

PARTIES

3. Stephen Holt is an individual residing in Brazos County, Texas. Mr. Holt is the father of L.H., a minor.

4. The General Council of the Assemblies of God is a foreign non-profit corporation with a principal place of business at 1445 N. Booneville Ave, Springfield, Missouri 76802, and may be served with citation by serving its registered agent, Corporation Service Company, at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

5. North Texas District Council Assemblies of God is a Texas non-profit corporation and may be served with citation by serving its registered agent, Gregg L. Headley, at 5241 FM 66, Waxahachie, Texas 75167.

6. Mountain Valley Fellowship is a Texas non-profit corporation and may be served with citation by serving its registered agent, Eli Russel J. Stewart, at 4107 Hunter Creek Drive, College Station, Texas 77845.

7. Chi Alpha Campus Ministries, College Station is a Texas non-profit corporation with a principal address of 4107 Hunter Creek Drive, College Station, Texas 77856, and may be served with citation by serving its registered agent, Eli Russell James Stewart, at 4107 Hunter Creek Drive, College Station, Texas 77845.

JURISDICTION AND VENUE

8. This Court has personal jurisdiction over Defendants because certain Defendants are residents of the State of Texas, all Defendants have sufficient

minimum contacts with the State of Texas, and the acts and/or omissions giving rise to the claims asserted herein occurred in Texas.

9. This Court has subject matter jurisdiction over Plaintiff's claims against Defendants because the amount in controversy exceeds this Court's minimum jurisdictional requirements.

10. Venue is proper in Harris County under § 15.002 of the Texas Civil Practice & Remedies Code because all or a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in Harris County.

INTRODUCTION

11. Defendant Chi Alpha Campus Ministries, College Station ("Chi Alpha") is a fraternal organization with over 300 chapters "on university campuses all over the world[,]" including Texas A&M University in College Station, Brazos County, Texas. <https://chialpha.com/about/our-story/>. Chi Alpha is closely connected with and, in fact, sponsored by Defendant The General Council of the Assemblies of God ("AG"):

WHO WE'RE SPONSORED BY

Chi Alpha is sponsored by the Assemblies of God (AG). That means the AG provides each local campus with support, resources and connectivity to a larger worldwide movement. They also work to equip the leaders of each local XA, both the vocational missionaries associated with each group and the student leaders.

<https://chialpha.com/about/our-story/>.

12. Daniel Savala ("Savala") has a long history of involvement with Defendants AG and Chi Alpha. Indeed, as early as 1980 (and again in 1991-1992), Savala served as a counselor at an AG camp in Kerrville, Texas and, in 1989, the

University of Louisiana-Lafayette yearbook identified Savala as a Chi Alpha staff member.

13. From approximately 1995 to 1997, Savala served as youth pastor at Clover Pass Community Church (“CPCC”) in Ketchikan, Alaska. Eli Stewart (“Stewart”)—who graduated from Ketchikan high school in 1998—was a regular attendee of CPCC and member of Savala’s youth group.

14. In January 2012, Savala was indicted on eleven (11) counts in Alaska after former male members of Savala’s youth group at CPCC alleged he sexually abused them during his tenure as youth pastor at CPCC. In July 2012, Savala was convicted of one count of third-degree sexual abuse and was released after serving ninety (90) days in prison. Savala was and is required to register annually as a sex offender.

15. On information and belief, Stewart was sexually abused by Savala as a youth in Ketchikan, Alaska. Nonetheless, following Savala’s indictment in 2012, Stewart petitioned Chi Alpha members to write letters on Savala’s behalf requesting leniency.

16. On information and belief, AG and Chi Alpha were made aware of Savala’s history of sexually abusing minors shortly after his conviction. Despite this knowledge, after his release, Savala moved to Texas and became involved with Chi Alpha at Sam Houston State University (“SHSU”) in Huntsville, Texas where Stewart was serving as part of the Chi Alpha pastoral team.

17. In or about 2017, Stewart relocated from SHSU to College Station, Texas where he relaunched a Chi Alpha chapter at Texas A&M University (“TAMU”) and planted a church, Mountain Valley Fellowship (“MVF”). Stewart served as lead pastor of MVF until 2023.

18. MVF is a church within the North Texas District of the AG and under the supervision and control of Defendant North Texas District Council Assemblies of God. Defendant North Texas District Council Assemblies of God, in turn, is a district/division of and under the supervision and control of Defendant AG.

19. During his tenure as pastor of MVF, Stewart allowed members of the TAMU Chi Alpha chapter, including Ryan Hoffart (“Hoffart”), William Johnson (“Johnson”), Bo Randolph (Randolph”) and Alex Owens (“Owens”), to serve as group leaders to youth and/or be around youth, including L.H., at MVF. He also allowed youth at MVF, including L.H., to be with and around Savala and thereby subjected to his deviant sexual propensities toward minor males.

20. In October 2021, Hoffart took L.H. to Savala’s home in Houston, Harris County, Texas where, among other things, Hoffart and Savala:

- a. made L.H. strip off his clothing and sit naked with the two of them in a small sauna;
- b. asked L.H. to touch Savala’s penis;
- c. attempted to grab L.H.’s penis; and
- d. made other inappropriate comments and engaged in other inappropriate conduct with L.H., who was merely thirteen years old at the time.

21. Thereafter, in August 2022, TAMU Chi Alpha members took L.H. with them on a leadership trip to Colorado, where, without informing L.H.'s parents, they took L.H. skinny dipping and engaged in other acts of grooming L.H. as they preyed upon his innocence.

22. And, in November 2022, at a Chi Alpha gathering led by TAMU Chi Alpha members and attended by L.H. upon their invitation:

- a. the Chi Alpha members showed L.H. their penises and played with themselves;
- b. a Chi Alpha member stroked his own penis in front of L.H. until he became erect;
- c. L.H. was "dry humped" by Hoffart, Johnson, Randolph and Owens;
- d. various Chi Alpha members showed L.H. their testicles or anuses;
- e. various Chi Alpha members pushed L.H.'s face into their crotches and made sexual noises and pulled L.H.'s pants down; and
- f. various Chi Alpha members played a game called "Fire Truck" where they would rub their hands on L.H.'s thighs and into his crotch.

23. In April or May of 2023, Stewart was removed as pastor of MVF. A statement from MVF said it had learned of "some major allegations against our Pastor and grievances against our church."

24. In September 2023, Savala was indicted in McClennan County, Texas on charges of "two or more acts of trafficking of persons by causing the boys to engage in such prohibited conduct as indecency with a child by contact, indecency with a child by exposure and sexual performance of a child."

25. Savala is currently incarcerated at the McClennan County jail in Waco, Texas.

CLAIMS FOR RELIEF

COUNT 1 - NEGLIGENCE (Against Assemblies of God)

26. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

27. Defendant Assemblies of God was negligent in the following particulars:

- a. Failing to properly monitor and supervise the activities of Defendants North Texas Assemblies of God, Mountain Valley Fellowship and Chi Alpha Christian Fellowship;
- b. Failing to properly investigate Savala's criminal background when it knew or should have known Savala was a convicted sex offender;
- c. Failing to warn children and families, including Plaintiff, of the dangers posed by Savala—dangers of which Defendant Assemblies of God knew or should have known;
- d. Allowing children within its organization and under its control to be exposed to Savala;
- e. Allowing Savala access to children within its organization; and
- f. Allowing Savala a leadership role over children within its organization.

28. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

Vicarious Liability

29. Because Defendants North Texas District Council Assemblies of God, Mountain Valley Fellowship and Chi Alpha Campus Ministries, College Station are agents of Defendant The General Council of the Assemblies of God, Defendant The

General Council of the Assemblies of God is vicariously liable for the acts and omissions of Defendants North Texas District Council Assemblies of God, Mountain Valley Fellowship and Chi Alpha Campus Ministries, College Station, as those acts and omissions are described below.

COUNT 2 - NEGLIGENCE
(Against North Texas Assemblies of God)

30. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

31. Defendant North Texas Assemblies of God was negligent in the following particulars:

- a. Failing to properly monitor and supervise the activities of Defendant Mountain Valley Fellowship;
- b. Failing to properly investigate Savala's criminal background when it knew or should have known Savala was a convicted sex offender;
- c. Failing to warn children and families, including Plaintiff, of the dangers posed by Savala—dangers of which Defendant North Texas Assemblies of God knew or should have known;
- d. Allowing children within its organization and under its control to be exposed to Savala;
- e. Allowing Savala access to children within its organization; and
- f. Allowing Savala a leadership role over children within its organization.

32. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

Vicarious Liability

33. Because Defendant Mountain Valley Fellowship is an agent of Defendant North Texas District Council Assemblies of God, Defendant North Texas District Council Assemblies of God is vicariously liable for the acts and omissions of Defendant Mountain Valley Fellowship, as those acts and omissions are described below. Likewise, because Stewart is an agent of Defendant North Texas District Council Assemblies of God, Defendant North Texas District Council Assemblies of God is also vicariously liable for the acts and omissions of Stewart, as those acts and omissions are described below.

COUNT 3 - NEGLIGENCE (Against Mountain Valley Fellowship)

34. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

35. Defendant Mountain Valley Fellowship was negligent in the following particulars:

- a. Failing to properly monitor and supervise the activities of Stewart;
- b. Failing to properly monitor and supervise the activities of Hoffart, Randolph, Johnson and Owens;
- c. Failing to properly investigate Savala's criminal background when it knew or should have known Savala was a convicted sex offender;
- d. Failing to warn children and families, including Plaintiff, of the dangers posed by Savala—dangers of which Defendant Mountain Valley Fellowship knew or should have known;
- e. Failing to properly investigate/screen Hoffart, Randolph, Johnson and Owens;

- f. Failing to warn children and families, including Plaintiff, of the dangers posed by Hoffart, Randolph, Johnson and Owens—dangers of which Defendant Mountain Valley Fellowship knew or should have known;
- g. Providing Hoffart, Randolph, Johnson and Owens positions which engendered trust and gave them authority and power over minor children, including Plaintiff;
- h. Providing Hoffart, Randolph, Johnson and Owens positions and environments which created opportunities for them to take emotional and physical advantage of minor children, including Plaintiff;
- i. Providing Hoffart, Randolph, Johnson and Owens positions where they would have unsupervised control over minor children and which engendered trust creating an environment where they would have unsupervised control of minor children, including Plaintiff;
- j. Allowing Hoffart, Randolph, Johnson and Owens to come into contact and association with minor children, including Plaintiff, when Defendant Mountain Valley Fellowship knew or should have known that Hoffart, Randolph, Johnson and Owens were peculiarly likely to molest minor children and that the environment created around Hoffart, Randolph, Johnson and Owens by Defendant Mountain Valley Fellowship afforded Hoffart, Randolph, Johnson and Owens a peculiar opportunity to commit the acts of molestation described herein.
- k. Failing to have proper policies, procedures and protocols in place within its church to ensure dangerous individuals, such as Hoffart, Randolph, Johnson and Owens, would not be allowed to serve in leadership roles and afforded access to minor children; and
- l. Allowing children within its congregation to be exposed to Savala, Hoffart, Randolph, Johnson and Owens.

36. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

Vicarious Liability

37. Because Eli Stewart is an agent of Defendant Mountain Valley Fellowship, Defendant Mountain Valley Fellowship is vicariously liable for the acts and omissions of Eli Stewart, which acts and omissions include:

- a. Failing to properly monitor and supervise the acts of Savala, Hoffart, Randolph, Johnson and Owens;
- b. Failing to properly investigate Savala's criminal background when he knew or should have known Savala was a convicted sex offender;
- c. Failing to warn children and families, including Plaintiff, of the dangers posed by Savala—dangers of which Stewart knew or should have known when, on information and belief, he himself was sexually abused by Savala as a minor and when, following Savala's indictment in 2012, Stewart petitioned Chi Alpha members to write letters on Savala's behalf requesting leniency.
- d. Failing to properly investigate/screen Hoffart, Randolph, Johnson and Owens;
- e. Failing to warn children and families, including Plaintiff, of the dangers posed by Hoffart, Randolph, Johnson and Owens—dangers of which Stewart knew or should have known;
- f. Providing Savala, Hoffart, Randolph, Johnson and Owens positions which engendered trust and gave them authority and power over minor children, including Plaintiff;
- g. Providing Savala, Hoffart, Randolph, Johnson and Owens positions and environments which created opportunities for them to take emotional and physical advantage of minor children, including Plaintiff;
- h. Providing Savala, Hoffart, Randolph, Johnson and Owens positions where they would have unsupervised control over minor children and which engendered trust creating an environment where they would have unsupervised control of minor children, including Plaintiff;
- i. Allowing Savala, Hoffart, Randolph, Johnson and Owens to come into contact and association with minor children, including Plaintiff, when Stewart knew or should have known that Savala, Hoffart, Randolph,

Johnson and Owens were peculiarly likely to molest minor children and that the environment created around Savala, Hoffart, Randolph, Johnson and Owens by Defendant Mountain Valley Fellowship afforded Savala, Hoffart, Randolph, Johnson and Owens a peculiar opportunity to commit the acts of molestation described herein.

- j. Failing to have proper policies, procedures and protocols in place within Mountain Valley Fellowship to ensure dangerous individuals, such as Savala, Hoffart, Randolph, Johnson and Owens, would not be allowed to serve in leadership roles and afforded access to minor children; and
- k. Allowing children to be exposed to Savala, Hoffart, Randolph, Johnson and Owens.

38. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

**COUNT 4 - NEGLIGENCE
(Against Chi Alpha Christian Fellowship)**

39. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

40. Defendant Chi Alpha Christian Fellowship was negligent in the following particulars:

- a. Failing to properly monitor and supervise the activities of Savala, Hoffart, Randolph, Johnson and Owens;
- b. Failing to properly investigate Savala's criminal background when it knew or should have known Savala was a convicted sex offender;
- c. Failing to warn children and families, including Plaintiff, of the dangers posed by Savala—dangers of which Defendant Chi Alpha Christian Fellowship knew or should have known;
- d. Failing to properly investigate/screen Hoffart, Randolph, Johnson and Owens;

- e. Failing to warn children and families, including Plaintiff, of the dangers posed by Hoffart, Randolph, Johnson and Owens—dangers of which Defendant Chi Alpha Christian Fellowship knew or should have known;
- f. Providing Savala, Hoffart, Randolph, Johnson and Owens positions which engendered trust and gave them authority and power over minor children, including Plaintiff;
- g. Providing Savala, Hoffart, Randolph, Johnson and Owens positions and environments which created opportunities for them to take emotional and physical advantage of minor children, including Plaintiff;
- h. Providing Savala, Hoffart, Randolph, Johnson and Owens positions where they would have unsupervised control over minor children and which engendered trust creating an environment where they would have unsupervised control of minor children, including Plaintiff;
- i. Allowing Savala, Hoffart, Randolph, Johnson and Owens to come into contact and association with minor children, including Plaintiff, when Defendant Chi Alpha Christian Fellowship knew or should have known that Savala, Hoffart, Randolph, Johnson and Owens were peculiarly likely to molest minor children and that the environment created around Savala, Hoffart, Randolph, Johnson and Owens by Defendant Chi Alpha Christian Fellowship afforded Savala, Hoffart, Randolph, Johnson and Owens a peculiar opportunity to commit the acts of molestation described herein;
- j. Failing to have proper policies, procedures and protocols in place within its organization to ensure dangerous individuals, such as Savala, Hoffart, Randolph, Johnson and Owens, would not be allowed to serve in leadership roles and afforded access to minor children; and
- k. Allowing children to be exposed to Savala, Hoffart, Randolph, Johnson and Owens.

41. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

Vicarious Liability

42. Because Hoffart, Randolph, Johnson and Owens are agents of Defendant Chi Alpha Christian Fellowship, Defendant Chi Alpha Christian

Fellowship is vicariously liable for the acts and omissions of Hoffart, Randolph, Johnson and Owens, which acts and omissions include:

- a. Placing minor children, including Plaintiff, in environments where it was reasonably foreseeable the minor children, including Plaintiff, would be sexually abused, including but not limited to, facilitating encounters with, and allowing Plaintiff to be in the presence of, Savala—an individual Hoffart, Randolph, Johnson and Owens knew or should have known was a convicted sex offender; and
- b. Failing to protect and/or warn minor children and their families, including Plaintiff, when Hoffart, Randolph, Johnson and Owens knew or should have known that minor children, including Plaintiff, were being sexually abused and/or were in danger of being sexually abused as Hoffart, Randolph, Johnson and Owens had previously witnessed Plaintiff being sexually abused.

43. These acts and omissions, taken by themselves or in combination, were a proximate cause of Plaintiff's injuries and damages.

**COMPENSATORY DAMAGES
(Sought from all Defendants)**

44. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

45. Plaintiff has each suffered damages caused by the tortious conduct of Defendants described above, which conduct was negligent, grossly negligent and reckless. Additionally, it is reasonably probable that Plaintiff will continue suffering such damages in the future.

46. The damages suffered by Plaintiff include past and future physical pain and suffering, past and future mental anguish, and past and future loss of the enjoyment of life. Plaintiff also seeks to recover pre-judgment and post-judgment interest at the highest rate allowed by law.

PUNITIVE DAMAGES
(Sought from all Defendants)

47. Plaintiff incorporates the allegations in all previous paragraphs of this Petition as if fully set forth herein.

48. As alleged above, the harm to Plaintiff resulted from the malice, gross negligence, (as those terms are defined in Section 41.001 of the Texas Civil Practice and Remedies Code) or both of each of the Defendants. Accordingly, Plaintiff seeks recovery of exemplary damages from each Defendant as allowed under Chapter 41 of the Texas Civil Practice and Remedies Code.

RULE 193.7 NOTICE

49. All documents produced by Defendants in response to written discovery served herein are authenticated for use at any pretrial proceeding and trial under Rule 193.7 of the Texas Civil Procedure and Plaintiff intends to use all such documents as allowed under that Rule.


JURY DEMAND

50. Plaintiff demands a jury trial and tenders the appropriate fee herewith.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that Defendants be cited to appear and answer herein, for judgment against Defendants as pleaded herein, and for all other just relief, at law or in equity, to which Plaintiff may be justly entitled.

Dated: January 25, 2024



Anthony Bruster
Texas Bar No. 24036280
akbruster@brusterpllc.com

John C. Hull

Texas Bar No. 24050791

jhull@brusterpllc.com

T. Wesley Holmes

Texas Bar No. 09908495

wholmes@brusterpllc.com

BRUSTER PLLC

680 N. Carroll Ave., Suite 110

Southlake, Texas 76092

Telephone: (817) 601-9564

Facsimile: (817) 796-2929

Attorneys for Plaintiff