of the local department on a form prescribed by the Board. Failure to make a report by a person who is required to do so as soon as possible, but no more than 24 hours after learning of the allegations shall face a fine and may be guilty of a Class 1 misdemeanor. Code of Virginia §63.2-1509.

81. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

COUNT IV

***Assault and Battery
(Against All Defendants)***

82. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

83. The unlawful and unwelcomed touchings to which Plaintiffs were subjected constitute assault and battery under Virginia law.

84. Plaintiffs were subjected to several acts of assault and battery as described in more particularity, above.

85. The Defendants' assault and battery against Plaintiffs as set forth above was outrageous, intentional, willful, and malicious, and Plaintiffs suffered significant harm as a result, including physical pain, emotional pain, mental anguish, anxiety, humiliation, loss of quality of life and other suffering for which the Defendants are liable.

86. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

COUNT V

Vicarious Tort Liability: Respondeat Superior (Against All Defendants)

87. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

88. At all relevant times to this action, Camp counselors, Camp staff members, and Camp directors and managers were the agents or employees of A.R.E. and the A.R.E. Camp.

A.R.E. management held their Camp employees out to be upstanding members of society and as people who could be trusted to act in a position of youth leader, guide, and counselor to minor campers and Camp staff. Plaintiffs relied on this representation and trusted A.R.E.

89. The abuse of Plaintiffs by A.R.E. Camp staff occurred in the course of performing duties that were within the scope of their employment and/or agency with A.R.E. and the A.R.E. Camp and in execution of those services for which he was employed to perform by A.R.E. and the A.R.E. Camp, namely as Counselor/Staff/Youth Leader

90. A.R.E. and the A.R.E. Camp took no action against any A.R.E. Camp staff member to report prior complaints and allegations of sexual harassment and sexual abuse to legal authorities and they continued to permit A.R.E. Camp employees who had committed acts of sexual abuse, molestation and harassment to continue to have access to children as well as privileges and duties as an A.R.E. agent and/or employee, youth leader, and counselor, without any restrictions at all, thus sanctioning and ratifying this conduct. These counselors and staff members harassed and assaulted campers and staff members of A.R.E. and A.R.E. Camp agents and/or employees and directors. A.R.E. Camp Directors were notified of several instances of harassment and sexual assaults, yet nothing was done to address the harassing and assaultive conduct, thus confirming, or accepting the behavior and allowing it to continue unchecked.

91. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN

MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

COUNT VI

Intentional Infliction of Emotional Distress (Against all Defendants)

92. The allegations set forth in paragraphs 1 through 61, above, are incorporated into this Count by reference.

93. Defendants conduct toward Plaintiffs, as described herein, was outrageous and extreme.

94. A reasonable person would not expect or tolerate Defendants' putting untrained and dangerous adults in positions of authority at A.R.E. Camp. Defendants enabled dangerous and exploitative people to have access to minor campers, including Plaintiffs, so that they could commit wrongful sexual acts with minors, including the conduct described herein. Each Plaintiff held great trust, faith, and confidence in Defendants.

95. A reasonable person would not expect or tolerate Defendants to force and coerce Plaintiffs to participate in "forgiveness ceremonies" wherein Plaintiffs were made to face A.R.E. Camp staff members who had sexually abused, harassed, molested, and exploited them and ultimately state that the conduct would be forgiven.

96. As a direct, actual and proximate result of the actions of the Defendants, each Plaintiff has suffered significant damages including mental anguish, physical pain, anxiety, humiliation, bodily injury and loss of quality and enjoyment of life. The Defendants' conduct was outrageous, wanton, willful and malicious.

WHEREFORE, the Plaintiffs, Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4, each pray for judgment against each Defendant, jointly and severally, in the amount of TEN MILLION DOLLARS (\$10,000,000.00). In addition, each Plaintiff requests an award of punitive damages in the amount of THREE HUNDRED FIFTY THOUSAND DOLLARS (\$350,000.00).

JURY TRIAL DEMANDED

The Plaintiffs hereby request a jury trial on all matters raised in this Complaint.

Respectfully submitted,

**LYNSEY DOE, HANNAH FURBUSH,
CHEYENNE DOE, and JANE DOE**

By: _____


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