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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR KERN COUNTY**

11 Plaintiff Doe, an individual;

12 Plaintiff,

13 v.

14 THE BRIDGE BIBLE CHURCH OF
15 MENNONITE BRETHREN, a California
16 Corporation; ERIC SIMPSON, an
17 individual; and DOES 1 through 50,
18 Inclusive,

19 Defendants.

) **CASE NO. BCV-20-101706**

) **PLAINTIFF'S COMPLAINT FOR:**

) **(1) SEXUAL ASSUALT**

) **(2) SEXUAL BATTERY**

) **(3) CIVIL RIGHTS VIOLATION, CIVIL CODE**
14 **§51.9**

15) **(4) CIVIL RIGHTS VIOLATION, CIVIL CODE**
16 **§51.7**

17) **(5) CIVIL RIGHTS VIOLATION, CIVIL CODE**
18 **§52.4**

19) **(6) CIVIL RIGHTS VIOLATION, CIVIL CODE**
20 **§51**

21) **(7) INTENTIONAL INFLICTION OF**
22 **EMOTIONAL DISTRESS**

23) **(8) BREACH OF FIDUCIARY, CONFIDENTIAL**
24 **RELATIONSHIP**

) **(9) NEGLIGENCE**

) **DEMAND FOR JURY TRIAL**

25 Plaintiff Doe, by and through her counsel, alleges as follows:

26 **PARTIES**

27 1. Plaintiff Doe is a female individual who, at all relevant times alleged herein was,
28 a resident of Kern County, State of California. Due to the events alleged herein, she currently

1 resides in the County of Lane, State of Oregon.

2 2. Plaintiff is informed and believes that Defendant THE BRIDGE BIBLE
3 CHURCH OF MENNONITE BRETHREN (hereinafter "BBC") is, and at all relevant times
4 alleged herein was, a corporation organized and existing in the State of California, with a
5 principal place of business located in Bakersfield, California.

6 3. Plaintiff is informed and believes that Defendant ERIC SIMPSON is, and at all
7 relevant times alleged herein was, a male individual who was employed or contracted to perform
8 work with Defendant BBC at its principal place of business in Kern County, State of California.
9 He is believed to have been and continues to be a resident in the City of Bakersfield.

10 4. Plaintiff is informed and believes that Defendants Does 1 through 50 are, and at
11 all relevant times alleged herein were, responsible, in some manner, for the acts, omissions,
12 events, and occurrences alleged herein.

13 5. Plaintiff is informed and believes that, at all relevant times alleged herein,
14 Defendants Does 1 through 50 were the officers, directors, members, partners, employees,
15 contractors, agents, representatives, subsidiaries, departments, divisions, or other affiliated
16 individuals or entities of Defendants BBC, Simpson, and/or Does 1 through 50, acting within the
17 scope and purpose of such employment or agency, and with the power and authority vested in
18 them, or ratification, endorsement, or approval of the conduct with respect to the events and
19 happenings alleged herein by Defendants BBC, Simpson, and/or Does 1 through 50.

20 6. Plaintiff is informed and believes that Defendants Does 1 through 50 are legally
21 responsible for the events and happenings alleged herein, and legally and proximately caused or
22 contributed to the injuries and damages that she suffered from the alleged events and happenings.
23 Plaintiff does not know the true names and capacities of Defendants sued as Does 1 through 50,
24 and therefore sues them by such fictitious names. Plaintiff will amend her complaint to insert
25 their true names and capacities when ascertained.

26 **JURISDICTION AND VENUE**

27 7. This Court has personal jurisdiction over Defendants on the basis that Defendants
28 are doing business in and/or are residents of the State of California, and have through their

1 actions, voluntarily subjected themselves to the laws of the State of California.

2 8. This Court has subject matter jurisdiction over all causes of action pursuant to
3 Article VI, §10 of the California Constitution, California Code of Civil Procedure §410.10, on
4 the basis that this is a civil action in which the matter in controversy, exclusive of interest,
5 exceeds twenty-five thousand dollars (\$25,000.00), and because each cause of action arises
6 under the laws of the State of California or is subject to adjudication in the courts of the State of
7 California. No part of this complaint is preempted by federal law or challenges conduct within
8 the exclusive domain of any federal agency, and adjudication of the claims has not been
9 statutorily assigned to any other court of jurisdiction.

10 9. Venue is proper in accordance with California Code of Civil Procedure §395(a)
11 on the basis that the City of Bakersfield, County of Kern, is where Defendant BBC's principal
12 place of business is located, and/or the events and happenings alleged herein took place.

13 **GENERAL ALLEGATIONS**

14 **The Parties**

15 10. Plaintiff and her husband were members of The Bridge Bible Church located at
16 12225 Stockdale Highway, Bakersfield, California ("Bridge Church"). Plaintiff became a
17 member at the Bridge Church in or about 2013.

18 11. Plaintiff is informed and believes that, at all relevant times alleged herein,
19 Defendant BBC was affiliated with the denomination of Mennonite Brethren. As such,
20 Defendant BBC was a member of the U.S. Conference of Mennonite Brethren Churches
21 ("USMB") and an affiliate of the Pacific District Conference of Mennonite Brethren Churches.

22 12. Plaintiff is informed and believes that, at all relevant times alleged herein,
23 Defendant Simpson was a pastor and the head family and marriage counselor at the Bridge
24 Church. Defendant Simpson was employed or contracted to perform services, including but not
25 limited to therapy sessions for individuals and couples, by Defendant BBC. Defendant Simpson
26 also was licensed through the USMB.

27 13. Plaintiff is informed and believes that, at all relevant times alleged herein, the
28 USMB consisted of about two hundred churches throughout the United States. Defendants BBC

1 and Simpson were required to complete applications and a screening process for acceptance and
2 approval as a church affiliate and licensed pastor with the USMB.

3 14. Plaintiff is informed and believes that, at all relevant times alleged herein, as an
4 affiliate church and licensed pastor of USMB, Defendants BBC and Simpson were required to,
5 among other acts, “abide by the Bylaws of both the District and USMB,” “participate regularly
6 in the conventions, conferences, missions, and programs of the USMB and of [the] District
7 Conference,” and “educate [themselves] concerning the Mennonite Brethren Mission, Vision, and
8 Core Values.” Defendant BBC also was “expected to participate in conventions by sending
9 delegates” to the biennial regular conventions and periodic special conventions.

10 15. Plaintiff is informed and believes that, at all relevant times alleged herein, Jeff
11 Gowling, in his capacity as the head pastor for Defendant BBC, was actively involved with the
12 USMB, which included but was not limited to regular attendance at conventions, conferences,
13 and workshops presented by USMB, and participation on boards and committees for USMB.

14 16. Plaintiff is informed and believes that as part of the application and screening
15 process, Defendants BBC and Simpson, and Mr. Gowling were provided licensing documents,
16 which included but were not limited to applications, agreements, policies and procedures,
17 ministry, pastoral, and conflict covenants, and a manual entitled “Resource for Churches Dealing
18 with Sexual Misconduct” (“USMB’s Dealing with Sexual Misconduct”). The manual was
19 intended to provide “guidance to a church who might be called upon to process sexual abuse
20 within their church.”

21 17. According to USMB’s Dealing with Sexual Misconduct, “sexual misconduct in
22 the church became prominent in our society” after the widespread scandals involving clergy
23 abuse of children and youth became publicly known. In response to the prevalence of sexual
24 misconduct in church organizations, USMB began publishing, circulating, and disseminating
25 information, rules, policies, procedures, and guidelines on sexualized behavior and misconduct
26 to its affiliate churches and licensed pastors in or about early 1990.

27 18. Plaintiff is informed and believes that, at all relevant times alleged herein,
28 Defendants BBC and Simpson, and Mr. Gowling were aware that characteristics of inappropriate

1 sexualized behavior consist of, among other acts, “unusual attention from a pastor, including
2 such things as gifts, frequent social telephone calls, letters, private visits, use of electronic/social
3 media, or the maintenance of a special mentoring relationship,” “flirtatious talk, innuendo or
4 propositions,” “sexual jokes or offensive gestures,” “intrusive sexual questions about the
5 person’s personal life,” “explicit descriptions of a pastor’s own sexual experiences,” and
6 “whatever the person considers inappropriate, including unwanted physical contact such as
7 touching, hugging, pinching, patting and kissing, as well as whistling, catcalls and leering, etc.”
8 They also were aware that “warning signs” of sexualized behavior includes the counselor
9 providing therapy to an individual that goes beyond his training and ability, or counseling that
10 exceeds the scope of his relationship with the individual. The counselor tending to sexualize
11 conversations is yet another warning sign. Other indicators that the counselor is violating
12 personal and professional boundaries include “physical contact [that] moves beyond simple
13 greetings to inappropriate pats and hugs,” the counselor “fantasizes about a sexual relationship
14 with a parishioner,” and the counselor “arranges meetings with the parishioner outside normal
15 office hours.” They further knew that church affiliates and licensed pastors should “refer long-
16 term counseling of members to professional counselors.” (USMB’s Dealing with Sexual
17 Misconduct)

18 19. Plaintiff is informed and believes that, at all relevant times alleged herein,
19 Defendants BBC and Simpson, and Mr. Gowling knew that a “sexual predator” is “someone who
20 engages in either repeated acts of trolling, grooming and sexual misconduct.” It is “analogous to
21 how a predator hunts down its prey, so the sexual predator is thought to ‘hunt’ for his or her sex
22 partners.” They also knew that “trolling” is a “form of harassment aimed to test a person’s
23 vulnerability to manipulation and sexual abuse. A potential offender may troll for a victim
24 through asking personal questions, touching inappropriately, or sharing intimate information.”
25 They further knew that “grooming” is “the process by which an offender draws a victim into a
26 sexual relationship and maintains that relationship in secrecy. After targeting a person through
27 trolling, a potential offender attempts to gain the trust of a potential victim and their family and
28 friends. The potential offender isolates the potential victim, initiates sexual intimacy and controls

1 the victim with requirements of secrecy.” (“Prevention & Response: Sexual Abuse and Non-
2 Credentialed Individuals” (“Prevention & Response”) by the Panel on Sexual Abuse Prevention
3 of the USMB)

4 20. Plaintiff is informed and believes that, at all relevant times alleged herein,
5 Defendants BBC and Simpson, and Mr. Gowling understood there was a “great need within the
6 church to confront sexual abuse honestly as well as to address the systemic issues that enable
7 sexual abuse to exist.” They also understood that “sexual abuse” was “sexualized behavior that
8 occurs in a relationship where one party has more power than the other and meaningful consent
9 is difficult, if not impossible. Sexual abuse takes advantage of another in order to use, control or
10 intimidate him or her for one’s own purposes. It is violence that has been sexualized. It can
11 include actual physical contact of a sexual nature, such as hugs, kisses, touching, assault and
12 intercourse. Sexual abuse can also involve more covert acts such as using sexual innuendo or
13 pornography in the relationship, emotional and spiritual manipulation, or inappropriate
14 disclosures of a personal nature regarding sexual matters.” They further understood that “sexual
15 harassment is any unwanted and unwelcome behavior of a sexual or gender-specific nature. It
16 can interfere with a person’s ability to work, get an education or engage in ministry, among other
17 things. It often takes two forms: ... Quid pro quo harassment occurs when someone is pressured
18 to trade sexual favors in return for a job, promotion or grade. ... Environmental harassment
19 refers to unwelcome sexual behavior that creates a hostile environment. It can include sexually
20 suggestive remarks, jokes or gestures, displaying degrading pictures or objects, unwelcome
21 propositions and unwanted physical contact such as touching, hugging, pinching, patting or other
22 sexual demands.” (USMB’s Prevention & Response)

23 21. Plaintiff is informed and believes that, at all relevant times alleged herein,
24 Defendants BBC and Simpson, and Mr. Gowling were aware that a counselor’s sexualized
25 behavior with an individual is a “misuse of authority and power.” They also were aware that
26 “sexual misconduct is the breach [sic] of trust that uses one’s ministry or professional role to
27 gain advantage over an individual and exploiting that person in an abusive and unjust manner. It
28 is also a violation of personal and professional boundaries by using force, threat, coercion,

1 intimidation, and promises including promotions, or the misuse of one’s role or position to
2 exploit a child, youth, or adult for one’s sexual gratification.” (USMB’s Dealing with Sexual
3 Misconduct)

4 22. Plaintiff is informed and believes that, at all relevant times alleged herein,
5 Defendants BBC and Simpson, and Mr. Gowling knew that a counselor’s sexualized behavior
6 with an individual is not a “relationship” because the “power of imbalance precludes the
7 possibility of a consensual relationship.” They also knew that a counselor’s sexualized behavior
8 with an individual constitutes “sexual abuse, violence, or misconduct when an allegation is
9 made.” Defendant BBC and Mr. Gowling further knew that a counselor’s sexualized behavior
10 with an individual should not be referred to or reported as a “relationship.” (USMB’s Prevention
11 & Response)

12 23. Plaintiff is informed and believes that, at all relevant times alleged herein,
13 Defendants BBC and Simpson, and Mr. Gowling were aware that “victims should always be
14 heard and supported and kept in the communication loop.” They also were aware that “legal
15 concerns are not the primary concern of institutions responding to sexual abuse.” They further
16 were aware of the need to “confirm that individuals have more than one avenue to report
17 misconduct — not only to the lead pastor or area conference minister.” (USMB’s Prevention &
18 Response)

19 24. Plaintiff is informed and believes that, at all relevant times alleged herein,
20 Defendant BBC and Mr. Gowling were aware of the importance of informing “individuals within
21 the offender’s faith community and/or organization for their own safety Protecting the
22 identity of the offender is not responsible or helpful. Offenders are more likely to reoffend if they
23 are not held publicly accountable.” Defendant BBC and Mr. Gowling also were aware that “the
24 offender must take full responsibility, be held publicly accountable and offer an apology.”
25 (USMB’s Prevention & Response)

26 25. Plaintiff is informed and believes that commencing in or about 1990, the
27 Mennonite Brethren Church embarked on a highly publicized campaign against sexual abuse by
28 leaders within the church organizations. The sexual abuse of children and women was not simply

1 a problem with a few bad pastors, but rather a systemic issue caused by church organizations
2 making choices that perpetuated and enabled the widespread sexual violations.

3 26. Plaintiff is informed and believes that, at all relevant times alleged herein,
4 Defendant BBC was required to “provide training and guidance for church leaders and
5 volunteers to prevent and avoid sexual misconduct in the church.” Defendant BBC also was
6 required to “provide the guidelines and procedures to victims of sexual misconduct.” (USMB’s
7 Prevention & Response)

8 27. Plaintiff is informed and believes that, at all relevant times alleged herein,
9 Defendant BBC was required to report allegations of sexual misconduct to the District Manager
10 for USMB. Defendant BBC and Mr. Gowling were aware that upon notice of a claim, the USMB
11 appointed an investigation team, consisting of both men and women, who determined the guilt or
12 innocence of the assailant’s actions against the victim.

13 28. Plaintiff is informed and believes that, at all relevant times alleged herein, the
14 USMB required its affiliated churches, which included Defendant BBC, to establish a “support
15 team” for victims of sexualized behavior by staff members of their organizations. The team was
16 to consist of at least three people, and be composed of both men and women. The support team
17 was to have regular meetings with the victim. A mentor also was to be offered to the victim as a
18 fourth member of the support team. (USMB’s Dealing with Sexual Misconduct)

19 29. Plaintiff is informed and believes that, at all relevant times alleged herein,
20 Defendants BBC and Simpson, and Mr. Gowling knew the importance of being familiar with and
21 understanding the definitions of sexual misconduct, the warning signs for identifying and
22 recognizing sexualized behavior, the appropriate policies for preventing and responding to sexual
23 abuse, and the importance of properly and adequately training and supervising staff counselors,
24 especially male counselors that provided one-on-one therapy sessions to females.

25 **Defendant Simpson’s Sexual Abuse of Plaintiff**

26 30. In or about 2016, Plaintiff and her husband decided to seek counseling for family
27 and marital issues. Plaintiff scheduled an appointment for both her and her husband through the
28 counseling center at the Bridge Church. She was told that the best person to counsel her and her

1 husband was Defendant Simpson. Defendant Simpson was represented to have extensive training
2 and experience in family and marriage counseling.

3 31. Defendant Simpson met with Plaintiff and her husband for therapy sessions every
4 other week from in or about August of 2016 to May of 2017. Plaintiff scheduled the
5 appointments through the counseling center. She and her husband checked in at the front desk
6 before each session. They were escorted to a back office where the therapy sessions were
7 conducted. Plaintiff and her husband sat on a couch. Defendant Simpson sat across from them in
8 a chair.

9 32. Defendant Simpson provided various materials, including secular handouts on
10 communication and finances, to Plaintiff and her husband. He also gave them the secular
11 publication entitled “Parenting with Love and Logic” by Dr. Foster Cline and Jim Fay.

12 33. Although not an issue between Plaintiff and her husband, Defendant Simpson
13 insisted on talking about sex during their therapy sessions. Defendant Simpson shared intimate
14 details about his sex life with his wife. He also began making sexually inappropriate comments
15 outside their therapy sessions in text messages and in conversations after services at the Bridge
16 Church. Defendant Simpson’s focus on sex made them feel uncomfortable. However, Plaintiff
17 and her husband trusted Defendant Simpson and the referral by Defendant BBC.

18 34. Defendant Simpson began telling Plaintiff and her husband that they were in a
19 very select group of individuals that he counseled who he considered to be his “friends.”
20 Defendant Simpson was powerful and beloved at Defendant BBC. Plaintiff felt so incredibly
21 honored and special to be considered a friend. As a result, Plaintiff opened up and shared her
22 deepest darkest secrets with him, especially in the sessions without her husband. Defendant
23 Simpson learned that Plaintiff is a people pleaser, submissive, forgiving, and struggles to say
24 “no” to people. He also learned about her family-of-origin issues which had caused her to doubt
25 herself and her self-worth, especially in relationships with men.

26 35. In or about May of 2018, Plaintiff suffered personal losses that sent her into a
27 deep dark place of despair and isolation. She was crying every day. She had trouble getting out
28 of bed. She was missing work. She was not eating. Unable to handle watching his wife’s grief,

1 Plaintiff's husband asked for help from Defendant Simpson.

2 36. Defendant Simpson began one-on-one therapy sessions with Plaintiff. However,
3 these therapy sessions were different. Defendant Simpson told her to contact him directly to
4 schedule appointments. She was told that she no longer needed to check-in at the front desk.
5 Rather, she was to come directly to his office.

6 37. Plaintiff was later informed Defendant BBC had a policy that prohibited male
7 counselors from meeting privately with females for one-on-one sessions. Defendant BBC's staff
8 never told Plaintiff that Defendant Simpson could not meet with her alone, that she needed to
9 schedule her appointments through the counseling center, or that she was required to check in at
10 the front desk before her therapy sessions.

11 38. Unlike the initial round of therapy with her husband, Defendant Simpson insisted
12 that she participate in locking eyes with him during the sessions. She later learned that the eye-
13 gazing technique was used by secular therapists to help couples reconnect. Defendant Simpson
14 repeatedly told her that her husband was a lucky man. He said things to her that she had told him
15 in the previous round of therapy that she had wished her husband would say to her. His words
16 and actions made her forget her problems. She trusted him and believed that he could help her
17 work through her mental and emotional problems.

18 39. Unbeknownst to Plaintiff, Defendant Simpson had been testing her "vulnerability
19 to manipulation and sexual abuse" (trolling) and gaining the "trust" of her and her family
20 (grooming) in order to initiate sexual intimacy which he would then control with requirements of
21 secrecy (sexual abuse). After months of manipulation, Defendant Simpson had Plaintiff where he
22 wanted her. Starting in July of 2019, Defendant Simpson began sexually abusing Plaintiff. He
23 used his position of authority and trust to initiate repeated physical contact of a sexual nature on
24 Plaintiff. He also bombarded her with sexually explicit and graphic comments about the sex acts
25 that he wanted to do to her.

26 40. In an effort to continue his sexual abuse of Plaintiff, Defendant Simpson
27 attempted to distract her husband by regularly calling and sending text messages to him. In order
28 to keep a close eye on his victim, he insisted that the couple return to therapy with him. During

1 the sessions, he encouraged them to consider separating in an apparent attempt to have more time
2 alone with Plaintiff.

3 41. On or about August 4, 2018, Plaintiff could no longer handle the shame from the
4 sexual abuse by Defendant Simpson. She told her husband about what had happened with
5 Defendant Simpson. Her husband immediately contacted an elder at the Bridge Church.

6 **Defendant BBC's Investigations**

7 42. On or about August 6, 2018, Plaintiff was interrogated by three male elders at
8 Defendant BBC, which included Mr. Gowling. The elders inquired about her "relationship" with
9 Defendant Simpson. They did not inform her that a male counselor's sexualized behavior with a
10 female cannot be a relationship because the "power of imbalance precludes the possibility of a
11 consensual relationship." They never advised her that the sexualized behavior she had been
12 subject to was actually "sexual abuse, violence, or misconduct." She was not told that
13 "meaningful consent is difficult, if not impossible," in cases of "sexualized behavior that occurs
14 in a relationship where one party has more power than the other." They did not tell her that a
15 "sexual predator" was "someone who engages in either repeated acts of trolling, grooming and
16 sexual misconduct." She was not informed that "trolling" is a "form of harassment aimed to test
17 a person's vulnerability to manipulation and sexual abuse," or that "a potential offender may troll
18 for a victim through asking personal questions, touching inappropriately, or sharing intimate
19 information." They did not raise the known problem of "grooming" in the counseling setting,
20 which they knew was prevalent throughout church organizations. They also did not disclose that
21 grooming was "the process by which an offender draws a victim into a sexual relationship and
22 maintains that relationship in secrecy." She was not told that "after targeting a person through
23 trolling, a potential offender attempts to gain the trust of a potential victim and their family and
24 friends," or that "the potential offender isolates the potential victim, initiates sexual intimacy and
25 controls the victim with requirements of secrecy." Rather, they allowed her to believe that
26 Defendant Simpson's sexualized behavior was her fault. They let her feel that she was a
27 homewrecker and had not only ruined Defendant Simpson and his family's life, but had also hurt
28 the church organization at the Bridge Church.

1 43. On or about August 8, 2018, Plaintiff was subjected to another round of
2 questioning. This meeting included all of the elders, all of which were male, for Defendant BBC.
3 Mr. Gowling insisted that Plaintiff had a “consensual affair” with Defendant Simpson. Although
4 having the opportunity to do so, the elders did not disclose that a male counselor’s sexualized
5 behavior with a female is a “misuse of authority and power.” They neglected to tell her that
6 sexual misconduct occurs when a counselor uses his “ministry or professional role to gain
7 advantage over an individual.” She was not told that the vast majority of sexualized behavior
8 between male counselors and females are not “consensual,” but rather the result of trolling and
9 grooming. Instead, they allowed her to feel responsible for the sexualized behavior imparted on
10 her by Defendant Simpson. In an apparent effort to censor Plaintiff, she was assured that they
11 would do everything they could to repair the damage she had caused to the Bridge Church by her
12 “affair” with Defendant Simpson.

13 44. Shortly after meeting with Plaintiff, Mr. Gowling announced to the congregation
14 that Defendant Simpson would no longer be working at the Bridge Church. He accurately
15 reported that Defendant Simpson had an inappropriate relationship with a female member.
16 However, Defendant Simpson’s relationship with the female member was deceitfully described
17 as having stopped short of any sexual contact or intimacy.

18 45. Although required to do so, Defendant BBC did not report Defendant Simpson’s
19 sexual misconduct and abuse of Plaintiff to the USMB. Defendant BBC also did not provide
20 Plaintiff with information on sexual misconduct or her right to have an unbiased investigation
21 performed by the USMB. She was not provided a “support team” or “mentor.” She was not
22 encouraged to continue to attend services and activities at the Bridge Church. Rather, she was
23 treated as a criminal, punishable by censoring and banishment from her friends and community.

24 46. Plaintiff and her husband sought outside therapy shortly after the meeting with the
25 elders from Defendant BBC. Through the painful and difficult process, Plaintiff learned that
26 Defendant Simpson’s actions were textbook trolling, grooming, and sexual abuse. She
27 discovered that she had been an easy target due to her disposition of being insecure, emotionally
28 devastated and isolating, submissive, and a people pleaser. She also routinely took responsibility

1 for other's bad behavior, and had trouble saying "no."

2 47. Starting in or about September of 2018, Plaintiff began providing Defendant
3 BBC's elders with material on the psychology of sexual misconduct and abuse in church
4 organizations. She informed them that she had been the victim of grooming and sexual abuse by
5 Defendant Simpson. Despite their receipt of the publications and literature, Defendant BBC and
6 Mr. Gowling stood firm on their claim that the relationship had been an affair between two
7 consenting adults.

8 48. In or about November of 2018, Defendant BBC hired PastorServe under the guise
9 that the outside company would be conducting an independent investigation of Plaintiff's
10 allegations against Defendant Simpson. As part of the investigation, Plaintiff was subjected to
11 another round of questioning by a group consisting of only men. When she told the group of men
12 that she had been the subject of sexual grooming, they claimed to have never heard of the
13 terminology.

14 49. Plaintiff and her husband stopped going to the services and activities at the Bridge
15 Church. They felt shunned. They felt unwelcome. Defendant BBC had not made efforts to
16 attempt to reconnect Plaintiff and her husband with the Bridge Church.

17 50. Plaintiff began suffering severe panic attacks and post-traumatic stress. She would
18 hide when she saw someone that looked remotely like Defendant Simpson, any of the elders at
19 Defendant BBC, or any members from the Bridge Church. Her mental and physical health
20 continued to rapidly decline. The last straw was when she discovered that PastorServe had not
21 been hired to help her. Rather, PastorServe's sole purpose was to re-establish Defendant
22 Simpson's relationship with the staff at the Bridge Church. PastorServe's objective was to
23 protect the reputation of Defendants BBC and Simpson.

24 51. Plaintiff, on the other hand, was outcasted as the offender, rather than the victim
25 of sexual trolling, grooming, and abuse. She had been subjected to multiple one-sided, biased,
26 discriminatory, harassing, embarrassing, humiliating, and shaming interrogations by men whose
27 sole purpose was to classify the sexualized behavior as a consensual affair. Even after being
28 provided publications and literature on the textbook nature of Defendant Simpson's sexual

1 misconduct, Defendant BBC rejected that he could have sexually groomed and abused Plaintiff.

2 52. Plaintiff is informed and believes that, as a result of PastorServe's work and Mr.
3 Gowling's misleading message to the congregation at the Bridge Church, Defendant Simpson
4 was allowed to meet weekly with the staff at the Bridge Church. He was paid a substantial
5 severance. He was provided outside financial support. He started a non-profit corporation that
6 partners with community outreach programs. He began working with public agencies, including
7 the fire department and school board. He returned to counseling work at Hume Lake Christian
8 Camps. Defendant BBC has not only enabled Defendant Simpson to continue his work in the
9 ministry, but also to work one-on-one with vulnerable individuals.

10 53. Plaintiff is informed and believes that, in or about 2018, Defendant BBC was
11 preparing to launch a fundraising campaign to raise money to first build a children's ministry
12 building and then a new worship center. The fundraising campaign was delayed following
13 Defendant Simpson's departure from the Bridge Church. Defendant BBC launched the
14 fundraising campaign only after sufficient time had passed following Defendant Simpson's
15 departure from the Bridge Church and his reestablishment into the ministry and the community
16 of Bakersfield.

17 54. Plaintiff has suffered and continues to suffer severe post-traumatic stress and
18 anxiety, especially around men. She has constant flashbacks. She has nightmares. She has
19 difficulty sleeping which causes her to be chronically fatigued.

20 55. Plaintiff is informed and believes that Defendant BBC did not take steps to
21 determine if there were other victims of Defendant Simpson's sexualized behavior. Had it done
22 so, it would have discovered that she may not have been the only victim of the sexualized
23 behavior by Defendant Simpson.

24 **FIRST CAUSE OF ACTION**

25 **SEXUAL ASSAULT**

26 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

27 56. Plaintiff realleges and incorporates herein by this reference each allegation in this
28 Complaint.

1 57. From in or about May of 2018 through August of 2018, Defendant Simpson
2 sexually assaulted Plaintiff with the intent to cause harmful and offensive contact with her,
3 and/or to cause her imminent apprehension of harm in a manner that offends a reasonable sense
4 of personal dignity.

5 58. Plaintiff did not consent to the sexually assaultive conduct, or to be placed in
6 imminent apprehension of harmful or offensive contact by Defendant Simpson.

7 59. Defendant Simpson's conduct was a substantial factor in causing harm to
8 Plaintiff.

9 60. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
10 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
11 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
12 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
13 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
14 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
15 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
16 censored and ousted Plaintiff.

17 61. As a proximate result of Defendants' conduct, Plaintiff has employed and
18 continues to employ physicians, and other health care providers to examine, treat, and care for
19 her, and has incurred and continues to incur medical and incidental expenses.

20 62. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
21 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
22 opportunities, and experience, and other special and compensatory damages, along with
23 prejudgment interest.

24 63. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
25 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
26 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
27 inconvenience, embarrassment, and other non-economic losses.

28 64. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified

1 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
2 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
3 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
4 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
5 people. Defendants further intentionally misrepresented or concealed material facts with the
6 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
7 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
8 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
9 SIMPSON and Does 1 through 25.

10 **SECOND CAUSE OF ACTION**

11 **SEXUAL BATTERY**

12 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

13 65. Plaintiff realleges and incorporates herein by this reference each allegation in this
14 Complaint.

15 66. From May of 2018 through August of 2018, Defendant Simpson made sexually
16 offensive contact, both directly and indirectly, to intimate parts of Plaintiff. Defendant Simpson
17 also used intimate parts of his body to make sexually offensive contact, both directly and
18 indirectly, with Plaintiff. Defendant Simpson further acted to cause imminent apprehension of
19 sexually offensive contact, both directly and indirectly, to Plaintiff.

20 67. Plaintiff did not consent to the acts of Defendant Simpson, which were offensive
21 to a reasonable sense of a person's personal dignity.

22 68. Defendant Simpson's conduct was a substantial factor in causing harm to
23 Plaintiff.

24 69. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
25 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
26 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
27 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
28 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the

1 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
2 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
3 censored and ousted Plaintiff.

4 70. As a proximate result of Defendants' conduct, Plaintiff has employed and
5 continues to employ physicians, and other health care providers to examine, treat, and care for
6 her, and has incurred and continues to incur medical and incidental expenses.

7 71. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
8 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
9 opportunities, and experience, and other special and compensatory damages, along with
10 prejudgment interest.

11 72. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
12 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
13 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
14 inconvenience, embarrassment, and other non-economic losses.

15 73. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified
16 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
17 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
18 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
19 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
20 people. Defendants further intentionally misrepresented or concealed material facts with the
21 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
22 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
23 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
24 SIMPSON and Does 1 through 25.

25 **THIRD CAUSE OF ACTION**

26 **CIVIL CODE §51.9**

27 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

28 74. Plaintiff realleges and incorporates herein by this reference each allegation in this

1 Complaint.

2 75. Beginning in or about August of 2016 and continuing through August of 2018,
3 Defendant Simpson, in the course and scope of his work with and through the counseling center
4 at Defendant BBC and Does 25 through 50, provided familial and marital therapy services to
5 Plaintiff. Defendant BBC had referred Plaintiff to Defendant Simpson as its head counselor, and
6 claimed that he possessed the experience and training to provide family and marital counseling.

7 76. In or about May of 2018, Defendant Simpson engaged in verbal, visual, and
8 physical conduct of a sexual nature with Plaintiff that continued through August of 2018.
9 Defendant Simpson's sexualized behavior also included sexual advances, solicitations, and
10 requests, demands for sexual compliance, and sexually assaultive and abusive conduct, which
11 constituted the sexual abuse and harassment of Plaintiff.

12 77. Defendant Simpson's sexualized behavior was unwelcomed by Plaintiff. It also
13 was so severe, pervasive, and objectively offensive that it deprived and interfered with Plaintiff's
14 access and right to associate with her family, the church organization at the Bridge Church, and
15 friends within the community of Bakersfield.

16 78. Defendant Simpson's sexual abuse and harassment of Plaintiff, which caused her
17 to suffer economic loss, disadvantage, and personal injury, violated her statutory and
18 constitutional rights under Federal and State Laws.

19 79. Defendant BBC and Does 25 through 50 contributed to Plaintiff's harm and
20 damages by failing, refusing, and rejecting its responsibilities to identify, recognize, and address
21 the sexualized behavior, and to properly and adequately train and supervise a staff counselor,
22 which had a systemic and detrimental and debilitating effect on Plaintiff's statutory and
23 constitutional rights to be free from sexual abuse and harassment based on her sex and gender.

24 80. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
25 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
26 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
27 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
28 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the

1 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
2 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
3 censored and ousted Plaintiff.

4 81. As a proximate result of Defendants' conduct, Plaintiff has employed and
5 continues to employ physicians, and other health care providers to examine, treat, and care for
6 her, and has incurred and continues to incur medical and incidental expenses.

7 82. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
8 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
9 opportunities, and experience, and other special and compensatory damages, along with
10 prejudgment interest.

11 83. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
12 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
13 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
14 inconvenience, embarrassment, and other non-economic losses.

15 84. As a further proximate result of Defendants' conduct, Plaintiff is entitled to a
16 maximum of three times her actual damages in an amount no less than four-thousand dollars per
17 occurrence, along with attorney's fees that may be determined by the Court.

18 85. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified
19 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
20 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
21 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
22 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
23 people. Defendants further intentionally misrepresented or concealed material facts with the
24 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
25 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
26 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
27 SIMPSON and Does 1 through 25.

28 **FOURTH CAUSE OF ACTION**

1 **CIVIL CODE §51.7**

2 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

3 86. Plaintiff realleges and incorporates herein by this reference each allegation in this
4 Complaint.

5 87. Beginning in or about May of 2018 through August of 2018, Defendant Simpson
6 committed violent acts of sexual abuse against Plaintiff. Defendant Simpson further threatened
7 violent acts of sexual abuse, some of which he carried out on Plaintiff, that a reasonable person
8 would have been intimidated by and believed he was capable of and would carry out such acts of
9 violence.

10 88. A substantial motivating reason for Defendant Simpson’s sexual abuse of Plaintiff
11 was her sex and gender as a female. He further perceived her as an easy target due to her
12 disposition of being insecure, emotionally devastated and isolating, submissive, and a people
13 pleaser. He also knew that she routinely took responsibility for the bad behavior of others, and
14 had trouble saying “no” to people. Defendant Simpson learned about her weakened state and
15 disposition through therapy sessions in which he was able to get her to share her deepest darkest
16 secrets, including her family-of-origin issues that caused her to doubt herself and her self-worth,
17 especially in relationships with men.

18 89. Defendant Simpson’s sexual violence and threats of sexual violence were
19 substantial factors in causing harm to Plaintiff.

20 90. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
21 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
22 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
23 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
24 Defendant BBC’s elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
25 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
26 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
27 censored and ousted Plaintiff.

28 91. As a proximate result of Defendants’ conduct, Plaintiff has employed and

1 continues to employ physicians, and other health care providers to examine, treat, and care for
2 her, and has incurred and continues to incur medical and incidental expenses.

3 92. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
4 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
5 opportunities, and experience, and other special and compensatory damages, along with
6 prejudgment interest.

7 93. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
8 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
9 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
10 inconvenience, embarrassment, and other non-economic losses.

11 94. As a further proximate result of Defendants' conduct, Plaintiff is entitled to civil
12 penalties of twenty-five thousand dollars per occurrence, along with attorney's fees that may be
13 determined by the Court.

14 95. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified
15 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
16 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
17 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
18 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
19 people. Defendants further intentionally misrepresented or concealed material facts with the
20 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
21 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
22 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
23 SIMPSON and Does 1 through 25.

24 **FIFTH CAUSE OF ACTION**

25 **CIVIL CODE §52.4**

26 **AGAINST DEFENDANTS SIMPSON and DOES 1 - 25**

27 96. Plaintiff realleges and incorporates herein by this reference each allegation in this
28 Complaint.

1 97. Beginning in or about May of 2018 through August of 2018, Defendant Simpson
2 committed acts of gender violence against Plaintiff. Defendant Simpson used, attempted to use,
3 and threatened to use physical force, by physical intrusion or physical invasion of a sexual nature
4 under coercive conditions based on Plaintiff's gender as a female.

5 98. Defendant Simpson's gender violence was a substantial factor in causing harm to
6 Plaintiff.

7 99. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
8 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
9 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
10 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
11 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
12 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
13 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
14 censored and ousted Plaintiff.

15 100. As a proximate result of Defendants' conduct, Plaintiff has employed and
16 continues to employ physicians, and other health care providers to examine, treat, and care for
17 her, and has incurred and continues to incur medical and incidental expenses.

18 101. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
19 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
20 opportunities, and experience, and other special and compensatory damages, along with
21 prejudgment interest.

22 102. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
23 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
24 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
25 inconvenience, embarrassment, and other non-economic losses.

26 103. As a further proximate result of Defendants' conduct, Plaintiff is entitled to civil
27 penalties of twenty-five thousand dollars per occurrence, along with attorney's fees that may be
28 determined by the Court.

1 especially in relationships with men.

2 108. Beginning on or about August 6, 2018, Defendant BBC and Does 25 through 50
3 embarked on an elaborate scheme to cover-up Defendant Simpson's sexual misconduct by,
4 among other acts, claiming the sexualized behavior was a consensual relationship, reestablishing
5 Defendant Simpson within the Bridge Church and community of Bakersfield, and censoring and
6 ousting Plaintiff, all of which interfered with her right to full and equal accommodations,
7 advantages, facilities, privileges, and services at the Bridge Church.

8 109. A substantial motivating reason for the cover-up of Defendant Simpson's sexual
9 misconduct by Defendant BBC and Does 25 through 50 was Plaintiff's sex and gender as a
10 female.

11 110. Defendant Simpson's sexualized behavior and Defendant BBC and Does 25
12 through 50's cover-up of Defendant Simpson's sexual misconduct were substantial factors in
13 causing harm to Plaintiff.

14 111. Defendants Simpson, BBC, and Does 1 through 50's conduct violated Plaintiff's
15 statutory and constitutional rights be free from sexual abuse, harassment, and discrimination
16 based on her sex and gender.

17 112. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
18 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
19 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
20 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
21 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
22 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
23 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
24 censored and ousted Plaintiff.

25 113. As a proximate result of Defendants' conduct, Plaintiff has employed and
26 continues to employ physicians, and other health care providers to examine, treat, and care for
27 her, and has incurred and continues to incur medical and incidental expenses.

28 114. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues

1 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
2 opportunities, and experience, and other special and compensatory damages, along with
3 prejudgment interest.

4 115. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
5 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
6 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
7 inconvenience, embarrassment, and other non-economic losses.

8 116. As a further proximate result of Defendants' conduct, Plaintiff is entitled to a
9 maximum of three times the amount of actual damages in amount no less than four-thousand
10 dollars per occurrence, along with attorney's fees that may be determined by the Court.

11 117. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified
12 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
13 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
14 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
15 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
16 people. Defendants further intentionally misrepresented or concealed material facts with the
17 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
18 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
19 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
20 SIMPSON and Does 1 through 25.

21 **SEVENTH CAUSE OF ACTION**

22 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

23 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

24 118. Plaintiff realleges and incorporates herein by this reference each allegation in this
25 Complaint.

26 119. Beginning in or about May of 2018 and continuing through August of 2018,
27 Defendant Simpson began repeated acts of trolling, grooming, and sexual abuse which were
28 intended to and/or performed with reckless disregard for the probability of causing severe

1 emotional distress to Plaintiff. Defendant Simpson’s conduct included but was not limited to
2 “unusual attention ... including such things as gifts, frequent social telephone calls, letters,
3 private visits, use of electronic/social media, or the maintenance of a special mentoring
4 relationship,” “flirtatious talk, innuendo or propositions,” “sexual jokes or offensive gestures,”
5 “intrusive sexual questions about [his] personal life,” “explicit descriptions of [his] own sexual
6 experiences,” and “unwanted physical contact such as touching, hugging, pinching patting and
7 kissing.” Defendant Simpson misused his power as an authority figure at Defendant BBC and
8 treating therapist of Plaintiff. He violated personal and professional boundaries by using force,
9 threat, coercion, intimidation, and promises for his own sexual gratification.

10 120. Beginning on or about August 6, 2018, Defendants BBC and Does 25 through 50
11 embarked on an elaborate scheme to cover-up Defendant Simpson’s sexual misconduct which
12 was intended to cause and/or was performed with reckless disregard for the probability of
13 causing severe emotional distress to Plaintiff. Defendant BBC and Does 25 through 50’s conduct
14 includes but is not limited to repeated interrogations by men for the purpose of classifying the
15 sexualized behavior as a consensual affair rather than sexual abuse. Defendant BBC and Does 25
16 through 50 misused their authority and power by, among acts, failing to disclose that a male
17 counselor’s sexualized behavior with a female cannot be an affair because the “power of
18 imbalance precludes the possibility of a consensual relationship.” Defendant BBC and Does 25
19 through 50 also failed to disclose that Plaintiff had been the victim of a “sexual predator,” and
20 that Defendant Simpson’s actions were textbook “trolling,” “grooming,” and “sexual abuse.”
21 Contrary to the USMB’s policies, Defendant Simpson’s sexualized behavior was not reported to
22 the District Manager for USMB Pacific District Conference by Defendant BBC. Due to
23 Defendant BBC’s failure to comply with this procedure, Plaintiff was not aware of nor given the
24 opportunity to have an independent investigation by unbiased and professionally trained
25 individuals. Further, Defendant BBC and Does 25 through 50 deceitfully and/or wrongfully
26 reestablished Defendant Simpson into the ministry and the community of Bakersfield.

27 121. Defendants BBC and Does 25 through 50 were aware of the sexually assaultive
28 conduct, sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other

1 unlawful and wrongful conduct of Defendant Simpson through, among other means, the
2 publications, literature, and training they had received on the prevalence of sexual misconduct
3 and abuse within church organizations, and importance of identifying and recognizing sexualized
4 behavior. Defendants BBC and Does 25 through 50 also ignored and/or disregarded the obvious
5 warning signs of sexual impropriety and deviance, along with the violations of the organization's
6 policies and procedures by Defendant Simpson.

7 122. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
8 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
9 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
10 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
11 Defendant BBC's elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
12 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
13 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
14 censored and ousted Plaintiff.

15 123. Defendants' conduct was a substantial factor in causing harm, including but not
16 limited to severe emotional distress, to Plaintiff.

17 124. As a proximate result of Defendants' conduct, Plaintiff has employed and
18 continues to employ physicians, and other health care providers to examine, treat, and care for
19 her, and has incurred and continues to incur medical and incidental expenses.

20 125. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
21 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
22 opportunities, and experience, and other special and compensatory damages, along with
23 prejudgment interest.

24 126. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
25 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
26 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
27 inconvenience, embarrassment, and other non-economic losses.

28 127. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified

1 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
2 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
3 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
4 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
5 people. Defendants further intentionally misrepresented or concealed material facts with the
6 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
7 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
8 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
9 SIMPSON and Does 1 through 25.

10 **EIGHTH CAUSE OF ACTION**

11 **BREACH OF FIDUCIARY, CONFIDENTIAL RELATIONSHIP**

12 **AGAINST DEFENDANTS SIMPSON, BBC, and DOES 1 - 50**

13 128. Plaintiff realleges and incorporates herein by this reference each allegation in this
14 Complaint.

15 129. Beginning in or about August of 2016 and continuing to August of 2018,
16 Defendant Simpson, in the course and scope of his work with and through the counseling center
17 at Defendant BBC and Does 25 through 50, was in a confidential relationship with Plaintiff and
18 her husband, in which he provided private, one-on-one, family and marital therapy services to
19 them, both separately and together. In his capacity as a family and marriage counselor,
20 Defendant Simpson owed a duty to act with the utmost good faith and in the best interests of
21 Plaintiff.

22 130. During the course of Defendant Simpson's therapy sessions with Plaintiff and her
23 husband, Defendant Simpson began telling them that they were in a very select group that he
24 counseled who he considered to be his "friends." Their "close friendship" with this authority
25 figure, who was highly respected both in and out of the church environment, made both of them
26 feel incredibly honored and special. As a result, Plaintiff opened up and shared her deepest
27 darkest secrets with him, especially in the sessions without her husband. Through Plaintiff's
28 disclosure of confidential, private, and extremely personal information about herself and her life,

1 Defendant Simpson discovered that she was insecure, emotionally devastated and isolating,
2 submissive, and a people pleaser. He also knew that she routinely took responsibility for the bad
3 behavior of others, and had trouble saying “no” to people. He knew that these character traits
4 made her vulnerable and an easy target for sexual abuse.

5 131. Beginning on or about May of 2018 and continuing through August 2, 2018,
6 Defendant Simpson began a continuous pattern of sexually inappropriate and injurious conduct
7 against Plaintiff. His actions began as trolling, then moved into grooming, and finally sexual
8 abuse of Plaintiff, all of which were performed for his own sexual gratification.

9 132. Plaintiff did not give informed consent to Defendant Simpson’s use of her
10 confidential, private, and extremely personal information, which were not a matter of general
11 knowledge, for the purpose of violating his personal and professional boundaries with her
12 through the use of mental and emotional manipulation, force, threat, coercion, intimidation, and
13 promises.

14 133. Defendant Simpson’s breach of fiduciary duties was a substantial factor in
15 causing harm to Plaintiff.

16 134. Defendants BBC and Does 20 through 50 ratified the sexually assaultive conduct,
17 sexualized behavior, sexual abuse, sexual discrimination, sexual harassment, and other unlawful
18 and wrongful conduct of Defendant Simpson by, among other acts and omissions, the biased,
19 one-sided, discriminatory, harassing, embarrassing, humiliating, and shaming actions by
20 Defendant BBC’s elders, including Mr. Gowling, and PastorServe after Plaintiff reported the
21 sexualized behavior by Defendant Simpson. They also deceitfully and/or wrongfully
22 reestablished Defendant Simpson into the ministry and the community of Bakersfield, and
23 censored and ousted Plaintiff.

24 135. As a proximate result of Defendants’ conduct, Plaintiff has employed and
25 continues to employ physicians, and other health care providers to examine, treat, and care for
26 her, and has incurred and continues to incur medical and incidental expenses.

27 136. As a proximate result of Defendants’ conduct, Plaintiff has suffered and continues
28 to suffer financial damage and hardship, past and future lost earnings, employment benefits,

1 opportunities, and experience, and other special and compensatory damages, along with
2 prejudgment interest.

3 137. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
4 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
5 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
6 inconvenience, embarrassment, and other non-economic losses.

7 138. The conduct of Defendants SIMPSON and Does 1 through 25, by and/or ratified
8 by managing agents of Defendants BBC and/or Does 26 through 50, was performed with the
9 intent to cause injury, was despicable and a willful, knowing, and deliberate disregard for the
10 rights and well-being of Plaintiff, which subjected her to cruel and unjust hardship, and which
11 was so vile, base, or contemptible that it would be looked down on and despised by reasonable
12 people. Defendants further intentionally misrepresented or concealed material facts with the
13 intent to and which did cause harm to Plaintiff. Defendants' conduct constitutes malice,
14 oppression, and/or fraud as defined in California Civil Code §3294, entitling Plaintiff to an
15 award of punitive or exemplary damages in an amount sufficient to punish and deter Defendants
16 SIMPSON and Does 1 through 25.

17 **NINTH CAUSE OF ACTION**

18 **NEGLIGENCE**

19 **AGAINST DEFENDANT BBC and DOES 25 - 50**

20 139. Plaintiff realleges and incorporates herein by this reference each allegation in this
21 Complaint.

22 140. Plaintiff is informed and believes that, at all relevant times alleged herein,
23 Defendants BBC and Does 25 through 50 owned, controlled, and/or were responsible, in some
24 manner, for the operations or management of the Bridge Church, which included but was not
25 limited to the counseling center and services, employees, and contractors.

26 141. Defendants owed a duty of care to the members of its church organization to use
27 reasonable care in the operations and management of the Bridge Church, which included the
28 hiring, training, supervision, and retention of employees, agents, and contractors in their work

1 with the Bridge Church.

2 142. Defendants further owed a duty of care to the members of its church organization,
3 especially members seeking family and marriage therapy through the counseling center, to take
4 reasonable steps to prevent the sexual assault, battery, harassment, abuse, violence, and
5 discrimination, infliction of emotional distress, and breach of fiduciary and confidential relations
6 by officers, directors, leaders, elders, employees, contractors, and other members at the Bridge
7 Church.

8 143. Plaintiff is informed and believes that, at all relevant times alleged herein,
9 Defendants knew or in the exercise of reasonable care should have known that Defendant
10 Simpson was incompetent and unfit to provide family and marriage therapy to members of the
11 church organization due, in part, to his obsession with sex, sexually graphic, explicit, and
12 inappropriate language, comments, and statements, violation of procedures and policies relating
13 to the counseling of females, and his sexualized behaviors of trolling, grooming, and sexual
14 abuse of females, each of which they knew or should have known created a serious, substantial,
15 and foreseeable risk of injury to the public, especially to females at the Bridge Church.

16 144. Plaintiff is informed and believes that, at all relevant times alleged herein,
17 Defendants knew or in the exercise of reasonable care should have known that Mr. Gowling and
18 other key members of Defendant BBC were incompetent and unfit to properly investigate, hire,
19 train, and supervise employees and contractors who provided family and marriage therapy to
20 members of the church organization at the Bridge Church.

21 145. Plaintiff is informed and believes that, at all relevant times alleged herein,
22 Defendants knew or in the exercise of reasonable care should have known that the elders at
23 Defendant BBC, including Mr. Gowling, along with PastorServe, were untrained in investigating
24 claims of sexual misconduct, and thereby incompetent and unfit to investigate and handle
25 Plaintiff's claim of sexualized behavior against Defendant Simpson. Defendants further knew or
26 should have known that the elders at Defendant BBC, including Mr. Gowling, and PastorServe,
27 could not perform a fair and impartial investigation due, in part, to the pending fundraising
28 campaign to turn their church organization into a megachurch.

1 146. Defendants breached their duties of care by referring Plaintiff for family and
2 marriage counseling to Defendant Simpson. Plaintiff did not discover and did not know or
3 recognize his behavior as sexual misconduct due to her diminished mental and emotional
4 condition from a recent personal loss, insecurities, submissive and people pleasing character
5 traits, and family-of-origin issues that caused her to doubt herself and her self-worth, especially
6 in relationships with men.

7 147. Defendants breached their duties of care by failing to use reasonable care to
8 properly investigate, train, supervise, and terminate Defendant Simpson.

9 148. Defendants also breached their duties of care by failing to use reasonable care in
10 their investigation and handling of the sexual abuse allegations brought by Plaintiff against
11 Defendant Simpson.

12 149. Defendants' breaches of their duties of care owed to Plaintiff were substantial
13 factors in causing the injuries and damages suffered by Plaintiff.

14 150. As a proximate result of Defendants' conduct, Plaintiff has employed and
15 continues to employ physicians, and other health care providers to examine, treat, and care for
16 her, and has incurred and continues to incur medical and incidental expenses.

17 151. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues
18 to suffer financial damage and hardship, past and future lost earnings, employment benefits,
19 opportunities, and experience, and other special and compensatory damages, along with
20 prejudgment interest.

21 152. As a further proximate result of Defendants' conduct, Plaintiff has suffered and
22 continues to suffer severe emotional distress, anguish, fright, horror, nervousness, grief, anxiety,
23 worry, shock, humiliation, shame, physical pain, mental suffering, loss of enjoyment of life,
24 inconvenience, embarrassment, and other non-economic losses.

25
26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff prays for judgment against each of the Defendants as follows:
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1. For special, general, and compensatory damages in amounts to be proven at the time of trial;
2. For punitive and exemplary damages in amounts to be proven at the time of trial against Defendant SIMPSON;
3. For statutory and civil penalties;
4. For attorney fees;
5. For pre-judgment interest at the prevailing statutory rates;
6. For costs of suit;
7. For injunctive relief; and
8. For such other relief as the Court may deem proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial for the causes of action set forth above.

Dated: July 22, 2020

BRADDOCK LAW APC

By: 

 LAURA SASAKI, ESQ.
 Attorneys for Plaintiff