

**IN THE CIRCUIT COURT OF THE SIXTEENTH JUDICIAL CIRCUIT
KANE COUNTY, ILLINOIS**

JOHN DOE,

Plaintiff,

v.

FIRST BAPTIST CHURCH OF GENEVA,
d/b/a CHAPELSTREET CHURCH,

[REDACTED]

BRIAN COFFEY,

[REDACTED]

and

DON VANTHOURNOUT,

[REDACTED]

Defendants.

10/21/2025 10:17 AM

COMPLAINT

DEMAND FOR JURY TRIAL

[REDACTED]

COMPLAINT

COMES NOW Plaintiff, by and through his counsel, OnderLaw, LLC, states and
alleges as follows:

[REDACTED]

INTRODUCTION

1. This is an action for damages arising from the sexual abuse and exploitation of Plaintiff by Defendant Don Vanthournout, a church leader in Defendant First Baptist Church of Geneva, d/b/a Chapelstreet Church. At the time of the abuse, Plaintiff was the child of religious missionaries who were on furlough at their home church, Chapelstreet, where Defendant Brian Coffey served as Lead Pastor.

PARTIES

2. John Doe is a resident of British Columbia, Canada, and was born in 2004. At the time of the alleged sexual assaults, John Doe was a minor who was staying at Defendant Don Vanthournout's residence in Kane County, Illinois.

3. Defendant FIRST BAPTIST CHURCH OF GENEVA, d/b/a CHAPELSTREET CHURCH (hereinafter, "Defendant Chapelstreet" or "Chapelstreet") is a not-for-profit corporation doing business in Illinois with its principal place of business located at 2300 South Street, Geneva, Kane County, Illinois 60134.

4. Defendant BRIAN COFFEY (hereinafter, "Defendant Coffey" or "Coffey") is the current Interim Lead Pastor and former Lead Pastor of Chapelstreet. Upon information and belief, Defendant Coffey is a resident of the State of Illinois. Defendant Coffey is being sued in his professional capacity as former Lead Pastor and individually.

5. Defendant DON VANTHOURNOUT (hereinafter, "Defendant Vanthournout" or "Vanthournout") is an individual residing in Kane County, Illinois. Defendant Vanthournout is being sued individually.

JURISDICTION AND VENUE

6. Venue is proper in the Circuit Court of Kane County, Illinois, pursuant to 735 ILCS 5/2-101(1) and (2) because the causes of action stated herein arose out of acts and omissions that occurred at Defendant First Baptist Church of Geneva, d/b/a Chapelstreet Church, whose principal place of business was and still is located in Kane County, Illinois, and the residence of Defendant Don Vanthournout, which was located in Kane County, Illinois.

7. Moreover, the amount in controversy exceeds \$50,000.

8. Jurisdiction is proper pursuant to 735 ILCS 5/209 because Defendants, at all relevant times: (1) transacted business in Illinois; (2) committed tortious actions within Illinois, and/or (3) owned, used, or possessed real estate in the State of Illinois.

9. The State of Illinois has both general and specific jurisdiction over Defendants First Baptist Church of Geneva, d/b/a Chapelstreet, and Defendant Brian Coffey, which had and still have their principal place of business located in Kane County, Illinois.

10. The State of Illinois has specific jurisdiction over Defendant Brian Coffey because the tortious conduct alleged herein occurred in Kane County, Illinois.

11. The State of Illinois has specific jurisdiction over Defendant Don Vanthournout because the sexual abuse and tortious conduct alleged herein occurred in Kane County, Illinois.

12. At all relevant times, this action relates to and arises out of contacts created in the State of Illinois by these Defendants.

13. The Defendants' connections with the State of Illinois are consistent with the requirements of the Due Process Clause of the Fourteenth Amendment because each Defendant has purposely availed itself of the privilege of conducting activities in Illinois, the causes of action arising out of the acts and omissions that occurred in Illinois, and each Defendants' activities are so substantially connected to Illinois that the exercise of jurisdiction over each Defendant is fair and reasonable.

FACTS APPLICABLE TO ALL COUNTS

14. Upon information and belief, Plaintiff states the following:

CHAPELSTREET CHURCH

15. Defendant Chapelstreet was incorporated as a not-for-profit organization in the State of Illinois in 1957.

16. Chapelstreet's corporate name is "*First Baptist Church of Geneva*," and it operates under the assumed name of "*Chapelstreet Church*."

17. Chapelstreet is "...an evangelical, multi-site megachurch in the Chicago suburbs."¹ It has four campuses, three in Geneva, Illinois, and one in Aurora, Illinois.

18. In its "Bylaws of First Baptist Church of Geneva," Chapelstreet claims affiliation with "...the Baptist Christian denomination known as Converge (formerly

¹ Josh Shepard, Chicago-Area Megachurch Pastor on Leave Due to 'Use of Alcohol' and 'Concealment' of Wrongdoing (January 9, 2024), <https://julieroys.com/chicago-area-megachurch-pastor-on-leave-due-to-use-of-alcohol-and-concealment-of-wrongdoing/>.

known as the Baptist General Conference) and the local mission of Converge known as Converge MidAmerica (formerly known as the Midwest Baptist Conference).”²

19. Chapelstreet claims that its “*vision*” is to be a “*family of neighborhood churches, committed to transforming lives and impacting the world with the gospel of Jesus Christ.*”³

20. Chapelstreet also claims that its mission is to “*...be a place where people can experience grace, grow in faith, and make an impact...*”⁴

21. In Article IV of its Bylaws, Chapelstreet states that its responsibility is to “*...assist each individual believer to discover and develop his or her spiritual gifts, and to equip each believer for Godly living and ministry.*”⁵

22. Regarding Chapelstreet’s Lead Pastor, the Bylaws state, “*The Lead Pastor will be the principal executive officer of the Church and will in general manage all of the spiritual and business ministries and programs of the Church in accordance with these bylaws and policies adopted by the Executive Counsel.*”⁶ Specifically:

A. “*The Lead Pastor will have the authority to hire, supervise, and terminate all other Church employees, including other pastoral staff.*”⁷

DEFENDANT BRIAN COFFEY

23. Currently, Defendant Brian Coffey is Chapelstreet’s “*Interim Lead Pastor.*”⁸

² <https://chapelstreet.church/wp-content/uploads/2024/04/Bylaws-9.2022.pdf>, at p. 1.

³ *Id.*

⁴ *Id.*

⁵ *Id.* at p. 3.

⁶ *Id.* at p. 9.

⁷ *Id.*

⁸ <https://chapelstreet.church/staff/>

24. According to Chapelstreet's website, Coffey "*has served at Chapelstreet for 39 years: first as Youth Pastor, then as Senior Pastor, and most recently as Pastor of Leadership & Development as well as the Campus Pastor at our South Street Campus.*"⁹

25. From the mid-1990's until 2016, Coffey served as Chapelstreet's Lead Pastor.

26. In 2016, Coffey transitioned to a mentoring and training role until 2024, when Coffey was appointed "*Interim Lead Pastor.*"

27. At all relevant times, Coffey was either Lead Pastor or in a leadership role within Chapelstreet.

28. As Lead Pastor, Coffey was the principle executive officer of Chapelstreet and had a duty and the authority to hire, supervise and terminate Church employees and/or agents, including Church volunteers.

29. As Lead Pastor, Coffey had a duty to the parishioners of Chapelstreet to warn of known dangers.

DEFENDANT VANTHOURNOUT

30. At all relevant times, Defendant Vanthournout was an employee and/or agent of Chapelstreet.

31. At all relevant times, Vanthournout served in various leadership roles within Chapelstreet, such as:

⁹ *Id.*

A. Discipleship Leader of TREK, which was a program within Chapelstreet's Student Ministries, a high school student ministry;

B. Leader of Chapelstreet youth programs such as Teen Mission;

C. Leader of Chapelstreet's "Early Risers," a weekly Bible study group;
and

D. Sponsor of Plaintiff and his family during missionary furlough trips to Chapelstreet.

32. At all relevant times, Defendants Chapelstreet and Coffey placed Vanthournout in leadership roles within the church, thus holding him out to the community as a trusted employee and/or agent of the congregation.

VICTIM #1 AND DEFENDANT VANTHOURNOUT

33. In 1983, 14-year-old Victim #1 and Defendant Vanthournout both attended the same Baptist church in St. Charles, Illinois.

34. Vanthournout, who was then in his twenties, befriended Victim #1 as a sponsor of the church youth group. Victim #1 and Vanthournout developed a "*friendship*" and they spent considerable time together during bible studies and youth group functions.

35. As their interactions increased in frequency, Vanthournout began grooming Victim #1 by giving him frequent hugs, forcing Victim #1 to hold his hand, and pressing his erection against Victim #1 while the two would "*wrestle*."

36. In the summer of 1983, Vanthournout obtained permission from Victim #1's father to take Victim #1 to a cabin in Harris Park, Colorado. The trip lasted approximately

one week. Victim #1 and Vanthournout stayed at the cabin together, with Vanthournout having primary care, custody, and control of Victim #1.

37. On one occasion, Victim #1 and Vanthournout each went to their separate rooms in the cabin to sleep for the night. Vanthournout asked Victim #1 to join him in his (Vanthournout's) bed, which Victim #1 declined.

38. After Victim #1 declined Vanthournout's invitation to bed, Vanthournout responded by relentlessly shaming Victim #1.

39. Feeling scared and helpless, Victim #1 surrendered to Vanthournout's pressure and laid in the bed. As he laid down in the bed, Vanthournout pulled Victim #1 close enough to him that he could feel Vanthournout's erection pressing against his buttocks. Vanthournout then proceeded to touch Victim #1's genitals. When Victim #1 tried to remove Vanthournout's hand, the adult overpowered the 14-year-old and continued touching his genitals.

40. After the trip to Colorado, Victim #1 was able to distance himself from Vanthournout. Over the next 24 years, Victim #1 suppressed the trauma of his abuse. As Victim #1 got older he attended a different church, Chapelstreet. Vanthournout also attended Chapelstreet, but Victim #1 was able to avoid him by attending different services.

41. In August of 2007, Victim #1 finally sought healing and forgiveness for the sexual abuse he suffered at the cabin in Colorado. Victim #1 wrote and sent Vanthournout a letter expressing his pain, grief, and the desire for a genuine apology. The letter sent to Vanthournout was not "general" in any way. The letter contained the exact facts recited above in paragraphs 36 through 39.

42. Specifically, in Victim #1's words, the letter to Vanthournout detailed the following:

A. *"And, I always remember you had an erection when we'd wrestle, and you made me aware of its presence. I grew to hate the wrestling events, that only occurred at your apartment in private, as it always seemed to excite you sexually and you'd press that erection against me every time."*

B. *"You'd grab my hand and interlace your fingers with mine and hold my hand, as a guy would hold a girlfriend's hand, and again, I'd try to get free, but it was only when you wanted to let me go."*

C. *"We went to bed that night, and there were 2 bedrooms upstairs in the cabin...I just laid down and you called to me to come to your room. I walked in and you said, 'Why don't you just sleep with me?' ... 'Don't you love me? I paid for this entire week in Colorado, you have paid for nothing. All I ask is for you to sleep here with me and you can't do that?'"*

D. *"So, reluctantly I laid down next to you and immediately you grabbed me and pulled me close, in a very close embrace...You said, 'See, this isn't so bad'...[a]nd the next thing I noticed is that you had an erection, and you were pressing yourself against my buttocks."*

E. *"You began rubbing my chest and shoulders, and then you rubbed my genitals."*

F. *"I grabbed your wrist and then it became a match of strength, and you won."*

43. Victim #1 received a responsive letter from Vanthournout approximately a month later. Vanthournout's letter included, but was not limited to, the following admissions:

A. *"First, I want to apologize for the things that I did which have caused you so much pain. I hope you know that it was certainly never my intent to cause you the pain that you have experienced because of me."*

B. *"Though it was difficult to read your letter, what you included provided me an excellent understanding of your perspective and what you have been through. I feel horrible that you have suffered as you have because of me."*

C. *"In preparing to write this letter, I have been reading what the Bible has to say about forgiveness and what an undeserved privilege we have in being able to approach God to receive His grace and forgiveness."*

D. *"You also stated in your letter that you want to be compensated financially for your suffering. Can you please let me know what you feel an appropriate amount of compensation would be?"*¹⁰

VICTIM #1 PLACES DEFENDANTS CHAPELSTREET AND COFFEY ON NOTICE
REGARDING DEFENDANT VANTHOURNOUT

44. In the years following their letter exchange, Victim #1 and Defendant Vanthournout both continued attending Defendant Chapelstreet.

¹⁰ It should be noted that Victim #1's letter *never* states or insinuates any request for financial compensation. Instead, Victim #1 writes that *despite* the serious criminal and civil repercussions of Defendant Vanthournout's actions, all Victim #1 was seeking was an apology.

45. In April of 2010, Victim #1 became more concerned about Vanthournout's involvement as a leader in Chapelstreet's youth programs. Wanting to ensure that Vanthournout did not have the opportunity to harm any other children, Victim #1 reached out to then Lead Pastor, Defendant Coffey.

46. In a series of email exchanges between April 7, 2010, and April 12, 2010, Victim #1 and Coffey arranged to meet confidentially to discuss Vanthournout.

47. On April 16, 2010, Victim #1 and Coffey met at Chapelstreet's east campus, located on Keslinger Road in Geneva, IL. During the meeting, Victim #1 recounted his history of sexual abuse at the hands of Vanthournout. Victim #1 showed Coffey the letters he exchanged with Vanthournout, which included Victim #1's detailed recounting of facts, and Vanthournout's admissions to them. Coffey assured Victim #1 that he will bring the issue to the attention of Chapelstreet's "*Senior Elders*."

48. After the meeting, Victim #1 assumed that Chapelstreet took appropriate measures to ensure the safety of the congregation's children, as the church's Lead Pastor (Coffey) was on notice that Vanthournout admitted to sexually abusing a minor.

49. However, on September 14, 2010, Victim #1 received an email from Coffey. In the message, Coffey asks, "*I'm just checking in with you to see if you have had any conversation or interaction with Don V. since we talked back in the spring? I'm not looking for anything in particular – just wondering. Thanks!*"

50. That same day, Victim #1 sent a response email to Coffey, mentioning an awkward in-person encounter Victim #1 had with Vanthournout at a *Teen Mission* send-off in June of 2010.¹¹

51. Also contained in Victim #1's September 14, 2010 response, he mentioned an alarming Chicago Tribune article that was published on August 27, 2010. The article, titled Teens flock to join the flock, covered various church youth groups, including the "First Baptist Church of Geneva" (Chapelstreet). The article contained several comments by "Discipleship Group leader; Don Vanthournout." Among Vanthournout's published quotes were the following:

A. *"I'm someone other than a teacher or parent they can talk to."*

B. *"They talk about temptations during dating, frustrations with parents, porn on the Internet."*

C. *"Their parents call me and tell me what the kids are struggling with and ask if I can work it into our conversations."*

52. The article further stated:

A. *"At the end of the school year, Vanthournout organizes a trip for his group. 'Camping, fishing, whatever – the kids decide,' [Vanthournout] says."*

B. *"Between get-togethers, Vanthournout's cell phone buzzes with text messages from the kids he calls 'my guys.'"*

¹¹ Defendant Chapelstreet and Defendant Coffey continued to allow Defendant Vanthournout to be involved with youth programs despite learning two months prior that he had sexually abused a child.

53. Given Vanthournout's history of child sexual abuse, Victim #1 ends his September 14, 2010 email response to Coffey by saying:

A. *"I am deeply concerned about Don talking to kids about pornography, and that he has any interaction at all with boys. I know you are in a difficult position and I know you've prayed over this greatly, as have I. I would just ask that you really revisit your position with Don, and the future he has as a leader of teenage boys."*

54. Coffey sent a reply email later the same day, assuring Victim #1 that Vanthournout was asked to take a "sabbatical" from the student ministry in June of 2010. Specifically, Coffey's reply states:

A. *"He was asked to step back for other reasons – mostly having to do with some attitude and respect issues with regard to student ministry leadership."*

B. *"My guess is that your presence has made him think about whether or not 'the next shoe is going to drop.'"*

C. *"The main thing I wanted to know was if you were around FBCG and if Don knows you are around FBCG. He would have to know that it is possible you have spoken to me and that **I know that Don lied to me those years ago about the event that took place.**" (emphasis added).*

D. *"I want to keep Don out of student ministries while also keeping this issue as confidential as possible. As the fall moves on I am probably going*

to confront Don with what I know and give him the chance to quietly turn his sabbatical into a 'resignation' from all student ministries."

E. *"I think all I will have to do i[s] make him aware that I have seen the letter that he wrote to you offering to compensate you for the pain he caused you."*

F. *"You told me back in April that I could use that information in such a way – and I guess I would like to know if you are still OK with Don knowing that you and I have talked?"*

55. Approximately an hour and twenty minutes later, Victim #1 responded to Coffey, *"...I am more than OK with you using the information I gave you in April to confront him. If you would like, I would be willing to give you a copy of the letter he wrote me for your files."*

56. Two days later, On September 16, 2010, Coffey emailed Victim #1 asking him to mail a copy of the letter Vanthournout wrote, which Victim #1 mailed to Coffey's home address.

57. After this exchange in September of 2010, Victim #1, for a second time, assumed that Chapelstreet took appropriate measures to ensure the safety of children involved with their congregation.

58. Despite Coffey's promise to take appropriate measures to ensure the safety of the children within Chapelstreet, Vanthournout was allowed to continue having contact with children in the course of his activities on behalf of Chapelstreet.

59. Despite Coffey's promise to take appropriate measures to ensure the safety of the children within Chapelstreet, Coffey took no meaningful steps to warn members of the congregation about the dangerous sexual propensities of Vanthournout.

60. Despite Coffey's promise to take appropriate measures to ensure the safety of the children within Chapelstreet, Coffey took no meaningful steps to supervise Vanthournout's activities performed on behalf of Chapelstreet that brought him into contact with children.

61. Despite Coffey's promise to take appropriate measures to ensure the safety of the children within Chapelstreet, Coffey took no meaningful steps to supervise the children of the congregation who came into contact with Vanthournout.

PLAINTIFF'S TRIPS TO CHAPELSTREET BETWEEN 2011 AND 2018

62. At all times relevant, including the time period between 2011 and 2018, Defendant Vanthournout was a member of Defendant Chapelstreet, and held positions of leadership and authority within the church.

A. Specifically, Vanthournout held positions such as Youth Leader and Discipleship Group Leader in Chapelstreet's youth ministry.

63. L.B. grew up in St. Charles, Illinois and attended the First Baptist Church of St. Charles (hereinafter, FBCSC). In the late 1980's when L.B. was in high school, Defendant Vanthournout served as her youth pastor at FBCSC. Vanthournout supervised L.B. on church youth group activities and in bible studies.

64. L.B. graduated high school in 1989, and by the time she returned from Bible college in the early 1990's, many members of FBCSC split off and joined another church,

First Baptist Church of Geneva (Defendant Chapelstreet). L.B.'s family and Vanthournout were among those that switched to Chapelstreet.

65. L.B. eventually met her husband and moved to Colorado in 1992, before eventually landing in British Columbia, Canada in 2007. Although L.B. did not regularly attend Chapelstreet after the 1990's, she remained in contact with both the church and Vanthournout.

66. In 2011, L.B. and her husband were religious missionaries in Canada where they lived with their two minor children. At the time, L.B.'s youngest child, Plaintiff John Doe (hereinafter, Plaintiff) was approximately 6 years old, and her oldest child, John Doe-2 (hereinafter, Doe-2) was 8 years old.

67. As part of their missionary work, the L.B.'s planned a "*furlough*" to Chapelstreet.¹²

68. Upon information and belief, this "furlough" was done with the approval and support of Chapelstreet and Coffey.

69. When L.B. and her husband notified Chapelstreet about their planned furlough, Vanthournout offered to have the family stay at his residence.

70. Having remembered Vanthournout from her own youth group experience in the 80's, L.B. and her family, including Plaintiff and John Doe-2, stayed with Vanthournout through the summer of 2011.

¹² For missionaries, a "furlough" is a return to their home country to, in part, reconnect with their home ministries and raise financial support for further work.

71. Chapelstreet was aware or should have been aware that Plaintiff and his family were staying with Vanthournout during this furlough.

72. During the 2011 summer furlough, Plaintiff and his family took part in numerous Chapelstreet activities. Coffey and Chapelstreet were aware or should have been aware that the Plaintiff, as a minor child, was at risk of being sexually groomed and abused by Vanthournout.

73. Despite this known risk, neither Coffey nor Chapelstreet took any steps to warn Plaintiff or his family of Vanthournout's history of sexual abuse upon minor children.

74. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Plaintiff to protect him from being sexually groomed and abused by Vanthournout.

75. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Vanthournout to prevent him from sexually grooming and abusing Plaintiff.

76. When the summer was over, L.B.'s family returned to Canada.

77. In 2017, Vanthournout reached out to L.B. and asked if Plaintiff and Doe-2 could stay with him for the summer.

78. Between the 2011 Chapelstreet mission trip and 2017, Vanthournout became a financial supporter of L.B.'s family through their mission, Cup of Cold Water Ministries.¹³

¹³ People can donate money to Cup of Cold Water missionaries through their website.

79. Vanthournout told L.B. that if Plaintiff and Doe-2 stayed with him for the summer, he would take them to various attractions such as Chicago Cubs baseball games and Noah's Ark Waterpark.

80. Believing her children would have a good time, L.B. allowed Plaintiff and Doe-2 to stay with Vanthournout for the summer in 2017, while L.B. and her husband stayed in Canada.

81. During their stay with Vanthournout, Plaintiff and Doe-2 regularly attended Chapelstreet, and Vanthournout held Chapelstreet Bible studies at his residence.

82. Coffey and Chapelstreet were aware or should have been aware that the Plaintiff, as a minor child, was at risk of being sexually groomed and abused by Vanthournout.

83. Despite this known risk, neither Coffey nor Chapelstreet took any steps to warn Plaintiff or his family of Vanthournout's history of sexual abuse upon minor children.

84. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Plaintiff to protect him from being sexually groomed and abused by Vanthournout.

85. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Vanthournout to prevent him from sexually grooming and abusing Plaintiff.

86. After Plaintiff and Doe-2 returned to Canada at the end of 2017, L.B.'s family planned a second mission trip to Chapelstreet in 2018. Again, they stayed the summer at Vanthournout's residence.

87. Coffey and Chapelstreet were aware or should have been aware that the Plaintiff, as a minor child, was at risk of being sexually groomed and abused by Vanthournout.

88. Despite this known risk, neither Coffey nor Chapelstreet took any steps to warn Plaintiff or his family of Vanthournout's history of sexual abuse upon minor children.

89. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Plaintiff to prohibit him from being sexually groomed and abused by Vanthournout.

90. Despite this known risk, neither Coffey nor Chapelstreet took any meaningful steps to supervise Vanthournout to prevent him from sexually grooming and abusing Plaintiff.

91. In preparation for the 2018 trip, Chapelstreet helped arrange band instruments for Plaintiff and Doe-2 to use during the summer.

92. While staying with Vanthournout that summer, L.B.'s husband became ill, and Chapelstreet helped pay for him to return to Canada for treatment.

VANTHOURNOUT'S SEXUAL ABUSE OF PLAINTIFF

93. Unbeknownst to L.B. and her husband, between 2011 and 2018, Vanthournout repeatedly subjected Plaintiff to sexual abuse.

94. Vanthournout's physical grooming of Plaintiff began in a similar fashion to Victim #1's, with Vanthournout holding Plaintiff's hand and having him sleep in the same bed.

95. Plaintiff was also made to take a shower in Vanthournout's room, and on several occasions Vanthournout would join him in the shower naked.

96. On several occasions, while either laying in the bed or standing in the shower, Vanthournout touched Plaintiff's genitals, made Plaintiff touch his genitals, and anally penetrated Plaintiff.

97. The above-mentioned sexual abuse occurred at Vanthournout's residence in Kane County, Illinois.

DEFENDANTS CHAPELSTREET AND COFFEY'S NEGLIGENCE

98. At all times material, Vanthournout was an employee, agent, or servant of and under the supervision and control of Defendants Chapelstreet and Coffey.

99. All acts of sexual abuse against Plaintiff took place while Vanthournout had custody or control of Plaintiff in his role as an authority figure within Chapelstreet.

100. At all relevant times, Chapelstreet and Coffey failed to act in a manner that protected children within their congregation, community, and/or missionary program, including the Plaintiff, who was a minor child.

101. Chapelstreet and Coffey were aware in 2010 that Vanthournout had sexually abused a child. Victim #1 made Chapelstreet and Coffey aware of Vanthournout's sexual abuse and provided evidence in the form of Victim #1's detailed letter, and Vanthournout's admissions to the abuse. Rather than immediately removing Vanthournout from their church, Chapelstreet and Coffey continued to allow Vanthournout to serve in youth group leadership roles, and house Plaintiff during missionary trips and/or church functions.

102. As a result of Chapelstreet and Coffey's actions and inactions, Plaintiff suffered sexual abuse at the hands of Vanthournout.

COUNT I: CHILDHOOD SEXUAL ABUSE
(AS TO DEFENDANT VANTHOURNOUT)

103. Plaintiff adopts and incorporates by reference each and every allegation contained in paragraphs 1 through 102 of this Complaint as if fully set forth herein.

104. Between 2011 and 2018, Defendant Vanthournout committed acts of sexual abuse against Plaintiff.

105. At all times Plaintiff was sexually abused by Vanthournout, he was under 18 years of age, and as a minor, Plaintiff was incapable of consenting to any of Vanthournout's sexual acts.

106. The sexual acts Vanthournout committed against Plaintiff include, but are not limited to:

- A. Vanthournout touching of Plaintiff's genitals either directly or through the clothing;
- B. Vanthournout making Plaintiff touch his genitals either directly or through the clothing; and
- C. Vanthournout penetrating the anus of Plaintiff.

107. Each act of sexual assault gives Plaintiff a civil cause of action against Vanthournout pursuant to 735 ILCS 5/13-202.2.

108. As a direct and proximate result of Defendant Vanthournout's sexual abuse of Plaintiff, Defendant Vanthournout directly caused, or directly contributed to cause, serious, permanent, and progressive injuries, medically diagnosable and significant emotional distress, mental anguish and injury, and damages to Plaintiff for which he has and will continue to need medical and psychiatric care and treatment for.

109. Pursuant to 735 ILCS 5/23-101, Defendant Vanthournout's sexual abuse of Plaintiff is considered obviously and material harmful to Plaintiff and should be deemed *per se* harmful and traumatic.

WHEREFORE, Plaintiff prays for a judgment and damages in a just and reasonable sum in excess of Fifty Thousand Dollars (\$50,000.00), to be determined by a jury at trial, together with costs herein expended, and such further relief as the Court deems just and proper.

COUNT II: NEGLIGENT RETENTION OF DEFENDANT VANTHOURNOUT
(AS TO DEFENDANTS CHAPELSTREET AND BRIAN COFFEY)

110. Plaintiff adopts and incorporates by reference each and every allegation contained in paragraphs 1 through 102 of this Complaint as if fully set forth herein.

111. Defendants Chapelstreet and Coffey appointed Vanthournout as a church leader, and in doing so, held him out to the congregation and community as someone who embodied the morals and ideals of the church.

112. Defendants Chapelstreet and Coffey affirmatively represented to the congregation and community that Vanthournout was fit to provide mentorship and counseling to minors at Chapelstreet.

113. Defendants Chapelstreet and Coffey affirmatively encouraged and supported Plaintiff's family to serve out their missionary furlough under the auspices of Chapelstreet and its congregation.

114. Defendants Chapelstreet and Coffey affirmatively represented to the congregation and community, including Plaintiff and his family, that Vanthournout was fit to house families who were on missionary furloughs.

115. Plaintiff and his family placed great trust and confidence in Defendants Chapelstreet and Coffey, and in persons acting on their behalf, including Vanthournout.

116. Defendants Chapelstreet and Coffey accepted Plaintiff and his family as members of the church.

117. Defendants Chapelstreet and Coffey agreed to retain Vanthournout as an employee and/or agent after receiving reports of him sexually abusing a minor.

118. Defendants Chapelstreet and Coffey agreed to and had a duty to supervise Vantnournout after receiving reports of him sexually abusing a minor.

119. Defendants Chapelstreet and Coffey knew or should have known that Vanthournout was a danger to minors, including Plaintiff.

120. Defendants Chapelstreet and Coffey determined and controlled Vanthournout's leadership within the church.

121. At all relevant times, Defendants Chapelstreet and Coffey could have terminated Vanthournout's employment and/or agency as church leader, including his ability to house families on missionary furlough.

122. At all relevant times, Defendants Chapelstreet and Coffey failed to exercise reasonable care by retaining Vanthournout as an employee and/or agent.

123. Defendants Chapelstreet and Coffey breached their duty of care to Plaintiff by committing one or more of the following acts and/or omissions by:

A. Failing to create, adopt, and/or implement adequate policies to remove employees and/or agents who posed a risk to minors;

B. Failing to follow established written policies that would have required the removal of employees and/or agents who sexually abused minors;

C. Failing to recognize and/or act upon the predatory tendencies of Vanthournout while he was in their employment and/or agency;

D. Failing to adequately investigate reports that Vanthournout sexually abused minors while he was an employee and/or agent;

E. Failing to remove Vanthournout from the ministry or work that would allow him access to minors;

F. Failing to adequately supervise Vanthournout;

G. Failing to warn the public, including Plaintiff and his family, that Vanthournout sexually abused a minor and was a danger to others;

H. Permitted Vanthournout to supervise minor children who were on missionary furlough; and

I. Was otherwise careless or negligent.

124. As a direct and proximate result of Defendants Chapelstreet and Coffey's aforementioned negligence, the Plaintiff was a victim of sexual abuse by Defendant Vanthournout.

125. As a direct and proximate result of Defendants Chapelstreet and Coffee's negligence, Defendants Chapelstreet and Coffey directly caused, or directly contributed to cause, serious, permanent, and progressive injuries, medically diagnosable and significant emotional distress, mental anguish and injury, and damages to Plaintiff for which he has and will continue to need medical and psychiatric care and treatment for.

WHEREFORE, Plaintiff prays for a judgment and damages in a just and reasonable sum in excess of Fifty Thousand Dollars (\$50,000.00), to be determined by a jury at trial, together with costs herein expended, and such further relief as the Court deems just and proper.

COUNT III: NEGLIGENT SUPERVISION OF DEFENDANT VANTHOURNOUT
(AS TO DEFENDANTS CHAPELSTREET AND BRIAN COFFEY)

126. Plaintiff adopts and incorporates by reference each and every allegation contained in paragraphs 1 through 102 of this Complaint as if fully set forth herein.

127. Defendants Chapelstreet and Coffey had a duty to supervise their employees and/or agents.

128. Defendants Chapelstreet and Coffey had a duty to supervise Vanthournout.

129. Defendants Chapelstreet and Coffey had a duty to ensure that Vanthournout did not have access to minors.

130. Defendants knew that Vanthournout's position as church leader involved him interacting with minors, including housing Plaintiff and his family while on missionary furlough.

131. At all relevant times, it was foreseeable to Defendants Chapelstreet and Coffey that Vanthournout could engage in sexual conduct with a minor, including children within Chapelstreet.

132. Defendants Chapelstreet and Coffey knew or should have known that Vanthournout posed a risk of sexual grooming and abuse to any minor child that he encountered in the course of his church activities.

133. Defendants Chapelstreet and Coffey failed to adequately supervise Vanthournout and breached their duty of care to Plaintiff by committing one or more of the following acts and/or omissions by:

A. Failing to create, adopt, and/or implement adequate policies to remove employees and/or agents who posed a risk to minors;

B. Failing to follow established written policies that would have required the removal of employees and/or agents who sexually abused minors;

C. Failing to recognize and/or act upon the predatory tendencies of Vanthournout while he was in their employment and/or agency;

D. Failing to adequately investigate reports that Vanthournout sexually abused minors while he was an employee and/or agent;

E. Failing to remove Vanthournout from the ministry or work that would allow him access to minors;

F. Failing to adequately supervise Vanthournout;

G. Failing to warn the public, including Plaintiff and his family, that Vanthournout sexually abused a minor and was a danger to others;

H. Permitted Vanthournout to supervise minor children who were on missionary furlough; and

I. Was otherwise careless or negligent.

134. As a direct and proximate result of Defendants Chapelstreet and Coffey's aforementioned negligence, the Plaintiff was a victim of sexual abuse by Defendant Vanthournout.

135. As a direct and proximate result of Defendants Chapelstreet and Coffee's negligence, Defendants Chapelstreet and Coffey directly caused, or directly contributed to cause, serious, permanent, and progressive injuries, medically diagnosable and significant emotional distress, mental anguish and injury, and damages to Plaintiff for which he has and will continue to need medical and psychiatric care and treatment for.

WHEREFORE, Plaintiff prays for a judgment and damages in a just and reasonable sum in excess of Fifty Thousand Dollars (\$50,000.00), to be determined by a jury at trial, together with costs herein expended, and such further relief as the Court deems just and proper.

