

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
CIVIL DIVISION

SUZANNE LANDER,

PLAINTIFF

V.

RODNEY LOY, an individual, and
NORTH LITTLE ROCK FIRST
ASSEMBLY OF GOD CHURCH,

DEFENDANTS.

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CASE NO. _____

COMPLAINT

Comes now Plaintiff, Suzanne Lander (hereinafter “Plaintiff”), for her Complaint against Defendants, Rodney Loy (hereinafter “Defendant Loy”), and North Little Rock First Assembly of God Church (hereinafter “Defendant Church”), and states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Suzanne Lander is a resident of Georgetown, Texas. Plaintiff is an adult woman who brings this action for sexual abuse she suffered as a minor child, and which also continued into adulthood. From approximately 1996, when Plaintiff was sixteen years old, through 2016, when Plaintiff was thirty-six years old, Plaintiff was sexually abused by Defendant Loy.

2. Defendant Rodney Loy is an individual and resident of North Little Rock, Arkansas. At all times relevant to this Complaint, Defendant Loy was a pastor

at Defendant Church. Defendant Loy may be served with process at 4501 Burrow Drive, North Little Rock, Arkansas 72116.

3. Defendant North Little Rock First Assembly of God Church is a church located in North Little Rock, Arkansas. At all times relevant to this Complaint, Defendant Church employed Defendant Loy as a pastor. Defendant Church may be served with process at 4501 Burrow Drive, North Little Rock, Arkansas 72116.

4. This Court has subject matter jurisdiction over this action pursuant to Arkansas Code Annotated § 16-13-201.

5. Venue is proper in this Court pursuant to Arkansas Code Annotated § 16-60-101(a)(1) because a substantial part of the events or omissions giving rise to the causes of action occurred in Pulaski County, Arkansas.

6. Plaintiff's claims are timely under Arkansas Code Annotated § 16-118-118, the Justice for Vulnerable Victims of Sexual Abuse Act, which provides a lookback window for claims of childhood sexual abuse and removes statute of limitations barriers for vulnerable victims who suffered sexual abuse as minors.

7. Additionally, and alternatively, Plaintiff's claims are timely under Arkansas' delayed discovery statute, Arkansas Code Annotated § 16-56-130. A.C.A. § 16-56-130 applies as follows:

- a. Plaintiff was born in 1980. Plaintiff was abused as a minor between approximately 1996 and 1998, when Plaintiff was approximately 16 to 18 years old.
- b. In 1993, the special statute of limitations for claims based on child sexual abuse (A.C.A. § 16-56-130) was enacted and took effect. Arkansas Code Annotated § 16-56-130 applies to claims filed on or after its effective date of August 13, 1993. Arkansas Code Annotated § 16-56-130

gives a victim of childhood sexual abuse three years from the time the victim “discovers the effect of the injury or condition attributable to the childhood sexual abuse” to bring suit.

- c. Not until the past three years did Plaintiff discover the effect of the injuries or conditions attributable to the childhood sexual abuse perpetrated by Defendant Loy. Prior to that time, Plaintiff did not discover the effect of the injuries or conditions attributable to the childhood sexual abuse because, for nearly two decades following the childhood abuse, Defendant Loy maintained psychological control over Plaintiff through his positions as her pastor, employer, and adoptive father. He systematically conditioned her to believe their “sexual relationship” had been normal, godly, and her own fault—exploitation made possible by her history as a parental sex trafficking victim, which left her without a baseline for healthy relationships. This manipulation prevented Plaintiff from recognizing the conduct as abuse or understanding its causal connection to her psychological and physical injuries.
 - d. It was only through ongoing therapy and following a significant increase in the frequency and severity of her seizures that Plaintiff began recalling additional specific incidents of abuse and, critically, came to understand the relationship between Defendant’s conduct and her current disabilities, including complex PTSD, severe anxiety, depression, and neurological impairment. Prior to this therapeutic breakthrough, Plaintiff’s ability to perceive the abuse as abuse—rather than as what Defendant told her it was—had been destroyed by years of spiritual manipulation, psychological conditioning, and the unique vulnerabilities created by her traumatic childhood.
 - e. Plaintiff has filed suit for claims based on childhood sexual abuse less than three (3) years after discovering the effect of the injuries or conditions attributable to the childhood sexual abuse. Accordingly, Plaintiff’s claims are timely under Arkansas Code Annotated § 16-56-130.
8. Plaintiff’s damages exceed the jurisdictional limits of this Court.
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FACTS

9. In 1996, Plaintiff began attending Defendant Church just after she turned sixteen years old. At that time, Plaintiff was an extraordinarily vulnerable young woman who desperately needed a safe place and a supportive community.

10. When Plaintiff first walked through the doors of Defendant Church in 1996, she believed she had found the home and family she had never known. At Defendant Church, Plaintiff encountered God for the first time. She felt welcomed and safe. For the first time in her life, Plaintiff experienced what she believed to be genuine care and spiritual guidance.

11. It was at Defendant Church that Plaintiff met Defendant Loy. At all times relevant to this Complaint, Defendant Loy served as a pastor at Defendant Church. From 1996 until approximately 2001, Defendant Loy held the position of Executive Pastor. In or around 2001, Defendant Loy became the Senior Pastor of Defendant Church, a position he continues to hold to this day.

12. As a pastor at Defendant Church, Defendant Loy held a position of significant spiritual authority and trust within the church community. Church members, including Plaintiff, noted that the church had a leadership culture and viewed Defendant Loy as a spiritual leader who spoke for God. Defendant Loy was responsible for providing pastoral care, spiritual counseling, and guidance to congregants, including minor children like Plaintiff.

The Abuse

13. Shortly after Plaintiff began attending Defendant Church, Defendant Loy took this vulnerable teenager under his wing. Defendant Loy told Plaintiff that she was the daughter he always wanted. He encouraged her to trust him for spiritual and fatherly guidance.

14. Plaintiff rightly trusted Defendant Loy as one of Defendant Church's pastors and as a spiritual father figure. Plaintiff believed that Defendant Loy genuinely cared about her well-being.

15. From the outset, Defendant Loy demonstrated a calculated interest in Plaintiff. Shortly after Plaintiff began attending Defendant Church in 1996, Defendant Loy took Plaintiff and another young girl from the church on a shopping trip for dresses. Defendant Loy told Plaintiff he wanted to purchase her first "official" church dress. At Dillard's in McCain Mall, Defendant Loy selected dresses for Plaintiff and observed her model each one. Plaintiff interpreted his attention as genuine care and guidance about her appearance.

16. Defendant Loy then cultivated a false interest in Plaintiff's activities. As basketball dominated Plaintiff's high school life, Defendant Loy started playing one-on-one with her at his residence, and started attending Plaintiff's basketball games, appearing both alone and with his wife and two young sons. For the first time, Plaintiff experienced what felt like a supportive family in the stands.

17. Defendant Loy systematically expanded his access to Plaintiff by waiting for her after games instead of allowing her to be with her friends, and by regularly visiting her workplace at Sonic, where he would order his “usual.”

18. Defendant Loy’s grooming escalated when he began inviting Plaintiff to his home multiple evenings each week. There, he engaged her in activities such as playing Nintendo while positioning himself as a father figure.

19. Defendant Loy also began arranging private meetings with Plaintiff in his church office under the pretense of discussing her “spiritual development.” During these sessions, Defendant Loy guided Plaintiff through books addressing her struggles with insecurity. Defendant Loy exploited his roles as Plaintiff’s pastor and a paternal figure to gain her trust and sense of safety. Having secured that trust, he began sexually abusing Plaintiff.

20. In the fall of 1996, only months after Plaintiff began attending Defendant Church, Defendant Loy initiated sexual abuse. Defendant Loy had previously demonstrated physical affection through hugging, which Plaintiff had never experienced before. Defendant Loy then began using a Nintendo gaming controller to touch Plaintiff’s genitalia over her clothing. Defendant Loy soon progressed to using his hands to touch Plaintiff’s genitalia over her clothing and then to putting his hands inside her clothing and rubbing his genitalia on her while she watched television in his home. Plaintiff suppressed her instinctive discomfort with this contact because of the trust she had placed in Defendant Loy as both her pastor

and father figure. Throughout this abuse, Defendant Loy told Plaintiff that this was what God wanted her to do.

21. Defendant Loy also sexually abused Plaintiff in his office at Defendant Church. With the door shut and the blinds drawn, Defendant Loy directed Plaintiff to tell him what was wrong with her and what she needed to improve about herself. This made Plaintiff feel like a failure and filled her with shame. Defendant Loy then exploited this vulnerability to sexually victimize Plaintiff. Plaintiff trusted Defendant Loy and thought she was safe in his presence, but Defendant Loy shattered that trust—leaving her profoundly confused and trapped—especially when he insisted that his actions were directed by God.

22. During one office meeting, Defendant Loy forced Plaintiff to perform oral sex on him while she sat under his desk. After ejaculating, Defendant Loy zipped his pants, hugged Plaintiff, and told her he was proud of her. Shortly thereafter, Defendant Loy assisted in leading a church service.

23. In the fall of 1996, Defendant Loy raped Plaintiff in his home. While his wife put the children to sleep, Defendant Loy and Plaintiff were on his bed watching television. Defendant Loy began by touching Plaintiff's genitalia, then put on a condom and raped her. Afterward, Defendant Loy pulled up his shorts and eventually told Plaintiff it was late and time to go home.

24. One of the most destructive aspects of Defendant Loy's sexual crimes was how he combined sexual abuse with continued inclusion of Plaintiff in his family events, giving her money, helping her find scholarships for youth activities, and daily

phone calls. Defendant Loy told Plaintiff that God expected her to allow him to rape her and that followers of Jesus performed sexual acts for the men who were their spiritual leaders. As her first pastor and spiritual leader, Defendant Loy left Plaintiff confused and unable to recognize the abuse or challenge his authority. She knew no one would believe her. She was completely trapped.

25. The sexual assaults escalated as Defendant Loy gained greater access to Plaintiff. Over the next two years while Plaintiff was still a minor, Defendant Loy forced her to perform oral sex, performed oral sex on her, and raped her in multiple locations: his church office, the storage closet, nursery, Junior Super Church Room, church parking lot, and his home. Defendant Loy consistently told Plaintiff: “God wants you to have sex with me because I am your pastor,” “You sucking my penis pleases God,” “God likes you sharing your body with me,” “You don’t have to be afraid; this is what God wants,” and “This makes you better in the eyes of God.” A verse Defendant Loy often recited to Plaintiff was Hebrews 13:17 (“Obey your leaders and submit to them, for they are keeping watch over your souls, as those who will have to give an account. Let them do this with joy and not with groaning, for that would be of no advantage to you.”)

26. Defendant Loy’s abuse and scriptural manipulation continued after Plaintiff turned eighteen, persisting for another eighteen years as he maintained control over her life, her marriage, and her children. Defendant Loy arranged for Plaintiff to stay in proximity to him during church trips, thereby isolating Plaintiff from others. At church camps, Defendant Loy arranged for Plaintiff to stay on a

separate floor from other attendees—on the same floor as Defendant Loy with easy access between their rooms.

27. In 2016, Plaintiff escaped Defendant Loy’s control when she and her family left Defendant Church and moved to Jonesboro.

The Failure to Protect

28. Defendant Church knew or should have known that Defendant Loy posed a danger to minor females in his care, including Plaintiff. Defendant Loy publicly employed a pattern of surrounding himself with minor female congregants, particularly those from vulnerable backgrounds like Plaintiff.

29. Defendant Loy openly referred to young girls at Defendant Church as his “projects.” He maintained extensive photographic collections featuring these minors, with Plaintiff appearing in a vast number of these photographs. It was no secret at the church that Defendant Loy regularly mentored young girls but did not mentor young boys. Although Defendant Loy demanded that other male staff members at Defendant Church adhere to strict rules governing interactions with females, Defendant Loy violated those rules by engaging in interactions with young girls.

30. A former employee observed that Defendant Loy had many rules regarding what male staff could and could not do with females, but Defendant Loy broke those rules by having young girls close to him. At the time, the former employee did not question Defendant Loy’s behavior because the church had fostered a culture in which Defendant Loy’s authority was not to be questioned.

31. A former employee attended “family nights” at the Loy residence. During church sponsored “family nights” Defendant Loy and Plaintiff often disappeared for periods of time, often before the meal was served. Defendant Loy openly claimed that they were disappearing so Plaintiff could select Defendant Loy’s clothes for the next day.

32. Defendant Church maintained a culture of authoritarian leadership in which questioning Defendant Loy was not tolerated. Defendant Loy controlled staff members’ personal lives to an extreme degree. This authoritarian culture directly enabled Defendant Loy to control and silence Plaintiff for two decades.

33. Despite Defendant Loy’s pattern of surrounding himself with minor females, maintaining exclusive relationships with young girls, disappearing alone with Plaintiff on multiple occasions, and arranging for Plaintiff to stay in proximity to him during church trips, Defendant Church failed to supervise Defendant Loy, failed to investigate warning signs, failed to establish or enforce policies to protect minor congregants, and failed to take any action to protect Plaintiff from Defendant Loy.

34. Defendant Church’s failures to supervise Defendant Loy and protect minor congregants were not isolated oversights. Rather, Defendant Church’s failures were the foreseeable result of a culture that prohibited questioning Defendant Loy’s conduct and punished those who set boundaries. This culture enabled Defendant Loy’s unfettered access to Plaintiff and other vulnerable minor females for years.

35. Upon information and belief, Defendant Church failed to conduct background checks on Defendant Loy, failed to provide training to staff on recognizing warning signs of abuse, and failed to implement or enforce policies requiring supervision of interactions between pastors and minor congregants. Despite having policies that other male staff were required to follow regarding interactions with females, Defendant Church allowed Defendant Loy to exempt himself from these policies without consequence. Defendant Church's failure to enforce its own policies created an environment that allowed Defendant Loy to maintain unrestricted access to Plaintiff and other vulnerable minor females.

36. As a direct and proximate result of Defendant Loy's conduct and Defendant Church's negligence, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income or loss of earning capacity.

COUNT I - SEXUAL ASSAULT AND BATTERY
(Against Defendant Loy)

37. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

38. Defendant Loy committed acts of sexual assault, battery, and rape against Plaintiff including intentional, harmful, unwanted, and offensive sexual contact and sexual intercourse. These acts included, but were not limited to, touching Plaintiff's genitalia, forcing Plaintiff to perform oral sex on Defendant Loy, performing oral sex on Plaintiff, and raping Plaintiff through vaginal penetration. These acts occurred in multiple locations including Defendant Loy's church office, church storage closet, church nursery, Junior Super Church Room, church parking lot, Defendant Loy's home, and during church-related trips to locations in Arkansas, Texas, and Florida.

39. From the fall of 1996 through 1998, Plaintiff was a minor child under the age of eighteen years and did not consent to sexual contact or sexual intercourse with Defendant Loy. Defendant Loy's acts of sexual assault, battery, and rape during this period violated Title 5 of the Arkansas Code Annotated, which criminalizes sexual contact with a minor. All sexual contact between Defendant Loy and Plaintiff during this period was without Plaintiff's consent as a matter of law.

40. As a direct and proximate result of Defendant Loy's acts of sexual assault, battery, and rape, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily

activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Loy for compensatory damages and such other and further relief as this Court deems just and proper.

COUNT II – THE TORT OF OUTRAGE
(Against Defendant Loy)

41. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

42. Defendant Loy's conduct was extreme and outrageous, beyond all possible bounds of decency, and utterly intolerable in a civilized community. Defendant Loy exploited his position as a trusted spiritual leader to systematically groom, manipulate, and sexually abuse a vulnerable sixteen-year-old girl who had survived years of parental sexual abuse and trafficking. Defendant Loy used religious teachings and scripture to convince Plaintiff that God wanted her to submit to his sexual demands, telling her repeatedly that performing sexual acts pleased God and made her better in God's eyes.

43. Defendant Loy intended to cause severe emotional distress to Plaintiff or knew with substantial certainty that severe emotional distress would result from his conduct. Defendant Loy knew Plaintiff was a vulnerable minor with a history of severe abuse when he began grooming her. Defendant Loy knew that using his position as her pastor and father figure to sexually abuse her, while simultaneously

telling her that God commanded her submission to him, would cause profound psychological harm. Defendant Loy knew that isolating Plaintiff from her family, controlling her personal and professional life, and maintaining sexual control over her would cause devastating emotional and psychological injuries.

44. As a direct and proximate result of Defendant Loy's acts of sexual assault, battery, and rape, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Loy for compensatory damages and such other and further relief as this Court deems just and proper.

COUNT III - NEGLIGENCE
(Against Defendant Church)

45. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

46. Defendant Church owed Plaintiff a duty to exercise reasonable care to protect minor congregants and vulnerable members from foreseeable harm, including

sexual abuse by church leaders. This duty included adopting and enforcing appropriate policies, supervising pastors and staff, investigating warning signs of abuse, and responding appropriately to observations of concerning conduct by persons in positions of authority over minors.

47. Defendant Church knew or should have known that Defendant Loy posed a danger to minor females in his care, including Plaintiff. Multiple church staff members and congregants observed Defendant Loy's pattern of surrounding himself with minor female congregants from vulnerable backgrounds, referring to them as his "projects," maintaining extensive photographic collections featuring these minors, regularly mentoring young girls but not boys, and flouting the church's own rules regarding interactions with females that other male staff were required to follow.

48. Upon information and belief, Defendant Church breached its duty of care to Plaintiff in the following respects:

- a. Failing to conduct background checks on Defendant Loy;
- b. Failing to provide training to staff on recognizing warning signs of sexual abuse and grooming behaviors;
- c. Failing to adopt and implement child protection policies appropriate for a religious institution serving minor congregants;
- d. Failing to enforce the church's own policies requiring appropriate supervision of interactions between pastors and minor congregants;
- e. Failing to supervise Defendant Loy's activities with minor females, including Plaintiff;
- f. Failing to investigate multiple observations by staff members and congregants that Defendant Loy regularly disappeared alone with Plaintiff during church events and family nights at his home;

- g. Failing to respond to observations that Defendant Loy maintained an unusually close relationship with Plaintiff that included daily phone calls, inclusion in family events, and control over her personal and professional life;
- h. Failing to establish and enforce policies prohibiting pastors from exempting themselves from rules that other staff were required to follow regarding interactions with females; and
- i. Maintaining an authoritarian church culture in which questioning Defendant Loy was not tolerated and staff members who set boundaries were shunned and isolated, thereby preventing reporting of concerns and enabling Defendant Loy's unfettered access to Plaintiff.

49. Defendant Church's failures to supervise Defendant Loy and protect minor congregants were not isolated oversights but rather the foreseeable result of a culture that prohibited questioning church leadership and punished those who raised concerns.

50. As a direct and proximate result of Defendant Church's negligence, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Church for compensatory damages and such other and further relief as this Court deems just and proper.

COUNT IV - NEGLIGENT HIRING, SUPERVISION, AND RETENTION
(Against Defendant Church)

51. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

52. Defendant Church owed Plaintiff a duty to exercise reasonable care in hiring, supervising, and retaining pastors and staff who would have authority over and access to minor congregants, including Plaintiff. This duty included the obligation to assess the fitness and suitability of individuals for positions involving unsupervised contact with minors, to monitor their conduct with minors, and to remove individuals who posed a danger to minors.

53. Defendant Church negligently hired, supervised, and retained Defendant Loy in a position of authority over youth and vulnerable congregants despite knowing or having reason to know of his propensity for targeting and maintaining exclusive relationships with minor females from vulnerable backgrounds.

54. Defendant Church was on actual or constructive notice of the acts being perpetrated by Defendant Loy based on observations by multiple staff members and congregants over a period of years, yet refused to remove him from his position of authority or take any action to limit his access to Plaintiff and other vulnerable minor females.

55. Defendant Church's negligent hiring, supervision, and retention of Defendant Loy constitutes a breach of the duty owed to Plaintiff. Defendant Church failed to:

- a. properly screen, evaluate, and assess Defendant Loy's fitness and suitability for a position involving authority over and unsupervised access to minor congregants;
- b. properly train Defendant Loy on appropriate boundaries between pastors and minor congregants;
- c. supervise Defendant Loy's activities with minor females despite observations by numerous staff members of concerning patterns of behavior;
- d. investigate warning signs that Defendant Loy was grooming and maintaining an exclusive relationship with Plaintiff;
- e. take disciplinary action against Defendant Loy despite his violation of church policies that other male staff were required to follow; and
- f. remove Defendant Loy from his position despite knowledge that he fit the profile of a child predator and posed a danger to minor congregants.

56. As a direct and proximate result of Defendant Church's negligent hiring, supervision, and retention of Defendant Loy, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to

incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Church for compensatory damages and such other and further relief as this Court deems just and proper.

COUNT V - BREACH OF FIDUCIARY DUTY
(Against Defendant Church)

57. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

58. As a religious institution providing spiritual guidance, pastoral care, and counseling to congregants including minor children, Defendant Church owed Plaintiff a fiduciary duty to act in her best interests and to protect her from harm. This fiduciary relationship arose from the trust and confidence Plaintiff placed in Defendant Church to provide a safe environment and appropriate spiritual guidance, and from Defendant Church's acceptance of responsibility for Plaintiff's spiritual well-being and safety as a minor congregant.

59. Defendant Church breached its fiduciary duty to Plaintiff by:

- a. Allowing Defendant Loy to exploit his position of spiritual authority to groom, manipulate, and sexually abuse Plaintiff;
- b. Failing to protect Plaintiff from Defendant Loy despite knowledge of warning signs observed by multiple staff members and congregants;
- c. Enabling the abuse through its failures to supervise Defendant Loy, investigate concerning conduct, and enforce policies designed to protect minor congregants;

- d. Maintaining an authoritarian church culture that prevented reporting of concerns about Defendant Loy's conduct and punished those who questioned church leadership;
- e. Placing the interests and reputation of Defendant Loy and Defendant Church above Plaintiff's safety and well-being; and
- f. Allowing Defendant Loy to maintain control over Plaintiff's life, including intercepting and controlling communications between Plaintiff and her family members, thereby isolating Plaintiff and preventing others from discovering the abuse.

60. Defendant Church's breach of fiduciary duty enabled Defendant Loy to sexually abuse Plaintiff during her childhood, causing profound and lasting harm to Plaintiff.

61. As a direct and proximate result of Defendant Church's breach of fiduciary duty, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Church for compensatory damages and such other and further relief as this Court deems just and proper.

COUNT VI - VICARIOUS LIABILITY AND RESPONDEAT SUPERIOR
(Against Defendant Church)

62. Plaintiff incorporates by reference all previous paragraphs as if fully set forth herein.

63. At all times material to this Complaint, Defendant Loy was an agent, employee, and representative of Defendant Church acting within the course and scope of his employment and agency as a pastor. Defendant Loy held positions of Executive Pastor and Senior Pastor at Defendant Church and was empowered with spiritual authority over congregants, including authority to provide pastoral care, spiritual counseling, and guidance to minor congregants such as Plaintiff.

64. Defendant Loy's wrongful conduct against Plaintiff was committed in the scope of his duties as a pastor and spiritual leader. Defendant Loy used his position as pastor to gain access to Plaintiff, conducted the abuse during purported "counseling sessions" and "spiritual guidance" in his church office with the door closed, committed acts of abuse on church property and during church-related activities, and exploited the trust created by his pastoral role to manipulate and control Plaintiff. Defendant Church empowered Defendant Loy with authority over congregants and minor children, which Defendant Loy exploited to perpetrate the abuse.

65. Even to the extent any conduct falls outside the scope of Defendant Loy's employment, such conduct occurred within the scope of Defendant Loy's authority because the abuse occurred during pastoral counseling sessions, Defendant Loy used his position and spiritual authority to facilitate the abuse, and the abuse was made

possible by the trust and access Defendant Church vested in Defendant Loy as a pastor.

66. Under the doctrine of respondeat superior and vicarious liability, Defendant Church is liable for the tortious acts of its agent, employee, and representative when such acts are committed in the actual or apparent scope of their duties.

67. As a direct and proximate result of Defendant Loy's wrongful conduct committed within the scope of his agency and employment with Defendant Church, Plaintiff has suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and mental anguish, physical manifestations of emotional distress, embarrassment, loss of self-esteem, humiliation, shame, and psychological injuries (including anxiety, panic disorder, depression, and complex post-traumatic stress disorder (C-PTSD)). Plaintiff was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life; she has and will continue to incur expenses for medical and psychological treatment, therapy, and counseling; and has incurred and will continue to incur loss of income and/or loss of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant Church for compensatory damages and such other and further relief as this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Suzanne Lander respectfully demands the following:

1. Judgment against Defendants, jointly and severally, in favor of Plaintiff in an amount in excess of the jurisdictional limits of this Court, said amount to be that which is determined as being fair and reasonable by all the evidence, for the following elements of damages, both in the past and in the future:

- a. physical pain, suffering, and inconvenience;
 - b. mental anguish and emotional distress;
 - c. medical expenses;
 - d. loss of earning capacity and economic harm;
 - e. loss of enjoyment of life;
2. Punitive damages against Defendants as allowed by law;
 3. Pre-judgment and post-judgment interest as allowed by law;
 4. Plaintiff's costs expended herein, including reasonable attorneys' fees;
 5. TRIAL BY JURY; and
 6. Any and all other relief to which Plaintiff may be entitled.

Respectfully submitted,

/s/ Keith L. Langston

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Pro Hac Vice Pending

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