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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 MARIAN BARBU

Case No.: 5:25-cv-02428-SSS-MAA

12 Plaintiff,

**CONSOLIDATED AMENDED
COMPLAINT**

13 vs.

DEMAND FOR JURY TRIAL

14 HARVEST CHRISTIAN FELLOWSHIP,
15 GREG LAURIE, RICHARD SCHUTTE,
16 and PAUL HAVSGAARD,

Consolidated with Civil Action Nos.:
5:25-cv-02429, 5:25-cv-02461,
5:25-cv-02559, 5:25-cv-02560,
5:25-cv-02561, 5:25-cv-03048,
5:25-cv-03052, 5:25-cv-03074,
5:25-cv-03076, 5:25-cv-03092,
5:25-cv-03093, 5:25-cv-03488,
5:25-cv-03493, 5:25-cv-03495,
5:25-cv-03496, 5:25-cv-03497,
5:25-cv-03499, 5:25-cv-03501,
5:25-cv-03503, 5:25-cv-03505, and
5:25-cv-03506.

17
18 Defendants.

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1 Plaintiff MARIAN BARBU (“MARIAN B.”), by and through his attorneys,
2 McAllister Olivarius, on behalf of himself and MIHAI-CONSTANTIN PETCU,
3 CRISTIAN AEROAIEI, CONSTANTIN-ALIN NITU, RAZVAN-GHEORGHE
4 NITU, GEORGE ADRIAN VASILE, AURELIAN BUSCA, ALEXANDRU-
5 CRISTIAN BUSCA, MARIAN DRAGNE, FLORIN CRISTIAN CARAGEA,
6 ALEXANDRU BADALUTA, BOGDAN IONESCU, MARIAN LIVIU MIHAILA,
7 ALEXANDRA-ELENA LANGA, IOANA COSMINA PIRVU, GHEORGHITA-
8 BOGDANA TICI, MARIA GHENCIULESCU, DENIS-VASILE OTCUPARU,
9 EMILIA-MARIANA TUDOSIE, ROXANA-MARIA TURUIANU, CRISTINA-
10 BIANCA POPESCU, and ALEXANDRU IONITA (collectively, “Plaintiffs”), files
11 this Consolidated Amended Complaint against Defendants Harvest Christian
12 Fellowship (“Harvest Riverside”), Greg Laurie (“Laurie”), Richard Schutte
13 (“Schutte”), and Paul Havsgaard (“Havsgaard”) (collectively, “Defendants”), for
14 damages and other relief.

15 In support of these claims, Plaintiffs allege as follows:

16 **INTRODUCTION**

17 1. In or around 1998 through 2008, when Plaintiffs were minors as young as
18 four, Defendant Havsgaard and others he supervised sexually abused them on many
19 occasions.

20 2. Havsgaard was a pastor and an employee and/or agent of Defendant
21 Harvest Riverside, based in Riverside, California, and is arguably one of the most
22 prolific child sex abusers alive in the United States today, having committed thousands
23 of individual acts of abuse. Havsgaard managed the network of orphanages/foster
24 homes where Plaintiffs resided (“Harvest Homes” or “Homes”). The Harvest Homes
25 were operated, funded, and administered in California by Harvest Riverside, whose
26 long-time leader and unquestioned authority is Defendant Laurie. Defendant Schutte,
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1 Harvest Riverside’s Missions Pastor, had operational responsibility under Laurie for
2 supervising the Harvest Homes.

3 3. Defendants conducted major, successful fundraising programs in
4 California based on Harvest Riverside’s operation of the Harvest Homes.

5 4. In the decade between 1998 and 2008 when Defendants operated the
6 Harvest Homes in Romania, Havsgaard sexually abused and terrorized scores of
7 Romanian children in his custody and care, including Plaintiffs.

8 5. At all relevant times, Harvest Riverside has been a highly successful
9 church based in Riverside, California, with weekly services attracting up to 15,000
10 people. Laurie, Harvest Riverside’s charismatic founder and chief pastor, attracts
11 national attention as an evangelist, podcaster and the subject of a Hollywood movie
12 about his early days, *Jesus Revolution*, which grossed \$53 million in its first year.

13 6. Havsgaard was a senior pastor at Harvest Riverside and kept that position
14 as he embarked in 1998 on a foreign mission to Romania, then the sex trafficking
15 capital of Europe, at the direction of Harvest Riverside, Laurie, and Schutte.

16 7. Prior to the last time each Plaintiff was sexually abused as a minor,
17 Harvest Riverside, Laurie, and Schutte had received multiple reports in California that
18 Havsgaard was sexually abusing the children in the care of Harvest Riverside at the
19 Harvest Homes. These reports started in 1999. They came from the child residents,
20 from multiple local Romanian employees of the homes, from volunteers who travelled
21 there from California, from the wife of a Harvest Riverside pastor living in California,
22 and from pastors themselves.

23 8. From their offices in California, Harvest Riverside, Laurie, and Schutte
24 turned a blind eye. For years, they ordered no regular inspections or staff training,
25 instituted no safeguarding measures or relevant policies. Harvest Riverside continued
26 to pay Havsgaard’s salary, to list him as a pastor on its website, to fund the Harvest
27 Homes by making large payments from its own offices and accounts in California into
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1 his personal bank account with no proper accounting of his spending, and to bring
2 Havsgaard and some residents of the Homes to California to raise money in the United
3 States (and to suffer Havsgaard’s sexual abuse in California too).

4 9. Finally, by 2004, Havsgaard’s abuse had become so notorious that an
5 American missionary from another Calvary church in California, Steve Quarles
6 (“Quarles”), heard about it and complained to Schutte in Riverside, ultimately
7 prompting Schutte, the pastor in charge of all missionary work at Harvest Riverside
8 and Laurie’s trusted lieutenant, to authorize an inspection by Quarles and two other
9 Calvary ministers.

10 10. Quarles and his team performed the inspection in October 2004. They
11 were so alarmed that they spoke to Schutte in California, asking him to come see for
12 himself.

13 11. Schutte travelled to Bucharest and met with the inspection team, who laid
14 out conclusive evidence that Havsgaard was sexually abusing children and
15 misappropriating money, both on a shocking scale. Quarles told Schutte, “Paul
16 [Havsgaard] needs to be on that plane with you when you leave tomorrow. He doesn’t
17 need to be another day in Romania. He needs to be gone. He is an embarrassment to
18 every single missionary and Christian worker. Get him out of here and into
19 counselling.”

20 12. But Havsgaard was an important fundraiser for Laurie’s church whose
21 “good works” also brought credit to Laurie. As senior Harvest figures told Quarles,
22 Havsgaard “is very important because he’s the face of the ministry. He’s the one who
23 goes and talks to the churches and raises the money. And we can’t have him not be
24 part of things.” Firing Havsgaard would have hurt donations in California and possibly
25 unleash a scandal that would have hurt Laurie’s reputation.

26 13. So, despite proof that Havsgaard was a devious and unrelenting
27 pedophile, and despite knowing they had provided him a perfect laboratory of
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1 desperate and vulnerable children to exploit, Harvest Riverside, Laurie and Schutte did
2 nothing. They did not fire, suspend, withdraw or discipline Havsgaard despite their
3 clear authority to do so under California law and Laurie’s unquestioned authority over
4 all Harvest Riverside policies, decisions and activities. They neither reported
5 Havsgaard to the authorities, as was their duty under California law, nor instituted any
6 new policies or procedures at the Harvest Homes. They did nothing to protect the
7 children there, who remained completely subject to Havsgaard’s domination and
8 voracious appetites. Nor did they do anything to support Havsgaard’s victims.

9 14. Laurie instead engineered a “soft landing”: he let Havsgaard stay in
10 charge, free to molest and rape, while Laurie slowly closed the money spigot, until the
11 Romanian homes finally withered to nothing—*four years* later in 2008.

12 15. During this extended period, Havsgaard continued to abuse Plaintiffs and
13 other children in the Harvest Homes, both those who were already there and the new
14 ones he was left free to recruit, without any new restraints imposed by Harvest
15 Riverside, Laurie or Schutte.

16 16. Laurie even authorized a gift to Havsgaard from Harvest Riverside funds
17 in California of some \$200,000 in severance as he continued in his post as if nothing
18 had happened. Romanian authorities were told nothing.

19 17. Harvest Riverside continued to solicit and collect funds in California for
20 the Homes despite knowing they were closed.

21 18. In 2009, a year after Havsgaard’s return to California from Bucharest,
22 Laurie called him “a pastor who faithfully served the Lord for many years at Harvest
23 Christian Fellowship, the church where I pastor,” and even compared his work in
24 Romania to that of Moses with the Israelites, because his “life demonstrates the power
25 that just one godly person can have.”¹

26 _____

27 ¹ Greg Laurie, *What One Can Do*, Crosswalk (June 23, 2009), [https://www.crosswalk.com/](https://www.crosswalk.com/fair/spiritual-life/what-one-can-do-11604878.html)
28 [faith/spiritual-life/what-one-can-do-11604878.html](https://www.crosswalk.com/fair/spiritual-life/what-one-can-do-11604878.html).

1 19. Since his return to California in 2008, Havsgaard has continued to work
2 at Calvary churches in California linked to Harvest Riverside, with unsupervised
3 access to children, which Defendants could easily have stopped but did not. He has
4 never been publicly repudiated or admonished by Laurie, Schutte or Harvest Riverside,
5 and even performed a wedding at Harvest Riverside in 2016.

6 20. The cover-up has worked well for Laurie. As Havsgaard raped his way
7 through scores of children in Harvest Riverside’s care, including Plaintiffs, and
8 returned to a comfortable life in California, Laurie grew in national prominence and
9 wealth, with a \$5.5 million home in Newport Beach, a home in Hawaii, a \$90,000 car,
10 a top-rated podcast, and a Hollywood movie.

11 21. In sharp contrast, Plaintiffs and the scores of other Romanian victims of
12 Havsgaard’s abuse and Defendants’ cover-up in California went back on the streets
13 with no money, no plan for the future, no medical care, no therapy for PTSD and other
14 medical and psychological damage that Defendants caused, and certainly no gifts of
15 severance payments that Havsgaard enjoyed. Defendants promised Plaintiffs and other
16 children security and support, but betrayed that promise with years of sexual abuse,
17 and then chucked them on the street without an iota of practical help or human
18 sympathy.

19 22. Defendants have continued to conspire in California to cover up these
20 horrors for which they were all responsible. The cover-up has succeeded for 20 years—
21 until now.

22 23. In fact, the “Havsgaard cover-up” mirrors many others by Laurie and his
23 senior pastors, including of repeated complaints about senior pastors’ extramarital
24 affairs on Harvest Riverside’s campus, which resulted in no investigations but quiet
25 exits and at least one multi-million dollar payoff; mistreatment and sexual abuse of
26 children at a Calvary “boot camp” for teens in Mexico; diversion of donations to
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1 purposes different from those advertised; and covert electronic surveillance of
2 employees, among others.

3 24. The failure of Harvest Riverside, Laurie and Schutte to investigate
4 Havsgaard took place in California. They made money in California by using their
5 Romanian venture to raise funds and brought children to California to raise more,
6 where Havsgaard sexually abused them. Harvest Riverside's, Laurie's, and Schutte's
7 failure to supervise or remove Havsgaard and to warn future victims took place in
8 California. They knowingly raised money in California for the Harvest Homes after
9 they shut them down. The ongoing conspiracy and cover-up have been directed from
10 California.

11 25. As a result of the acts and omissions that took place in California,
12 Havsgaard sexually abused and sexually trafficked Plaintiffs, who suffered permanent
13 physical and psychological injuries.

14 **JURISDICTION AND VENUE**

15 26. This Court has jurisdiction over Plaintiffs' California state law claims
16 pursuant to 28 U.S.C. § 1332 because the amount in controversy exceeds \$75,000
17 exclusive of interest and costs, and there is complete diversity between the parties, with
18 Plaintiffs residing in Romania, Spain, or the United Kingdom, and each Defendant
19 residing or situated in California.

20 27. This Court further has subject matter jurisdiction over Plaintiffs'
21 California state law claims pursuant to 28 U.S.C. § 1367(a), as the claims are so related
22 to claims within the Court's original jurisdiction that they form part of the same case
23 or controversy under Article III of the United States Constitution.

24 28. This Court has subject-matter jurisdiction over Plaintiffs' claims arising
25 under 18 U.S.C. § 1595, the Trafficking Victims Protection Reauthorization Act, and
26 under 18 U.S.C. §§ 2423(c) and 2255, prohibiting illicit sexual conduct in foreign
27 places, pursuant to 28 U.S.C. §§ 1331 and 1343.

1 29. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), in that all
2 Defendants reside in this district, and 28 U.S.C. § 1391(b)(2), in that a substantial part
3 of the events or omissions giving rise to the claim occurred in this district.

4 **CHOICE OF LAW & STATUTE OF LIMITATIONS**

5 30. Cal. Civ. P. Code § 361 permits Plaintiffs' California state law claims
6 even though Plaintiffs are Romanian because Plaintiffs are bringing claims which arose
7 in California and are based on acts and omissions that occurred in California. Both the
8 substantive and procedural law of California apply to Plaintiffs' California law claims.

9 31. At the time of commencing this action, all Plaintiffs are entitled to bring
10 claims arising from child sex abuse under California law. *See* Cal. Civ. P. Code §
11 340.11 (2024).

12 32. All Plaintiffs were under the age of 40 at the time this action was
13 commenced.

14 33. Due to circumstances resulting from Defendants' sex trafficking scheme,
15 it was previously impracticable for Plaintiffs to bring a case under 18 U.S.C. §1595.

16 34. Plaintiffs, to the extent applicable here, have pursued their rights
17 diligently and were impeded because of extraordinary threats and coercion that
18 Defendants applied to Plaintiffs during the period of their residency in the Harvest
19 Homes. Plaintiffs were further impeded in pursuing their claims by the extraordinary
20 mental and emotional damage that Defendants inflicted on Plaintiffs; Havsgaard's
21 order not to talk about what he was doing with them lest they be punished; and the
22 disappearance of Havsgaard and Harvest Riverside back to California after 2008,
23 which left no evident route of redress to young, poorly educated and traumatized
24 Romanian children.

25 35. Defendants conspired to and did fraudulently conceal the sexual assaults
26 perpetrated against Plaintiffs and other Romanian children.

1 36. Defendants’ wrongful and/or negligent acts and omissions as described
2 below were a substantial factor in bringing about childhood sex abuse of Plaintiffs
3 which caused them injury.

4 37. As a result, to the extent necessary, all applicable statutes of limitations
5 should be equitably tolled.

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PARTIES

I. PLAINTIFFS

A. Plaintiff Marian Barbu

Figure 1: Plaintiff Marian Barbu, circa 2004



38. Plaintiff MARIAN BARBU (“MARIAN B.”) is a citizen of Romania and a former resident of the Harvest Homes.

39. MARIAN B. was born in 1992 in Bucharest. His mother died when he was five years old, and his father was an alcoholic who was unable to care for him properly and died when MARIAN B. was 15.

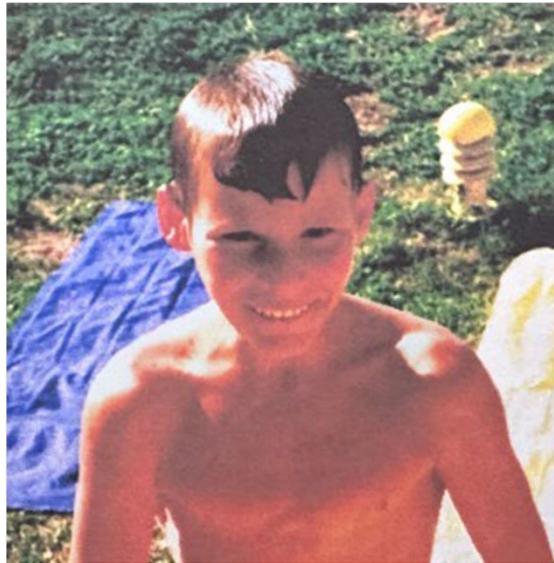
40. In or around 2000, when MARIAN B. was eight years old, police found him living alone on the street and took him to Havsgaard. MARIAN B. was acutely vulnerable, desperate for food, shelter and stability. Havsgaard invited him into Harvest’s care. At various points MARIAN B. lived at the Buftea, Dămăroaia, and Bârlogeni homes, all of which were established by Harvest Riverside at Laurie’s direction and run day-to-day by Havsgaard.

41. Havsgaard regularly physically and sexually abused MARIAN B., who was at all relevant times a child under the custody, care and supervision of Defendants,

1 for eight years until he left the Harvest Homes at the age of 16. It was reasonably
2 foreseeable to Defendants that Havsgaard would sexually abuse MARIAN B., as they
3 knew or should have known about Havsgaard’s rampant sexual abuse of scores of other
4 children in the Harvest Homes.

5 **B. Plaintiff Mihai-Constantin Petcu**

6 *Figure 2: Mihai-Constantin Petcu, circa 2002*



17 42. Plaintiff MIHAI-CONSTANTIN PETCU (“MIHAI-CONSTANTIN”) is
18 a citizen of Romania and a former resident of Harvest Homes.

19 43. MIHAI-CONSTANTIN was born in 1985 in Bucharest. Since his father
20 was an alcoholic and mostly absent, MIHAI-CONSTANTIN was raised by his mother.
21 She suffered from diabetes and struggled to look after MIHAI-CONSTANTIN and his
22 younger brother, with whom MIHAI-CONSTANTIN no longer has a relationship.

23 44. MIHAI-CONSTANTIN ran away from home with his brother on several
24 occasions. From a young age up until he was 14 years old, he alternated between living
25 at home and on the streets in Bucharest.

26 45. In 2000, MIHAI-CONSTANTIN met Havsgaard while he was homeless
27 in Bucharest. Havsgaard visited MIHAI-CONSTANTIN and his brother several times,
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1 with Leo L.² by his side. Havsgaard bought a McDonald’s meal for MIHAI-
2 CONSTANTIN and his brother. He asked if MIHAI-CONSTANTIN wanted to live in
3 one of the Harvest Homes and told him that he would be fed, clothed, and able to go
4 to school. MIHAI-CONSTANTIN agreed.

5 46. Havsgaard regularly physically and sexually abused MIHAI-
6 CONSTANTIN, who was a child under the custody, care and supervision of
7 Defendants until he turned 18 in 2004, and MIHAI-CONSTANTIN remained at the
8 Harvest Homes until they closed in 2008. It was reasonably foreseeable to Defendants
9 that Havsgaard would sexually abuse MIHAI-CONSTANTIN, as they knew or should
10 have known about Havsgaard’s rampant sexual abuse of scores of other children in the
11 Harvest Homes.

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27 ² Pseudonyms are employed in this Complaint to protect the anonymity of certain minor victims of
28 Defendants, in the form of a first name plus an initial for the surname, such as “Abigail A.” or “Peter P.”.

1 **C. Plaintiff Cristian Aeroaiei**

2 *Figure 3: Plaintiff Cristian Aeroaiei, circa 2001*



20 47. Plaintiff CRISTIAN AEROAIEI (“CRISTIAN”) is a citizen of Romania
21 and a former resident of the Harvest Homes.

22 48. Cristian was born in 1989 in Bucharest. He lived with his parents and
23 brother until he was about eight years old. Cristian’s father was an alcoholic and used
24 to beat him. Cristian has a younger sister but he has never met her. Cristian has not
25 seen his father since he was a child.

26 49. CRISTIAN’s mother escaped their abusive household, and CRISTIAN
27 ran away a year later. CRISTIAN stayed with his godmother for two years but left, in
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1 or around 2000, when he was ten or eleven years old, due to his fears that his father
2 would find him.

3 **D. Plaintiff Constantin-Alin Nitu**

4 50. Plaintiff CONSTANTIN-ALIN NITU (“ALIN”) is a citizen of Romania
5 and a former resident of the Harvest Homes.

6 51. ALIN was born in 1989 in Bucharest. He has an older brother, Plaintiff
7 RAZVAN-GHEORGHE NITU who also stayed at the Harvest Homes. ALIN’s father
8 died when he was four years old, and he and his siblings grew up under the sole care
9 of their mother.

10 52. When ALIN’s father died, his mother moved into her brother’s house.
11 ALIN and his brother were left behind, homeless, and lived on the streets.

12 53. In or around 2000 or 2001, they met Stefan S. at a train station in
13 Bucharest and explained their living situation. He told them about a place called
14 Harvest where they could sleep, eat, and go to school.

15 54. ALIN and his brother, lured by the promise of a roof over their heads and
16 food to eat, subsequently became residents of the Bârlogeni Harvest Home.

17 55. While at Harvest Homes, ALIN was permitted to see his mother
18 occasionally, but Havsgaard would threaten him and his brother with stopping this if
19 they did not do as he wished.

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1 **E. Plaintiff Razvan-Gheorghe Nitu**

2 *Figure 4: Plaintiff Razvan-Gheorghe Nitu, circa 2004*



13 56. RAZVAN-GHEORGHE NITU (“RAZVAN”) is a citizen of Romania
14 and a former resident of the Harvest Homes.

15 57. Răzvan was born in 1987 in Bucharest. He has a younger brother, ALIN,
16 who also stayed at the Harvest Homes. He also has two sisters. RAZVAN’s father died
17 when he was six years old, and he and his siblings grew up under the sole care of their
18 mother.

19 58. When RAZVAN’s father died, his mother moved into her brother’s house.
20 RAZVAN and his brother were left behind, homeless, and lived on the streets.

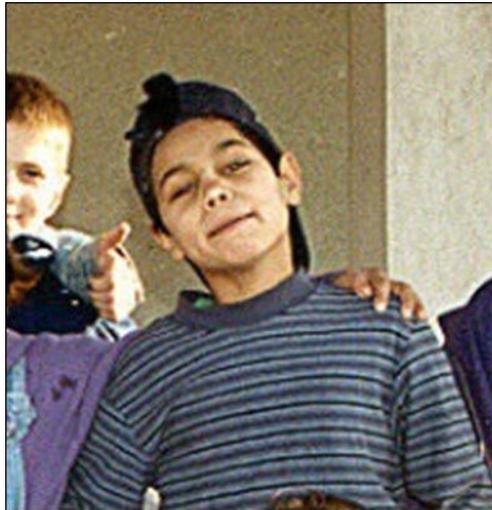
21 59. 40. In or around 2000 or 2001, they met Stefan S. at a train station in
22 Bucharest and explained their living situation. He told them about a place called
23 Harvest where they could sleep, eat, and go to school.

24 60. RAZVAN and his brother, lured by the promise of a roof over their heads
25 and food to eat, subsequently became residents of the Bârlogeni Harvest Home.

1 61. While at Harvest Homes, RAZVAN was permitted to see his mother
2 occasionally, but Havsgaard would threaten him and his brother with stopping this if
3 they did not do as he wished.

4 **F. Plaintiff George Adrian Vasile**

5 *Figure 5: Plaintiff George-Adrian Vasile, circa 1999*



15 62. Plaintiff GEORGE ADRIAN VASILE (“ADRIAN”) is a citizen of
16 Romania and a former resident of the Harvest Homes.

17 63. ADRIAN was born in 1992 in Bucharest. He believes he has nine siblings
18 (he has not met all of them). ADRIAN lived with his parents until he was eight years
19 old. His father was an alcoholic, and his mother became ill with schizophrenia.

20 64. ADRIAN’s family was poor, and from around the age of seven, he was
21 sent to beg for food and money with his siblings on the streets of Bucharest. Havsgaard
22 found ADRIAN and his brothers begging in the streets and offered to take them to
23 Harvest. His parents believed this would be an improvement for them.

24 65. Havsgaard drove ADRIAN and his brother to the Harvest Homes in or
25 around 2000. At first, ADRIAN and his brother lived at the Buftea house, but
26 Havsgaard soon separated them and forced ADRIAN to move to the Dămăroaia house.

1 **G. Plaintiff Aurelian Busca**

2 *Figure 6: Plaintiff Aurelian Busca, circa 2002*



12 66. Plaintiff AURELIAN BUSCA (“AURELIAN”) is a citizen of Romania
13 and a former resident of the Harvest Homes.

14 67. AURELIAN was born in 1987 in Bucharest. He has two brothers, one of
15 whom, ALEXANDRU-CRISTIAN BUSCA (“ALEXANDRU-CRISTIAN”), was also
16 a child resident at the Harvest Homes, and two sisters. AURELIAN’s father was an
17 alcoholic and died when AURELIAN was a child; his mother struggled to parent her
18 children alone, so AURELIAN and ALEXANDRU-CRISTIAN stayed with their
19 grandparents for a while.

20 68. Eventually, ALEXANDRU-CRISTIAN, AURELIAN and one of their
21 sisters ended up living on the streets. They stayed in the sewers of Bucharest and
22 begged for food and money. One day, Romanian Child Protection Services picked up
23 the brothers and housed them in a state orphanage. The other children at the orphanage
24 were violent and abusive, so ALEXANDRU-CRISTIAN and AURELIAN ran away
25 to live back on the streets.

26 69. Then Havsgaard noticed ALEXANDRU-CRISTIAN, gave him a bracelet
27 that read “Jesus Loves You,” and invited him to become a resident of Harvest Homes.

1 Some time later, ALEXANDRU-CRISTIAN, accompanied by Havsgaard, went to see
2 AURELIAN. AURELIAN was impressed by the nice clothes that ALEXANDRU-
3 CRISTIAN was wearing and asked to move into the Harvest Homes too. Havsgaard
4 initially declined to admit AURELIAN, but eventually let him move to the Harvest
5 Home located in Bârlogeni—separate from ALEXANDRU-CRISTIAN, who lived in
6 the house in Buftea.

7 70. Havsgaard intentionally kept AURELIAN and ALEXANDRU-
8 CRISTIAN separated throughout their time at the Harvest Homes.

9 **H. Plaintiff Alexandru-Cristian Busca**

10 *Figure 7: Plaintiff Alexandru-Cristian Busca, circa 2004*



24 71. Plaintiff Alexandru-Cristian Busca (“ALEXANDRU-CRISTIAN”) is a
25 citizen of Romania and a former resident of the Harvest Homes.

26 72. ALEXANDRU-CRISTIAN was born in 1986 in Bucharest. He has two
27 sisters and two brothers, one of whom, AURELIAN, also lived at the Harvest Homes.

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1 ALEXANDRU-CRISTIAN’s father was an alcoholic and died when ALEXANDRU-
2 CRISTIAN was a child; ALEXANDRU-CRISTIAN’s mother struggled to parent her
3 children alone, so ALEXANDRU-CRISTIAN and AURELIAN lived for some time
4 with their grandparents.

5 73. Eventually, ALEXANDRU-CRISTIAN, AURELIAN, and one of their
6 sisters ended up living on the streets. They stayed in the sewers of Bucharest and
7 begged for food and money. One day, Romanian Child Protection Services picked up
8 the brothers and housed them in a state orphanage. The other children at the orphanage
9 were violent, so ALEXANDRU-CRISTIAN ran away to live back on the streets.

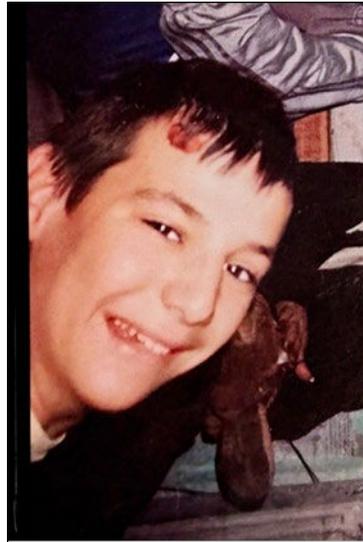
10 74. Then Havsgaard noticed ALEXANDRU-CRISTIAN, gave him a bracelet
11 that read “Jesus Loves You,” and invited him to live at the Harvest Homes.

12 75. At first, ALEXANDRU-CRISTIAN declined. Soon thereafter, he became
13 ill with appendicitis and was hospitalized. The nurses alerted Child Protection
14 Services, who again placed ALEXANDRU-CRISTIAN in a state orphanage once he
15 recovered. Eventually, Havsgaard located ALEXANDRU-CRISTIAN and took him to
16 live at the Harvest Homes.

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2 **I. Plaintiff Marian Dragne**

3 *Figure 8: Plaintiff Marian Dragne, circa 2002*



14 76. Plaintiff MARIAN DRAGNE (“MARIAN D.”) is a citizen of Romania
15 and a former resident of the Harvest Homes.

16 77. MARIAN D. was born in 1988 in Bucharest. He has two brothers and two
17 sisters. His family was poor. MARIAN D.’s mother died when he was eight and
18 MARIAN D.’s father died three years later, following which MARIAN D. moved in
19 with his grandparents.

20 78. MARIAN D.’s grandparents died when MARIAN D. was 14 and a
21 neighbor took MARIAN D. to live at the Harvest Homes in Buftea. None of his siblings
22 joined him.

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1 **J. Plaintiff Florin Cristian Caragea**

2 *Figure 9: Plaintiff Florin Cristian Caragea, circa 2002*



19 79. Plaintiff FLORIN CRISTIAN CARAGEA (“FLORIN”) is a citizen of
20 Romania and a former resident of the Harvest Homes.

21 80. FLORIN was born in 1992 in Alexandria, Romania. When he was six
22 months old, his parents separated, and FLORIN’s father got custody. His father
23 remarried and had six other children with his new wife. FLORIN was neglected by his
24 family and did not know anything about his biological mother. FLORIN’s father forced
25 him to beg on the streets to support the family. FLORIN ran away from home when he
26 was nine or ten years old.

1 81. In or around 2002, FLORIN met Havsgaard at a McDonald's in
2 Bucharest. Havsgaard promised FLORIN a good life if he came with him to Harvest
3 Homes. Enticed by the promises of food, clothing, and a place to live, FLORIN agreed
4 to go with Havsgaard.

5 82. During his time at Harvest Homes, FLORIN lived in the house in
6 Bârlogeni before moving to Buftea when the Bârlogeni house closed in 2007.

7 **K. Plaintiff Alexandru Badaluta**

8 *Figure 10: Plaintiff Alexandru Badaluta, circa 2004*



19 83. Plaintiff ALEXANDRU BADALUTA (“ALEXANDRU B.”) is a citizen
20 of Romania and a former resident of the Harvest Homes.

21 84. ALEXANDRU B. was born in 1989 in Constanța, Romania. He never
22 knew his father, who died when ALEXANDRU B. was a child. His mother started a
23 new family with a different man and did not take care of ALEXANDRU B. well.

24 85. ALEXANDRU B. ran away from this unhappy home when he was seven
25 years old. For five years, he lived on the streets and begged for food.

1 86. When ALEXANDRU B. was twelve years old, Havsgaard and his driver,
2 Marcel Musceleanu (“Musceleanu”), noticed him, brought him a McDonald’s meal,
3 and gave him a bracelet that read, “Jesus Loves You.”

4 87. Havsgaard and Musceleanu hugged ALEXANDRU B. and explained that
5 his life would be better if he came with them to Buftea: He would have food, be able
6 to go to school, and be surrounded by other children. ALEXANDRU B. agreed and
7 moved into the Buftea house in or around 2001. At a later date, Havsgaard relocated
8 ALEXANDRU B. to the Harvest Home located in Strada Bârlogeni.

9 **L. Plaintiff Bogdan Ionescu**

10 *Figure 11: Plaintiff Bogdan Ionescu, circa 2004*



23 88. Plaintiff BOGDAN IONESCU (“BOGDAN”) is a citizen of Romania and
24 a former resident of the Harvest Homes.

25 89. BOGDAN was born in 1990 in Bucharest. He never knew his parents or
26 the rest of his family as they abandoned him shortly after he was born.

1 90. BOGDAN moved frequently between various Romanian state-run
2 orphanages in his early childhood. He stayed for some time at a state orphanage called
3 Casa Pinocchio together with CRISTINA POPESCU (“CRISTINA”).

4 91. When BOGDAN was nine, he ran away from Casa Pinocchio with
5 CRISTINA (who was seven) due to the poor living conditions there. To survive, they
6 stayed at a railway station in Bucharest for two weeks, sleeping on benches.

7 92. Eventually, Havsgaard and his wife noticed BOGDAN and CRISTINA,
8 fed them, and invited them to come with him to the Harvest Homes with promises of
9 better lives. They accepted.

10 93. At first, BOGDAN lived in the Iancului house but Havsgaard later moved
11 him to the Dămăroaia house and then to the house in Buftea.

12 **M. Plaintiff Marian Liviu Mihaila**

13 *Figure 12: Plaintiff Marian Liviu Mihaila, circa 2003*



26 94. Plaintiff Marian Liviu Mihaila (“MARIAN LIVIU”) is a citizen of
27 Romania and a former resident of the Harvest Homes.

1 95. MARIAN LIVIU was born in 1987 in Bucharest, Romania. When he was
2 around six years old, his mother abandoned him to the care of his alcoholic father. His
3 father struggled financially, and they ended up losing their apartment.

4 96. From the age of nine to 15, MARIAN LIVIU and his father lived on the
5 streets or sometimes MARIAN LIVIU would end up in a children’s home, including a
6 center called Saint Macrina. MARIAN LIVIU nonetheless managed to distinguish
7 himself as a talented wrestler, competed semi-professionally in the sport, and received
8 a modest allowance from Romania’s Sport Institute.

9 97. Eventually, MARIAN LIVIU started attending a “Back to School”
10 program led by Sorin Gheorghe (“Sorin”), who introduced MARIAN LIVIU to
11 Havsgaard and Harvest Homes.

12 98. In or around December 2002, when MARIAN LIVIU was 15 years old,
13 he moved into the Harvest Home in Strada Bârlogeni.

14 **N. Plaintiff Alexandra-Elena Langa**

15 *Figure 13: Plaintiff Alexandra-Elena Langa, circa 2004*



26 99. Plaintiff ALEXANDRA-ELENA LANGA (“ALEXANDRA”) is a
27 citizen of Romania and a former resident of the Harvest Homes.

1 100. ALEXANDRA was born in 1997 in Bucharest. She grew up with her
2 father, mother, and brother DENIS-VASILE OTCUPARU (“DENIS”), who also
3 stayed at Harvest Homes. When ALEXANDRA was very young, her father was
4 diagnosed with a brain tumor and underwent several surgeries, leaving him paralyzed
5 and needing assistance to walk. ALEXANDRA was sent to live with her aunt, who
6 was abusive and eventually threw ALEXANDRA out of the house.

7 101. ALEXANDRA’s mother then sent her to Harvest Homes, which she had
8 learned about through her church. ALEXANDRA was about four years old at the time.

9 102. ALEXANDRA was meant to stay at Harvest Homes during the week and
10 go home to her family each weekend. However, Havsgaard often punished
11 ALEXANDRA by forbidding her to go home or otherwise see her parents.

12 103. For a while, ALEXANDRA and DENIS lived in the same Harvest Home,
13 but Havsgaard later forcibly separated them, which deeply hurt them. The separation
14 allowed Havsgaard to more easily sexually abuse them.

15 **O. Plaintiff Ioana Cosmina Pirvu**

16 *Figure 14: Plaintiff Ioana Cosmina Pirvu, circa 2004*



26 104. Plaintiff IOANA COSMINA PIRVU (“COSMINA”) is a citizen of
27 Romania and a former resident of the Harvest Homes.

1 105. COSMINA was born in 1993 in Bucharest. She grew up with two older
2 sisters, S. GHEORGHITA-BOGDANA TICI (“DANA”), and MARIA
3 GHENCIULESCU (“MARIA”). Their family was poor. Their father was an alcoholic
4 who often beat their mother.

5 106. When COSMINA was around three years old, her mother fled home and
6 took the daughters with her. The four of them lived on the streets, begging for food. A
7 man who lived in a tent on the streets offered to help them. COSMINA’s mother was
8 only 27 at the time, with three daughters to take care of, so she accepted; this man over
9 time became the sisters’ stepfather. They all lived together and spent their days
10 begging, looking for food in the garbage, sleeping under bridges, using drugs, and
11 drinking.

12 107. In or around 2000, when COSMINA was seven years old, MARIA met a
13 woman named Mihaela, who worked for Havsgaard at the Harvest Homes and offered
14 to help the family. MIHAELA fed MARIA and her sisters and offered to accept them
15 as Harvest Homes residents on Havsgaard’s behalf. Their mother agreed.

16 108. Shortly thereafter, Havsgaard visited the family’s tent, took pictures, and
17 brought MARIA and DANA to the Harvest Home in Buftea; he returned for
18 COSMINA a few weeks later. In or around 2001 or 2002, Havsgaard expanded Harvest
19 Homes to include a new home in Dămăroaia and moved the sisters there.

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2 **P. Plaintiff Gheorghita-Bogdana Tici**

3 *Figure 15: Plaintiff Gheorghita-Bogdana Tici, circa 2004*



14 109. Plaintiff Gheorghita-Bogdana Tici (“DANA”) is a citizen of Romania and
15 a former resident of the Harvest Homes.

16 110. DANA was born in 1990 in Bucharest. She grew up with two sisters,
17 MARIA and COSMINA. Their family was poor and their father was an alcoholic who
18 often beat their mother.

19 111. When DANA was around six years old, her mother fled home and took
20 the daughters with her. The four of them lived on the streets, begging for food. A man
21 who lived in a tent on the streets offered to help them. DANA’s mother was only 27 at
22 the time, with three daughters to take care of, so she accepted; this man over time
23 became the sisters’ stepfather. They all lived together and spent their days begging,
24 looking for food in the garbage, sleeping under bridges, using drugs, and drinking.

25 112. In or around 2000, when DANA was ten years old, MARIA met a woman
26 named Mihaela, who worked for Havsgaard at the Harvest Homes and offered to help
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1 the family. Mihaela fed MARIA and her sisters and offered to accept them as Harvest
2 Homes residents on Havsgaard’s behalf. Their mother agreed.

3 113. Shortly thereafter, Havsgaard visited the family’s tent, took pictures, and
4 brought MARIA and DANA to the Harvest Home in Buftea; he returned for
5 COSMINA a few weeks later. In or around 2001 or 2002, Havsgaard expanded Harvest
6 Homes to include a new home in Dămăroaia and moved the sisters there.

7 **Q. Plaintiff Maria Ghenciulescu**

8 *Figure 16: Plaintiff Maria Ghenciulescu, circa 2004*



18 114. Plaintiff MARIA GHENCIULESCU (“MARIA”) is a citizen of Romania
19 and a former resident of the Harvest Homes.

20 115. MARIA was born in 1988 in Bucharest. She grew up with two younger
21 sisters, DANA and COSMINA. Their family was poor and their father was an alcoholic
22 who often beat their mother.

23 116. When MARIA was around eight years old, her mother fled the home and
24 took her daughters with her. The four of them lived on the streets, begging for food. A
25 man who lived in a tent on the streets offered to help them. MARIA’s mother was only
26 27 at the time, with three daughters to take care of, and she accepted; this man over
27 time became the sisters’ stepfather. They all lived together and spent their days
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1 begging, looking for food in the garbage, sleeping under bridges, using drugs, and
2 drinking.

3 117. In or around 2000, when MARIA was twelve years old, she met a woman
4 named Mihaela, who worked for Havsgaard at the Harvest Homes and offered to help
5 the family. Mihaela gave MARIA and her sisters a meal and offered to accept them as
6 Harvest Homes residents on Havsgaard’s behalf. Their mother agreed.

7 118. Shortly thereafter, Havsgaard visited the family’s tent, took pictures, and
8 brought MARIA and DANA to the Harvest Home in Buftea; he returned for
9 COSMINA a few weeks later. In or around 2001 or 2002, Havsgaard expanded Harvest
10 Homes to include a new home in Dămăroaia and moved the sisters there.

11 **R. Plaintiff Denis-Vasile Otcuparu**

12 119. Plaintiff DENIS-VASILE OTCUPARU (“DENIS”) is a citizen of
13 Romania and a former resident of the Harvest Homes.

14 120. DENIS was born in 1993 in Bucharest, Romania. He grew up living with
15 his mother, father, and sister, ALEXANDRA, who also lived at the Harvest Homes.

16 121. Before DENIS moved to Harvest Homes, his father became paralyzed
17 from a brain tumor and had undergone multiple brain surgeries. His father could not
18 walk properly. DENIS’s mother sold candles at a local church to support her family.

19 122. In or around 2000, when DENIS was seven years old, his mother heard
20 about Harvest Homes at her church and decided to send DENIS and ALEXANDRA to
21 live there. DENIS first stayed in the Buftea house for a year, after which Havsgaard
22 moved him to the Dămăroaia location.

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1 **S. Plaintiff Emilia-Mariana Tudosie**

2 *Figure 17: Plaintiff Emilia-Mariana Tudosie, circa 2004*



14 123. Plaintiff EMILIA-MARIANA TUDOSIE (“EMILIA”) is a citizen of
15 Romania and a former resident of the Harvest Homes.

16 124. EMILIA was born in 1987 in Bucharest as one of four siblings. Her
17 mother did not have the means to raise them and some of her siblings grew up with
18 various relatives.

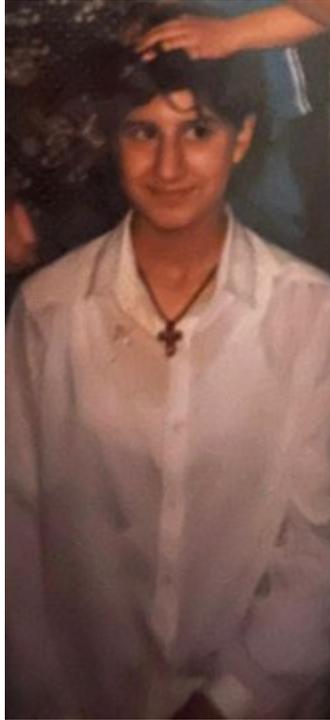
19 125. As a child, EMILIA began living on the streets for multiple years and also
20 stayed in a Romanian state orphanage, Casa Pinocchio.

21 126. At ten years of age, EMILIA met Havsgaard, who invited her to move
22 into Harvest Homes. EMILIA first stayed in the Iancului home; later she moved to the
23 house in Dămăroaia. EMILIA’s younger sister, Laura, also lived in the Harvest Homes.

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1 **T. Plaintiff Roxana-Maria Turuianu**

2 *Figure 18: Plaintiff Roxana-Maria Turuianu, circa 2002*



16 127. Plaintiff ROXANA-MARIA TURUIANU (“ROXANA”) is a citizen of
17 Romania and a former resident of the Harvest Homes.

18 128. ROXANA was born in 1986 in Bucharest. She lived with her parents until
19 they divorced, and then lived with an aunt and other family members.

20 129. In 2001, when ROXANA was 15, she joined the “Back to School”
21 program run by Sorin, who also taught some of the children living at Harvest Homes.
22 Two years later, ROXANA’s aunt told ROXANA to move in with her grandmother in
23 the countryside. ROXANA did not want to leave Bucharest, so she ran away from
24 home and asked Sorin for help. Sorin spoke to Havsgaard, who invited ROXANA to
25 move into the girls’ Harvest Home in Dămăroaia.

1 **U. Plaintiff Cristina-Bianca Popescu**

2 *Figure 19: Plaintiff Cristina-Bianca Popescu, circa 1999*



16 130. Plaintiff CRISTINA-BIANCA POPESCU (“CRISTINA”) is a citizen of
17 Romania and a former resident of the Harvest Homes.

18 131. CRISTINA was born in 1992 in Buftea. She ran away from home when
19 she was five or six years old because her parents regularly beat her. She boarded a train
20 to Bucharest and eventually ended up in Casa Pinocchio, a Romanian orphanage.

21 132. At the orphanage, CRISTINA met BOGDAN. CRISTINA and BOGDAN
22 were often beaten by other children and staff. When CRISTINA was seven and
23 BOGDAN was nine, they ran away. To survive, they stayed at a railway station in
24 Bucharest for two weeks, sleeping on benches.

25 133. Eventually, Havsgaard and his wife noticed BOGDAN and CRISTINA,
26 fed them, and invited them to come to the Harvest Homes with promises of better lives.
27 BOGDAN and CRISTINA accepted.

1 134. At first, CRISTINA lived in Harvest Homes’ Iancului house. After a year
2 and a half, Havsgaard moved her to the house in Buftea. CRISTINA also stayed at the
3 Dămăroaia house during her time at Harvest Homes.

4 **V. Plaintiff Alexandru Ionita**

5 *Figure 20: Plaintiff Alexandru Ionia, circa 2002*



15 135. Plaintiff ALEXANDRU IONITA (“ALEXANDRU I.”) is a citizen of
16 Romania and a former resident of the Harvest Homes.

17 136. ALEXANDRU I. was born in 1986 in Bucharest. His family was very
18 poor and his parents separated when he was young. ALEXANDRU I. and his sister
19 lived with their mother who worked night shifts to support the family and slept for
20 much of the day. As a child, ALEXANDRU I. used to spend his days and evenings on
21 the streets, begging for food at a local McDonald’s.

22 137. ALEXANDRU I. met Havsgaard in or around 2000. Havsgaard visited
23 the McDonald’s from time to time and bought ALEXANDRU I. and other children
24 food. The other children at the McDonald’s often talked about the Harvest Homes and
25 asked Havsgaard to let them live there.
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1 138. In or around 2000, Havsgaard took ALEXANDRU I. to stay at Harvest
2 Homes. ALEXANDRU I. first lived in the Iancului house but, in or around 2002,
3 Havsgaard moved him to the Buftea house.

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W. Summary Table of Plaintiffs' Names

Plaintiffs' Names	Defined Term	Original Case No.:
Marian Barbu	MARIAN B.	5:25-cv-02428-SSS-MAA
Mihai-Constantin Petcu	MIHAI-CONSTANTIN	5:25-cv-02429-SSS-RAO
Cristian Aeroaiei	CRISTIAN	5:25-cv-02461-SSS-MAA
Constantin-Alin Nitu	ALIN	5:25-cv-02559-SSS-MAA
Razvan-Gheorghe Nitu	RAZVAN	5:25-cv-02560-SSS-MAA
George Adrian Vasile	ADRIAN	5:25-cv-02561-SSS-MAA
Aurelian Busca	AURELIAN	5:25-cv-03048-SSS-MAA
Alexandru-Cristian Busca	ALEXANDRU-CRISTIAN	5:25-cv-03052-SSS-MAA
Marian Dragne	MARIAN D.	5:25-cv-03074-SSS-MAA
Florin Cristian Caragea	FLORIN	5:25-cv-03076-SSS-MAA
Alexandru Badaluta	ALEXANDRU B.	5:25-cv-03092-SSS-MAA
Bogdan Ionescu	BOGDAN	5:25-cv-03093-SSS-MAA
Marian Liviu Mihaila	MARIAN LIVIU	5:25-cv-03488-SSS-MAA
Alexandra-Elena Langa	ALEXANDRA	5:25-cv-03493-SSS-MAA
Ioana Cosmina Pirvu	COSMINA	5:25-cv-03495-SSS-MAA
Gheorghita-Bogdana Tici	DANA	5:25-cv-03496-SSS-SP
Maria Ghenciulescu	MARIA	5:25-cv-03497-SSS-MAA
Denis-Vasile Otcuparu	DENIS	5:25-cv-03499-SSS-MAA
Emilia-Mariana Tudosie	EMILIA	5:25-cv-03501-SSS-MAA
Roxana-Maria Turuianu	ROXANA	5:25-cv-03503-SSS-MAA
Cristina-Bianca Popescu	CRISTINA	5:25-cv-03505-SSS-MAA
Alexandru Ionita	ALEXANDRU I.	5:25-cv-03506-SSS-SP

1 **II. DEFENDANTS**

2 **A. Defendant Greg Laurie**

3 *Figure 21: Laurie preaching*



15 139. Laurie was born in 1952. He currently resides in Newport Beach,
16 California in a home worth an estimated \$5,144,100 as of June 2025. At all material
17 times, Laurie has been a resident of California.

18 140. Laurie is the co-founder and Senior Pastor of Harvest Riverside. He has
19 supreme authority and makes all important decisions concerning Harvest Riverside.

20 141. Energetic and resourceful, Laurie has also become a successful author,
21 podcaster and national figure. With his oratorical skills, books, podcasts, TV
22 broadcasts, and regular crusades, Laurie is often likened to Billy Graham and sits on
23 the Board of Directors of the Billy Graham Evangelical Association. His podcast has
24 been among the top 100 most popular in the United States. He has recently been touring
25 the country as part of Turning Point USA’s “Make Heaven Crowded” campaign
26 headlined by Erika Kirk. His daily broadcast “A New Beginning” is heard on over
27 1,100 radio stations and Sirius XM.

1 *Figure 22: Laurie crusade in Dodger stadium, 2012*



11 142. Laurie’s crusades typically attract hundreds of thousands of people to the
12 biggest stadiums in the Los Angeles area. From 2012 to 2018, Laurie also simulcast
13 crusade-type appearances into churches and other venues, a campaign titled “Greg
14 Laurie Harvest America.” To encourage hosts to sign up, he sent a truck-mounted
15 theater around the country offering shows that explained what would be on offer.

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1 *Figure 23: “Greg Laurie Harvest America” tour bus, 2012*



15 143. Laurie’s wood-paneled office is full of pictures of him in the company of
16 important politicians, religious leaders and actors.

17 144. In February 2023, the production company Lionsgate released a movie
18 based on Laurie’s autobiography called *Jesus Revolution*, which grossed over \$53
19 million worldwide in its first year, with revenues continuing to grow.

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1 *Figure 24: Laurie at the Hollywood premiere of Jesus Revolution, with Cathe,*
2 *and actors Joel Courtney and Anna Grace Barlow who played them in the film*



18 **B. Defendant Richard Schutte**

19 145. Pastor Richard Schutte was Missions Pastor at Harvest Riverside between
20 1996 and 2013. He is currently an Assistant Pastor at Impact Bible Fellowship in
21 Riverside, California. During the events described in this Complaint, he was a principal
22 deputy to Laurie in charge of supervising Harvest Riverside’s mission to Romania, and
23 served on the board of Actively Restoring Kids International (“ARK”), a California
24 charity Havsgaard and Laurie set up to raise money for Romania and other foreign
25 projects.

1 146. Schutte and his wife were ALEXANDRU-CRISTIAN’s sponsors and
2 occasionally sent him money, toys, and gifts. Schutte and his wife wanted to adopt
3 ALEXANDRU-CRISTIAN but Havsgaard intervened to block it.

4 147. At all material times, Schutte has been a resident of California.

5 **C. Defendant Harvest Christian Fellowship**

6 148. Harvest Christian Fellowship is a nonprofit religious corporation located
7 in Riverside, California. It is duly organized and existing under the laws of California.
8 It was founded in 1976 by Laurie, Havsgaard and three other men as Calvary Chapel
9 of Riverside and reconstituted in 1982 as Harvest Christian Fellowship.

10 149. The origins of Harvest Riverside lie in the surfing counterculture of
11 Southern California in the 1960s and 70s. Laurie, a charismatic, motorcycle-riding
12 surfer himself who used marijuana and LSD, described himself in a memoir as “a long-
13 haired liberal hippie—pro-drugs, pro-sex and pro-rock ’n’ roll...” At age 17, Laurie
14 heard the charismatic “hippie preacher” Lonnie Frisbee speak at his high school with
15 “such authenticity and power” that he gave his life to Christ. Frisbee was a dynamic
16 force in the “Jesus Movement” that gathered young people into evangelical
17 Christianity in the Los Angeles area and spurred explosive growth in a Calvary church
18 in Newport Beach, Laurie’s hometown, from a handful of members to thousands
19 within a few months.

20 150. Laurie did not attend college or seminary, but was swept into the Jesus
21 Movement through Frisbee’s example. He spent considerable time with Frisbee, eating
22 regularly at his house in a commune of believers and, according to Frisbee’s widow,
23 even began to dress and act like him. Frisbee built up a Monday Night Bible Study
24 group to approximately 300 members before Chuck Smith, the founder of Calvary,
25 encouraged Laurie to take it over, which he did around 1971.

26 151. Frisbee, himself a victim of child sex abuse, was later excommunicated
27 from the Calvary movement because he was gay, and the story of Harvest Riverside’s
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1 origins told in *Jesus Revolution* minimizes Frisbee’s involvement and arguably
2 amplifies the credit given to Laurie for Harvest Riverside’s early success. Frisbee’s
3 widow Connie says, “I can testify that Greg Laurie is not a truth teller. He has built his
4 ministry on Lonnie’s foundation while erasing Lonnie from the story.” The producers
5 of *Jesus Revolution* did not speak to her, she says, after Laurie told them she was dead.
6 Nevertheless, Laurie successfully developed the Bible study group in Newport Beach.
7 He and his wife Cathe (they started dating when she was 15 and he was 18, and married
8 after she graduated from high school) proved a reliable anchor for attracting followers.

9 152. Harvest Riverside is now one of the largest churches in the United States,
10 supporting a congregation of approximately 15,000 each Sunday that continues to
11 grow. Harvest Riverside’s mission is “to know God and make Him known.” It has an
12 active program in Hawaii where Laurie and other ministers maintain luxury homes.

13 153. Since 1990, Harvest Riverside has organized regular Harvest Crusades,
14 which have reached millions of people. It is a member of Calvary Chapel, a non-
15 denominational association of evangelical churches, numbering 1,800 in the United
16 States and additional locations abroad.

17 154. In 2017, Harvest Riverside joined the Southern Baptist Convention. This
18 was considered a coup for the Southern Baptists because of Laurie’s prominence in the
19 evangelical movement.

20 **D. Defendant Paul Havsgaard**

21 155. Havsgaard was born in 1949 and now lives in Forest Falls, California. At
22 all material times, he has been a resident of California.

23 156. He is the oldest of seven children. Their father was an alcoholic who was
24 chronically out of work and frequently beat the children, and their mother was a nurse
25 who was often absent because she had to support her struggling family.

26 157. Havsgaard grew up in Riverside, California and attended Ramona High
27 School, graduating in 1967, and married his high school girlfriend Kathy Warrick
28

1 (“Kathy”) when she was 16. He then joined the Navy, serving on a destroyer off the
2 coast of Vietnam as an aviation electrician’s mate. He took some college classes but
3 does not have a degree, and did not attend seminary. He and Kathy divorced in 2007
4 and have both remarried.

5 158. When Havsgaard’s marriage to Kathy was in difficulty in 1971, he was
6 advised to attend Laurie’s Bible study class. Kathy wanted to end the marriage because
7 she felt no intimacy from Paul and his only sexual interest was in infrequent anal sex.
8 Laurie told her that it was her duty as a Christian wife to make the marriage work, and
9 she ultimately adopted this approach. She was later to say that according to the beliefs
10 prevailing at Harvest, a wife who criticized or contradicted her husband was “lower
11 than a sewer.” The Havsgaards moved to be closer to Laurie and the Calvary
12 community, becoming active in outreach and organizational work.

13 159. Laurie selected Havsgaard to run Harvest Homes in Romania in part
14 because they had worked closely together for decades running Harvest Riverside.

15 160. Havsgaard became Assistant Pastor in charge of Children’s Ministry at
16 Harvest Riverside in 1976. In the early 1980s, he left Harvest to become senior pastor
17 at the Calvary Chapel of the High Desert in Victorville, California.

18 161. Havsgaard liked running a church of his own, but as Harvest Riverside
19 grew and Laurie began to travel more, Laurie thought Havsgaard would make a
20 suitable senior deputy and asked him to return. Havsgaard accepted because it gave
21 him a chance to operate in a growing organization with larger reach than his isolated
22 desert congregation.

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1 *Figure 25: Havsgaard baptizing a young man as pastor of*
2 *Calvary Chapel of the High Desert, 1982*



20 **✦ Baptismal**

Photo / RITA SMITH

21 Paul Havsgaard, pastor of the Calvary Chapel of the High Desert, dips
22 a young man into the water at Lake Silverwood on Saturday to

symbolize the man's admission into Christianity. More than 30
church members were baptized by Havsgaard at the mass baptism.

23 162. When Havsgaard returned to Harvest Riverside in 1984, many people
24 viewed him as the second most powerful pastor next to Laurie and a possible
25 competitor for the top job. It was a new, entrepreneurial organization, growing rapidly.
26 Neither Laurie nor Havsgaard had worked outside the Calvary movement, which did
27 not have established traditions or specific credentials required for leadership. That
28

1 meant personal followings were an important barometer for pastors, and Havsgaard
2 was popular with many at Harvest Riverside as the church was expanding.

3 *Figure 26: Laurie (front row, center) and Havsgaard (front row, far left, coral*
4 *shirt) with other Harvest Riverside staff, 1990s*



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21 163. But Havsgaard also had his problems and detractors. He was known to be
22 volatile, to have a big ego requiring constant praise, and to be badly organized, for
23 example frequently forgetting scheduled meetings.

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1 **GENERAL ALLEGATIONS**

2 **III. HARVEST RIVERSIDE ESTABLISHES CHILDREN’S HOMES IN ROMANIA**

3 **A. Origins of the Harvest Homes**

4 164. As reported in *Calvary Chapel Magazine*, Havsgaard “first came to
5 Romania on an outreach in 1998 as an assistant to Greg Laurie, who is a nationally
6 known Calvary Chapel evangelist and pastor.”³ Visiting under the auspices of an
7 evangelical charity directed by Franklin Graham known as Samaritan’s Purse,
8 Havsgaard distributed shoeboxes of gifts to children in Bucharest on behalf of Harvest
9 Riverside.

10 165. The experience induced Havsgaard to suggest, and Laurie to approve, a
11 permanent Harvest Riverside mission in Romania.

12 166. Romania was well known in the 1990s for attracting pedophiles, because
13 in addition to the grinding poverty that drove many people, including children, into sex
14 work, the country’s institutions were weak and corrupt, and foreigners could easily
15 evade punishment. As a result, Bucharest was widely regarded as the pedophilia capital
16 of Europe.

17 167. Later in 1998, Havsgaard returned to Bucharest with Kathy to implement
18 a plan Laurie had approved to build up Harvest Riverside’s presence in Romania via
19 Harvest Homes and established a local Romanian entity, the Fundatia Harvest
20 Romanian, also known as Romanian Harvest Foundation (“Local Foundation”), to
21 handle the formalities.

22 168. While Defendants delegated much of the day-to-day running of the
23 Harvest Homes to Havsgaard in Romania, key decisions were made in California by
24 Laurie and Schutte in keeping with Laurie’s position of supreme authority at Harvest
25 Riverside and Schutte’s positions as Missions Pastor, and because an important object
26

27 _____

28 ³ Tom Price, *Saving One Child at a Time*, *Calvary Chapel Magazine*, 2002, at 7.

1 of the Romanian venture was to bring financial benefits and prestige to Harvest
2 Riverside and Laurie in California by allowing them to raise money and generate
3 publicity there.

4 169. Harvest Riverside’s employees and congregants called Harvest Homes
5 “our Romanian orphanage” or “Harvest Romanian orphanage,” very much considering
6 Harvest Homes as belonging to Harvest Riverside.

7 **B. The Harvest Homes Are a Fundraising Vehicle for Laurie and**
8 **Harvest Riverside**

9 170. The Harvest Homes were designed in part as a fundraising and marketing
10 tool for Harvest Riverside, which was able to attract more money and positive regard
11 for itself and Laurie in the United States by highlighting its charitable efforts in
12 Romania.

13 171. Harvest Riverside regularly diverted funds ostensibly raised to support
14 Harvest Homes in Romania to other purposes in California.

15 172. Defendants conducted regular and substantial fundraising programs in
16 California based on the Romanian venture.

17 173. Harvest Riverside taught congregants in California how to say “Jesus
18 loves you” in Romanian to build connections with the child residents of Harvest
19 Homes, and to encourage donations.

20 174. Defendants incorporated a California charity, ARK, to raise money in the
21 United States for the Harvest Homes and other international projects and to promote
22 the Harvest organizations. Harvest Riverside and ARK, in partnership, conducted
23 many fundraising events in California.

24 175. The money raised in these joint fundraisers was processed by a group of
25 Harvest Riverside employees in the conference room next to Laurie’s office, and was
26 then divided up between Harvest Riverside and other ventures (including ARK and the
27
28

1 Harvest Homes) by the Harvest Riverside accounting department in whatever
2 proportion Laurie and other pastors demanded.

3 176. Harvest Riverside and ARK shared employees and management,
4 including Havsgaard (employee of Harvest Riverside, on the board of ARK) and
5 Schutte (employee and senior pastor at Harvest Riverside, on the board of ARK).
6 Another ARK board member, Wes Denham (“Denham”), was a Calvary minister close
7 to Laurie and Schutte.

8 177. Defendants set up ARK in California to be a fundraising vehicle for their
9 activities in Romania and became a conduit for members of Harvest Riverside to
10 donate funds meant for Harvest Riverside’s activities in Romania, in addition to funds
11 sent directly by Harvest Riverside to Havsgaard to run the Harvest Homes.

12 178. Harvest Riverside and Laurie effectively controlled ARK.

13 179. Money from Harvest Riverside and ARK paid employees of the Local
14 Foundation.

15 180. ARK used Harvest Riverside’s and Laurie’s resources and contacts to
16 raise money, including being allowed to use Harvest Riverside’s main fundraising
17 telephone number in California.

18 181. The Harvest Homes showed many indicators of being an outpost of
19 Harvest Riverside. They were commonly referred to as being part of “Harvest.” The
20 children were given Harvest-branded T-shirts and hats to wear. Visitors and volunteers
21 from Harvest Riverside came to help at the Harvest Homes.

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1 *Figure 27.a: Kathy and Harvest Homes children wearing*
2 *Harvest Riverside-branded clothes*



23 *(This space is left intentionally blank)*

1 *Figure 27.b: Kathy and Harvest Homes children wearing*
2 *Harvest Riverside-branded clothes*



18 182. Havsgaard returned frequently to California, where he remained a legal
19 resident at all relevant times, checking in with Schutte and Laurie, and sometimes
20 bringing children with him as walking advertisements for his Romanian mission (and
21 to sexually abuse in private at his house and elsewhere). They participated in multiple
22 church services and raised money for Harvest Riverside and the Harvest Homes.

23 183. For years, Harvest Riverside deposited large sums of money supposedly
24 designated for Harvest Homes' operating costs directly into Havsgaard's personal bank
25 account. Havsgaard then used large portions of these funds to buy things for himself
26 as well as abundant presents and alcohol for his child sex victims to keep them pliant,
27 and to buy silence from Harvest staff about his child abuse.

1 184. Harvest Riverside in California allowed this misdirection of its funds to
2 continue for years.

3 185. Thus, Laurie set up a substantial venture in Romania and directed large
4 sums to its support, but required no proper accounts or financial audits, no regular
5 inspections of the Harvest Homes, no child protection policies or training. Instead,
6 Laurie continued to gather the donations that flowed into Harvest Riverside in
7 California based on energetic advertising in the United States about the supposed good
8 works Harvest was doing in Bucharest, and the accompanying prestige.

9 **C. Havsgaard Arrives in Romania with a History of Sexual Criminality**
10 **and Cruelty**

11 1. Havsgaard's Sister Makes an Early Report of His Abuse of
12 Children

13 186. Havsgaard is the oldest of seven children, four boys and three girls.

14 187. When Havsgaard was twelve to 18 years old, he repeatedly raped his
15 younger sister Mary M. (who was eight to 14 years old at the time), threatening
16 beatings and death if she reported him.

17 188. In this same period, Havsgaard similarly and regularly raped another
18 younger sister, Hanna H., also starting when she was eight, also employing similar
19 threats.

20 189. When confronted by Hanna H. and another sister, Samantha S., about this
21 sexual abuse in or around 1994, in the presence of Havsgaard's wife Kathy, Havsgaard
22 reluctantly admitted it but told Samantha S. "I don't need this drama; don't bother me
23 with this."

24 190. At a later point, Samantha S. concluded she had to make sure Harvest
25 Riverside knew that her brother was a danger to children. She found it strange that
26 Havsgaard's big ego, bullying and volatile temper had not already set back his career.
27 Given what she knew about his voracious sexual interest in children, she thought it
28

1 likely he had been abusing them as a minister too, and worried it was all being covered
2 up to protect Laurie and Harvest Riverside.

3 191. Samantha S. decided to put Havsgaard’s pedophilia on the record with the
4 organization. She met with a Harvest Riverside lay leader, Nehemias Quintanilla, who
5 was teaching a Spanish Bible study course. The meeting took place at a coffee shop in
6 the Redlands area.

7 192. Samantha S. reported to Quintanilla that when Havsgaard was a teenager,
8 he had repeatedly raped his sisters Hanna H. and Mary M. as children.

9 193. Quintanilla replied, “This happens in a family if they learn it from another
10 generation. That’s just what happens.” But Quintanilla also told Samantha S. that a
11 letter critical of Havsgaard had been circulated among the Harvest Riverside
12 congregation, implying that he respected her decision to report him, and ended the
13 conversation there.

14 194. Upon information and belief, shortly after Samantha S.’s report to
15 Quintanilla about Havsgaard’s history of sexual abuse, Quintanilla told his superiors
16 at Harvest Riverside about her allegations. On information and belief, they took no
17 action in response.

18 2. Havsgaard Molests His Foster Daughter

19 195. While a pastor at Harvest Riverside, Havsgaard also molested a foster
20 daughter, Julia J. starting in or around 1986, when he was in his late thirties, and she
21 was 15 or 16.

22 196. Julia J. reports: “One day I was at the dryer, and Paul came up behind me
23 and pushed himself onto me. His penis was erect. He knew my history and that being
24 molested was what put me in foster care to begin with. I froze. He backed away and
25 left the garage.”

26 197. Shortly thereafter, when Julia J. was in her bedroom, Havsgaard “came
27 in, crouched down, slipped his hand in my underpants, and inserted his finger into my
28

1 anus. Before he put his finger in my underpants, he put it in his mouth as though he
2 had done it many times before. Every time he did it, it was the same thing. I lived there
3 for over a year and a half. It happened five or six times during that period.”

4 3. *Kathy Havsgaard Arrives in Bucharest Aware of Havsgaard’s*
5 *Unsuitability for the Role*

6 198. Kathy’s own marriage to Havsgaard was long troubled, in part because of
7 his sexual compulsions. He did not want to have sex with her, and when they did,
8 perhaps two or three times a year, he only wanted anal sex, which she disliked, and
9 also to urinate inside her vagina. Havsgaard had also told Kathy that during his time in
10 the Navy, he had strong sexual feelings for a man, whose name he would shout out
11 during their sporadic sexual interactions. (She believed he had had sex with the man,
12 but Havsgaard denied this.) She had reason to believe he had raped a four-year-old girl
13 and urinated inside her. He was also emotionally distant and domineering.

14 199. Despite her unhappiness, Kathy felt a strong duty, one that had been
15 reinforced repeatedly at Harvest Riverside and by Laurie, to stand by her husband as a
16 good Christian wife. She did not at all want to accompany Havsgaard to Romania: she
17 was still grieving the loss of her teenage daughter, caring for her and Havsgaard’s
18 elderly parents, and wanted to be close to her children and grandchildren. But
19 Havsgaard wanted to go, and Laurie said it was her obligation to go with her husband.

20 200. The fact that Harvest Riverside was able to send an apparently wholesome
21 married couple to Romania was an important reassurance to Romanian authorities that
22 the Harvest Homes would be properly run, and was also a plus for fundraising in
23 California. Kathy joined Havsgaard on the Board of the Local Foundation.

24 **D. Daily Operations of the Harvest Homes**

25 201. Havsgaard never learned Romanian. Accompanied by a translator, he
26 recruited children off the streets, most commonly by buying them McDonald’s meals
27 and promising a better life. Once he recruited a few children who spoke English, he
28

1 used them (instead of an adult translator) to recruit more children. The youngest
2 resident he recruited was four years old.

3 *Figure 28: Havsgaard with street children in Bucharest, 2003*



18 202. Funds raised by Defendants in California paid for everything to keep the
19 Romanian operation afloat: the purchase of the Harvest Homes themselves, their
20 furniture and equipment, salaries for Havsgaard and local staff, food and supplies, cars,
21 and Harvest-branded shirts and hats for employees and children.

22 203. Laurie, Schutte and Harvest Riverside sent Havsgaard approximately
23 \$17,000 a month, which in Romania at that time had huge purchasing power. These
24 funds were administered by the Harvest Riverside finance department.

25 204. By comparison: Steve Quarles, an American minister working in
26 Romania at the same time, was able to provide for his family of eight, run three
27 different churches, and pay an assistant, all for \$1,400 per month.

28

Figure 29.a: Page from Calvary Chapel Magazine, Winter 2002 edition, showing Havsgaard, in red shirt, talking to street children in Bucharest



Paul Havsgaard (red shirt) ministers to street children in downtown Bucharest. The CC Modesto team looked on in disbelief as two boys sniff pain.



The Modesto team poses in front of the castle in Simona.

CC Bucharest
Coast 2 Coast Missions
(714) 891-9495
missions@cchb.org
www.cchb.org



Paul Havsgaard's generous nature draws the street children to his side.

"Having your own children, and knowing how much you love them, makes it extremely difficult when you see the conditions of the Romanian children in the orphanages," said Bob. He has been to Russia twice on mission outreaches. "This was his second trip to Romania. He was able to observe the work of ROCK ministries in the hospital in Bucharest.

"I was grieved by the hopeless situations of the babies where medical solutions are possible but finances prevent intervention." Bob was burdened when he spent time with Alexandra, a seven-month-old girl, suffering from brain damage. The doctors had given up on her recovery.

They also spent time with Paul Havsgaard, who works with street children. "Seeing children as young as eight-years-old begging on the streets, sniffing pain to get high, and being sold into prostitution by older children really breaks your heart," said Bob. "Then you see a man like

Paul Havsgaard, giving his life to these lost children. You can see the love in his eyes. They are drawn to him like you might imagine children being drawn to Jesus."

The senior pastor of CC Modesto, Damian Kyle, had heard about the work in Romania from Bill Welsh. The Modesto team met

We are troubled on every side, yet not distressed; we are perplexed, but not in despair; persecuted, but not forsaken; cast down, but not destroyed.
2 Corinthians 4:8-9

once a week for three months in preparation for the outreach. Modesto plans to have a missionary training course twice a year that would prepare those planning for a mission trip. "The training is important to unite the team, not only in legistics, but in prayer and purpose," said Bob.

The Modesto team had the opportunity to witness in Popesti, a small Romanian village, where a Calvary Chapel outreach has recently begun. Paul Tilman, a missionary from CC Prescott, Arizona, his wife Wendy, and their four children moved there from Hungary. The family felt God's call to teach in Romania. Paul ministers at another Calvary Chapel on the other side of Bucharest as well.

Recently, the outreach in the Romanian village has drawn threats from a local Romanian Orthodox clergyman who sees the Christians as a financial loss.

"Go back to America," yelled the priest as the Modesto team invited locals to the Bible study. "You cannot take all of my money," he screamed in English. Threat of exclusion from the local cemetery frightens the older people. In addition, the priest orchestrated a boycott of the vegetable crops belonging to the host of the Bible study. This has had a serious impact on the new believers. Despite the threats, twelve new people came to the Bible study that day, curious and excited to hear God's Word. ☺

Harvest Romania
Phone 011-40-92-794-766
US Phone (909) 687-6902
e-mail: harvestromania@aol.com

Figure 29.b: Zoomed-in extract of Figure 29.a, showing the US phone number for Harvest Homes in Romania

Harvest Romania
Phone 011-40-92-794-766
US Phone (909) 687-6902
e-mail: harvestromania@aol.com

1 *Figure 29.c: Zoomed-in extract from Figure 29.a, discussing Havsgaard’s work in*
2 *Romania*

3
4 “Having your own children, and knowing how much you love them, makes it extremely difficult when you see the conditions of the Romanian children in the orphanages,” said Bob. He has been to Russia twice on mission outreaches. This was his second trip to Romania. He was able to observe the work of ROCK ministries in the hospital in Bucharest.

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We are troubled on every side, yet not distressed; we are perplexed, but not in despair; persecuted, but not forsaken; cast down, but not destroyed.

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17 207. Page 15 of the Winter 2002 edition of the *Calvary Chapel Magazine* asks
18 for donations to help Havsgaard’s work and lists the same phone number that Harvest
19 Riverside used for its day-to-day business in California, (909) 687-6902. This number
20 was also listed on Harvest Riverside’s website at the time.

21 208. Fundraising materials in the United States for the Harvest Homes also
22 listed Harvest Riverside’s California phone numbers as the method of contact.

23 209. Defendants sought publicity in other outlets in this period, including the
24 *Christian Science Monitor*, which refers to Havsgaard as “director of the Romanian
25 branch of the California-based Harvest Foundation.”⁵

27 ⁵Andrea Snyder, *For Romania’s dropouts, a fresh start*, *The Christian Science Monitor* (July 3, 2003,
28 12:07 PM), <https://www.csmonitor.com/2003/0703/p08s01-woeu.html>.

1 210. The July 2003 edition of *Prayer Watch*, a monthly publication by Harvest
2 Riverside, lists Havsgaard's and Kathy's work at the Harvest Homes as one of Harvest
3 Riverside's missions. It also asks members of the California congregation to pray each
4 day for the Havsgaards and the financial support of the Harvest Homes.⁶

5 *Figure 30: Extract from Prayer Watch, July 2003*

6
7 [DAILY PRAYER]

- 8 ☀ **PASTORS:** Pray for Pastor Greg as he prepares for the 2003 Harvest. Remember
9 the entire pastoral staff and their families as they serve the Lord.
10 ☀ **NATION:** Pray for the wisdom and guidance of President Bush. Pray for the Pledge
11 of Allegiance to be left in our schools.
12 ☀ **MISSIONS:** Pray for Paul and Kathy Havsgaard and the financial support of their
13 Romanian orphanages.
14 ☀ **THE CHURCH:** Pray for Christian families to teach the Word of God to their children;
15 intercede for the unemployed; and pray for teenagers to be obedient to their
16 parents and to live holy lives.
17 ☀ **HARVEST CRUSADES:** Hawaii, July 19-20; Anaheim, August 8-10; Australia, September
18 11-14; New Zealand, September 19-20.

17 211. After several months at rented premises in Iancului, Havsgaard received
18 funds and authority from Laurie and Harvest Riverside to buy a property in Buftea, a
19 suburb about 25 kilometers northeast of central Bucharest. The children moved there
20 just before Christmas 1998.

21 212. Owning the Buftea property allowed Havsgaard to increase recruitment.

22 213. By 2000, Laurie authorized the purchase of two more homes to house the
23 growing number of children in Havsgaard's care, one in the Dămăroaia district in north
24
25

26
27 ⁶ Harvest Christian Fellowship, *Prayer Watch*, Harvestriverside.org (July 2003), <http://www.harvestriverside.org/church/images/calendar-0703.pdf>,
28 [\[https://web.archive.org/web/20050325024915/http://www.harvestriverside.org/church/images/calendar-0703.pdf\]](https://web.archive.org/web/20050325024915/http://www.harvestriverside.org/church/images/calendar-0703.pdf).

1 Bucharest for housing girls and young boys, and a smaller one in Strada Bârlogeni,
2 mostly for boys.

3 *Figure 31: The Buftea home in 2017*



15 214. Havsgaard quickly made such a name for himself that police officers
16 would bring him children they found in the streets to put in the homes.

17 215. While the children in Havsgaard's care lived across multiple properties,
18 they met frequently and came together for Bible study, prayer and Sunday school, all
19 of which Havsgaard led in English, a language most of the children did not understand.

20 216. At first, the children were pleased to be admitted to the Homes. All had
21 come from desperate situations, many sleeping on the street and subsisting by begging.
22 The security of a bed, three meals a day, and the semblance of a normal family life
23 were miracles to them.

24 217. Once they had settled in, Havsgaard began to sexually abuse them.

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Figure 32: Bible study at Harvest, which Havsgaard typically led



IV. HAVSGAARD’S SEXUAL ABUSE OF PLAINTIFFS AND OTHER CHILDREN IS RAMPANT

A. Havsgaard Uses Defendants’ Authority and Resources to Groom Plaintiffs and Scores of Other Children for Sex

218. Once Havsgaard successfully recruited a child, plucked from destitution and completely reliant on his goodwill to avoid returning to the streets, he started grooming them for sex. He would begin by treating them warmly and gently, showing kindness that was unusual for these children to experience from an adult, particularly a father figure.

219. Soon he might nuzzle the child, then progress to glancing touches, then lingering ones, on the lower back, then the thighs, buttocks, and groin. Then things got worse.

1 220. At the time Havsgaard was a heavy, powerful man, 5'9", 275-300 pounds,
2 clearly able to physically overpower children and teenagers.

3 1. Havsgaard's Multiple Forms of Child Sexual Abuse

4 221. Often, under the guise of punishment for infractions both real and
5 invented, Havsgaard stripped off Plaintiffs' and other children's trousers and
6 underwear, bent them over his legs, and hit them. Then, with them naked from the
7 waist down, he would force them over his knee, directly on top of his crotch, and spank
8 them.

9 222. He often got erect, which Plaintiffs and other children could feel through
10 his clothes.

11 223. At times, Havsgaard would also massage their legs and buttocks, at first
12 rubbing in a way that was not painful, but eventually he would usually probe their anal
13 area with his fingers.

14 224. This frequently led to Havsgaard painfully inserting his finger in the
15 child's anus.

16 225. Sometimes he would smell or lick his fingers after doing this, even if
17 covered with feces, a signature fetish.

18 226. The combination of spanking with digital anal penetration was so
19 common that the children developed a polyglot Romanian-English term for it, which
20 sounded like "spanky" or "spankies."

21 227. For boys, he also fondled their penis and scrotum.

22 228. Mostly Havsgaard abused the children in this way in private (in a bedroom
23 or the attic), but he also did so in front of other children including at the Sunday church
24 service, which Havsgaard led and where Harvest staff were present.

25 229. Havsgaard administered these painful sexual abuse sessions regularly,
26 from multiple times a week to several times a day, depending on the child and
27 Havsgaard's whims.

1 230. Many times, the cries of the victims were widely audible. This prompted
2 Havsgaard to choke children during punishment, additionally terrifying them. One boy
3 remembers being punished, then being asked to touch Havsgaard’s erect penis, with
4 Havsgaard choking him to make sure he stayed quiet, saying: “It will all be over soon.”

5 231. Harvest staff knew of Havsgaard’s sexual abuse, and some used it to
6 threaten children when they misbehaved, giving the kids a macabre choice of
7 discipline: either kneel for hours with their bare knees on broken walnut shells, or with
8 their face against the tile wall of a bathroom, arms raised, or “go with Paul”—to be
9 spanked, fondled, masturbated, digitally penetrated, and sometimes anally raped.

10 232. Beyond the “spankies” with or without anal digital penetration, for both
11 boys and girls, Havsgaard had multiple ways of sexually abusing the children in his
12 charge, who were as young as four:

- 13 a. He took shirtless photos of the boys saying they were for their
14 American sponsors but actually used them for his own sexual
15 gratification.
- 16 b. He showed them pornography on computers and on his phone at the
17 Harvest Homes;
- 18 c. He made the children join him in watching pornography, both
19 straight and gay, commenting favorably, normalizing sexual activity;
- 20 d. While walking or sitting with children, he repeatedly touched both
21 boys’ and girls’ intimate areas, including their inner thighs and
22 groins;
- 23 e. He fondled the children’s thighs and crotch on car trips while they
24 sat in the passenger’s seat as he drove;
- 25 f. He took boys to spend nights in a hotel room alone with him, or on
26 lengthy rides in his car late at night, during which he continued his
27 touching, grooming and other sexual activities;
- 28

- 1 g. He watched the children shower and bathe naked, often while
- 2 masturbating himself;
- 3 h. He masturbated in the boys' bedrooms, sometimes while groping one
- 4 or more boys;
- 5 i. He forced boys to masturbate him;
- 6 j. He forced boys to accept masturbation from him;
- 7 k. He forced boys to give him oral sex;
- 8 l. He forced boys to accept oral sex from him;
- 9 m. He forced boys to have anal sex with him;
- 10 n. He would remove fecal matter from the children's anuses and lick
- 11 his fingers; and
- 12 o. He took and kept videos of sexual encounters with boys and girls,
- 13 which was child pornography.

14 233. Havsgaard often accompanied his sexual abuse with a patter professing that
15 he was their "father," that he loved them "as a father," and that they were all part of one
16 loving "family"—with him in control. He told the children "I know what God wants,"
17 and "what I want, God wants."

18 234. Havsgaard's perverse murmurings added to the harm and upset from
19 Havsgaard's sexual abuse.

20 235. Stories circulating about Havsgaard's abuse of the children caused
21 outsiders to deride residents of the homes as gay, a terrible stigma in Romania at that
22 time.

23 236. Like other child sex abuse victims, many residents of Harvest Homes,
24 including Plaintiffs, were in complete tumult about their sexual identity.

25 237. Beyond Havsgaard's regular sexual conquest of boys, he also assaulted
26 the girls. Havsgaard would undress them and force them on top of his lap. He would
27

1 then brutally spank their bare bottoms. While he was spanking some of them, he would
2 touch himself.

3 238. When he had finished his physical attacks, Havsgaard would then force
4 some of the girls to stand naked in front of him, while he looked them up and down,
5 hugged them, caressed them, and kissed them.

6 239. Some educational programs were instituted at first, but these degenerated
7 and the children emerged from the Harvest Homes with little or no schooling, prepared
8 only for manual labor, a return to the streets and/or sex work. Some, including
9 BARBU, remain functionally illiterate.

10 2. Havsgaard Lavishes Rewards on His Favorites, Further
11 Corrupting the Ethos of the Homes

12 240. The children, at sea in this abusive environment, learned that giving into
13 Havsgaard’s predation brought rewards.

14 241. His favorites received expensive gifts like stereos and PlayStations,
15 branded clothing and sneakers, better food, trips outside the home, overnight trips to
16 hotels with him (where they had to stay in the same room and bed), and sometimes
17 permission to see their families (if they had one).

18 242. Some boys were permitted to have girlfriends and have sex with them in
19 the homes starting at age 13 or 14—Havsgaard’s way of reassuring the boys that they
20 were “not homosexual” despite regular anal rape from Havsgaard, and a reward for
21 being available to him and keeping silent.

22 243. They were allowed to drive Harvest vehicles while underage and without
23 a license. On at least one occasion, a boy caused a serious accident.

24 244. Several boys would unlock and open the bathroom door to watch
25 Havsgaard’s wife Kathy showering. She asked Havsgaard to intervene to stop them,
26 but he did nothing, and they continued to besiege and ogle her in the bathroom.

27
28

1 245. Finally, Kathy took to having a bucket in her bedroom to urinate and used
2 baby wipes to give herself a “shower.”

3 246. Havsgaard’s favorite boys basked in their special status, despite their
4 inner turmoil, and often taunted and beat up other less-favored kids without
5 repercussions from Havsgaard or other Harvest staff.

6 3. Plaintiffs and Other Children Are Terrified of Havsgaard’s Abuse
7 of Others

8 247. Havsgaard’s flagrant abuse of children meant that everyone, including
9 Plaintiffs, lived on constant high alert, fearing when he might next single them out.

10 248. The children often saw Havsgaard sexually abuse others through open
11 doors: “spankies,” masturbation, oral sex, digital penetration, anal sex, and more.

12 249. One child found shoeboxes and wastebaskets full of feces in the attic of
13 the Buftea home, where Havsgaard engaged in frequent anal sex with boys in his care.

14 250. One child who wanted permission to go out for an evening confronted
15 Havsgaard in front of the other children and adults in the Harvest home. He asked
16 Havsgaard directly, “What’s the deal? Do I have to stay for you to suck my dick to go
17 out?”

18 251. Havsgaard’s response was to give a beating and “spankies.”

19 4. Children Repeatedly Witness Havsgaard Having Sex with One of
20 the Boys in His Care, Leo L.

21 252. The children often saw evidence that Havsgaard was sexually abusing
22 other children—their friends. For instance, one girl noticed that one of the boys, Leo
23 L., at times left Havsgaard’s bedroom with a wet spot on the back of his shorts, which
24 was apparently caused by leftover sexual lubricant or semen. Other times, children
25 spotted dark stains on Leo L.’s trousers.

26 253. In or around 2007, when Havsgaard broke his leg, he requested that a
27 resident of the Harvest Homes, ROXANA, tend to him in various ways. On at least
28

1 one occasion, Havsgaard asked ROXANA to wash him and got an erection. Plaintiff
2 MIHAI-CONSTANTIN walked past and saw Havsgaard masturbating himself while
3 ROXANA washed his feet.

4 254. One of the children living at the Buftea home, CRISTIAN, noticed
5 Havsgaard going up to the attic and followed him there after a little while, curious
6 about what was up there after he had seen Havsgaard carrying boxes upstairs.
7 CRISTIAN found Havsgaard with Leo L., both with their pants down. Leo L. was
8 cleaning his buttocks.

9 255. Another child, Plaintiff BOGDAN, witnessed Havsgaard perform oral sex
10 on Leo L. In or around 2006, BOGDAN went to the bathroom, which was located near
11 Havsgaard's bedroom upstairs in Buftea. Havsgaard's bedroom door was left slightly
12 ajar, and BOGDAN could see Havsgaard kneeling on the floor, shirtless, while Leo L.
13 sat in front of him on the couch sucking Havsgaard's penis.

14 256. Plaintiff ALEXANDRU-CRISTIAN also witnessed Havsgaard perform
15 oral sex on Leo L. One day, Havsgaard had bought Leo L. a stereo, but Leo L. did not
16 like how it sounded. Havsgaard purchased him another one, and he placed the first
17 stereo in the attic of the Buftea house. ALEXANDRU-CRISTIAN told Leo L. that he
18 would like to have the discarded stereo. Leo L. told ALEXANDRU-CRISTIAN that
19 he (Leo L.) would ask Havsgaard if ALEXANDRU-CRISTIAN could have it.
20 Havsgaard and Leo L. went to the attic purportedly to look for the stereo, but they did
21 not come back for several minutes. ALEXANDRU-CRISTIAN went to look for them,
22 but when he opened the door, Havsgaard was kneeling with Leo L. standing naked in
23 front of him. Havsgaard had his mouth on Leo L.'s penis.

24 257. Finally, another child resident of Harvest Homes, Plaintiff ADRIAN also
25 once entered a bedroom and saw Leo L. without trousers on with Havsgaard kneeling
26 in front of him, performing oral sex on Leo L. ADRIAN closed the door immediately
27 and left.

1 5. Plaintiffs and Other Children Repeatedly Witness Havsgaard
2 Having Sex with One of the Boys in His Care, Mark M.

3 258. CRISTIAN also walked in on Havsgaard performing oral sex on another
4 boy, Mark M., in the home. CRISTIAN had been looking for Havsgaard because he
5 was promised money to buy new jeans. Although CRISTIAN was surprised by what
6 he saw, he did not leave; he just asked Mark M. to translate his request for cash so
7 Havsgaard would understand it. Havsgaard then grabbed a handful of money and gave
8 it to CRISTIAN, showing no embarrassment over the sexual crime he was in the act of
9 committing. Havsgaard returned to the blow job as soon as CRISTIAN started to leave
10 the room.

11 259. ALEXANDRU also shared a room with Mark M., who would beg
12 ALEXANDRU not to leave the room, telling him, “don’t leave, Paul is coming again
13 to suck my dick.”

14 6. Havsgaard Installs Video Recording Equipment in the Attic Where
15 He Regularly Abuss Children

16 260. Photography has been a lifetime hobby for Havsgaard.

17 261. Havsgaard installed videography equipment in the attic of the Buftea
18 home, some of which was positioned over a hole in the ceiling of the shower. In the
19 attic, Havsgaard kept audio recording devices, a box of video tapes including small
20 format ones, and boxes with significant amounts of Romanian money.

21 262. This equipment is consistent with reports that Havsgaard took videos of
22 naked children.

23 263. After some of his equipment and tapes were stolen, Havsgaard put all of
24 his tapes in a leather bag carried over his chest that he never parted with.

25 7. A Life-Long Child Sex Abuser, Havsgaard Is Cruel and Perverse

26 264. Havsgaard used his total power over the children not just to gain sexual
27 access, but to express his nasty and dominating personality.

1 265. For example, Havsgaard put some siblings, including ADRIAN and his
2 brother, AURELIAN and ALEXANDRU-CRISTIAN, and ALEXANDRA and
3 DENIS, in different homes to keep them isolated and increase his own power over
4 them. Havsgaard put ALEXANDRU B. and other children who displeased him out on
5 the street in the winter, letting them plead in the cold and dark for re-entry.

6 266. Havsgaard strangled and smothered children with pillows, letting go just
7 before they lost consciousness, had them tied to beds and radiators, and kept them
8 under “room arrest” for days.

9 267. Havsgaard would promise children they could see their families but then
10 never permit it, or he would grant, but then withdraw, permission, to prove he was the
11 boss or make them more pliable.

12 268. Havsgaard kicked children out of the homes without notice, without any
13 place to go or funds to tide them over.

14 269. Havsgaard took Plaintiffs and other children to use computers at the
15 internet café owned by Cătălin Manescu (“Manescu”), who worked as a Harvest
16 Homes driver and was later promoted by Havsgaard to Finance Director, located on
17 Strada Mitropolit Varlaam. They also used a computer at the Buftea house with internet
18 capability, often to watch porn with Havsgaard’s encouragement and participation.

19 270. Manescu knew about Havsgaard’s sexual abuse of children. Knowing that
20 Havsgaard got away with it, Manescu felt emboldened to abuse children himself.
21 Manescu primarily preyed on minor girls, including by groping their breasts, touching
22 them in a lingering way, and pressuring them to have sex with him. He would force
23 girls out of the homes and into a van, where he then sexually assaulted them.
24 Mimicking Havsgaard, Manescu thereafter gave his victims extra privileges and/or
25 gifts.

26 271. Havsgaard knew about Manescu’s sexual abuse of some of the Plaintiffs
27 and other children but did not intervene.

1 272. Also, with Havsgaard’s encouragement, some of the underage boys
2 accessed online sex forums. The boys then procured customers, sold their naked
3 pictures, and also met for paid sex, with Havsgaard taking a cut of the proceeds.

4 273. In the evenings, Havsgaard also took boys to bathhouses where men,
5 usually foreign tourists, would pay to wash and masturbate the boys, or for the boys to
6 masturbate them.

7 274. Havsgaard took a cut of their earnings. He picked the boys up late at night
8 after their activities, taking them back after he received his share.

9 275. The misery of Havsgaard’s regime extended to his wife, Kathy. She saw
10 less and less of him, because “he always had a boy with him.” Excluded by Havsgaard
11 from anything significant, and lacking purpose, Kathy “crocheted constantly” and
12 taught this to some of the girls to have something useful to do. Havsgaard remained
13 autocratic and emotionally distant, and she felt lonely and besieged in the acutely
14 dysfunctional homes, to the point where she was constantly taking Valium to feel less
15 awful. Things were so bad that Kathy built up a supply of Valium in case she had to
16 commit suicide—and she was not a powerless child like Plaintiffs, but an adult, an
17 American, the wife of the man in charge, and a director of the Local Foundation.

18 276. Kathy returned to the United States and divorced Havsgaard in 2007.

19 **B. Havsgaard Exploits Sponsors in California to Abuse Plaintiffs**

20 1. Havsgaard’s Fundraising Trips to California

21 277. Defendants in California had an active fundraising program for the
22 Harvest Homes.

23 278. One aspect was Havsgaard’s regular fundraising trips to California when
24 he spoke at Harvest Riverside during Laurie’s services and at other churches. He went
25 for several weeks every Christmas, and at other times too. Laurie enjoyed how the
26 Romanian program reflected well on Harvest Riverside and him in California.

1 279. During the Christmas trips, Havsgaard usually brought children living in
2 the Harvest Homes, including EMILIA, with him to show them off and elicit more
3 sympathy and money from donors in California. The children considered this a great
4 privilege and he mainly picked his favorites, those most inured to acceding to his
5 sexual demands.

6 *Figure 33: Harvest Homes children in California on the beach with hosts*



19 280. Havsgaard required sex from them in California too, keeping the boys
20 upstairs in his house with him and ordering the girls to stay downstairs.

21
22
23
24 *(This space is left intentionally blank)*
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1 *Figure 34: Two Harvest Homes children in California*



13 281. On a trip in 2003, Romanian authorities required him to bring along a
14 social worker employed by the Harvest Homes, Carmen Andreosi (“Andreosi”), to
15 ensure that the children were properly treated. She spoke English and was supposed to
16 accompany them on their activities. “In reality, once we arrived in the United States,
17 Paul excluded me from caring for or supervising the children,” she says. “He used me
18 as a cover to justify his travel with the children.”

19 282. Havsgaard left Andreosi alone in his California house for long periods,
20 sometimes for many days, without giving any information about where he was taking
21 the children. International calls were blocked, internet access was infrequent and
22 Andreosi was in practical terms marooned, with a few eggs and leftovers from the
23 children’s excursions left in the refrigerator for her to eat.

24 283. Several times the group was scheduled to go back to Romania; Havsgaard
25 would leave Andreosi waiting for a pickup at the church, the library or even at the
26 airport but not appear, changing his plans impulsively and without notification.

1 284. She observed: “In Romania, Paul frequently took the same group of
2 teenage boys with him on private outings. He showered them with gifts—clothes,
3 sweets and other items—while the younger children were excluded,” which made them
4 upset. “The boys who went with him always returned quiet, never explaining where
5 they had been or what had happened. This secrecy, combined with his favoritism, left
6 me deeply uneasy. Although I did not personally witness physical abuse, I came to
7 suspect that Paul might be a pedophile. The staff suspected something was wrong, but
8 no one felt able to act at the time.”

9 2. False Promises to and about Sponsors

10 285. Another fundraising program set up by Defendants tried to establish a
11 direct connection between sponsors in California and individual children in Romania.

12 286. The families in California sent care packages and money to their
13 sponsored children, sometimes as much as \$500 per month.

14 287. Havsgaard bragged to the children that the sponsors were putting money
15 aside as nest eggs to launch them when they graduated from the Harvest Homes. In
16 fact, none of the children received any of these funds, either while they stayed at the
17 homes or afterwards. Havsgaard siphoned much of these earmarked funds for himself
18 and his sexual favorites.

19 288. The sponsorship program, financed by people in California with its
20 promise of a wholesome future after Harvest Homes, was another lie Havsgaard
21 exploited to win respect and approval from American donors, to line his own pockets,
22 and to entice sex and compliance from Plaintiffs and other children.

23 289. Plaintiffs and some other children spoke periodically to their sponsor
24 families and told them they never saw any of this money. The sponsor families reported
25 this back to Harvest Riverside, Laurie and Schutte, but Defendants kept Havsgaard in
26 place nonetheless, ignoring evidence of theft and putting no standard accounting
27
28

1 safeguards in place to insure that the money they raised in California by generating
2 sympathy for deprived Romanian children went to its intended proper purpose.

3 3. Exploiting False Promises of Adoption

4 290. Another form of cruelty and fraud came from Havsgaard's assurances to
5 Plaintiffs and many other children that they were to be adopted by their sponsor
6 families and live in the United States. Some children discussed this possibility with
7 their future California families by video call, and the families were enthusiastic.

8 291. In one instance, two children, Plaintiffs BOGDAN and CRISTINA, were
9 told that Harvest Riverside had prepared the documents needed for their adoption and
10 move to America, and all that was required was Havsgaard's signature in front of some
11 officials at the airport.

12 292. At around the same time, Havsgaard organized a fundraising trip to
13 Harvest Riverside and intended to bring BOGDAN, CRISTINA and a few other
14 children with him. Havsgaard took BOGDAN and CRISTINA to the airport to process
15 the necessary paperwork.

16 293. At the airport, Havsgaard pulled BOGDAN aside to go to the bathroom.
17 Inside, Havsgaard went to grab the boy's penis, but BOGDAN objected.

18 294. Havsgaard used this as an excuse to refuse to sign the adoption papers,
19 and forced both BOGDAN and CRISTINA to return to Harvest Homes. They were
20 crushed that Havsgaard had thwarted their near-escape.

21 295. Back at Harvest Homes, Havsgaard spanked and sexually assaulted
22 BOGDAN as a further punishment for resisting sexual abuse at the airport.

23 296. After refusing to sign the adoption papers, Havsgaard forbade BOGDAN
24 from speaking to his sponsors in California.

1 303. For employees and church members, fear of ostracism from the Harvest
2 Riverside community is a powerful motivator. Ex-employees call Laurie and his top
3 echelon the “Harvest Mafia.” One long-time ex-congregant says “Greg [Laurie] is the
4 biggest narcissist you will ever meet, him and his flying monkeys” i.e., subordinate
5 pastors. Another likens the fear and sycophancy surrounding Laurie to a cult.

6 304. Laurie’s determination that a well-liked cafeteria worker “looked gay”
7 was enough to get the man fired.

8 305. An elderly volunteer who took calls from donors objected when a new
9 policy required her to press callers to include Harvest Riverside in their wills. She was
10 happy to accept money people wanted to offer, but did not think it was right to extract
11 more from their estates. Harvest Riverside immediately suspended her. Senior figures
12 told her she should resign and keep her views to herself. She was even promised a
13 payment in return for cooperation.

14 306. Harvest Riverside and Laurie directed secretaries to screen social media
15 accounts of employees and church members, and send screenshots of posts
16 demonstrating untoward opinions to pastors. The pastors would then demand that
17 employees remove the posts or get fired. This included a post as objective and mundane
18 as a photo of the “B” grade the Riverside Health Department had given the Harvest
19 Riverside café.

20 307. Harvest Riverside covertly surveils its employees and volunteers via
21 microphones and cameras across its Riverside campus, including in conference rooms
22 and staff’s private offices. One ex-employee of Harvest Riverside discovered that his
23 termination was based on covert video footage.

24 308. To avoid being caught by Harvest Riverside’s surveillance, employees
25 whispered sensitive conversations or took them entirely off campus. One contractor
26 joked: “You have to be careful what you say around Harvest [Riverside].”
27
28

1 309. One employee saw a letter addressed to Laurie in a pile of donations and
2 slipped it under his door. Unbeknownst to the employee, the letter contained criticisms
3 of Laurie, and surveillance equipment allowed Harvest Riverside to identify her. Her
4 boss was furious and told her that her job was now in jeopardy. Laurie was not used to
5 receiving critical material because his secretaries were tasked with screening it out.

6 310. Senior Pastors at Harvest Riverside told employees that raising internal
7 complaints or legal claims against Laurie or the organization would result in their
8 termination.

9 311. Some ex-employees have struggled to find work in the Riverside area
10 because Harvest Riverside contacted potential employers in the area, badmouthed the
11 ex-employees and effectively blacklisted them.

12 312. Many Harvest Riverside employees believe that Laurie is further
13 insulated from normal constraints due to his close relations with the Riverside Police
14 Department and Riverside Sheriff's Department, which maintains a substation on the
15 Riverside campus.

16 313. In or around 2010, Franklin Graham, a famous pastor and son of Billy
17 Graham who was also a member of Harvest Riverside's board, pulled Robert Lawless
18 ("Lawless"), Harvest Riverside's Chief Financial Officer, out of a board meeting after
19 Lawless raised concerns about potentially unlawful conduct, telling him: "your job is
20 to protect Greg Laurie at all costs."

21 314. Besides fear, Harvest Riverside and Laurie have another powerful tool to
22 induce cooperation and tamp down dissent and scandal: money. The rivers of cash
23 flowing into the organization from weekly collections (at one point this was \$70,000
24 per service for each of three Sunday services), Harvest Crusades, donations,
25 merchandise, books and broadcasting, unregulated by anything except Laurie's
26 decisions, permit easy redirection of funds to help allies and buy silence.

1 315. Because Harvest Riverside is a religious organization, its reporting
2 requirements to the government are minimal. Further, unlike many other evangelical
3 churches which file annual returns to the Evangelical Council for Financial
4 Accountability and distribute them to church members, Harvest Riverside keeps its
5 financial results secret.

6 316. Pastors, including Joseph Sabolick, Josh Thompson, Steve Wilburn, and
7 others, who left Harvest Riverside to found new churches, received bridge funding
8 from Harvest Riverside, ensuring lasting gratitude and support.

9 317. Pastors who remain at Harvest Riverside also have a strong incentive to
10 toe the party line. Salaries for pastors usually exceed \$100,000 and some have made
11 as much as \$600,000.

12 **V. HAVSGAARD AND MANESCU REPEATEDLY SEXUALLY ABUSE PLAINTIFFS**

13 **A. Havsgaard’s Sexual Abuse of Plaintiff Marian Barbu**

14 1. Abuse from Havsgaard at Harvest Homes

15 318. Havsgaard sexually abused MARIAN B. soon after he arrived at Harvest,
16 age 8, in multiple ways.

17 319. Havsgaard often sat MARIAN B. on his lap and said he liked when
18 MARIAN B. was a “good boy,” while kissing MARIAN B. on his neck and chest.
19 Havsgaard rubbed his hand up and down MARIAN B.’s chest in a sexual way.

20 320. Once MARIAN B. was physically capable of getting erections,
21 Havsgaard tried to arouse him.

22 321. Havsgaard would take MARIAN B. into his bedroom alone, closed the
23 door, and showed him pornographic videos. Havsgaard proceeded to masturbate as he
24 kissed MARIAN B.’s neck and groped his genitals.

25 322. At night while MARIAN B. laid in bed (with other boys in a shared
26 bedroom), Havsgaard would enter, kiss MARIAN B.’s neck, caress his thighs and
27

1 touch him all over his body in a sexual manner. MARIAN B. observed Havsgaard
2 similarly kiss and touch the other boys in the room.

3 323. Havsgaard would also touch MARIAN B.'s penis to get MARIAN B. or
4 himself sexually aroused. Each time, MARIAN B. objected aloud, sometimes loud
5 enough to bother Havsgaard, in which case he would put a pillow over MARIAN B.'s
6 face and press down. MARIAN B. felt that he was going to suffocate.

7 324. Havsgaard also spanked MARIAN B. at least six times. Havsgaard's true
8 purpose was not discipline but sexual abuse. Havsgaard took MARIAN B. into a room
9 alone and ordered him to get naked, watching while he did so. Sometimes, Havsgaard
10 also undressed himself. Havsgaard then laid MARIAN B. naked across his knees,
11 stroked MARIAN B.'s buttocks, rubbed MARIAN B.'s anus, and spanked him.
12 Havsgaard became sexually aroused and forced MARIAN B. to touch his erect penis.

13 325. MARIAN B. would shout in pain and out of fear for his safety. To keep
14 MARIAN B.'s shouts from echoing around the house, Havsgaard would choke him
15 and say "it will all be over soon." Nobody ever came to help MARIAN B. and stop
16 Havsgaard's abuse, even when other Harvest staff were present.

17 326. MARIAN B. told Havsgaard that he did not like his touching and that he
18 was attracted to girls.

19 327. Havsgaard would come into the shared bathroom while MARIAN B. and
20 other boys were taking baths, watching while the boys bathed together. At times,
21 Havsgaard was holding toilet paper and towels while masturbating.

22 328. MARIAN B. once entered Havsgaard's office and saw him masturbating.
23 When Havsgaard noticed MARIAN B., he said, "wait, I'll finish and wash my hands,
24 and then I'll talk to you." MARIAN B. felt extremely uncomfortable, but Havsgaard
25 did not seem to be concerned as he finished pleasuring himself.

26 329. Havsgaard was used to performing sex acts in front of MARIAN B. and
27 the other boys without consent. Havsgaard appeared to find special pleasure in abusing
28

1 the children in front of each other. In front of other boys, he would order MARIAN B.
2 to pull down his trousers and then touch his buttocks and spank him under the guise of
3 punishment. He would also force the boys to show their penises to one another during
4 these corporal punishment sessions.

5 330. In addition to sexual assault, Havsgaard also physically assaulted
6 MARIAN B. On one occasion, he hit MARIAN B.'s head against a bedframe. Another
7 time, he threw MARIAN B. against a wall so aggressively that his scalp split.

8 331. MARIAN B. lived in constant fear that Havsgaard would rape him.

9 2. Abuse from Havsgaard While on Trips

10 332. Havsgaard took MARIAN B. on several trips to the mountains and seaside
11 in Romania.

12 333. Once during these trips, Havsgaard came into the bathroom of MARIAN
13 B.'s room when he was alone, pulled down his own trousers so that his penis was
14 visible, touched MARIAN B.'s buttocks, and masturbated while directing MARIAN
15 B. to shower.

16 334. MARIAN B. pleaded "No Paul, please no," worried that Havsgaard might
17 escalate to rape since they were alone.

18 335. On another trip, Havsgaard entered MARIAN B.'s bedroom, closed the
19 door, and kissed him on his neck and thighs. Other boys were in the room when this
20 happened, but they were either asleep or pretending to be so that Havsgaard did not do
21 the same to them.

22 336. These trips occurred more frequently when members of Harvest Riverside
23 visited the homes because Havsgaard wanted to impress them. Paul and Cathy Cross
24 in particular joined on several trips. Havsgaard still sexually abused MARIAN B. and
25 the other boys while traveling, taking advantage of the greater privacy hotels afforded
26 than the Harvest Homes.

1 348. MARIAN B. was afraid that he would be punished if he spoke up about
2 the sexual abuse, and had no basis to believe that any adult would help him.

3 349. He knew that Havsgaard was cruel and violent, and feared he had no
4 effective limits. MARIAN B. believed that Havsgaard would try to kill him if he ever
5 disclosed to adults what was happening.

6 6. Harvest Homes Staff's Knowledge of the Abuse

7 350. MARIAN B. knows that the Harvest staff were aware that Havsgaard
8 sexually abused him and the other boys. The staff would frequently threaten to call
9 Havsgaard when MARIAN B. misbehaved because they knew the boys feared
10 Havsgaard would "discipline" them by more sexual abuse.

11 351. Havsgaard changed the staff often to avoid them seeing more of his
12 behavior. MARIAN B. remembers Havsgaard firing employees who tried to stand up
13 to him about his abuse.

14 7. Plaintiff Marian B.'s Suffering

15 352. MARIAN B. lived in constant fear of sexual abuse by Havsgaard, and
16 believed that at any moment, Havsgaard would escalate the abuse to rape. He felt that
17 he was living in a torture chamber inside a prison.

18 353. At one point, MARIAN B. ran away, but soon recognized he had nowhere
19 to go and no way to support himself. He returned to beg Havsgaard to be allowed back.

20 354. Havsgaard agreed, but only on the condition that he could continue to
21 sexually abuse MARIAN B.

22 355. MARIAN B. did not want to experience more abuse but could not find
23 any other option.

24 356. MARIAN B. attempted suicide four times while living at the Harvest
25 homes.

26 357. He cut his wrists with a piece of glass, drank chlorine, took pills that he
27 stole from the staff, swallowed coins, and poured boiling water on himself.

1 358. MARIAN B. also cut himself with broken jars, thrust screws into his
2 wrists, and hit his head against a wall.

3 359. MARIAN B. still has scars on his hip, feet, and knee from times he self-
4 harmed while living at Harvest.

5 *Figure 35: Scar from childhood self-harm on Marian B.'s wrist, 2023*



17 8. Circumstances of Leaving Harvest Homes

18 360. In or around 2008, when MARIAN B. was approximately 16 years old,
19 he broke a window by mistake when trying to fix it, and cut the tendons on his wrist.

20 361. Havsgaard, believing that MARIAN B. was too troublesome, kicked him
21 out of the homes and threw him onto the streets.

22 **B. Havsgaard's Sexual Abuse of Plaintiff Mihai-Constantin Petcu**

23 1. Abuse from Havsgaard at Harvest Homes

24 362. Soon after MIHAI-CONSTANTIN arrived at Harvest, Havsgaard
25 frequently kissed him on the cheek and neck.

26 363. When he hugged MIHAI-CONSTANTIN, Havsgaard would caress his
27 lower back, often moving his hands down to caress MIHAI-CONSTANTIN buttocks.

1 364. This unwelcome behavior occurred when Havsgaard visited the home
2 where MIHAI-CONSTANTIN was staying, and the frequency was highest when
3 MIHAI-CONSTANTIN was younger.

4 365. Like the other children, MIHAI-CONSTANTIN was subject to
5 Havsgaard's sexually charged "spankies."

6 366. Havsgaard would force MIHAI-CONSTANTIN to fully undress.
7 Havsgaard would then caress MIHAI-CONSTANTIN's buttocks, moving his hand
8 close to MIHAI-CONSTANTIN's anus before inserting his finger in his anus.

9 367. Almost every time Havsgaard would visit the house that MIHAI-
10 CONSTANTIN stayed in, he would assault MIHAI-CONSTANTIN.

11 368. At the swimming pool, Havsgaard stared at the children in a way that
12 made MIHAI-CONSTANTIN uncomfortable, especially because he and the other
13 children were naked or just wearing swim trunks.

14 369. Havsgaard would prey on MIHAI-CONSTANTIN, touching his genitals
15 whenever MIHAI-CONSTANTIN would be close by, including when they went
16 swimming.

17 370. On one occasion, Havsgaard drove MIHAI-CONSTANTIN and his
18 brother home to see his mother. MIHAI-CONSTANTIN was sitting in the passenger
19 seat, and Havsgaard touched and caressed his upper thigh while he was driving.

20 371. As MIHAI-CONSTANTIN became older, he received fewer items from
21 Havsgaard, which he knew was because Havsgaard was finding him less attractive.

22 372. MIHAI-CONSTANTIN remembers how he felt lucky that he did not
23 speak English, since Havsgaard would have otherwise wanted to spend more time with
24 him.

25 2. Havsgaard Recruits Plaintiff Mihai-Constantin to Sex Work

26 373. Towards the end of MIHAI-CONSTANTIN's time at Harvest, Havsgaard
27 said he had to work if he was going to stay at the Buftea house.

1 374. Havsgaard brought him and other boys to bath houses where clients,
2 usually older rich foreigners, paid to manually stimulate their genitalia or fellate them.

3 375. MIHAI-CONSTANTIN and other boys would also use the internet for
4 sex work while at the Buftea house or Manescu's internet café, with Havsgaard's
5 knowledge and permission.

6 376. MIHAI-CONSTANTIN met strangers on the internet and charged money
7 for video chats, where he would undress and show the men his genitals.

8 3. Awareness of Abuse of Others at Harvest Homes

9 377. While at Harvest, MIHAI-CONSTANTIN was aware that Havsgaard was
10 sexually abusing other boys.

11 378. Peter P. openly joked about how Havsgaard was a pedophile. When
12 Havsgaard sat on the stairs, Peter P. would come up behind him and tap him on the
13 shoulder or head with his penis.

14 379. MIHAI-CONSTANTIN shared a room with Mark M., where he
15 witnessed Havsgaard intimately touch Mark M. in bed while MIHAI-CONSTANTIN
16 pretended to be asleep.

17 380. Havsgaard would then take Mark M. upstairs to Havsgaard's bedroom,
18 which Havsgaard did not share with Kathy. Havsgaard showered Mark M. with gifts,
19 which confirmed to MIHAI-CONSTANTIN that Havsgaard valued the sexual access
20 Mark M. gave him.

21 4. Circumstances of Leaving Harvest Homes

22 381. MIHAI-CONSTANTIN lived in perpetual fear that Havsgaard would
23 kick him back onto the streets, while also understanding that Havsgaard wanted to keep
24 him and other children close by for easy assault.

25 382. This constant tension meant MIHAI-CONSTANTIN found life at Harvest
26 oppressive. At one stage, the right side of his body became paralyzed for a month,
27 which he thinks was a reaction to the stress of living there.

1 383. MIHAI-CONSTANTIN left Harvest when the Buftea house closed in
2 2008. The conditions there had deteriorated due to a lack of funds. MIHAI-
3 CONSTANTIN left with no money and nowhere to go.

4 **C. Havsgaard’s Sexual Abuse of Plaintiff Cristian Aeroaiei**

5 1. Abuse from Havsgaard at Harvest Homes

6 384. Soon after CRISTIAN moved into Harvest, Havsgaard began to sexually
7 exploit him.

8 385. Havsgaard spanked CRISTIAN frequently under the pretense of
9 punishing him for misbehaving, even when CRISTIAN did not do anything wrong.

10 386. In the bathroom of the home or in CRISTIAN’s bedroom, Havsgaard
11 would pull down CRISTIAN’s pants and underpants and force him to lay across his
12 knees. Havsgaard alternated between spanking and stroking CRISTIAN’s thighs and
13 caressing his buttocks and anus. This made CRISTIAN fearful.

14 387. During these sessions, Havsgaard watched CRISTIAN closely, as if
15 enjoying CRISTIAN’s fear.

16 388. CRISTIAN observed, on several occasions, that Havsgaard would get an
17 erection while spanking him.

18 389. During these spanking sessions, Havsgaard sometimes also wrapped his
19 hands around CRISTIAN’s neck and choked him.

20 390. CRISTIAN thought Havsgaard was trying to keep him quiet so others
21 would not hear his cries.

22 391. After the “spankies,” Havsgaard would massage CRISTIAN’s buttocks
23 and anus. When Havsgaard had finished he would watch CRISTIAN closely as he
24 dressed himself.

25 392. Havsgaard used to eye CRISTIAN at other times when he was undressed,
26 such as when CRISTIAN showered or bathed.

1 393. Once when CRISTIAN was sick, he went to take a bath. When he got out,
2 he realized that he did not have a towel to dry himself. He opened the bathroom door
3 to call for one of the other children to bring him a towel from downstairs. CRISTIAN
4 suddenly saw Havsgaard standing in the corridor outside. Havsgaard did not enter the
5 bathroom, but he lingered in the corridor staring at CRISTIAN while he was naked.

6 394. This event made CRISTIAN extremely uncomfortable and embarrassed.

7 395. CRISTIAN was frightened because Havsgaard's behavior was so
8 unpredictable.

9 396. At times, when Havsgaard threatened punishment, CRISTIAN found that
10 instead of a spanking Havsgaard caressed him, kissed his neck, and rubbed his lower
11 back, buttocks, and anal region.

12 397. CRISTIAN could not understand why he would kiss a child on the neck
13 like that since it seemed sexual and intimate.

14 398. Havsgaard's intimate touching and uninvited kissing occurred often,
15 especially when CRISTIAN was in the Harvest van. Over time, the inappropriate
16 touching escalated and Havsgaard once groped CRISTIAN's crotch over his trousers.

17 399. Havsgaard would show CRISTIAN pornography.

18 400. When he observed that CRISTIAN felt uncomfortable from the touching
19 or "spanky," he whispered to him that they were "family."

20 401. He called CRISTIAN his "son" while he touched him, and CRISTIAN
21 longed for a father-son relationship, since his own relationship with his father was
22 nonexistent due to his father's alcoholism and physical abuse. However, over time,
23 CRISTIAN realized that Havsgaard's treatment of him and the other boys was not
24 normal for a father-son relationship.

25 402. It also became clear to CRISTIAN that Havsgaard was grooming him.
26 CRISTIAN knew about, indeed had seen, the sexual abuse of the other boys and
27 Havsgaard's behavior with CRISTIAN mimicked the same pattern.

1 403. CRISTIAN understood that Havsgaard touched and kissed him to gauge
2 his reaction and judge how much farther he could press him sexually.

3 404. CRISTIAN was a natural leader of the boys and felt that status made
4 Havsgaard concerned about pushing him too far, in case CRISTIAN might organize
5 the boys against him or report him to the police.

6 405. After CRISTIAN had seen this, Havsgaard gave CRISTIAN money
7 whenever he would ask. CRISTIAN understood that Havsgaard was trying to bribe
8 him to keep quiet.

9 2. Abuse from Havsgaard While on Trips

10 406. Havsgaard also abused CRISTIAN while on trips and other outings.
11 Havsgaard, CRISTIAN, and several other boys would occasionally leave Harvest to
12 visit their families. However, if they displeased Havsgaard they were not allowed to
13 see their families.

14 407. CRISTIAN would occasionally sit in the passenger seat next to Havsgaard
15 whilst he drove the van.

16 408. During these trips, Havsgaard would look at CRISTIAN intensely and
17 say, "I love you so much," as he caressed his inner thigh.

18 409. Havsgaard placed blankets on the back seats of the van where CRISTIAN
19 knew he performed sex acts on other children, such as with his friend Julian J.

20 410. On one trip in or around 2002, Havsgaard took Mark M. and CRISTIAN
21 to visit CRISTIAN's grandmother. They stayed in a hotel for three days.

22 411. Havsgaard sat on the bed in the hotel with intentionally revealing shorts,
23 and CRISTIAN could see his penis.

24 412. Havsgaard would often walk around the Harvest house in Buftea
25 intentionally with short, flimsy shorts and no underwear. CRISTIAN and the other
26 boys could see Havsgaard's genitals.

1 3. Effects of Abuse while at Harvest Homes

2 413. To escape the sexual abuse, CRISTIAN frequently ran away from Harvest
3 Homes.

4 414. One time, he spent several days sleeping directly outside one of the
5 Harvest Homes. Havsgaard could see him sleeping on the ground in the rain, but he
6 did not invite him back inside.

7 415. CRISTIAN believed that Havsgaard enjoyed watching him suffer because
8 it gave him a sense of power.

9 416. Eventually, several children begged Havsgaard to allow CRISTIAN to
10 come inside, and Havsgaard reluctantly agreed.

11 4. Awareness of Abuse of Others at Harvest Homes

12 417. From talking to his friends and from personal observation, CRISTIAN
13 knew that Havsgaard abused most of the boys at Harvest.

14 418. CRISTIAN understood “spanky” meant the same for all the boys, and he
15 knew that some boys were “spanked” more often than others, such as DENIS.

16 419. The other boys would joke about Havsgaard’s sexual abuse in front of
17 CRISTIAN.

18 420. For example, when CRISTIAN came back to the Harvest house from
19 McDonald’s, KFC, or a trip, the other boys would laugh at him and claim that
20 Havsgaard had anally raped him.

21 421. CRISTIAN knows that they said these things because it was generally
22 understood by Harvest residents that they would have to acquiesce in sexual activity
23 with Havsgaard to receive gifts, money, and to go on trips.

24 422. CRISTIAN felt that there was significant discord in general among the
25 boys at Harvest Homes because Havsgaard favored some boys. He often pitted the
26 boys against each other, and they were constantly fighting.

1 433. CRISTIAN saw that Kathy was often unhappy and angry with Havsgaard,
2 who spent so much time with the boys.

3 8. Harvest Homes Staff's Knowledge of the Abuse

4 434. CRISTIAN disclosed Havsgaard's abuse to Paul Adrian Crivceac
5 ("Crivceac"), the night caretaker at Harvest Homes.

6 435. CRISTIAN recalls that Paul Cross, a Calvary pastor, and his wife, Cathy,
7 visited Harvest. CRISTIAN thought that Paul Cross was scary, because he often hit
8 CRISTIAN and the boys.

9 436. Mihai Bundalici ("Mihai"), another boy staying at the home, told Paul
10 Cross that Havsgaard was gay but as he spoke, Paul Cross began to choke him,
11 apparently believing he was disobedient and provocative.

12 9. Circumstances of Leaving Harvest Homes

13 437. By the end of CRISTIAN's time at Harvest Homes in or around 2007, the
14 conditions at the homes had deteriorated significantly.

15 438. Finally, Manescu kicked CRISTIAN out. CRISTIAN did not receive any
16 money and had nowhere else to live.

17 **D. Havsgaard's Sexual Abuse of Plaintiff Constantin-Alin Nitu**

18 1. Abuse from Havsgaard at Harvest Homes

19 439. Havsgaard started early on to profess love for ALIN, saying "I love you
20 so much, buddy." The love was not fatherly, it was predatory.

21 440. Havsgaard showed ALIN—a child aged ten—pornography to groom him
22 for further sexual abuse.

23 441. Havsgaard used to walk around the house wearing revealing shorts. His
24 penis was clearly visible, and ALIN and the other boys believed Havsgaard was
25 intentionally making the environment sexual for the child residents.

26 442. Havsgaard used to stare at ALIN and the other boys in a clearly sexual
27 way when they were naked or in swim trunks.

1 443. Havsgaard often forced ALIN to sit on his lap, directly on top of his
2 genitals. Sometimes, ALIN felt Havsgaard's erection, a feeling he likened to sitting on
3 a rock.

4 444. Havsgaard also touched and kissed ALIN's intimate parts.

5 445. When ALIN was in bed or when he was standing in the back of the garage
6 where the bicycles and outside toys were kept, Havsgaard often came and kissed his
7 neck.

8 446. Havsgaard groped ALIN's penis over his clothes several times. He often
9 greeted ALIN by tapping his penis and saying, "hey buddy." This made ALIN feel
10 extremely uncomfortable.

11 447. Some of the boys told ALIN that they had given or received oral sex from
12 Havsgaard, and ALIN was scared that Havsgaard would abuse him in the same way.

13 448. Around a year after he moved to Harvest, ALIN fought with another boy
14 at the house. Havsgaard decided to "punish" ALIN and took him into his bedroom
15 upstairs for "spankies." Havsgaard pulled down ALIN's trousers and underpants, bent
16 him over his leg, spanked him, caressed ALIN's buttocks, and tried to digitally
17 penetrate ALIN's anus with his finger. Afterwards, Havsgaard hugged ALIN, said he
18 was sorry, and kissed him.

19 449. Havsgaard spanked ALIN more than five times in a disturbingly sexual
20 way. While spanking him, Havsgaard groped and fondled ALIN's penis.

21 450. ALIN feared these "spankies" from Havsgaard, since he had heard from
22 other boys that Havsgaard used punishment as a pretext to perform sexual acts.

23 451. Havsgaard also touched ALIN's anus with his fingers and attempted to
24 digitally penetrate him on multiple other occasions.

25 2. Abuse from Havsgaard While on Trips

26 452. ALIN was also abused by Havsgaard while on trips and outings away
27 from the Harvest homes, such as at the mall or at the waterpark.

1 453. On every trip, Havsgaard, while driving, would kiss ALIN or other boys
2 on the neck, force them to watch pornographic videos, or fondle their inner thighs and
3 genitals. Havsgaard also took some boys into his hotel room.

4 454. On one trip to northern Romania, Havsgaard booked ALIN and his
5 brother into a shared room. One night, while they were sleeping, Havsgaard entered
6 the room, pulled down ALIN's trousers and underpants, caressed his buttocks, and
7 attempted to insert his fingers into ALIN's anus. ALIN shrieked and turned away to
8 stop Havsgaard from molesting him.

9 455. Havsgaard stood up, backed away, said "I love you" like he was trying to
10 normalize the situation, and offered to pay him 300 RON (Romanian currency) to buy
11 new clothes. ALIN understood that Havsgaard was offering to pay him either to not
12 tell anyone what had happened, or to encourage more cooperation the next time.

13 3. Awareness of Abuse of Other Children at Harvest Homes

14 456. ALIN witnessed Havsgaard drag boys into his room alone for "spankies."
15 He would hear the "spanked" children screaming and crying.

16 457. Havsgaard enjoyed showing ALIN and other boys pornographic videos,
17 at times forcing them to watch.

18 458. One day, ALIN and Mark M. were playing a PlayStation game.
19 Havsgaard entered the room, Mark M. told ALIN to leave, and Havsgaard shut the
20 door behind ALIN. Moments later, ALIN re-entered the room to ask Havsgaard for
21 money to buy new clothes. Once ALIN opened the door, he saw Havsgaard on his
22 knees and Mark M. quickly pulling his pants up. It was clear to ALIN that he
23 interrupted Havsgaard while performing oral sex on Mark M.

24 4. Harvest Homes Staff's Knowledge of Havsgaard's Abuse;
25 Americans' Visit the Harvest Homes

26 459. Harvest staff were aware that Havsgaard sexually abused him and the
27 other boys. The staff would frequently threaten to call Havsgaard when ALIN
28

1 misbehaved because they knew the boys feared Havsgaard would “discipline” them by
2 more sexual abuse.

3 460. ALIN remembers that multiple Americans visited Harvest Homes. ALIN
4 particularly recalls Paul and Cathy Cross, and believes they were aware of Havsgaard’s
5 sexual assaults on the children.

6 461. ALIN also had an American sponsor. He does not recall her name but
7 recalls that she worked at Harley-Davidson. They spoke from time to time and she
8 visited Harvest Homes on at least one occasion.

9 462. ALIN never received any money or gifts from his sponsor. Instead,
10 Havsgaard kept the funds donated for ALIN for himself and/or gave the funds to the
11 other boys who were his favorites.

12 5. Abuse from Harvest Homes Staff

13 463. For failings real and imagined, staff would force ALIN to kneel with his
14 hands up in the air, towards a wall, for hours. If ALIN moved, he was beaten.

15 464. One staff member often beat ALIN with a ruler.

16 465. Other staff members would also choke ALIN by putting their knees on
17 his neck.

18 466. The staff often threatened to kick ALIN out of the homes if he
19 misbehaved.

20 467. Havsgaard sanctioned this abuse.

21 6. Plaintiff Alin’s Suffering

22 468. Throughout ALIN’s time at Harvest, he was constantly afraid of
23 Havsgaard and that his sexual abuse would escalate.

24 469. Havsgaard was unpredictable and often violent towards ALIN. He
25 shouted at ALIN and sometimes grabbed ALIN by the throat and choked him.

26 470. ALIN turned to smoking marijuana and gambling to dull Havsgaard’s
27 sexual, physical and psychological abuse.

28

1 471. ALIN also self-harmed while he was at Harvest Homes by cutting himself
2 behind his knee.

3 7. Circumstances of Leaving Harvest Homes

4 472. In 2007, the conditions in the Harvest Homes became much worse
5 because money was clearly tighter. The staff needed to ration food due to insufficient
6 funds.

7 473. In or around 2008, ALIN and his brother resolved to leave Harvest Homes
8 together. The two brothers and their two sisters lived together with their mother in one
9 small room. She could not support them and so ALIN found a job to help support the
10 family. After several years, ALIN's mother became ill with leukemia.

11 474. ALIN turned to sex work as a means to survive. He feels that his traumatic
12 experience at Harvest Homes is still chasing him today; he feels cursed.

13 **E. Havsgaard's Sexual Abuse of Plaintiff Razvan-Gheorghe Nitu**

14 1. Abuse from Havsgaard at Harvest Homes

15 475. Havsgaard sexually abused RAZVAN in multiple ways.

16 476. Havsgaard visited the Harvest home in Bârlogeni almost daily and abused
17 RAZVAN or other boys during every visit.

18 477. Very often, Havsgaard "spanked" RAZVAN often under the guise of
19 punishment. Havsgaard grabbed him, pulled down his trousers and underpants, and
20 forced him over his lap. As he "spanked" RAZVAN, Havsgaard would sometimes
21 wrap his hands around his neck and choke him.

22 478. After the spanking, Havsgaard would forcibly insert his finger into
23 RAZVAN's anus. He would cry out from the intense pain.

24 479. Havsgaard's sexual abuse was frequent and unpredictable. When the
25 other kids were at school or playing outside, Havsgaard would come into RAZVAN's
26 room and try to undress him. Havsgaard then forcibly touched RAZVAN all over his
27 body. At times, Havsgaard ejaculated while touching RAZVAN.

1 480. These encounters led RAZVAN to try to avoid being alone with
2 Havsgaard. The longer he stayed at Harvest, the more afraid of Havsgaard he became.

3 481. RAZVAN saw that Havsgaard gave gifts to some boys. At one point, he
4 gave RAZVAN a bicycle. However, RAZVAN learned that this was part of his
5 grooming technique. A gift was supposed to buy Havsgaard sexual access.

6 482. One day while he was a child resident at Harvest Homes, RAZVAN had
7 taken a large number of pills in an attempt to kill himself—he saw no other way to
8 escape Havsgaard’s abuse.

9 2. Abuse from Havsgaard While on Trips

10 483. Havsgaard took selected boys on outings, which sometimes included
11 RAZVAN. Havsgaard abused RAZVAN and other boys on these trips. Havsgaard
12 often fondled boys’ genitals while driving. Once, Havsgaard forced RAZVAN to sit
13 next to him and watch Havsgaard masturbate.

14 484. Havsgaard frequently forced RAZVAN to watch Havsgaard ejaculate.

15 485. Kathy and Manescu usually came with them, but they would travel in a
16 separate car. RAZVAN remembers that Paul Cross came on several trips when he was
17 visiting from the United States.

18 486. RAZVAN recalls a trip to Lasi in Romania when he was around 14 years
19 old. Havsgaard organized a hotel room for RAZVAN. One day, Havsgaard entered
20 RAZVAN’s room, pulled Răzvan’s pants and underpants down and began touching
21 RAZVAN all over his body, including his genitals. He kissed RAZVAN on the neck
22 and tried to kiss other intimate parts of his body.

23 487. Havsgaard then attempted to put his finger in RAZVAN’s anus.

24 488. Terrified and disgusted, RAZVAN ran out of the hotel room. Havsgaard
25 chased after RAZVAN. He told him that he was treating him as a father treats his son,
26 and everything he was doing was part of a normal father-son relationship. Eventually,
27
28

1 RAZVAN had no option but to go back to the hotel room. He felt trapped, and
2 remained on guard all night.

3 489. After the incident in Lasi, whenever RAZVAN travelled somewhere with
4 Havsgaard such as the mall or somewhere in Bucharest, Havsgaard made RAZVAN
5 sit next to him. While he was driving, Havsgaard would touch RAZVAN intimately
6 on his upper thighs and genitals.

7 490. On one trip, Havsgaard took RAZVAN to visit his mother, who was in a
8 hospital at the time. While in the van, Havsgaard took out his phone and showed
9 RAZVAN a video of adult men having sex.

10 491. Havsgaard told RAZVAN to watch the pornographic video to see if he
11 liked it, and reminded him that sex does not have to be between a man and a woman.

12 492. RAZVAN responded saying that he did not like it, and he turned his head
13 away.

14 3. Abuse from Harvest Homes Staff

15 493. Harvest staff members often beat RAZVAN with a belt. He still has a scar
16 on his hand from being hit with a belt buckle.

17 494. At one point, a staff member restrained RAZVAN by tying him to the bed
18 with rope.

19 495. Staff also made RAZVAN and the other kids kneel with their faces to the
20 wall. They were forced to keep their hands in the air for several hours, and would be
21 beaten if they moved.

22 496. RAZVAN felt constant fear while at Harvest. He was particularly worried
23 that if he spoke up about the abuse, Havsgaard would kick his little brother out of the
24 home.

25 4. Awareness of Abuse of Other Children at Harvest Homes

26 497. RAZVAN heard from the other children about Havsgaard's behavior
27 before he experienced any sexual abuse himself. Julian J., who was one of RAZVAN's
28

1 roommates, told him that Havsgaard anally raped him. Another boy, Peter P., told
2 RAZVAN that Havsgaard frequently attempted to and performed forced fellatio.

3 498. RAZVAN noticed early on that Havsgaard would give gifts and special
4 privileges to boys who would endure sexual abuse from him, including Leo L. and
5 Peter P. In exchange for the abuse, Havsgaard gave them generous gifts.

6 499. RAZVAN also observed Havsgaard abuse other children while in the van,
7 including touching Stefan S. and Julian J. on the upper thigh and genitals while he was
8 driving.

9 500. One day, RAZVAN directly witnessed Havsgaard perform oral sex on
10 Peter P. Havsgaard had taken Peter P. into his bedroom upstairs, but he left the door
11 slightly ajar. RAZVAN could see what was happening inside the room from the
12 corridor.

13 501. RAZVAN also recalls seeing Paul Cross notice Havsgaard taking boys to
14 Havsgaard's room several times. Sometimes, Cross rushed upstairs to follow
15 Havsgaard, as if to intervene. Further, on at least one occasion, Cross witnessed
16 Havsgaard spank Peter P.

17 502. RAZVAN also saw Cross hit ALEXANDRU, another child at the Harvest
18 Homes.

19 5. Harvest Homes Staff's Knowledge of the Abuse

20 503. At one point, RAZVAN told the cook at Harvest, Tina Radu Floarea, who
21 was known to the boys as Mami Tina ("Mami Tina"), about Havsgaard's sexual abuse.
22 He told her that Havsgaard used to undress him and the boys, spank them, and touch
23 their anus and genitals.

24 504. Mami Tina said she did not want to get involved because she was afraid
25 she would be fired if she spoke out, even though she knew Havsgaard's conduct was
26 wrong.

1 505. In fact, RAZVAN noticed that most of the staff at Harvest changed
2 regularly. Either they could not stand it, or Havsgaard hoped to keep them ignorant by
3 getting rid of them, or needed to get rid of them once they knew.

4 6. False Promises of Adoption

5 506. Stefan S., who had recruited RAZVAN and his brother into Harvest
6 Homes, was one of Havsgaard's favorites. Havsgaard regularly showered Stefan S.
7 with gifts and gave him special privileges. Because Stefan S. spoke better English than
8 most of the other residents, he translated for American visitors to Harvest Homes and
9 became privy to information about how Harvest Riverside and Havsgaard interacted
10 with various sponsors in the United States.

11 507. For example, Stefan S. learned that a female musician in the United States
12 sponsored RAZVAN and frequently made donations to support his care. Stefan S.
13 relayed this information to RAZVAN, who was surprised to learn this because he never
14 received any money or gifts.

15 508. Instead, Havsgaard kept the funds donated for RAZVAN for himself
16 and/or gave the funds to the other boys who were his favorites.

17 509. Although RAZVAN did not speak directly with any American sponsors,
18 Havsgaard used to film him and other kids to elicit further donations and gifts.

19 510. Havsgaard also promised RAZVAN that he would be taken to the United
20 States and adopted by new parents there. The promised adoption never materialized.

21 7. Circumstances of Leaving Harvest Homes

22 511. In 2007, the conditions in the Harvest Homes became much worse
23 because money was clearly tighter. The staff needed to ration food due to insufficient
24 funds.

25 512. In or around 2008, RAZVAN and his brother resolved to leave Harvest
26 Homes together. The two brothers and their two sisters lived together with their mother
27

1 in one small room. She could not support them and so RAZVAN quit school and found
2 a job to help support the family.

3 513. After several years, RAZVAN's mother became ill with leukemia.
4 RAZVAN worked in a car wash to pay for her treatment and even donated his bone
5 marrow in an attempt to save her life. She died in 2018 and RAZVAN subsequently
6 moved to the United Kingdom to live and work there.

7 **F. Havsgaard's Sexual Abuse of Plaintiff George Adrian Vasile**

8 1. Abuse from Havsgaard at Harvest Homes

9 514. Havsgaard paid ADRIAN special attention when he arrived at the Harvest
10 Homes. Havsgaard spoke with him frequently, brought him sweets, and fed him better
11 food than fed some of the other children.

12 515. ADRIAN's happiness in being singled out for special treatment changed
13 when Havsgaard began to make sexual advances towards him. These made ADRIAN
14 feel confused, frightened, stressed, and dirty.

15 516. Soon, Havsgaard started to find reasons to spank ADRIAN, saying that it
16 was punishment for mistakes ADRIAN had made. Havsgaard would force ADRIAN
17 to undress and then painfully spank him between ten and twenty times. After spanking
18 ADRIAN, Havsgaard would stop and smell his own hand, seemingly finding pleasure
19 from the smell.

20 517. Afterwards, Havsgaard put ADRIAN on his lap. Havsgaard would play
21 with ADRIAN's genitals and forcibly penetrate ADRIAN's anus with his finger.
22 Havsgaard would then tell ADRIAN how much he loved him and that he would get a
23 reward if he kept quiet.

24 518. ADRIAN would scream from the pain. Havsgaard would become red in
25 his face and start to shake. As a child, ADRIAN was confused but now understand that
26 Havsgaard was sexually gratifying himself.

27
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1 519. After the first sexual assault, ADRIAN spent four days hiding from
2 Havsgaard—under his bed, in the wardrobe, and in the water tank behind the house.
3 Still, Havsgaard’s “spankies” continued to happen, often in Havsgaard’s bedroom.

4 520. On many occasions, Havsgaard forcibly masturbated ADRIAN.
5 Havsgaard found special pleasure in squeezing ADRIAN’s penis in a brutal manner
6 and rotating it. It was painful, and ADRIAN screamed for help. Havsgaard tried to
7 convince ADRIAN this was a positive experience that he should want by saying that
8 ADRIAN “wanted to get wet,” and that he “should not be shy.”

9 521. On multiple occasions, Havsgaard also attempted to anally rape
10 ADRIAN.

11 522. When ADRIAN was in fifth grade, he received a bad mark in school.
12 Havsgaard was notified and once ADRIAN returned from school, they had an intense
13 argument about the grade. Havsgaard took ADRIAN to his room, pulled his trousers
14 down and spanked him even more heavily than usual, to the point of making his bottom
15 numb. Still, moments later, ADRIAN felt a sharp pain in his anus as Havsgaard
16 forcibly penetrated him.

17 523. At that moment, ADRIAN tried to fight Havsgaard off. In the struggle to
18 be free from Havsgaard, ADRIAN hit his head on a radiator and started to bleed. He
19 started to feel dizzy and fell to the ground. Eventually, staff came to the room to help
20 him. Havsgaard lied and told the staff that ADRIAN tried to escape routine spanking.

21 524. ADRIAN still has a scar on his head from this injury.

22 525. The same evening, ADRIAN ran away from Harvest Homes. After two
23 days in the streets, he reached his parents’ home. That same evening, Havsgaard
24 arrived to bring ADRIAN back. ADRIAN’s mother was hospitalized at the time, and
25 his father said that he had to go with Havsgaard because they did not have money to
26 feed him. ADRIAN started screaming with fear and begging to not be taken back, but
27 Havsgaard prevailed. ADRIAN spent the entire car ride with Havsgaard focusing on
28

1 the car door, biding his time to escape but never got the opportunity. Havsgaard forced
2 him to return to Harvest Homes.

3 2. Abuse from Harvest Homes Staff

4 526. ADRIAN remembers that the Harvest staff were cruel and often
5 physically abusive towards him. They asked the children to call them “Mom” and
6 “Dad,” but still punished them regularly.

7 527. If ADRIAN refused a “spanky” from Havsgaard as punishment, the staff
8 forced him to spend two to three hours kneeling on walnut shells, in the attic, in the
9 dark, which made his legs bleed.

10 528. Other times when the staff thought ADRIAN was misbehaving, they
11 would lock him in his room for up to a week. He was only allowed to leave for school
12 or to use the bathroom; at all other times he was locked in his room. Staff occasionally
13 brought him food as if he were in prison. He spent much of his time reading the Bible
14 and hoping to be saved from his misery. His roommates were not allowed to enter the
15 room while ADRIAN was locked in it, except at 10 p.m. to go to sleep.

16 529. Havsgaard and staff at Harvest Homes forbade ADRIAN from visiting
17 his mother, even when she was hospitalized. ADRIAN tried to run away a few times
18 but was caught, then locked in a room again for up to a week. A few times, Havsgaard
19 promised ADRIAN to take him to see his mother, but only if ADRIAN agreed to being
20 sexually abused by Havsgaard.

21 3. False Promises of Adoption

22 530. Another sinister form of manipulation that Havsgaard employed was
23 telling ADRIAN that he had a sponsor family in the United States, who would like to
24 adopt him. This promise, like many others of Havsgaard’s, never materialized.

25 4. Harvest Homes Staff’s Knowledge About Havsgaard’s Abuse

26 531. It is obvious to ADRIAN that the staff at Harvest Homes were aware of
27 Havsgaard’s sexual abuse. ADRIAN told a woman staffer, Mihaela Mustata, about the
28

1 abuse, including the attempted rape by Havsgaard. She seemed to believe him but said
2 she could not protect ADRIAN because Havsgaard was the pastor and her boss.

3 5. Circumstances of Leaving Harvest Homes

4 532. ADRIAN ran away from Harvest in around 2006, when he was 14 years
5 old, as he could no longer stand it. Harvest failed to provide him with any meaningful
6 education or life skills.

7 533. ADRIAN subsequently found work in construction and as a chef in a
8 restaurant.

9 **G. Havsgaard's Sexual Abuse of Plaintiff Aurelian Busca**

10 1. Abuse from Havsgaard at Harvest Homes

11 534. Havsgaard sexually and physically abused AURELIAN in multiple ways.

12 535. Havsgaard visited the Bârlogeni Harvest Home where AURELIAN lived
13 almost daily.

14 536. Havsgaard placed AURELIAN in a different house than ALEXANDRU-
15 CRISTIAN, despite AURELIAN's pleas to be reunited with his brother. Havsgaard
16 only allowed AURELIAN to see his brother during the Sunday church services, in
17 school, and, occasionally, for visits lasting a few hours. Havsgaard also frequently
18 forbade AURELIAN from seeing his mother, particularly when AURELIAN resisted
19 Havsgaard.

20 537. When Havsgaard drove AURELIAN to church services or elsewhere
21 around town, he often made AURELIAN sit in the front seat. While driving, Havsgaard
22 touched AURELIAN and fondled his genitals. When another boy sat in the front seat
23 instead, AURELIAN observed Havsgaard abusing him similarly.

24 538. On nearly daily basis, Havsgaard spanked AURELIAN in punishment for
25 infractions both real and imagined, such as not being good enough student. Havsgaard
26 grabbed AURELIAN by the neck, took him into the bathroom, undressed him,
27
28

1 massaged his buttocks and then spanked him. AURELIAN knew that if he wanted any
2 freedom, like playing soccer, he needed to endure a spanking from Havsgaard.

3 539. When AURELIAN resisted, Havsgaard tied him to a sofa and instructed
4 staff to keep him tied until Havsgaard left for the day.

5 540. On at least two occasions, Havsgaard spanked AURELIAN publicly, in
6 front of the other children. The first time, AURELIAN had run away from Harvest
7 Homes to a nearby school, wanting to play soccer. Havsgaard found him there and told
8 him he would receive a “special punishment” at church the following day. After the
9 customary service and prayer, Havsgaard announced to all children that a “sad
10 moment” was about to happen. Havsgaard then instructed AURELIAN to come to the
11 front of the crowd, stripped him naked, and spanked him over his knees for everybody
12 to see.

13 541. The second time Havsgaard spanked AURELIAN in public happened
14 after AURELIAN got into a fight with Mark M. in the garden of the Buftea house prior
15 to a Sunday church service. After church, Havsgaard again spanked AURELIAN in
16 front of all the children (though not Mark M.).

17 542. Havsgaard occasionally publicly spanked other children too.

18 543. One time when AURELIAN was showering, Havsgaard forced himself
19 into the bathroom and tried to touch AURELIAN’s penis. AURELIAN screamed out
20 of fear and tried to fight Havsgaard off. Havsgaard started to choke AURELIAN to
21 subdue and silence him. After a while, a staff member heard the struggle, came in and
22 asked Havsgaard to stop strangling AURELIAN.

23 544. AURELIAN was so affected by Havsgaard’s physical and sexual abuse
24 that he once ran into the kitchen, grabbed a knife, and screamed that he would kill
25 himself if Havsgaard did not stop hurting him.

1 545. AURELIAN tried to run away from Harvest Homes on multiple
2 occasions. Each time, Havsgaard found AURELIAN, brought him back, and put him
3 on house arrest for as long as a month.

4 546. With no practical means of escape, AURELIAN turned to drugs and got
5 addicted to heroin as a teenager.

6 2. False Promises of Adoption

7 547. AURELIAN recalls that Americans often visited Harvest Homes, some
8 multiple times like Cathy and Paul Cross, and Rowan and Monique Smith.

9 548. Havsgaard told AURELIAN that there was a sponsor family in America
10 who wanted to adopt him. AURELIAN recalls that one of his sponsors, Flavius,
11 promised to give AURELIAN a cassette recorder, which he never received.
12 AURELIAN wanted to be adopted but Havsgaard ultimately did not allow it to happen.

13 3. Circumstances of Leaving Harvest Homes

14 549. In 2005, AURELIAN received a rare permission to visit his mother. When
15 AURELIAN returned from his visit, Havsgaard told him that his time at the Harvest
16 Homes was over, and he could no longer live there.

17 550. AURELIAN then lived on the streets until his mother came and found
18 him.

19 **H. Havsgaard's Sexual Abuse of Plaintiff Alexandru-Cristian Busca**

20 1. Abuse from Havsgaard at Harvest Homes

21 551. Havsgaard sexually and physically abused ALEXANDRU-CRISTIAN in
22 multiple ways.

23 552. Havsgaard kept ALEXANDRU-CRISTIAN and his brother separate at
24 most times. ALEXANDRU-CRISTIAN frequently asked Havsgaard if he could see
25 his brother, but Havsgaard generally said no. They would see each other at Sunday
26 church service and at times in school. Only very occasionally, Havsgaard allowed
27

1 ALEXANDRU-CRISTIAN and AURELIAN to spend a few hours together at other
2 times.

3 553. When ALEXANDRU-CRISTIAN arrived at the Harvest Homes,
4 Havsgaard sat down with him and caressed his leg. ALEXANDRU-CRISTIAN did not
5 speak good English; Havsgaard had one of the other boys translate for him when he
6 told ALEXANDRU-CRISTIAN to “be a good boy and learn English.”

7 554. Havsgaard would often intentionally walk around the Harvest Homes
8 with short, flimsy shorts, and no underwear. ALEXANDRU-CRISTIAN and the other
9 boys could see Havsgaard’s genitals.

10 555. Havsgaard’s intimate touching escalated quickly. Anytime
11 ALEXANDRU-CRISTIAN did not want to go to church or to wake up, Havsgaard
12 entered his bedroom, stroked ALEXANDRU-CRISTIAN’s buttocks and groped his
13 penis, while convincing ALEXANDRU-CRISTIAN “come on, let’s go.”

14 556. Havsgaard frequently sexually abused ALEXANDRU-CRISTIAN in
15 ALEXANDRU-CRISTIAN’s bed. This included Havsgaard rubbing his face (nose, in
16 particular) on ALEXANDRU-CRISTIAN’s genitals. Havsgaard did this even when
17 ALEXANDRU-CRISTIAN’s roommates were in the room; he would sometimes rub
18 his face in their genitals too. At times, Havsgaard pinned ALEXANDRU-CRISTIAN
19 down to his bed by sitting on ALEXANDRU-CRISTIAN’s crotch.

20 557. Additionally, Havsgaard would often go into ALEXANDRU-
21 CRISTIAN’s room early in the morning, checking if ALEXANDRU-CRISTIAN or
22 any of the other boys had morning erections.

23 558. Havsgaard often tried to sexually arouse ALEXANDRU-CRISTIAN and
24 get him erect. When Havsgaard succeeded, he would excitedly comment on
25 ALEXANDRU-CRISTIAN’s penis, saying “big, oh my God.”

26 559. When Havsgaard drove ALEXANDRU-CRISTIAN to school,
27 ALEXANDRU-CRISTIAN sat in the front seat next to Havsgaard to ease his car
28

1 sickness. Havsgaard took advantage of this and groped ALEXANDRU-CRISTIAN's
2 genitals.

3 560. Havsgaard frequently performed "spankies" on ALEXANDRU-
4 CRISTIAN. Havsgaard would take ALEXANDRU-CRISTIAN to the bathroom,
5 undress him fully, and spank him. At the end, Havsgaard rubbed ALEXANDRU-
6 CRISTIAN's anus with his finger.

7 561. Havsgaard also abused ALEXANDRU-CRISTIAN physically. One time,
8 Havsgaard slapped ALEXANDRU-CRISTIAN so forcefully that ALEXANDRU-
9 CRISTIAN's eardrum tore. ALEXANDRU-CRISTIAN screamed with pain. The
10 eardrum never healed fully; to this day, ALEXANDRU-CRISTIAN suffers from
11 vertigo and must avoid letting water inside his ear.

12 562. ALEXANDRU-CRISTIAN observed another child, Mihai, trying to
13 stand up to Havsgaard. Once when Mihai wanted to go to a movie, he asked Havsgaard
14 directly, "What's the deal? Do I have to stay for you to suck my dick to go out?"
15 Havsgaard's response was to beat and spank Mihai.

16 563. ALEXANDRU-CRISTIAN self-harmed while he lived at Harvest
17 Homes; he cut himself with glass and needed stitches.

18 2. Havsgaard Recruits Plaintiff Alexandru-Cristian to Sex Work

19 564. Havsgaard often showed pornography to ALEXANDRU-CRISTIAN and
20 other children at Harvest Homes.

21 565. Havsgaard permitted ALEXANDRU-CRISTIAN and other boys to use
22 the computer in their residence or the internet café owned by Manescu for online sex
23 work. With Havsgaard's knowledge and consent, ALEXANDRU-CRISTIAN and the
24 boys procured customers on online dating sites and performed paid sex acts in front of
25 web cameras. ALEXANDRU-CRISTIAN started this at age 16.

26 566. ALEXANDRU-CRISTIAN had sex with men for money three times
27 while he was an underage resident of Harvest Homes. One time, ALEXANDRU-
28

1 CRISTIAN and another boy from the Harvest Homes were picked up from the Homes
2 by a French man, who paid them €50 to perform oral sex on them.

3 3. Schutte Was Plaintiff Alexandru-Cristian's Sponsor and Wanted to
4 Adopt Him

5 567. Havsgaard paired ALEXANDRU-CRISTIAN with sponsors in
6 California—Defendant Schutte and his wife. The Schuttes sent ALEXANDRU-
7 CRISTIAN money, toys and gifts, but Havsgaard kept all of them. The Schuttes sent a
8 picture of themselves which ALEXANDRU-CRISTIAN has kept. Schutte and his wife
9 visited ALEXANDRU-CRISTIAN at Harvest Homes.

10 568. Schutte and his wife wanted to adopt ALEXANDRU-CRISTIAN, but
11 Havsgaard cut off all communications between ALEXANDRU-CRISTIAN and the
12 Schuttes before the adoption could materialize.

13 *Figure 36: Family photograph the Schuttes sent Alexandru-Cristian*



1 4. Circumstances of Leaving Harvest Homes

2 569. In or around 2007, Havsgaard kicked ALEXANDRU-CRISTIAN out of
3 Harvest Homes.

4 570. ALEXANDRU-CRISTIAN struggled to survive afterwards. He turned to
5 stealing to buy food.

6 **I. Havsgaard's Sexual Abuse of Plaintiff Marian Dragne**

7 1. Abuse from Havsgaard at Harvest Homes

8 571. Havsgaard sexually abused MARIAN D. in multiple ways.

9 572. Havsgaard was an angry man with a short temper, who beat MARIAN D.
10 with sticks or rulers whenever he acted in a way that displeased Havsgaard. As another
11 form of punishment, Havsgaard also made MARIAN D. kneel on broken walnut shells
12 until his knees bled. MARIAN D. experienced extreme pain when forced to do so.

13 573. On one occasion, Havsgaard punished MARIAN D. by forbidding him
14 from leaving the Harvest Homes for two weeks. MARIAN D. tried to sneak out but
15 Havsgaard found him, grabbed him by the throat, and physically assaulted him.

16 574. At one point when MARIAN D. misbehaved, Havsgaard beat MARIAN
17 D. and forced him to drink chlorine as punishment, which made MARIAN D. feel very
18 sick.

19 575. When Havsgaard spanked MARIAN D., Havsgaard usually took
20 MARIAN D. to an empty room, forced MARIAN D. to undress, and then beat
21 and spanked him. Once he was done, Havsgaard hugged and kissed MARIAN D. and
22 groped his penis.

23 576. On occasions, while spanking MARIAN D., Havsgaard digitally
24 penetrated MARIAN D.'s anus and made MARIAN D. masturbate Havsgaard's penis.

25 577. On at least one occasion when MARIAN D. was bathing, Havsgaard
26 entered the bathroom, stared at MARIAN D., and masturbated himself.

1 578. MARIAN D. lived in constant fear from Havsgaard’s beatings, and sexual
2 assaults. MARIAN D. was also petrified that Havsgaard would kick him out of the
3 home as he had nowhere to go.

4 2. Abuse from Harvest Homes Staff

5 579. The Harvest Homes were a brutal place for MARIAN D. In the infrequent
6 windows of reprieve from Havsgaard’s abuse, the Romanian staff physically assaulted
7 him. On one occasion, some of the Romanian staff forcibly washed MARIAN D.’s
8 mouth with soap.

9 3. Awareness of Abuse of Other Children at Harvest Homes

10 580. MARIAN D. saw how Havsgaard sexually abused other children. One
11 time MARIAN D. was walking down the hallway in the Buftea house when he heard
12 a boy scream from a nearby room. The door to the room was open and so MARIAN
13 D. looked inside. He saw Havsgaard hitting the boy while touching the boy’s genitals.

14 581. One evening, Havsgaard’s absolute favorite boy, Leo L., was crying a lot.
15 MARIAN D. saw Leo L. self-harm; it seemed that Leo L. wanted to kill himself.
16 MARIAN D. and other boys in the room jumped on Leo L. to stop him from further
17 self-harm.

18 4. Circumstances of Leaving Harvest Homes

19 582. In 2006, when MARIAN D. was 18, he left Harvest Homes. He started to
20 drink excessive amounts of alcohol to numb his pain and erase his memories. He also
21 developed a gambling addiction.

22 **J. Havsgaard’s Sexual Abuse of Plaintiff Florin Cristian Caragea**

23 1. Abuse from Havsgaard at Harvest Homes

24 583. Havsgaard sexually abused FLORIN in multiple ways.

25 584. A few months after FLORIN moved into Harvest Homes, Havsgaard
26 forced him to sit on his lap as he caressed his inner thighs.
27
28

1 585. Havsgaard often wore flimsy shorts, without underwear, exposing his
2 genitals. At times, Havsgaard asked FLORIN to sit on his lap while revealing his penis.

3 586. One time, Havsgaard stared at FLORIN through a window in the
4 bathroom while FLORIN was showering. FLORIN noticed that Havsgaard's face
5 looked strained and sweaty, and understood that Havsgaard was masturbating. On
6 another occasion, FLORIN saw Havsgaard masturbate behind the house.

7 587. Havsgaard spanked FLORIN regularly. Havsgaard undressed FLORIN,
8 forcefully held him down over his lap, caressed his buttocks and spanked him.
9 FLORIN cried from the significant pain. Havsgaard finished the abuse session by
10 digitally penetrating FLORIN's anus and fondling his penis. FLORIN yelled about the
11 pain but learned early on that any resistance only led to a more severe spanking from
12 Havsgaard. Havsgaard often masturbated while he administered the "spankies" on
13 FLORIN.

14 588. FLORIN sometimes self-harmed by cutting his hands after being
15 spanked. He once tried to commit suicide after being spanked by throwing himself
16 down a well, but one of his friends stopped him. FLORIN was so affected by the abuse
17 that he cried himself to sleep almost every night.

18 589. The children in the Harvest Homes slept in bunkbeds and FLORIN had
19 the top bed of his bunkbed. One night FLORIN fell down from his bunkbed and
20 seriously fractured his hip and leg. FLORIN required surgery and was then confined
21 to a wheelchair with a cast on his leg for nine months. FLORIN was unable to wash or
22 use the bathroom by himself, yet no Harvest staff were assigned to help him. He was
23 forced to ask other children for help.

24 2. Awareness of Abuse of Other Children at Harvest Homes

25 590. FLORIN and other children discussed Havsgaard's rampant sexual abuse.
26
27
28

1 591. FLORIN saw Havsgaard touch other boys intimately on their thighs and
2 genitals, even in public settings in front of other adults. FLORIN learned that some of
3 the children were engaging in sex work on Havsgaard's request.

4 3. False Promises of Adoption

5 592. FLORIN knew that many children were sponsored by donors in America.
6 FLORIN was told that the sponsors sent money and gifts for them, but the only item
7 FLORIN received was a football. Havsgaard promised FLORIN that his sponsors
8 wanted to adopt him, but this never happened.

9 593. Havsgaard took photos of the boys, often shirtless, on the grounds that
10 he would send them to the sponsors.

11 4. Circumstances of Leaving Harvest Homes

12 594. FLORIN left Harvest Homes in 2008. He knew the only way to escape
13 Havsgaard's abuse was to leave. The conditions at the homes had also worsened. The
14 children lacked food, clothing, and were told that funding from America had ended.

15 595. Upon leaving, FLORIN returned to live with his father, who soon moved
16 to Spain, and his grandparents took care of him until he turned 18. To assist his
17 grandparents financially, FLORIN turned to sex work, as that is what he had learned
18 from his time at Harvest Homes. He engaged in sex work until he turned 17.

19 **K. Havsgaard's Sexual Abuse of Plaintiff Alexandru Badaluta**

20 1. Abuse from Havsgaard at Harvest Homes

21 596. Havsgaard started to sexually abuse ALEXANDRU B. around three
22 months after he arrived at Harvest Homes.

23 597. Havsgaard frequently walked around the Harvest Homes with flimsy
24 shorts, without underwear, and his penis was visible to the children, including
25 ALEXANDRU B. At times, Havsgaard had his hand inside his shorts, apparently
26 masturbating.

1 598. Havsgaard found reasons to “punish” ALEXANDRU B. for infractions
2 both real and invented. These punishments were Havsgaard’s opportunity to sexually
3 assault him.

4 599. On multiple occasions, Havsgaard took ALEXANDRU B. into the
5 bathroom and undressed him, put ALEXANDRU B. on his lap, and violently
6 “spanked” his buttocks. Havsgaard also forcibly rubbed his finger on ALEXANDRU
7 B.’s anus. ALEXANDRU B. felt Havsgaard’s erection through his trousers when
8 Havsgaard was abusing him.

9 600. Havsgaard ended these instances of abuse by kissing and hugging
10 ALEXANDRU B. The “spankies” occurred often, sometimes three times a day.
11 ALEXANDRU B. was frequently in pain from the abuse.

12 601. ALEXANDRU B. often ran away from Harvest Homes but eventually
13 returned because he needed food and shelter. Upon each return, Havsgaard punished
14 him.

15 602. One form of punishment was to put ALEXANDRU B. into solitary
16 confinement (in ALEXANDRU B.’s room) for a few days.

17 603. Before being reaccepted to “normal” status, there was a final hurdle:
18 Havsgaard would again administer “spanky,” fondle ALEXANDRU B.’s anus, and
19 violently strike him.

20 604. A second form of punishment was to kick ALEXANDRU B. out of the
21 homes. Havsgaard seemed to like this route particularly in the winter when outside
22 temperatures were well below freezing. One such time, when ALEXANDRU B. was
23 twelve, Havsgaard forced him to sleep outside in the snow. ALEXANDRU B.
24 developed frostbite on one of his legs, for which he was hospitalized. ALEXANDRU
25 B. has pain in that leg to this day.

26 605. As another form of punishment, Havsgaard often forced ALEXANDRU
27 B. to stand naked in the bathroom and then stare at him in a sexual manner. Havsgaard
28

1 also masturbated while watching ALEXANDRU B. take a bath. ALEXANDRU B.
2 saw Havsgaard walk around with his hands inside of his trousers, masturbating, while
3 ALEXANDRU B. was naked having a bath.

4 606. On some occasions, as if in a frenzy, Havsgaard choked ALEXANDRU
5 B. and forcefully rubbed his fingers on ALEXANDRU B.'s anus.

6 607. When ALEXANDRU B. was 14, Havsgaard entered ALEXANDRU B.'s
7 bedroom, locked the door, and started another "spanky" abuse session. ALEXANDRU
8 B. tried to flee the room but Havsgaard stopped him. Despairing, ALEXANDRU B.
9 punched his hand through one of the windows, jumped through the gap, and ran away.
10 For days, ALEXANDRU B. lived in the streets, struggling with the trauma from
11 Havsgaard's abuse. He drank large amounts of alcohol and slashed his arm with a sharp
12 object, causing substantial bleeding. Police found him and took him to the hospital,
13 where they saved his life. ALEXANDRU B. still has visible scars from this suicide
14 attempt.

15 608. ALEXANDRU B. still recalls how he wanted to slash his whole body
16 open that day. He attempted suicide several more times while he was a child resident
17 of the Harvest Homes. ALEXANDRU B. saw no other possible escape from
18 Havsgaard's abuse.

19 2. Awareness of Abuse of Other Children at Harvest Homes

20 609. ALEXANDRU B. learned from the other boys at Harvest Homes that
21 Havsgaard often masturbated in front of them.

22 610. ALEXANDRU B. also heard other boys' cries throughout the house.

23 3. Circumstances of Leaving Harvest Homes

24 611. In or around 2005, Havsgaard forced ALEXANDRU B. to watch a
25 pornographic video together with him in the attic. Havsgaard told ALEXANDRU B.
26 that it was a learning experience for when he grew up. But ALEXANDRU B. felt
27 ashamed and scared and so ran away for a final time.

28

1 612. For a while, ALEXANDRU B. lived at a state orphanage. Although many
2 of the physical conditions in the orphanage were worse than at Harvest Homes,
3 ALEXANDRU B. was content because he finally escaped Havsgaard’s abuse.

4 **L. Havsgaard’s Sexual Abuse of Plaintiff Bogdan Ionescu**

5 1. Abuse from Havsgaard at Harvest Homes

6 613. Havsgaard sexually abused BOGDAN in multiple ways.

7 614. Within two weeks of BOGDAN’s arrival at the Harvest Homes,
8 Havsgaard began touching his legs, arms and inner thighs in a sexual manner.

9 615. About a month later, Havsgaard started to repeatedly fondle BOGDAN’s
10 penis over his clothes. BOGDAN was nine years old at the time.

11 616. Soon after, Havsgaard frequently “spanked” BOGDAN under the guise
12 of punishment. Havsgaard would grab BOGDAN, take him to the bathroom, pull down
13 his trousers and underpants, force him over his lap, and spank him. As Havsgaard
14 “spanked” him, he would often fondle BOGDAN’s exposed genitals. After the
15 spanking, Havsgaard would stroke BOGDAN’s bare legs, buttocks, as well as kiss him
16 on his cheek, as if expressing a perverse affection.

17 617. At least once while BOGDAN was showering, Havsgaard entered the
18 bathroom uninvited, stared at BOGDAN’s body and masturbated himself.

19 618. Over time, Havsgaard’s “spankings” of BOGDAN become more sexually
20 abusive. On at least one occasion Havsgaard inserted his finger into BOGDAN’s anus
21 at the end of “spanky.” BOGDAN screamed out, “what are you doing? It’s not right!”
22 Havsgaard kept going and insisted: “It’s right, it’s right!”

23 2. Awareness of Abuse of Other Children at Harvest Homes

24 619. BOGDAN often heard children scream and cry when they were alone
25 with Havsgaard. BOGDAN understood that Havsgaard was sexually abusing them in
26 a similar manner.

1 620. BOGDAN also witnessed Havsgaard perform oral sex on Leo L. as set
2 out above

3 3. False Promises of Adoption

4 621. When BOGDAN was around 14 years old, Havsgaard introduced him to
5 a sponsor family who were members of Harvest Riverside's congregation and ran a
6 private school near Riverside. BOGDAN spoke to them via video call on at least three
7 occasions. On one of these calls, they told BOGDAN that they had been sending him
8 \$500 a month to allow him to go swimming and to play basketball. BOGDAN told
9 them he received any of this money; the sponsor family was shocked to learn this.

10 622. As detailed above, Havsgaard refused to sign BOGDAN's adoption
11 papers after BOGDAN objected to Havsgaard's sexual abuse.

12 4. Harvest Homes Staff's Knowledge of the Abuse

13 623. After Havsgaard thwarted BOGDAN's chances of being adopted in
14 America, BOGDAN felt increasingly lonely and depressed. Eventually, he confided in
15 one of the women working at the Harvest Homes and told her that Havsgaard was
16 sexually abusing him. She was shocked and offered to adopt BOGDAN herself but
17 Havsgaard again refused it.

18 5. Plaintiff Bogdan's Suffering

19 624. Throughout his time at the Harvest Homes, BOGDAN suffered deeply
20 from the abuse inflicted by Havsgaard. He lived in constant shame and fear of
21 Havsgaard.

22 625. BOGDAN's suffering intensified after Havsgaard's sexual assault at the
23 airport, when BOGDAN realized Havsgaard would never let him leave. BOGDAN
24 became withdrawn and self-harmed many times. Once, he punched a wall for half an
25 hour and banged his head against it, suffering injuries in the process.

26 626. BOGDAN has attempted suicide at least three times. He also saw another
27 child, MARIAN, attempt suicide by cutting.

1 6. Circumstances of Leaving Harvest Homes

2 627. BOGDAN was forced out of the Harvest Homes in 2008 when Harvest
3 Riverside closed them. He returned to living in the streets. With no meaningful life
4 skills, BOGDAN turned to sex work to earn a living.

5 628. BOGDAN soon attempted suicide by overdosing on pills.

6 629. BOGDAN self-medicated to repress his memories of Havsgaard’s sexual
7 abuse. For many years, he managed to block his memories of Havsgaard completely.
8 However, they eventually returned, in the form of recurring nightmares.

9 630. Around five years ago, BOGDAN planned to end his life again, this time
10 by drowning himself. He did not go through with the plan.

11 **M. Havsgaard’s Sexual Abuse of Plaintiff Marian Liviu Mihaila**

12 1. Abuse from Havsgaard at Harvest Homes

13 631. Havsgaard sexually abused MARIAN LIVIU in multiple ways.

14 632. Havsgaard frequently embraced MARIAN LIVIU, touched his buttocks
15 and kissed him. The intimate touching made MARIAN LIVIU uncomfortable.

16 633. MARIAN LIVIU often saw Havsgaard walking around the Harvest
17 Homes in flimsy shorts. MARIAN LIVIU could see Havsgaard’s genitals through the
18 shorts.

19 634. At times, MARIAN LIVIU saw Havsgaard looking sexually aroused
20 when being around the boys. MARIAN LIVIU also saw Havsgaard erect on multiple
21 occasions.

22 635. Havsgaard often stripped MARIAN LIVIU’s clothes off, bent him over
23 his knees and spanked his naked bottom. MARIAN LIVIU felt Havsgaard become
24 erect during these “spankies.” Afterwards he asked MARIAN LIVIU to leave the
25 room. A few minutes later Havsgaard also left the room, with a look of sexual
26 satisfaction; often, Havsgaard masturbated himself after administering “spankies.”

1 636. One day, MARIAN LIVIU asked Havsgaard for money to buy new shoes
2 because his were torn. Havsgaard got angry, grabbed MARIAN LIVIU and hustled
3 him out of the room and began to strangle him. Through gritted teeth, MARIAN LIVIU
4 saw Havsgaard’s eyes widen; Havsgaard’s tongue was sticking out of his mouth and
5 he became visibly erect. Havsgaard derived sexual pleasure from strangling MARIAN
6 LIVIU; MARIAN LIVIU feared he was going to die. MARIAN LIVIU tried to fight
7 Havsgaard, who overpowered MARIAN LIVIU and beat him.

8 637. Physical dominance over MARIAN LIVIU was important to Havsgaard.
9 When MARIAN LIVIU moved into Harvest Homes, he was a talented young wrestler;
10 a Romanian-American sponsor was supporting his training. If MARIAN LIVIU
11 continued to train, the sponsor had agreed to help him turn professional.

12 638. Havsgaard frequently forbade MARIAN LIVIU from entering into
13 wrestling tournaments, particularly when MARIAN LIVIU tried to resist Havsgaard’s
14 sexual advances. This ruined MARIAN LIVIU’s prospects of turning professional.

15 639. On other occasions, Havsgaard punished MARIAN LIVIU with lengthy
16 solitary confinement in MARIAN LIVIU’s room.

17 640. MARIAN LIVIU self-harmed by cutting himself while living in Harvest
18 Homes.

19 2. *Awareness of Abuse of Other Children at Harvest Homes*

20 641. MARIAN LIVIU often visited Manescu’s internet café and saw other boy
21 residents of Harvest Homes accessing online sex forums and webcam sex websites;
22 they were exposing themselves to strangers for money, with Havsgaard’s
23 encouragement.

24 642. MARIAN LIVIU occasionally also accessed online sex forums and talked
25 to men online but he never met one in person.

1 3. Circumstances of Leaving Harvest Homes

2 643. In or around 2005, MARIAN LIVIU noticed how Harvest Homes began
3 to run out of money for necessities, including food and MARIAN LIVIU left.

4 644. For years afterwards, MARIAN LIVIU struggled with drug addiction,
5 including to heroin.

6 **N. Havsgaard's Sexual Abuse of Plaintiff Alexandra-Elena Langa**

7 1. Abuse from Havsgaard at Harvest Homes

8 645. Havsgaard sexually abused ALEXANDRA in multiple ways.

9 646. Havsgaard sexually spanked ALEXANDRA on several occasions. Each
10 time, Havsgaard took off ALEXANDRA's pants and underwear, bent her over his
11 knee, and spanked her bare bottom violently and painfully. While he was spanking her,
12 Havsgaard was touching his erect penis over his pants.

13 647. Then Havsgaard stopped her from putting her clothes back on. Instead, he
14 would stand her upright, take her in his arms, and touch her naked body. He told
15 ALEXANDRA that she was his daughter.

16 648. ALEXANDRA was scared of Havsgaard, who often threatened to kick
17 her out of Harvest Homes if she misbehaved. He would also forbid her from seeing her
18 brother or the rest of her family whenever he deemed her disobedient.

19 2. Abuse from Harvest Homes Staff

20 649. Many staff members at Harvest Homes were abusive towards
21 ALEXANDRA. One named Mihaela would often beat ALEXANDRA with a ruler;
22 other staff beat her with a stick, often in front of other children.

23 650. The staff, with Havsgaard's knowledge and sometimes at his direction,
24 forced ALEXANDRA to kneel on broken walnut shells for extended periods.
25 ALEXANDRA often bled as a result. If she tried to move or escape this cruel
26 punishment, staff would hit her.

1 3. Awareness of Abuse of Other Children at Harvest Homes

2 651. ALEXANDRA remembers hearing about Havsgaard’s sexual abuse of
3 the other Harvest children. It was common knowledge as the boys made frequent
4 comments about the sexual acts Havsgaard forced them to perform.

5 652. When the children were together for church service on Sundays,
6 Alexandra overheard the boys talking to each other about how Havsgaard would enter
7 the bathroom while they were taking showers.

8 653. The boys would often joke about it, saying things like, “watch out for Paul
9 [Havsgaard], he might follow you into the bathroom.”

10 654. ALEXANDRA was also aware that Manescu was sexually abusing
11 underage girls. She also heard that Manescu was stealing money from Harvest.

12 655. ALEXANDRA had no doubt that the staff knew about Havsgaard’s
13 regime of abuse. It was impossible not to hear the children yelling in the houses while
14 they were alone with him.

15 656. Havsgaard would also directly ask the staff members to leave the room so
16 he could be alone with a child.

17 657. ALEXANDRA lived in constant fear of the sexual environment at
18 Harvest and that she would be sexually assaulted, as well as, physically assaulted.

19 4. Circumstances of Leaving Harvest Homes

20 658. In or around 2006, when ALEXANDRA was nine years old, her mother
21 withdrew her from Harvest Homes to beg on the street with her father, who was
22 paralyzed and in a wheelchair.

23 659. When ALEXANDRA was a teenager, she lived at the train station and
24 became addicted to drugs. She met a boy who would bring her drugs in exchange for
25 sex.

26 660. She became pregnant at age 16 and moved into a different home. She gave
27 up her son to her mother’s care, afterwards falling into a deep depression.

1 ALEXANDRA attempted suicide twice in a span of several months and had to be
2 hospitalized.

3 **O. Havsgaard’s Sexual Abuse of Plaintiff Ioana Cosmina Pirvu**

4 1. Abuse from Havsgaard at Harvest Homes

5 661. Havsgaard sexually abused COSMINA in multiple ways.

6 662. Havsgaard repeatedly kissed COSMINA.

7 663. Havsgaard spanked COSMINA frequently for infractions both real and
8 imagined. Havsgaard would remove COSMINA’s pants and underwear, bend her over
9 his knee, and spank her bare buttocks until they were bright red. COSMINA was in
10 intense pain and cried profusely. Once Havsgaard stopped, he fondled and squeezed
11 her buttocks. Havsgaard would tell COSMINA: “Oh, I don’t want to do this, I don’t
12 want to spank you.” At the end, he kissed her.

13 664. At times, Havsgaard abused COSMINA on the spot. Other times, he
14 scheduled “appointments” to spank and abuse COSMINA later in the day.

15 665. While living at Harvest Homes, Havsgaard’s abuse and her fear it would
16 never stop prompted COSMINA to self-harm by cutting her arms.

17 2. Awareness of Abuse of Other Children at Harvest Homes

18 666. COSMINA saw Havsgaard abuse many of her friends, which was deeply
19 upsetting to her.

20 667. At age 13, COSMINA started to date Anthony A., a 19-year-old fellow
21 resident. Havsgaard repeatedly sexually abused Anthony A. and was obviously jealous
22 of Anthony A.’s relationship with COSMINA. Havsgaard frequently pushed, shoved
23 and hit COSMINA. One time, in an odd bout of anger, Havsgaard threw a toilet paper
24 roll at her when she was with Anthony A.

25 668. Havsgaard also groomed Anthony A. for online sex work: Anthony A.
26 frequently accessed online sex forums, spoke to men online, and met them for paid
27 sex.

28

1 669. COSMINA also heard Manescu threaten many girls at Harvest Home to
2 do as he wished or he would kick them out.

3 3. Circumstances of Leaving Harvest Homes

4 670. COSMINA left Harvest at 14. She first moved back with her mother, who
5 was living with her partner and younger sister in a small, rented room.

6 671. When COSMINA was 17, she moved in with Anthony A. who took care
7 of her but asked that she help him find sex customers—the only way he learned to
8 make a living at Harvest Homes.

9 672. Around the same time, COSMINA got a job working at a bar with her
10 sister DANA. Five years later, COSMINA moved to the United Kingdom, working as
11 a nanny and home cleaner.

12 **P. Manescu’s Sexual Abuse of Plaintiff Gheorghita-Bogdana Tici**

13 1. Abuse from Manescu at Harvest Homes

14 673. When DANA was around 13 years old, Manescu began to groom her for
15 sex. He gave her significantly more attention than other children. For example, when
16 DANA and other children went to play computer games at Manescu’s house or at his
17 internet cafe, Manescu focused on DANA, spoke to her frequently and expressed
18 interest in what she was doing and saying. Manescu also granted DANA special
19 privileges: other children had strict time limits on being at his internet café but DANA
20 was exempt. Manescu also frequently bought DANA gifts.

21 674. Manescu told DANA not to tell anyone that she was one of his favorites,
22 which made DANA feel uncomfortable.

23 675. Manescu quickly escalated his grooming to sexual abuse.

24 676. Manescu frequently took DANA to clean Havsgaard’s apartment and then
25 took her to a restaurant. In the car on the way to Harvest Homes, Manescu fondled her
26 thighs and kissed her. DANA was deeply uncomfortable with Manescu’s sexual
27 advances.

1 677. When DANA was around 16, she started going out with a boy who lived
2 at a different children’s home nearby. Manescu demanded that DANA keep his sexual
3 abuse a secret from her new boyfriend. After Manescu touched her sexually or gave
4 her a gift, he would threaten her, “don’t you dare tell your boyfriend.”

5 678. DANA was frightened and stayed quiet. Nevertheless, she tried to cut
6 back seeing Manescu as much as she could get away with. When Manescu suggested
7 spending time together, DANA made up excuses. Eventually, Manescu moved on and
8 abused a different young girl.

9 679. Manescu’s sexual abuse of DANA and other underage girls at Harvest
10 Homes was overt and well-known to Havsgaard, Kathy and the staff. Neither
11 Havsgaard nor any other adult did anything to stop Manescu’s sexual abuse of girls.

12 2. Awareness of Abuse of Others at Harvest Homes

13 680. DANA was aware of other children’s abuse. She saw Havsgaard take her
14 sister, COSMINA, into the bathroom at Buftea and close the door. DANA heard
15 Havsgaard violently spank her sister from outside the room and COSMINA’s cries.
16 DANA decided to rescue COSMINA and knocked on the door. Havsgaard opened it
17 and told DANA, “this is what happens when you swear.”

18 681. DANA learned from COSMINA that COSMINA’s boyfriend, Anthony
19 A., and other boys, had been sexually abused by Havsgaard.

20 682. When DANA lived at the Buftea house, she observed Leo L. and other
21 young boys enter and leave Havsgaard’s bedroom. The boys told her that Havsgaard
22 was sexually abusing them.

23 3. False Promises of Adoption

24 683. Havsgaard made false promises of adoption to DANA. Havsgaard said
25 that her American sponsor family was interested in adopting her and her sisters. She
26 met with her sponsor family on multiple occasions.

1 684. DANA understood her American sponsors wanted to adopt her but
2 Havsgaard did not allow the adoption to go through.

3 4. Circumstances of Leaving Harvest Homes

4 685. In or around 2007, the living conditions at Harvest Homes deteriorated.
5 DANA was told that the house in Dămăroaia was closing, and the girls would have to
6 move back to Buftea. In 2008, when Havsgaard left Romania, DANA and the other
7 children were told that they had one month to move out of the houses.

8 686. Without any financial resources or support, DANA, COSMINA, and
9 MARIA moved back in with their mother. After several months, DANA and MARIA
10 moved into a home for adults who were ill-equipped to live independently.

11 687. To support herself, DANA left school and got a job at KFC and later at a
12 wine bar. In or around 2011, DANA and her partner moved to England where she
13 worked as a cleaner.

14 **Q. Havsgaard's and Manescu's Sexual Abuse of Plaintiff Maria**
15 **Ghenciulescu**

16 1. Abuse from Havsgaard at Harvest Homes

17 688. Havsgaard sexually abused MARIA in multiple ways.

18 689. Havsgaard painfully spanked MARIA on a weekly basis, always drawing
19 evident sexual pleasure from doing so. Havsgaard usually removed MARIA's pants
20 and underwear, bent her over his knees, and then forcefully spanked her bare buttocks.
21 On one occasion, Havsgaard instead lifted MARIA upside down, pulled down her
22 pants and underwear, and spanked her while he held her upside down in the air.

23 690. Havsgaard administered these "spankies" both in private and in front of
24 other children. At times, MARIA saw that Havsgaard got an erection and became
25 sexually aroused.

26 691. After "spankies," Havsgaard often put MARIA into solitary confinement
27 for the rest of the day without access to food or water.

1 692. MARIA was frightened by Havsgaard. She often self-harmed by cutting
2 herself and made three serious suicide attempts while she was a child living at Harvest
3 Homes, first by overdosing on pills, then by deeply cutting her wrists, and finally by
4 spending hours outside in the winter, naked, planning to freeze to death.

5 693. Once Havsgaard found out about her suicide attempts, he became enraged
6 and administered brutal “spankies.”

7 2. Abuse from Manescu at Harvest Homes

8 694. Manescu also sexually abused MARIA.

9 695. Manescu took MARIA to his van and touched her up and down her legs
10 in a sexual manner.

11 696. Manescu then instructed MARIA to masturbate him. MARIA refused, at
12 which point Manescu violently grabbed her, threw her out of the van and ordered her
13 not to tell anybody about this. Manescu added that even if MARIA did tell anybody,
14 nobody would believe her because she was young and he had Havsgaard’s backing.

15 697. MARIA saw Manescu sexually pursue other young girl residents of
16 Harvest Homes.

17 3. Awareness of Abuse of Other Children at Harvest Homes

18 698. MARIA was particularly close to Leo L. They were friends at first but
19 eventually started to date. MARIA quickly noticed that Havsgaard paid an
20 extraordinary amount of attention to Leo L., often showering him with gifts and taking
21 him on trips around Romania.

22 699. On countless occasions, MARIA saw Havsgaard touch Leo L. in a sexual
23 manner. Havsgaard touched Leo L. all over his body, particularly Leo L.’s inner thighs.

24 700. On one occasion, MARIA saw Havsgaard take Leo L. to his bedroom,
25 alone. Later that day, MARIA saw Leo L. come out of the bedroom with a wet spot on
26 the back of his shorts, which was apparently caused by leftover sexual lubricant or
27 semen.

1 701. MARIA witnessed several boy residents at Harvest Homes sexually abuse
2 a young girl. Havsgaard was nearby and able to intervene but chose not to.

3 4. Circumstances of Leaving Harvest Homes

4 702. In or around 2007, when MARIA was 19, she saw conditions at Harvest
5 Homes rapidly worsening. Havsgaard told all the children that Harvest Riverside was
6 no longer sending funds to support the homes. Soon after, Havsgaard shut the house in
7 Dămăroaia and moved MARIA back to the house in Buftea.

8 703. Havsgaard closed the Buftea house in 2008 and MARIA and her sisters
9 to once again live on the streets and fend for themselves. Eventually, MARIA moved
10 to a charitable foundation for adults, where she stayed for two years.

11 704. MARIA struggled with the effects of Havsgaard’s abuse of her and other
12 children and quickly became an alcoholic.

13 **R. Havsgaard’s Sexual Abuse of Plaintiff Denis-Vasile Otcuparu**

14 1. Abuse from Havsgaard at Harvest Homes

15 705. Havsgaard sexually abused DENIS in multiple ways.

16 706. Havsgaard did not allow DENIS to see his parents for the first year after
17 he moved to Harvest Homes. DENIS believes Havsgaard did this to isolate him and
18 make him more submissive to Havsgaard’s whims.

19 707. Havsgaard physically assaulted DENIS. Havsgaard frequently knelt on
20 DENIS’s neck, asphyxiating him. DENIS tried to stop Havsgaard but could not
21 overpower him.

22 708. Often, Havsgaard intensely stared at DENIS when DENIS was naked.
23 Havsgaard was full of sexual desire for DENIS and arousal, causing DENIS to fear
24 Havsgaard would sexually assault him.

25 709. On several occasions, Havsgaard abused DENIS through “spankies” by
26 fully undressing DENIS, forcing DENIS onto Havsgaard’s lap, spanking DENIS’s
27 bottom, and groping DENIS’s testicles. Havsgaard also caressed DENIS’s buttocks
28

1 and thighs, and forced his finger into DENIS's anus. On some occasions, Havsgaard
2 extracted fecal matter from DENIS's anus and then licked his (Havsgaard's) own
3 fingers, drawing sexual gratification.

4 710. At other times, Havsgaard pinned DENIS down and performed oral sex
5 on him. Havsgaard groped and fondled DENIS's genitals and forced DENIS to
6 reciprocate.

7 711. After Havsgaard finished sexually abusing DENIS, he kissed DENIS and
8 caressed his neck and hands. Havsgaard frequently apologized to DENIS and said that
9 he was like his son but that he needed to punish him.

10 712. Havsgaard drew sexual pleasure from abusing DENIS. Havsgaard was
11 visibly aroused and erect and frequently groaned with pleasure when he looked at
12 DENIS lustfully.

13 713. DENIS self-harmed because of Havsgaard's sexual abuse by cutting
14 himself with glass while he was a child resident of Harvest Homes. DENIS did not
15 care about his life or whether he would die.

16 2. Abuse From Harvest Homes Staff and Visitors

17 714. Paul Cross, an American that visited the Harvest Homes for extended
18 times, frequently hit DENIS and the other boys with a table tennis paddle.

19 715. Staff at Harvest Homes forced DENIS to kneel on his knees on broken
20 walnut shells for two hours while keeping his hands raised above his head. If DENIS
21 faltered, they beat him with sticks and other objects.

22 716. On multiple occasions, Manescu threatened DENIS and other child
23 residents of Harvest Homes that Havsgaard planned to kick them out onto the streets.

24 717. When DENIS complained to Havsgaard about how poorly Harvest
25 Homes staff were treating him and other children, Havsgaard told DENIS, "I do not
26 care, they can treat you however they want."
27
28

1 3. Awareness of Abuse of Other Children at Harvest Homes

2 718. DENIS and the other boys discussed Havsgaard's abuse. The boys talked
3 among themselves on Sundays after the church service led by Havsgaard, when the
4 different houses came together.

5 719. DENIS learned that Havsgaard performed oral sex on Leo L. and Peter P.
6 When DENIS went on trips with Havsgaard and other staff from Dămăroaia, he noticed
7 that Havsgaard disappeared with some boys. Havsgaard took the boys out alone to
8 sexually abuse them.

9 4. Circumstances of Leaving Harvest Homes

10 720. In or around 2007, when DENIS was 14 years old, he left Harvest Homes
11 as he could no longer stand the abusive environment. DENIS also dropped out of
12 school at the same time. He left Harvest Homes with no foundation for a productive
13 adult life.

14 **S. Havsgaard's and Manescu's Sexual Abuse of Plaintiff Emilia-**
15 **Mariana Tudosie**

16 1. Abuse from Havsgaard at Harvest Homes

17 721. Havsgaard was an angry and cruel man with a short temper, who
18 frequently beat and shook EMILIA for no logical reason.

19 722. Havsgaard isolated EMILIA from her family. He only allowed her to visit
20 them once or twice a year. EMILIA begged to see her family more often but Havsgaard
21 did not allow it.

22 723. One day, when EMILIA was around eleven years old, she was particularly
23 upset at his mistreatment and abuse. EMILIA and her roommate wrote that Havsgaard
24 was a pedophile on a piece of paper and stuck it on his bedroom door for all to see.
25 Once Havsgaard saw the note, he got furious and locked EMILIA and her roommate
26 in their bedroom for the rest of the day. A few hours into their confinement, Havsgaard
27 entered the room, undressed and violently spanked both of them. Once he was finished,
28

1 Havsgaard hugged EMILIA and told her that he and Jesus loved her. EMILIA then
2 begged to be allowed to use the bathroom, but Havsgaard refused, forcing her to urinate
3 in a cup.

4 724. Havsgaard locked EMILIA in her room as a form of punishment on other
5 occasions too.

6 2. Awareness of Abuse of Other Children at Harvest Homes

7 725. EMILIA often heard Havsgaard beat other children at Harvest Homes.
8 She also witnessed Havsgaard choke and strangle children on a near-weekly basis.

9 726. Havsgaard meted out this violent punishment for slight transgressions.
10 One time, Victor V. and EMILIA were playing when Victor V. should have been doing
11 chores. This provoked Havsgaard to choke Victor V. in front of EMILIA, relenting
12 only when the boy was clearly terrified.

13 3. Havsgaard Takes Emilia to California to Visit Harvest Riverside
14 and a Prospective Adopter

15 727. In or around 2000, Havsgaard took EMILIA, Mark M., Stefan S., and
16 Victor V. to California to visit Harvest Riverside. They stayed at Havsgaard's house
17 with his son, daughter-in-law, and grandchildren. The boys slept upstairs and EMILIA
18 slept downstairs on a sofa, alone. Havsgaard told her that he did not have a free room
19 for her and did not allow her to see the boys' upstairs room.

20 728. EMILIA spent much of her time in California with Kathy and a Harvest
21 Riverside congregant, Mioara Cojocnean ("Mioara"), who was originally from
22 Romania and immigrated to California together with her husband, Dan Cojocnean.
23 Mioara told EMILIA that she wanted to adopt her. Havsgaard later vetoed this, without
24 explanation.

25 729. Havsgaard raped Stefan S. and Mark M. on this trip to California.

26 730. EMILIA, Stefan S., Mark M., and Victor V. met Laurie during a church
27 service at Harvest Riverside. Laurie introduced them to other senior members of the
28

1 church and the congregation at large. Laurie invited the children to stand next to him
2 for everyone in the congregation to see. Placing EMILIA and the other children in front
3 of the congregation, next to a clearly supportive and approving Laurie, was an
4 important part of Harvest Riverside's effort to use the Harvest Homes as a fundraising
5 tool in California for Harvest Riverside.

6 4. Abuse from Manescu at Harvest Homes

7 731. EMILIA was deeply affected by the sexual abuse she suffered at Harvest
8 Homes. When she returned from the California trip, around 13 years old, she began to
9 take drugs and drink heavily. Havsgaard, the staff and other children were aware of
10 EMILIA's troubles but did not help her.

11 732. EMILIA once ran away from the Homes and lived on the streets.
12 Havsgaard instructed Manescu to bring her back. When Manescu found EMILIA, she
13 was incoherent because someone on the streets had given her drugs. Manescu put
14 EMILIA in his van and drove her back to Buftea.

15 733. EMILIA fell asleep on the drive back. When she woke up, the van was
16 stationary, EMILIA was in the back and Manescu was groping her breasts.

17 734. EMILIA tried to stop Manescu, but he threatened to tell her then-
18 boyfriend about her having been incapacitated with drugs. EMILIA did not want her
19 boyfriend to know and so did not resist Manescu further.

20 735. Manescu's sexual abuse of EMILIA and other underage girls at Harvest
21 Homes was overt and well-known to Havsgaard, Kathy and the staff. Neither
22 Havsgaard nor any other adult did anything to stop Manescu's sexual abuse of girls.

23 5. Circumstances of Leaving Harvest Homes

24 736. In or around 2002, when EMILIA was 15 years old, she left Harvest
25 Homes to live with her boyfriend, who is now her husband.

1 **T. Havsgaard’s Sexual Abuse of Plaintiff Roxana-Maria Turuianu**

2 1. Abuse from Havsgaard at Harvest Homes

3 737. Havsgaard often touched ROXANA’s lower back, waist, and upper
4 thighs.

5 738. Havsgaard administered “spankies” to ROXANA twice while she was a
6 minor. On one of the occasions, ROXANA had been arguing with another girl in the
7 Harvest Homes. Havsgaard saw the argument and told ROXANA to go upstairs and
8 wait for him to come and punish her. Havsgaard removed her pants and underwear and
9 heavily spanked her bare bottom. Havsgaard derived sexual pleasure from abusing
10 ROXANA in this way.

11 739. ROXANA became so traumatized from that spanking that she has tried to
12 block any memory of it.

13 740. Havsgaard ordered ROXANA to care for him after he broke his leg in
14 2007. Her tasks included bringing Havsgaard food, cleaning him up, and washing his
15 feet. When ROXANA washed Havsgaard, he put his hands down his pants, got erect,
16 and masturbated himself.

17 2. Awareness of Abuse of Other Children at Harvest Homes

18 741. ROXANA often heard other children at Harvest Homes crying and yelling
19 when they were alone with Havsgaard.

20 742. At Sunday church services which Havsgaard led, ROXANA saw him
21 hugging and touching boys all over their bodies, including their inner thighs, crotch
22 and genitals.

23 743. ROXANA heard several children call Havsgaard a pedophile in front of
24 Harvest Homes staff and other children.

25 744. ROXANA frequently saw Havsgaard physically fight with boys in his
26 care, on occasion hurting them.

1 3. Awareness of Manescu's abuse of girls at Harvest Homes

2 745. ROXANA worked at Manescu's internet café. He required that she work
3 twelve-hour shifts for less than minimum wage

4 746. ROXANA saw Manescu interact with many other Harvest residents who
5 frequented his café. She saw him repeatedly sexually proposition a minor girl, Amy A.
6 ROXANA saw Manescu isolate Amy A. from the rest of the children and drive away
7 with her in the Harvest Homes van.

8 747. One of Manescu's grooming techniques was to offer his target protection
9 from other children and Havsgaard.

10 748. Manescu told ROXANA that he was having sex with a 17-year-old girl.

11 749. When ROXANA told Havsgaard that she feared Manescu would sexually
12 abuse her too, Havsgaard said he could not do anything to help and that that ROXANA
13 had to accept Manescu for who he was and continue working for him.

14 750. Manescu told ROXANA's then-boyfriend that he had tricked Kathy into
15 believing that he was in love with her, hoping she would convince Havsgaard to
16 promote him.

17 4. Circumstances of Leaving Harvest Homes

18 751. In or around 2007, Havsgaard shut the Harvest Home in Dămăroaia due
19 to lack of funds. ROXANA and the rest of the girls were moved to Buftea.

20 752. Because Havsgaard and Harvest Homes were running out of money,
21 Havsgaard fired most of the staff and the standard of care suffered. Havsgaard
22 demanded that ROXANA give him a cut from her earnings so he could buy food for
23 Homes.

24 753. In 2008, ROXANA learned that Harvest Homes were closing. ROXANA
25 was afraid she would have nowhere to go and attempted to kill herself by overdosing
26 on pills stored in the bathroom. She needed hospitalization and was in a coma for three
27 days. Two months after she recovered, Havsgaard kicked her out of the Homes. Having
28

1 nowhere else to go, ROXANA knocked on doors around the neighborhood hoping to
2 find someplace to live.

3 **U. Havsgaard's Sexual Abuse of Plaintiff Cristina-Bianca Popescu**

4 1. Abuse from Havsgaard at Harvest Homes

5 754. Havsgaard sexually abused CRISTINA in multiple ways.

6 755. Havsgaard frequently spanked CRISTINA under the guise of punishment.
7 He took off her pants and underwear, bent her over his knee and then spanked her bare
8 bottom. When CRISTINA lived at the Dămăroaia house, Havsgaard spanked her
9 around weekly.

10 756. CRISTINA was also assaulted in other ways by Havsgaard and his staff.
11 They washed her mouth with soap, made her stay in her room without food, beat her
12 with a table tennis racket, and tied her to a radiator until her skin burned. Around
13 monthly, Harvest Homes staff punished her by making her kneel on broken walnut
14 shells while simultaneously holding her arms above her head, for up to an hour at a
15 time.

16 2. Havsgaard Let Boys Living at Harvest Homes Rape Cristina

17 757. When CRISTINA was between eight and ten years old, boys living at
18 Harvest Homes assaulted and raped her three times. The first rape occurred in a field
19 behind the Buftea house. The second happened in the attic.

20 758. The third incident of rape occurred in the changing room of a swimming
21 pool where Havsgaard regularly brought the children. After their swim, some of the
22 boys trapped CRISTINA in one of the changing rooms. They then took turns in raping
23 CRISTINA, who was under ten years old. CRISTINA tried to resist and her cries for
24 help echoed through the venue. Even though Havsgaard was close by and heard
25 CRISTINA, he did not intervene. CRISTINA was terrified for her life.

26 759. Havsgaard never punished the boys who raped CRISTINA, did not report
27 the rape to the police, and did not do anything to help CRISTINA recover.

28

1 760. CRISTINA confided in one of the women working at Harvest Homes, but
2 she was desensitized to the many sexual assaults and rapes that happened there
3 regularly and laughed CRISTINA off.

4 3. False Promises of Adoption

5 761. Havsgaard introduced CRISTINA to a sponsor family belonging to
6 Harvest Riverside’s congregation. CRISTINA spoke to them regularly. They told her
7 that they were sending her money but she never received any of it.

8 762. CRISTINA understood that her sponsors wished to adopt her, but
9 Havsgaard intervened and did not allow the adoption to go through. At one point,
10 Havsgaard said that he would bring CRISTINA to California to meet them but later
11 decided against this, preferring to instead take some of the boys.

12 4. Circumstances of leaving Harvest Homes

13 763. CRISTINA stayed at Harvest Homes until the Buftea house closed in
14 2008, when she was 16. She was transferred back to the Casa Pinocchio orphanage.

15 **V. Havsgaard’s Sexual Abuse of Plaintiff Alexandru Ionita**

16 764. Havsgaard sexually abused ALEXANDRU I. in multiple ways.

17 765. On multiple occasions, Havsgaard punished ALEXANDRU I. for
18 infractions real or imagined by violently and painfully “spanking” his naked bottom.
19 Havsgaard then fondled ALEXANDRU I.’s genitals and tried to digitally penetrate his
20 anus. Havsgaard drew sexual satisfaction from abusing ALEXANDRU I.

21 766. Havsgaard also regularly abused ALEXANDRU I. by fondling his body
22 and genitals while ALEXANDRU I. was in his bed, ready to sleep. ALEXANDRU I.
23 begged Havsgaard to stop touching him but Havsgaard did not relent.

24 1. Havsgaard Attempted to Anally Penetrate Alexandru I.

25 767. One evening, Havsgaard came into ALEXANDRU I.’s bedroom, touched
26 ALEXANDRU I.’s inner thigh for around 20 minutes, and then fondled his penis.
27
28

1 ALEXANDRU I. again told Havsgaard to stop. Eventually, Havsgaard turned to
2 ALEXANDRU I.'s roommate and abused him instead.

3 768. Later that evening, Havsgaard brought ALEXANDRU I. to the living
4 room. Havsgaard closed the door, took off his trousers to reveal his erect penis, and
5 demanded to anally penetrate ALEXANDRU I., who refused and so Havsgaard
6 changed roles and told ALEXANDRU I. to anally penetrate him. Havsgaard said, "if
7 you do not want me to have sex with you, you have sex with me." ALEXANDRU I.
8 again refused but this time Havsgaard did not take no for an answer.

9 769. Havsgaard grabbed ALEXANDRU I., pushed him against the wall,
10 forcefully removed ALEXANDRU I.'s trousers and started to anally penetrate
11 ALEXANDRU I.

12 770. ALEXANDRU I. then heard a door open downstairs and told Havsgaard
13 that this had to be Kathy, Havsgaard's wife, coming home. This startled Havsgaard
14 and allowed ALEXANDRU I. to run back to his bedroom.

15 2. Awareness of Abuse of Other Children at Harvest Homes

16 771. ALEXANDRU I. and other children knew that Havsgaard was sexually
17 abusing many of the other children in the Harvest Homes.

18 772. ALEXANDRU I. saw Havsgaard administer "spankies" to many other
19 fellow residents.

20 3. Circumstances of Leaving Harvest Homes

21 773. Havsgaard quickly punished ALEXANDRU I. for escaping the attempted
22 anal rape. He used the pretext of an argument ALEXANDRU I. had had with some
23 other children to administer a "spanky." Havsgaard undressed ALEXANDRU I.,
24 spanked his buttocks, and digitally penetrated ALEXANDRU I.'s anus.

25 774. ALEXANDRU I. ran away from Harvest soon after and moved back in
26 with his mother.

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1 **VI. HARVEST RIVERSIDE IS GIVEN REPEATED NOTICE THAT HAVSGAARD IS**
2 **SEXUALLY ABUSING PLAINTIFFS AND OTHER CHILDREN AT THE HARVEST**
3 **HOMES**

4 **A. Romanian Staff Quickly Recognize Havsgaard as a Pedophile**

5 775. Employees of the Local Foundation, Directors of the Local Foundation,
6 and visitors from Harvest Riverside (including employed ministers) all quickly
7 developed suspicions that Havsgaard was a child abuser, and word of this got back to
8 Harvest Riverside in California.

9 776. Children at the Harvest homes repeatedly complained about being
10 sexually abused, both to each other and to responsible adults, including the cook
11 “Mami Tina” Radu Florea, the night watchman Crivceac, and the Finance Director
12 Roman.

13 777. Mami Tina, who was consistently warm and supportive to the children
14 and won the trust of many, heard and observed enough about Havsgaard that she felt
15 obliged to report her suspicion that he was a pedophile to Schutte when Schutte visited,
16 two or three years after the Homes opened. When Schutte returned to California, he
17 escalated Mami Tina’s report to Pastor John Collins (“Collins”), Laurie’s principal
18 deputy at Harvest Riverside, who told other pastors, but no one took any further steps
19 to investigate or intervene.

20 778. Kathy, Havsgaard’s wife and a Director of the Local Foundation, had
21 known Havsgaard was a pedophile since at least 1994, when she was present for a
22 family discussion convened by his sisters to get his apology for raping them when they
23 were little girls. In Romania, she also suspected Havsgaard’s abuse but did not believe
24 she should or could act on it. She was entirely dependent on Havsgaard in an
25 unwelcoming foreign country for her entire existence—income, food, shelter, and adult
26 conversation in English (she did not speak Romanian)—and subordinated any worries
27 that arose about what he was doing to children in the Harvest Homes to her duties of
28

1 devotion and obedience as a wife as taught by Laurie and the doctrine at Harvest
2 Riverside, which had been her lodestar for 30 years. To oppose or publicly rebuke him
3 was actually inconceivable.

4 **B. Peter P. Reports Havsgaard's Sexual Abuse to Harvest Homes Staff**

5 779. Peter P. was a homeless child when he met Havsgaard. He moved into
6 one of the Harvest Homes in or around 1998. He was an early source of reports to
7 Local Foundation officials about Havsgaard's sexual abuse. As is typical of sex abuse
8 survivors, he tried different routes to get help from responsible adults, escalating over
9 time as he kept being ignored.

10 780. Havsgaard's abuse of Peter P. was consistent with that of other children.
11 Havsgaard regularly pulled down Peter P.'s trousers and underwear and spanked his
12 bare bottom; sometimes Havsgaard would let his hand linger, massage Peter P.'s
13 buttocks, kiss them, or put his finger in Peter P.'s anus, which was painful and
14 shocking.

15 781. Peter P. noticed that Havsgaard had favorites, on whom he would lavish
16 gifts and special trips. Peter P. was not a favorite and complained to Havsgaard about
17 getting less than the others. To console him, Havsgaard invited Peter P. for a trip into
18 town.

19 782. After the trip, when Peter P. was sleeping on the top bunk of his room,
20 Havsgaard came in and began to caress and massage him. Havsgaard put his hands
21 under Peter P.'s clothes and around his buttocks. Because it was difficult to reach him
22 on the top bunk, Havsgaard asked the boy in the bottom bunk to switch with Peter P.
23 The boy did, giving Havsgaard greater access to Peter P.'s body. Havsgaard massaged
24 and caressed Peter P.'s buttocks for half an hour. Peter P. understood this was the price
25 he paid for his special outing that day.

26 783. When Peter P. was twelve or 13 years old, he broke his leg. With Peter P.
27 especially vulnerable, Havsgaard insisted on washing Peter P. with his own hands.
28

1 Havsgaard would caress Peter P.’s back and chest, and then move on to his buttocks
2 and penis. Havsgaard would massage Peter P.’s genitals for 25 minutes or more. When
3 Peter P. asked him to stop, Havsgaard told him that he was “like a son” to him, and to
4 relax.

5 784. Another time, Havsgaard and Peter P. were in the garden for a “father-
6 son” talk. During the conversation, Havsgaard proceeded to perform manual sex on
7 Peter P.

8 785. On another occasion, Peter P. recalled Havsgaard having a heart-to-heart
9 with him about how proud he was of Peter P. Once again, Havsgaard put his hands
10 down Peter P.’s trousers and began performing manual sex on him.

11 786. Havsgaard asked Peter P., “Do you mind if you get a little bit wet?” Then,
12 standing behind Peter P., Havsgaard began to masturbate so that he could ejaculate on
13 Peter P.’s buttocks.

14 787. Havsgaard then rubbed his erect penis against Peter P.’s buttocks and
15 attempted to rape him anally, aggressively asserting his authority by violently biting
16 Peter P. Peter P. was terrified and managed to flee, a memory that still haunts him.

17 788. Peter P. felt confused and trapped. He could not reconcile Havsgaard’s
18 abuse with the man he was supposed to trust as father figure and pastor. He knew he
19 could not question the abuse without risking eviction and further assaults.

20 789. Peter P.’s response to this dilemma was to become more defiant.

21 790. Peter P. told staff members about the abuse, including the cook, Mami
22 Tina, and Crivceac. Nothing changed.

23 791. Peter P. wanted to provide more definitive proof so the adults at Harvest
24 could no longer pretend everything was normal.

25 792. One night in 2002, Peter P. invited a group of boys and Crivceac into the
26 living room and phoned Havsgaard on speakerphone without telling him.

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28

1 793. In Peter P.'s words, this is what followed:

2 I asked [Havsgaard] what he would do if I came to his
3 apartment. He said we would play. I asked him if he would give
4 me a blow job. He said he wouldn't force and would only do it
5 if I liked it. I said no, I didn't like it. I asked him if he liked it.
6 Paul said he'd like to "suck me." Paul had made a full
7 confession to the room, including the staff assembled there,
8 without realizing it. Then Paul said he would have one of his
9 favorites the next night anyway.

8 **C. A Couple from Harvest Riverside Encounters Signs of Child Abuse**
9 **by Havsgaard and Reports Back to California**

10 794. Another Harvest Riverside congregant, Randi Douthitt ("Douthitt"),
11 visited the Harvest Homes in approximately 2002. She recalls that Havsgaard was
12 always asking for money for the children, and she had raised \$10,000 to help. When
13 she arrived, she could see the children needed winter coats and suggested using the
14 money for this purpose. Havsgaard refused. He also refused to let her give the children
15 Bibles. Both of these refusals surprised her.

16 795. She was also surprised at the dilapidated state of the Harvest Homes. The
17 walls were dirty and there was a big pile of broken bicycles.

18 796. She noticed that Havsgaard spent excessive amounts of time with Mark
19 M., including late at night, and not with his wife. She also saw that Havsgaard
20 showered Mark M. and another favorite, Stefan S., with gifts.

21 797. Douthitt knew that Havsgaard had rented a separate apartment for Stefan
22 S., so he could stay there at age 17 with his girlfriend, who then had a baby at age 16,
23 which she did not think taught proper Christian values.

24 798. At the same time, Havsgaard was very harsh with other children; he
25 always had at least one child on lockdown.

26 799. Douthitt had gone to Bucharest with a friend, Sheryl, who was supposed
27 to check the books. Havsgaard gave her only very limited access to financial
28

1 information. Sheryl suspected that Havsgaard was running two sets of accounting
2 books.

3 800. All this disturbed Douthitt sufficiently that she returned to the Harvest
4 homes two weeks later with her husband John, a minister employed by Harvest
5 Riverside.

6 801. The Douthitts offered to paint the dirty walls and to fix the bicycles, but
7 Havsgaard would not let them. They offered to stay in Bucharest to help him for several
8 months, but Havsgaard refused that too. The Douthitts got the impression that
9 Havsgaard did not want them to know what was going on in the Harvest Homes. They
10 did not see direct evidence of pedophilia, but they suspected it.

11 802. When the Douthitts returned to California, they heard from an official at
12 Harvest Riverside who wanted to know what they had seen at the Homes. They gave
13 a full report of what they had witnessed and their impressions of Havsgaard.

14 **D. Roman Triggers Investigation by Harvest Riverside**

15 1. Roman Learns of Havsgaard's Sexual Abuse of Children

16 803. As early as 2001, a woman Havsgaard hired as an educator told Roman,
17 the Finance Director and board member of the Local Foundation, that there was
18 something suspicious happening between Stefan S. and Havsgaard. She suspected that
19 Havsgaard was a pedophile.

20 804. Roman then asked Stefan S. if Havsgaard had been abusing him. Stefan
21 S. denied this, but told the other boys that Roman had “figured it out.”

22 805. The news of Roman's discussion with Stefan S. reached Havsgaard, who
23 summoned Roman to an urgent meeting with Kathy also present.

24 806. Havsgaard tried to gaslight Roman, asking “How could you think I would
25 harm [the children]?”

26 807. Roman remained suspicious. He made a friend at Harvest Riverside, Dan
27 Cojocnean (“Cojocnean”), who was originally from Romania and emigrated to
28

1 California. Cojocnean was in charge of assembling contributions to the Harvest Homes
2 from members of Harvest Riverside in California, and then arranging their transport to
3 Romania as an agent of Harvest Riverside and ARK. On their behalf, he visited the
4 Harvest Homes three times. No later than 1999, Roman told Cojocnean that he feared
5 Havsgaard was a pedophile.

6 808. Cojocnean told Roman that when Havsgaard went back to California for
7 his fundraising trips, he badmouthed Roman as dishonest, apparently seeking to
8 “prebut” any possible criticisms of his own behavior.

9 809. Havsgaard apparently suspected that Roman had told Cojocnean about his
10 pedophilia, so Havsgaard then badmouthed Cojocnean to people at Harvest Riverside
11 too.

12 810. On information and belief, Cojocnean told his supervisors at Harvest
13 Riverside about his suspicions of Havsgaard’s pedophilia. Cojocnean eventually
14 became disgusted that Harvest Riverside was leaving Havsgaard in place and taking
15 advantage of the people whose donations he was canvassing for Romania, so he left
16 the church.

17 811. Roman felt intimidated by Havsgaard but continued to collect evidence
18 about his illicit behavior.

19 812. In 2003, Roman went to the Buftea home and asked the staff if Havsgaard
20 was doing anything unusual at night. The night staff told him that Havsgaard was often
21 out with a boy named Julian J.

22 813. Roman learned that Havsgaard had ordered the night watchman,
23 Crivceac, not to log his nocturnal travels with boys. Crivceac said to Roman it seemed
24 evident Havsgaard was having sex with Julian J.

25 814. Roman found receipts that corroborated Havsgaard’s late-night trips with
26 Julian J. and other boys, showing repeated purchases of snacks for two people after
27 midnight at gas stations on the Bucharest ring road including purchases of alcohol.

28

1 815. Armed with this new evidence, Roman confronted Havsgaard, who
2 claimed he was taking Julian J. out “to evangelize him.” Roman did not believe this.

3 816. Roman then discovered that Havsgaard was paying his driver, Marcel
4 Musceleanu, \$600 per month, compared to the \$400 per month Roman was earning as
5 Finance Director—a huge salary for a driver, much more than the Local Foundation
6 needed to pay at standard rates.

7 817. This suggested to Roman that Havsgaard was using Harvest money to buy
8 silence from his driver about where he was taking him, who was with him, and what
9 he was doing.

10 818. Roman also learned that Havsgaard was paying Manescu, another driver
11 who also ran an internet café Havsgaard liked to go to, directly in cash and without
12 receipts, which also signaled Havsgaard was trying to hide something.

13 819. Finally, Julian J. disclosed to Roman that Havsgaard had committed
14 sexual acts with another child. Mami Tina, the cook, also told Roman that Peter P. had
15 come into the kitchen very upset and asked Mami Tina if she knew what Havsgaard
16 “did to the children.”

17 820. While stopping Havsgaard was important to Roman, Roman did not want
18 to destroy the Harvest Homes and force the children back into the streets.

19 821. By October 2004, Roman thought he had enough evidence confirming
20 Havsgaard’s pedophilia and confronted him again. Roman then gave Havsgaard 30
21 days to have Laurie choose and announce Havsgaard’s replacement.

22 2. Harvest Riverside Investigates Havsgaard in 2004

23 822. Havsgaard did contact Laurie and Schutte about Roman’s ultimatum, but,
24 on information and belief, he falsely accused Roman of stealing money and of trying
25 to obscure that theft by accusing Havsgaard of child abuse.

26 823. At about this same time, Quarles, a Calvary minister working in Romania,
27 heard reports that Havsgaard was abusing the children in the homes. He left a phone
28

1 message at Harvest Riverside laying this out in a way he expected would generate a
2 rapid response. No one called him back.

3 824. Disturbed by the strange silence, he asked the pastor from his home
4 church in California, John Dunkan of Calvary Chapel Lake Elsinore, to call on his
5 behalf and implore Harvest Riverside to investigate.

6 825. Some weeks later, Quarles was home in California and happened to be in
7 the Lake Elsinore church office when he took a phone call in the absence of Pastor
8 Dunkan. A person he believes to be Schutte said, “We have a problem. One of your
9 missionary pastors has made an awful accusation about Paul Havsgaard.” Schutte was
10 angry. Quarles told Schutte that in fact he was the source of the accusation, and a tense
11 conversation ensued.

12 826. Several days later, as he was being driven to the airport to go back to
13 Romania, Quarles received another call from Schutte, who was much more amiable.
14 Schutte asked Quarles if he would replace Havsgaard and run the Harvest Homes

15 827. Quarles did not want the job but agreed to perform an audit of the Harvest
16 Homes. Anticipating that Havsgaard would be fighting for his professional life,
17 Quarles said he would run the audit only if he could have the help of two other Calvary
18 pastors working in Romania, Shane Herman (“Herman”) and Bob Keenan (“Keenan”).
19 Schutte agreed.

20 828. The three performed the audit in October 2004.

21 829. Quarles, Herman and Keenan interviewed staff at all the houses being run
22 by Havsgaard and discovered turmoil.

23 830. Crivceac, the night caretaker, provided a statement to the audit team,
24 stating that his wife, a cleaner at the homes, had told him that things there were “not
25 right,” so he had kept his eyes open and began seeing suspicious behavior by
26 Havsgaard.

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1 831. Crivceac reported that Havsgaard was “overly touchy” with the kids,
2 looking to cuddle them much too often. He gave some boys large amounts of attention
3 and would go out at night with a single boy at a time, not returning until well past
4 midnight.

5 832. Crivceac also reported that Havsgaard took one particular favorite, Leo
6 L., on trips and gave him many gifts. When Crivceac asked Leo L. where Havsgaard
7 took him, Leo L. refused to answer.

8 833. Havsgaard would also regularly take individual boys into the attic for
9 extended periods.

10 834. Three boys—Alexandru M., Peter P. and Mark M.—had told Crivceac
11 that Havsgaard had sexually abused them, and Peter P. often loudly and publicly
12 proclaimed this.

13 835. Quarles was so alarmed by what he learned from Crivceac and others that
14 he insisted to Schutte that he come see the Harvest Homes for himself.

15 836. On information and belief, Schutte discussed this brewing crisis in
16 Harvest Riverside’s Romanian mission with Laurie in California, who kept his distance
17 by sending Schutte rather than going to see for himself.

18 837. In November 2004, Schutte, accompanied by Denham (another senior
19 Calvary pastor on the board of ARK), arrived in Bucharest to see the Harvest Homes
20 on behalf of Harvest Riverside and Laurie. They met with the audit team of Quarles,
21 Herman and Keenan, who told the visiting chiefs from headquarters the following
22 findings from their survey of the homes:

- 23 a. Ample money was arriving from Harvest Riverside, some \$17,000
24 a month, but Havsgaard was spending some \$5,000 of it without
25 receipts or other records. Because dollars went a long way in
26 Romania at that time, these were substantial sums, particularly as
27 the siphoning accumulated over the years.

- 1 b. They had seen receipts gathered by Roman which showed
2 Havsgaard taking boys to hotels hours away from Bucharest, and
3 going on trips with them in Bucharest where they would buy snacks
4 and alcohol after midnight.
- 5 c. Roman had told the audit team that he had heard multiple accounts
6 of sexual abuse by Havsgaard from both staff and children in the
7 homes.
- 8 d. Roman had told them that he also understood that Havsgaard had
9 been arrested for child abuse in Romania.

10 838. Schutte and Denham then met with Roman directly. Their line of
11 questioning surprised Roman, who was worried about Havsgaard's sexual abuse,
12 because the visitors avoided that topic to focus on Havsgaard's misuse of Harvest
13 Riverside money.

14 839. Roman answered their questions, telling them how suppliers were not
15 being paid because Havsgaard was not providing him with enough funds despite the
16 regular payments from Harvest Riverside. Roman also produced detailed accountings
17 over many months. Schutte was shocked and asked for a copy, which Roman provided.
18 Schutte then promised that Harvest Riverside would pay the shortfall and send it
19 directly to the Local Foundation's account, bypassing Havsgaard to whom Harvest
20 Riverside had previously sent all California funds directly.

21 840. Roman also raised his worries about Havsgaard as a pedophile. He gave
22 the visitors an account of Havsgaard's inappropriate spending on late-night excursions
23 with the boys, and relayed reports from other staff about Havsgaard's abuse.

24 841. At the end of the meeting, Schutte took him aside and directed him to stop
25 talking about any child abuse by Havsgaard. Schutte then returned to California.

1 842. Even so, Quarles was now persuaded that Havsgaard was a pedophile. He
2 was based in Romania and called Roman to say he was thinking of reporting Havsgaard
3 to the police.

4 843. Roman worried that the homes might collapse and told Quarles that
5 replacing Havsgaard would be better than abruptly getting him sent to jail and leaving
6 the Harvest Homes leaderless.

7 844. Quarles pursued the idea of replacing Havsgaard quickly by speaking with
8 his contacts at Harvest Riverside in California.

9 845. Several weeks later, Schutte returned to Romania.

10 846. Quarles believed the overwhelming evidence that Havsgaard was a
11 pedophile and thought firing him from Harvest was essential. He told Schutte and
12 Denham, “Paul [Havsgaard] needs to be on that plane with you when you leave
13 tomorrow. He doesn’t need to be another day in Romania. He is an embarrassment to
14 every single missionary and Christian worker. Get him out of here and into
15 counselling.”

16 847. That started out as the plan. Schutte, Pastor Shane Herman and a
17 Romanian businessman, Robert Dinca, met with Roman and told him that Havsgaard
18 would be on a plane to California in the next few days, but Roman also had to resign.

19 848. Apparently, Defendants wanted a “clean sweep” of the old regime and no
20 one in power left to reveal their failings to authorities in Romania or California.
21 Quarles and Herman were going to take over for Havsgaard, and Dinca was going to
22 take over for Roman.

23 849. But Havsgaard refused to leave, and Defendants acquiesced. When the
24 time came for Havsgaard to go, Schutte and Denham told Quarles that Havsgaard “is
25 very important because he is the face of the ministry. He’s the one who goes and talks
26 to the churches and raises the money. We can’t not have him be part of things.”
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1 850. This answer reflected the views of Laurie, the ultimate authority at
2 Harvest Riverside who had set the entire Romanian enterprise in motion and had taken
3 credit for it. This was an acutely sensitive matter, Havsgaard was Laurie’s long-time
4 collaborator, and the idea that Schutte decided this independently of Laurie is not
5 credible.

6 851. This reply was so shocking that Quarles told Harvest leaders he “wanted
7 to have nothing to do with them after this.”

8 852. The result was that Havsgaard was not replaced. Schutte and Denham
9 went back to California leaving Havsgaard in command in Romania, the same as
10 before—except with added powers. Instead of appointing Dinca as Finance Director
11 as Schutte had arranged, Laurie and Schutte let Havsgaard appoint Manescu, his driver
12 who ran the internet café where he often took boys, including Plaintiffs MARIAN
13 LIVIU, ALEXANDRU-CRISTIAN, and MIHAI-CONSTANTIN, for webcam sex
14 work. Havsgaard paid Manescu a highly inflated salary.

15 853. Manescu had no background for the position and had good reason to go
16 on protecting Havsgaard.

17 **VII. HARVEST RIVERSIDE AND LAURIE COVER UP HAVSGAARD’S CHILD SEX**
18 **ABUSE**

19 854. Schutte and/or Denham reported the disturbing results of their inquiry
20 mission to Laurie at Harvest Riverside when they returned to California.

21 855. The scale of Havsgaard’s crimes and his rank incompetence in running
22 the Harvest Homes should have been anticipated by Laurie and were easily
23 discoverable by all Defendants from the start of Havsgaard’s time in Bucharest.

24 856. Nevertheless, the clear notice of Havsgaard’s pedophilia, theft, and
25 chaotic management that Schutte brought back with him from Bucharest in 2004
26 obliged Harvest Riverside and Laurie to take immediate corrective action.

27 857. Instead, they did nothing.
28

1 858. Defendants did not recall Havsgaard for questioning.

2 859. Defendants did not put Havsgaard on leave.

3 860. Defendants did not discipline Havsgaard.

4 861. Defendants did not require Havsgaard to attend counselling.

5 862. Defendants did not induce Havsgaard to retire.

6 863. Defendants did not fire Havsgaard.

7 864. Defendants did not shut down the Harvest homes.

8 865. Defendants did not send competent administrators to replace or supervise
9 Havsgaard.

10 866. Defendants did not introduce any guard rails to prevent Havsgaard from
11 further abusing Plaintiffs and other children in Romania or California.

12 867. Defendants did not institute mechanisms for Plaintiffs, other children or
13 staff at Harvest Homes to report future abuse by Havsgaard.

14 868. Defendants did not arrange for medical or psychological help for the
15 affected boys and girls, including Plaintiffs.

16 869. Defendants did not order any more inspection trips or other inquiries, nor
17 did Laurie or Schutte visit themselves.

18 870. Defendants did not immediately report Havsgaard to the police or child
19 protection authorities in Romania or the United States, although Schutte, Denham, and
20 Laurie were at all material times “mandatory reporters” of child sex abuse under
21 California law, and this obligation extended to abuse committed outside of California,
22 especially by one of their employees.

23 **A. The Playbook Harvest Riverside Used to Cover Up Havsgaard Is a**
24 **Copy of Its Approach to Other Scandals and Breaches of Legal Duty**

25 871. The following examples demonstrate that Harvest Riverside’s, Laurie’s
26 and Schutte’s conspiracy to cover up Havsgaard’s abuse of children was consistent
27 with cover-ups of related misconduct of other Harvest Riverside employees.

1 1. Harvest Riverside Recommends U-Turn for Christ Programs to its
2 Congregation Despite Their Physical and Sexual Abuse of
3 Children

4 872. At the same time Havsgaard was running Harvest Homes in Romania,
5 Harvest Riverside was associated with U-Turn for Christ Youth Ranch (“Ranch”), an
6 unlicensed camp for children needing special discipline in Baja, Mexico. Calvary
7 pastors Gerry Brown and Chuck Smith founded the Ranch and Harvest Riverside
8 routinely recommended it to parents who struggled with their children’s behavior.

9 873. The Ranch was staffed in substantial part by former drug addicts with
10 violent criminal convictions but no professional training in youth rehabilitation,
11 medicine, or mental health.

12 874. Children from Harvest Riverside who attended the Ranch recount being
13 subjected to daily beatings by its staff, forced labor, dire sanitation and medical care,
14 psychological coercion, and child sex abuse.

15 875. Similar to how Havsgaard treated children at the Harvest Homes, staff at
16 the Ranch inflicted severe punishments for the slightest acts of disobedience. Even if
17 a “counselor” was simply in a bad mood or wanted to throw his weight around, the
18 standard punishment was to force children to dig 5-by-5-by-5-foot holes—roughly the
19 volume of an elevator car—in the hard soil. The children had to complete the task
20 without food, water, or rest until the holes were finished, whether in the blazing sun or
21 through the night.

22 876. Due to dirty water, substandard food and overwork, children at the Ranch
23 often suffered from malnutrition and serious sickness without medical assistance.

24 877. In 2005, after one child escaped and reported the Ranch to the Mexican
25 police, 65 agents and inspectors from an interagency Mexican task force raided the
26 ranch, finding: “There was evidence of physical and mental mistreatment of minors,
27 improper medical attention, lack of responsible physicians, and the lack of workers
28

1 trained in rehabilitation” and that the camp employed “disciplinary methods similar to
2 those of a youth correctional facility.”⁷

3 878. Four American “counselors” were expelled from the Ranch and the
4 country, with a ban on re-entry for at least five years. Thirteen American teenage
5 campers were returned to the US. Representatives of U-Turn for Christ met them at the
6 border and downplayed the situation to their parents.

7 879. On information and belief, Harvest Riverside had notice of the illegal
8 conditions at the Ranch. Still, despite recommending the Ranch to parents for years,
9 Harvest Riverside never inspected it or took seriously any complaints from children
10 who endured it. After the raid, Harvest Riverside offered no public criticism of the
11 program or apology. Harvest Riverside continued to recommend the U-Turn for Christ
12 program to other parents.

13 2. Harvest Riverside Covers Up Cyberflashing to Teenagers at a
14 Harvest Youth Event

15 880. At a 2018 Harvest Riverside youth event for children in grades six to
16 twelve, someone transmitted a pornographic image via AirDrop to all the iPhones at
17 the event, including those belonging to underage children, causing a stir in the room.
18 Harvest Riverside did not investigate this serious incident and did not notify parents to
19 avoid public embarrassment and scrutiny.

20 3. A Child at Harvest Riverside Summer Camp is Hogtied

21 881. In 2019, a boy attending Harvest Riverside’s summer camp was hog-tied,
22 wrapped tightly in plastic wrap from the neck to the ankles, and dragged across the
23 grounds on his stomach. He was badly hurt and traumatized.

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26 ⁷ Sandra Dibble, *Center for Troubled U.S. Teens Shut Down by Mexican Officials*,
27 SignOnSanDiego.com (Dec. 6, 2005), <http://www.signonsandiego.com/news/mexico/tijuana/20051206-9999-1m6rehab.html>,
28 [\[https://web.archive.org/web/20080524091248/http://www.signonsandiego.com/news/mexico/tijuana/20051206-9999-1m6rehab.html\]](https://web.archive.org/web/20080524091248/http://www.signonsandiego.com/news/mexico/tijuana/20051206-9999-1m6rehab.html).

1 882. Many people witnessed the incident and some captured it on video. They
2 reported this violent incident to Harvest Riverside’s senior leadership, who again
3 covered it up and did nothing to help the victim.

4 883. Harvest Riverside did not punish the perpetrators because their leader was
5 the son of Laurie’s secretary.

6 4. Harvest Riverside Covers Up Pastors’ Extramarital Affairs

7 884. Jeff Lasseigne (“Lasseigne”) affiliated with Harvest Riverside in 1980
8 and became Assistant Pastor in 1989. He was an important and powerful figure in the
9 church. During a period when his wife was suffering from Alzheimer’s disease,
10 Lasseigne engaged in extramarital affairs with multiple women at the same time
11 including church employees, regularly using a janitor’s closet in the area reserved for
12 pastoral leadership. Many Harvest Riverside employees complained, including to
13 Laurie and his wife, but nothing was done—Lasseigne faced no disciplinary process
14 despite making employees of Harvest Riverside uncomfortable.

15 885. Finally, in 2021, Lasseigne was relieved of his duties. Seeking to avoid
16 scandal, Harvest Riverside offered no explanation to its employees or congregants.
17 Instead, it gave Lasseigne a severance package worth a reported \$4 million in exchange
18 for a non-disclosure agreement.

19 886. Harvest Riverside followed the same playbook when faced with similar
20 allegations against another pastor, Brad Ormonde, who had a multi-year extramarital
21 affair with Laurie’s personal secretary.

22 887. As with Havsgaard, Harvest Riverside did not disclose to donors that their
23 charitable contributions were being spent to cover up Lasseigne’s and Ormonde’s
24 misconduct.

25 888. As with Havsgaard, Harvest Riverside also erased mentions of
26 Lasseigne’s and Ormonde’s long history with the church from its website.

1 889. Ormonde continues to serve as a senior pastor at another Calvary church
2 30 minutes' drive from Harvest Riverside.

3 5. Harvest Riverside Covers Up Sex Offenses by Its Volunteers

4 890. In the late 1990s, William Walrath ("Walrath") served as a volunteer in
5 Harvest Riverside's "Rock the World" children's ministry. In approximately 2000, he
6 was arrested and subsequently convicted of multiple felony sexual offenses involving
7 minors and sentenced to twelve years in prison.

8 891. Harvest Riverside removed Walrath from his volunteer position but did
9 not make any public announcement or conduct an internal investigation to determine
10 if he had abused children at Harvest Riverside.

11 892. Harvest Riverside similarly mishandled accusations of child sex abuse
12 against Jose Cruz Martinez, who was a volunteer at Harvest Riverside between 2016
13 and 2023.

14 **B. After Harvest Riverside's Cover-Up of Havsgaard's Crimes, Harvest**
15 **Homes Get Poorer While Child Sex Abuse Remains Rampant**

16 893. Havsgaard benefitted from Harvest Riverside's practice, as set out in the
17 preceding section, of ignoring its pastors' misconduct and covering up potential
18 scandals. Once Havsgaard weathered Defendants' consequence-free investigation, he
19 retaliated against Roman for blowing the whistle and fired him.

20 894. Despite Havsgaard's pedophilia and long misuse of Harvest funds, he was
21 given authority over Harvest's Romanian bank accounts, appointing his poorly
22 educated driver Manescu to be Finance Director, at a highly inflated salary he knew
23 depended on Havsgaard's continued good standing with Harvest Riverside.

24 895. Manescu sometimes refused to pay the staff, likely pocketing their wages.

25 896. As Finance Director, Manescu required that some of the children living
26 in the Harvest Homes work 12-hour shifts in his internet café at less than minimum
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1 wage. When they protested, he threatened to throw them out. When the children
2 complained to Havsgaard, he did nothing to protect them.

3 **C. Once Defendants Finally Close Harvest Homes, Its Children Have**
4 **Nowhere to Go; Many Turn to Sex Work**

5 897. Under the joint leadership of Havsgaard and Manescu, with much of the
6 shrinking money still coming from California being diverted to their personal use, the
7 Harvest Homes became even more dangerous. Food and heat were sporadic, and the
8 danger of more abuse by Havsgaard was constant.

9 1. Havsgaard's Supervisors Fail in Their Duties Under California
10 Law to Restrain Him

11 898. Constantin, a social worker, inspected the Harvest Homes for the
12 Romanian government between 2004 and 2005, among many other facilities on her
13 roster. Her assignment was to check only for adequate food and living conditions and
14 she did not have time to interview any children. In 2005, Harvest advertised a job for
15 a resident teacher in the Buftea home, which she thought would be more interesting
16 and a shorter commute, and got the job. Constantin was surprised because Havsgaard
17 hired evangelical Christians only, and Constantin is Orthodox. She concluded that he
18 thought her presence would reassure the next social worker who would not feel a need
19 to look deeply into his operation.

20 899. Constantin says she “realized that something strange was definitely
21 happening to the boys.” She asked Mami Tina, the cook, who said “don’t ask, bad
22 things are happening” and started crying. Mami Tina told Constantin that she had lots
23 of children at home, so she had to keep her mouth shut or lose her job.

24 900. Constantin saw that Havsgaard had favorites and regularly took them
25 away for one-on-one expeditions, after which the boys would come back subdued and
26 not disclose where they had gone or what they had done. When she remonstrated with
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1 Havsgaard and said the boys should be in school, he would say they needed some extra
2 attention because they had had a bad day.

3 901. After Constantin developed a good relationship with the boys, they told
4 her that Havsgaard had ordered them not to talk about he was doing with them and that
5 they were scared of being kicked out if they did. She told them that together they could
6 figure out a better path, but the boys were too scared.

7 902. Unable to get any direct confessions, Constantin looked for physical
8 evidence like photos when she moved around the house but never found any. She came
9 to feel impotent and guilty, and ultimately quit, convinced that Havsgaard was an
10 active pedophile at the Harvest Homes.

11 903. Monique Smith, an American visitor who spent several months a year in
12 the homes starting in 2002, noticed that as early as 2005, conditions had deteriorated
13 significantly, particularly at the girls' home in Dămăroaia.

14 904. The children did not have regular meals and were often fed bread
15 sandwiches and cabbage.

16 905. There was no running hot water in the bathroom for at least a month, and
17 the staff boiled water to mix with cold water to bathe.

18 906. As the money ran out, Harvest Riverside and Laurie made no provision
19 for the children's further housing, safety, welfare or education.

20 907. When the Harvest Homes finally closed, Defendants dumped sthe
21 children on the street and gave them no exit money, no plan, not even a number to call
22 in an emergency.

23 908. Few had any education that would help them survive safely, let alone
24 prosper; some were not even literate.

25 909. Many roamed the streets hungry, homeless, in despair and fear, and were
26 routinely assaulted. Laurie and Harvest abandoned them.

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1 910. Having learned from Havsgaard that the route to survival was to sell their
2 bodies to him and others, many turned to sex work.

3 911. Harvest Riverside deliberately did not inform its congregation in
4 California that it had closed down the Harvest Homes in 2008.

5 912. In 2009, a congregant donated a large sum of money to Harvest Riverside
6 to support the Harvest Homes in Romania, not knowing that Harvest Riverside had
7 closed them.

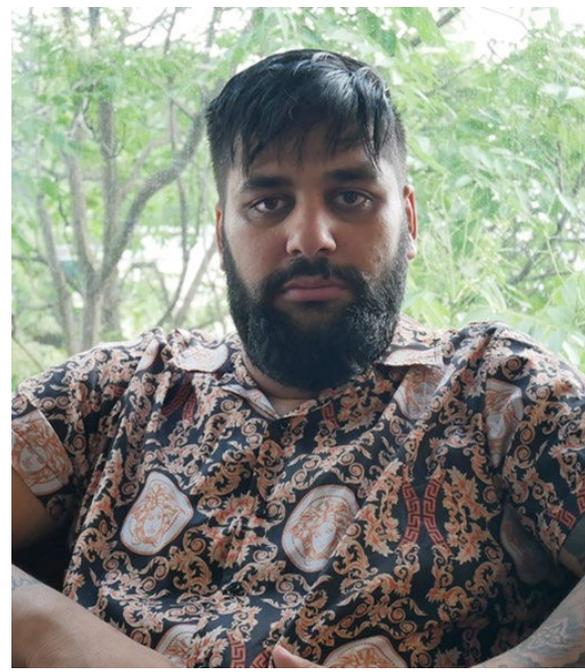
8 913. Harvest Riverside improperly accepted the donation and never returned
9 it.

10 **VIII. AFTER HARVEST HOMES CLOSE, PLAINTIFFS STRUGGLE WHILE DEFENDANTS**

11 **THRIVE**

12 **A. Plaintiff Marian Barbu**

13 *Figure 37: Marian B., 2023*



26 914. MARIAN B. has struggled since his experiences at Harvest Homes. He
27 lived in constant fear of sexual abuse by Havsgaard, and believed that at any moment,
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1 Havsgaard would escalate the abuse to rape. He felt that he was living in a torture
2 chamber inside a prison.

3 915. MARIAN B. is functionally illiterate, as he was not educated at the
4 Harvest Homes. Due to Havsgaard's scheme to persistently assault and terrorize him
5 and other children, he suffers from severe, complex Post-Traumatic Stress Disorder,
6 anxiety disorders, substance abuse disorders, and Major Depressive Disorder.
7 MARIAN B. has not yet been able to travel to a country where he could be examined
8 by a neuroscience professional, but his behaviors and apparent cognitive difficulties
9 indicate he has suffered frontal lobe damage due to his exposure to severe violence,
10 trauma and sexual abuse.

11 916. Also because of Defendants' scheme to abuse the Romanian children,
12 MARIAN B. has remained in abject poverty his entire adult life. He has not been able
13 to stay employed or sober and has been intermittently homeless throughout his
14 adulthood.

15 917. Without any meaningful education, MARIAN B. had no means to support
16 himself after he was kicked out at 16.

17 918. To survive, MARIAN B. broke into cars, stole cars, and sold drugs for
18 which he was arrested.

19 919. MARIAN B. also had paid sex with men to buy food even though he
20 identifies as heterosexual. MARIAN B. understands that because of his experience at
21 Harvest, he became conditioned to selling his body to survive.

22 920. MARIAN B. has life-long medical conditions as a result of Defendants'
23 actions. He takes medication as a result but suffers from serious side effects that
24 prevent him from working.

25 921. MARIAN B. lives off disability benefits. He receives approximately \$216
26 per month which is not enough to support himself and his family, so he goes to a charity
27 for food.

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1 922. MARIAN B. continues to exhibit symptoms from his time at Harvest. He
2 struggles with chronic depression, severe anxiety, hallucinations, beliefs of being
3 persecuted, and severe Post-Traumatic Stress Disorder. MARIAN B. struggles to sleep
4 at night and takes Depakine (sodium valproate), a mood stabilizer, and Trittico
5 (trazadone), an antidepressant, day and night.

6 **B. Plaintiff Mihai-Constantin Petcu**

7 *Figure 38: Mihai-Constantin, 2023*



22 923. With only six years of schooling, no qualifications, and a minimal
23 understanding of English, MIHAI-CONSTANTIN's best way to make money after he
24 left the Harvest Homes was to continue doing sex work to obtain drugs and food.

25 924. MIHAI-CONSTANTIN currently works as a security guard.

26 925. He continues to exhibit symptoms from his time at Harvest. He used to
27 sniff paint. He struggles with depression and has attempted suicide.

1 926. MIHAI-CONSTANTIN suffers from severe, complex Post-Traumatic
2 Stress Disorder, anxiety disorders, substance abuse disorders, and Major Depressive
3 Disorder.

4 927. While MIHAI-CONSTANTIN has not yet been able to travel to a country
5 where he could be examined by a neuroscience professional, his behaviors and
6 apparent cognitive difficulties indicate he has suffered frontal lobe damage due to his
7 exposure to severe violence, trauma and sexual abuse.

8 928. Also because of Defendants' scheme to abuse the Romanian children,
9 MIHAI-CONSTANTIN has remained in abject poverty his entire adult life. He has not
10 been able to maintain employment or sobriety and has been intermittently homeless
11 throughout his adulthood.

12 **C. Plaintiff Cristian Aeroaiei**

13 *Figure 39: Cristian, 2023*



25 929. Since leaving Harvest, CRISTIAN has had a hard time supporting
26 himself. He received no significant education at Harvest and left without the necessary
27 skills to obtain adequate employment.

1 930. For some years, CRISTIAN was forced into sex work to make a living,
2 including having sex with men even though he identifies as heterosexual.

3 931. This was in keeping with his education at Harvest, which taught him that
4 the way to survive in life was to exchange his body for money, food, and shelter.

5 932. To cope with the memories of the abuse, CRISTIAN self-harmed by
6 cutting his skin with pieces of broken glass.

7 933. He also fell into alcoholism and drug use, such as sniffing glue.

8 934. Due to his time at Harvest, CRISTIAN has lost faith in Jesus, God, and
9 all religion.

10 935. CRISTIAN continues to exhibit symptoms from his time at Harvest. He
11 struggles with significant depression, and severe Post-Traumatic Stress Disorder. He
12 struggles to sleep at night and has recurring nightmares. At times, he wakes up shaking
13 with fear because of anxiety.

14 936. In August 2017, CRISTIAN reached out to Havsgaard and Kathy’s
15 granddaughter through Facebook Messenger. He asked whether or not she was aware
16 that her grandfather was a pedophile and molested children at Harvest Homes. She told
17 CRISTIAN that her mother knew, and that she has “known for a while too.”

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1 942. As an adult, ALIN attempted to commit suicide because of the
2 compounded struggles he experienced as a result of Havsgaard’s abuse.

3 **E. Plaintiff Razvan-Gheorghe Nitu**

4 *Figure 41: Razvan, 2022*



16 943. RAZVAN did not do well at school as a child. This was in large part due
17 to the chaotic life at Harvest and its apathy towards his education.

18 944. RAZVAN, now 38, lives in Wolverhampton, England with his wife and
19 young son.

20 945. Until recently, RAZVAN had great difficulty starting and maintaining
21 healthy relationships. He met his wife in 2020, when he was 33 years old. Before that,
22 he did not feel comfortable trusting people intimately. The commitment of marriage
23 was also very frightening to RAZVAN because he did not feel he deserved a good
24 partner, and it took him a long time to be ready to have children.

25 946. He still feels angry and ashamed about the abuse he suffered at Harvest
26 Homes. Havsgaard and other staff members made him feel as though he was
27 responsible for his own sexual abuse, which they called “punishment” and tried to
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1 normalize as a customary way of disciplining boys. This feeling of being
2 fundamentally dirty has never left RAZVAN, and he thinks it never will.

3 947. RAZVAN suffers from severe Post-Traumatic Stress Disorder,
4 depression, and suicidal ideations including prior attempts. He experiences himself
5 detached from other people and suffers from hyper-vigilance and an overall inability
6 to experience positive emotions.

7 **F. Plaintiff George Adrian Vasile**

8 *Figure 42: Adrian, 2025*



21 948. ADRIAN has struggled since his experiences at Harvest Homes. He is
22 constantly scared, and easily frightened. He is afraid of the dark and suffers from low
23 self-confidence. He feels alienated from others due to the abuse he has suffered and
24 finds it difficult to create meaningful relationships, although he now has a girlfriend
25 and two children.

26 949. Due to Havsgaard's scheme to persistently assault and terrorize him and
27 other children, ADRIAN suffers from moderately severe, Post-Traumatic Stress
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1 Disorder, anxiety, depression, flashbacks, nightmares, daily shame, guilt, and
2 hypervigilance. ADRIAN has not yet been able to travel to a country where he could
3 be examined by a neuroscience professional, but his behaviors and apparent cognitive
4 difficulties indicate he has suffered frontal lobe damage due to his exposure to severe
5 violence, trauma and sexual abuse.

6 950. Also because of Defendants' scheme to abuse the Romanian children,
7 ADRIAN has remained in abject poverty his entire adult life. He has not been able to
8 stay durably employed or sober and has been intermittently homeless throughout his
9 adulthood.

10 951. After ADRIAN ran away from the Harvest Homes, he struggled. He often
11 resorted to stealing food and valuables to survive. He has been arrested and imprisoned
12 several times.

13 952. ADRIAN started using heroin after he ran away from the Harvest Homes,
14 partly as a way to numb his memories of the abuse. He has used other drugs too. He
15 has managed to stay sober for the last three years.

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1 individuals stole an electricity generator. ALEXANDRU-CRISTIAN was waiting in
2 the car while the two other individuals stole the generator. The police arrived at the
3 scene and decided to prosecute all three of them. Daily, ALEXANDRU-CRISTIAN
4 regrets that he partook in the theft and wish that he never had done it.

5 **I. Plaintiff Marian Dragne**

6 *Figure 45: Marian D., 2023*



18 960. MARIAN D. did not do well at school. This was in large part due to the
19 chaotic life at Harvest Homes and its apathy towards his education. Teachers would
20 also beat the students. As a result of this, MARIAN D. never learned to read or write.

21 961. MARIAN D. suffers from severe chronic depression, severe complex
22 Post-Traumatic Stress Disorder, suicidal ideation, crippling shame, a lack of
23 confidence, and often feels angry due to the abuse he suffered. MARIAN D. is still in
24 a fight or flight response and when someone shouts at him, he experiences shock and
25 becomes upset. MARIAN D. shuts himself off from the outside world, internalizes his
26 traumas, and suffers from almost daily nightmares.

1 daily. This sum is barely enough to support his family—he has two young children and
2 a daughter from his wife’s previous relationship.

3 964. FLORIN has never told anyone about the abuse he suffered at Harvest,
4 not even his wife.

5 965. FLORIN still feels ashamed about his mistreatment at Harvest Homes.
6 Havsgaard made him feel as though he was responsible for his own sexual abuse,
7 which he called “punishment” and tried to normalize as a customary way of
8 disciplining boys.

9 966. FLORIN suffers from severe Post-Traumatic Stress Disorder, persistent
10 dysthymic depression, sleeping problems, and a constant fear for something happening
11 to his children.

12 967. In some ways, FLORIN remains a ten-year-old boy forever searching for
13 the bicycle he was promised and never received.

14 **K. Plaintiff Alexandru Badaluta**

15 *Figure 47: Alexandru B., 2023*



26 968. ALEXANDRU B. has struggled with trauma caused by Havsgaard’s
27 sexual abuse. He suffers from severe, chronic Post-Traumatic Stress Disorder, suicidal
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1 thoughts, disordered eating, alcohol abuse, substance abuse, and severe depression.
2 ALEXANDRU B. has not yet been able to travel to a country where he could be
3 examined by a neuroscience professional, but his behaviors and apparent cognitive
4 difficulties indicate he has suffered frontal lobe damage due to his exposure to severe
5 violence, trauma and sexual abuse.

6 969. Because of Defendants’ scheme of abuse, ALEXANDRU B. has
7 remained in abject poverty his entire adult life. He has not been able to stay sober and
8 has been intermittently homeless throughout his adulthood. He works in a car wash.

9 970. ALEXANDRU B. no longer believes in God.

10 **L. Plaintiff Bogdan Ionescu**

11 *Figure 48: Bogdan, 2022*



23 971. BOGDAN, now 35, lives in Bucharest, Romania. He currently works at a
24 car wash, where he makes barely enough to survive.

25 972. BOGDAN has great difficulties in starting and maintaining healthy
26 relationships, He has never been married, has no children, and would prefer to die
27 alone.

28

1 973. BOGDAN suffers from severe Post-Traumatic Stress Disorder, severe
2 depression, and suicidal ideations including prior attempts.

3 **M. Plaintiff Marian Liviu Mihaila**

4 *Figure 49: Marian Liviu, 2023*



13 974. Havsgaard did not encourage MARIAN LIVIU to study and he completed
14 only five years of formal schooling. MARIAN LIVIU is ashamed of his lack of
15 education.

16 975. Because of his paltry education, MARIAN LIVIU could not complete the
17 necessary training to become a wrestling teacher, which was his dream job after
18 Havsgaard thwarted MARIAN LIVIU's chances to be a professional competitor
19 himself.

20 976. MARIAN LIVIU managed to gain employment as a security guard and
21 has worked in that industry for about eleven years.

22 977. He now lives in an apartment with his wife and two sons. MARIAN
23 LIVIU also cares for a daughter from an earlier relationship.

24 978. MARIAN LIVIU often thinks about his experience at the Harvest Homes
25 and feels like it eats away at him. He often suffers from intrusive memories, flashbacks,
26 and anger. MARIAN LIVIU feels like he is constantly in survival mode, hypervigilant
27 about any sign of danger.

1 979. MARIAN LIVIU suffers from severe Post-Traumatic Stress Disorder,
2 moderately severe chronic depression, and anger issues.

3 **N. Plaintiff Alexandra-Elena Langa**

4 *Figure 50: Alexandra, 2023*



16 980. ALEXANDRA has four sons from three relationships. Three of them live
17 with her, and the fourth lives with his father. Many of ALEXANDRA's relationships
18 have been abusive due to what she learned at Harvest Homes.

19 981. ALEXANDRA has low self-esteem, anxiety, insomnia, and depression
20 stemming from the trauma she endured at the Harvest Homes. She has flashbacks when
21 she least expects them, and terrible nightmares. ALEXANDRA suffers from chronic
22 depression, moderately severe Post-Traumatic Stress Disorder, and panic disorder.

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1 **O. Plaintiff Ioana Cosmina Pirvu**

2 *Figure 51: Cosmina (center) and her sisters, 2023*



12 982. COSMINA now works as a subcontractor for an airline, arranging

13 transport for crew and pilots. She tries to avoid thinking about Havsgaard and Harvest

14 Homes because of her many traumatic memories, which she actively suppresses to

15 avoid having a breakdown.

16 983. After leaving Harvest Homes, two American men wanted COSMINA to

17 share intimate pictures of herself. She did as they asked but now regrets doing so.

18 COSMINA believes she did it because of the sexual environment and conditioning she

19 received from Havsgaard at Harvest Homes.

20 984. COSMINA suffers from symptoms of Post-Traumatic Stress Disorder.

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1 **Q. Plaintiff Maria Ghenciulescu**

2 *Figure 53: Maria (left) with her sister Cosmina, 2023*



12 988. MARIA put herself through high school after Havsgaard closed down
13 Harvest Homes; she graduated when she was 24. MARIA worked for KFC in Romania
14 for over six years and then moved to the United Kingdom, where she now studies
15 Business and Tourism Management.

16 989. MARIA continues to struggle with deep shame and self-esteem issues
17 from Havsgaard’s abuse. She suffers from severe complex PTSD and major depressive
18 disorder. She has trouble forming meaningful relationships with others and frequently
19 disassociates from her surroundings as a defensive mechanism.

20 990. MARIA attempted suicide after she left Harvest Homes.

21 **R. Plaintiff Denis-Vasile Otcuparu**

22 991. Shortly after leaving Harvest, DENIS turned to drugs, including heroin
23 and marijuana, and further developed an alcohol addiction. DENIS also became
24 addicted to gambling.

25 992. After leaving Harvest Homes, DENIS lived on the streets, begging and
26 stealing to support himself and his sister, who had left Harvest Homes before DENIS.

1 993. DENIS could not find a steady job until he was 19 years old when he
2 started working at a factory. DENIS also found a second job a funeral home, where he
3 worked for eight years. To make ends meet, DENIS at times engaged in sex work,
4 which has filled him with shame. He now works as a taxi driver.

5 994. DENIS is in a long-term relationship and has two children.

6 995. DENIS suffers from chronic PTSD with dissociation, auditory
7 hallucinations, dissociation, extreme hypervigilance, derealization, and paranoia that
8 Havsgaard or someone else from Harvest Homes or Harvest Riverside is following
9 him.

10 **S. Plaintiff Emilia-Mariana Tudosie**

11 *Figure 54: Emilia, 2023*



24 996. EMILIA is now married with four children. She did not do well at school.
25 This was in large part due to the chaotic life at Harvest Homes and its apathy towards
26 her education. She works as a cleaner.

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1 997. EMILIA continues to struggle with the lingering effects of Havsgaard’s
2 and Manescu’s sexual abuse. She cries every time she thinks back to it. EMILIA suffers
3 from moderately severe Post-Traumatic Stress Disorder, difficulties with regulating
4 emotions, and suicidal ideation. She is particularly worried that her children may
5 similarly be sexually abused by other adults.

6 **T. Plaintiff Roxana-Maria Turuianu**

7 *Figure 55: Roxana, 2023*



18 998. ROXANA has struggled since leaving Harvest Homes. She has
19 difficulties trusting others and finds physical intimacy upsetting, due to the conflict
20 between Havsgaard’s teachings and the sexual depravity that pervaded the Harvest
21 Homes. She is married and has a daughter but still finds it hard to undress in front of
22 her husband. She also feels she does not deserve her family and is not good enough for
23 them.

24 999. ROXANA struggles from moderately severe PTSD and significant
25 symptoms of complex PTSD, including anxiety, chronic moderate to severe
26 depression, suicidal ideation, eating disorders, a gambling addiction, and nightmares.

1 She requires multiple years of trauma informed therapy, a psychiatric review, and
2 appropriate medication.

3 **U. Plaintiff Cristina-Bianca Popescu**

4 *Figure 56: Cristina, 2023*



15 1000. CRISTINA’s traumatic memories from Harvest Homes still overwhelm
16 her. She regularly thinks about suicide; she self-harmed before by cutting herself with
17 glass.

18 1001. CRISTINA also struggles with alcohol and gambling addictions. She has
19 trouble being intimate with others. To this day, CRISTINA traumatically relives the
20 rapes on a regular basis. CRISTINA rarely trusts other people because Havsgaard,
21 whom she had trusted like a father, took advantage of her.

22 1002. CRISTINA suffers from severe Post-Traumatic Stress Disorder, chronic
23 moderate to severe depression and suicidal ideations.

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1 1007. That process of quiet extrication, delicately orchestrated by Defendants,
2 took four more years, until 2008, during which Harvest Riverside and Laurie left
3 Havsgaard in charge, free to sexually abuse scores of children thousands of more times.

4 **A. Protecting Havsgaard Has Been Key to Keeping the Laurie**
5 **Juggernaut Rolling**

6 1008. After 2004, Harvest Riverside’s accounting department no longer
7 processed Havsgaard’s salary along with those of other employees. Instead, Jeff
8 Jackson, Harvest Riverside’s Head of Accounting, who reported to Lawless, processed
9 Havsgaard’s salary without sharing the details with the rest of the department.
10 Havsgaard was the only person whose salary payments were handled this way and this
11 method continued until Havsgaard’s return to the United States in 2008.

12 1009. Havsgaard came back to Riverside with an unblemished record and no
13 restrictions—a noble missionary returning home. He went often to the Harvest
14 Riverside campus. He ate in the café and is described by church members as having
15 been “highly visible” there in 2009-10.

16 1010. In 2009—a year after the closure of the Harvest Homes and five years
17 after Schutte had found evidence of Havsgaard’s theft and industrial-grade
18 pedophilia—Laurie praised Havsgaard publicly, describing him as “a pastor who
19 faithfully served the Lord for many years at Harvest Christian Fellowship, the church
20 where I pastor,” and compared his work in Romania to that of Moses with the Israelites,
21 because his “life demonstrates the power that just one godly person can have.”⁸

22 1011. Havsgaard played along with the charade, talking fondly about his time
23 in Romania and the children he supervised. He referred to them as “his boys” and
24 showed their pictures. He described them as “fragile.” When asked if they had anger
25 issues, he said: “No, not my kids.”

26
27 ⁸ Laurie, *supra*.

1 1012. After his return from Romania, Havsgaard was permitted to take up duties
2 in the Calvary Chapel network.

3 1013. Laurie, Schutte and Harvest Riverside did not warn anyone at Harvest
4 Riverside or any of these other churches about Havsgaard's compulsive pedophilia and
5 violence.

6 1014. Laurie and Schutte (and other pastors at Harvest Riverside who had
7 received evidence of Havsgaard's child abuse) were mandatory reporters of suspected
8 child abuse in California, but made no such report.

9 1015. Throughout his post-Bucharest pastoral work in California, Havsgaard
10 has continued to have unsupervised access to children.

11 1016. In 2012, Havsgaard became a pastor at Calvary the Cross in Riverside, a
12 15-minute drive from Laurie's office.

13 1017. On May 7, 2016, Havsgaard officiated a wedding at Harvest Riverside.
14 Only pastors in good standing with Laurie are permitted to do this.

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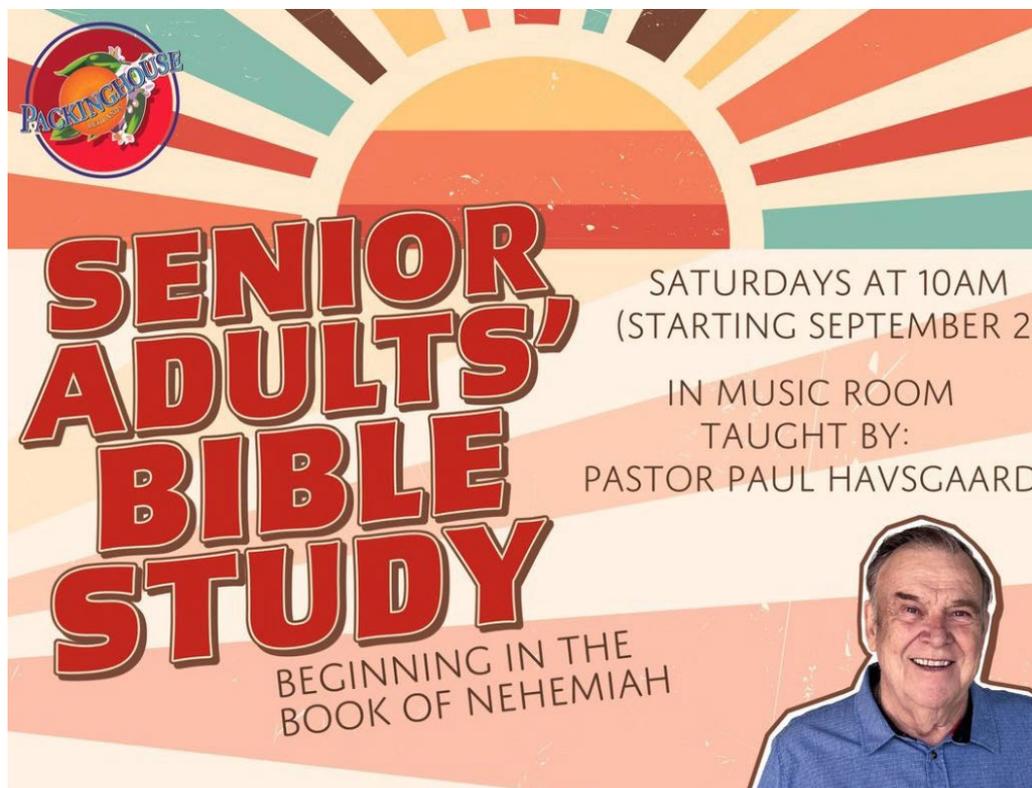
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1 *Figure 59: Havsgaard officiating a wedding at Harvest Riverside, May 7, 2016*



23 1018. On September 2, 2023, Havsgaard led a senior adults' Bible study at the
24 Packinghouse Christian Fellowship, run by Probert, who was also one of the original
25 incorporators of Calvary Chapel Riverside, the precursor to Harvest Riverside.

1 *Figure 60: Ad in a Packinghouse Facebook post showing Havsgaard as a*
2 *respected religious figure in circles close to Harvest Riverside, August 17, 2023*



17 1019. Havsgaard has periodically visited Tijuana, Mexico with Probert. The two
18 ministers reportedly help women living in shelters by giving a few hours' care to their
19 children while the women attend Bible study.

20 1020. As recently as March 6, 2026, Havsgaard advertised himself on LinkedIn
21 as "Open to Work" as a bereavement coordinator seeking a position of "Director."

22 1021. Havsgaard now leads a quiet life in retirement close to Riverside,
23 spending hours a day online. Topics in which Havsgaard has expressed public online
24 interest in the past three years include: "Feeling awkward after his last Google search
25 on his phone and how to delete it," "Removing his personal information from Google
26 searches," "How to screen record someone with an Android phone," "Banks watching
27 him move large sums of money in his bank account," "How to quickly remove your
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1 browsing history with a short keystroke,” “Wiping data from phones and computers
2 before selling them,” “Deleting his Google drive cache,” and “Converting VHS tapes
3 to digital.” The collection of pornography Havsgaard showed to children in Bucharest
4 was on VHS, as were the tapes used in the cameras set up in the attic rooms where he
5 had sex with children.

6 1022. Other topics he searched include “The deep cost of his sin” and “Can we
7 forgive when an offender won’t repent?”

8 1023. In 2014, Havsgaard married Susan Marlowe. Between them, Havsgaard
9 and Susan Marlowe have at least ten grandchildren. They moved to Forest Falls,
10 California. Havsgaard has an office in a remote section of the house, close to the guest
11 bedroom where the grandchildren stay.

12 **B. Schutte Is Fired to Protect the Cover-Up**

13 1024. Schutte left Harvest Riverside in 2013 in good standing to serve as pastor
14 at Calvary Chapel Cincinnati. He returned to Harvest Riverside in 2018.

15 1025. Later that year, Schutte was called into the Harvest Riverside boardroom
16 by Pastors Lasseigne and Collins, fired on the spot, taken to his office to collect his
17 things, and escorted out of the building by security. Harvest Riverside and Laurie had
18 reportedly become concerned that the story of Havsgaard’s abuse and their own multi-
19 year cover-up might soon come to light and had decided to make Schutte the “fall guy.”

20 1026. Harvest Riverside and Laurie made no public announcement about why
21 Schutte, a recently returned and popular senior pastor, had to leave. They did not tell
22 the congregation or donors about Havsgaard’s child sex abuse or their long cover-up.
23 They did not offer any redress to Plaintiffs.

24 1027. The scandal stayed covered up.

25 **C. Videos of Havsgaard at Harvest Riverside Are Purged**

26 1028. Also in 2018, Harvest Riverside Pastor Paul Eaton and Lawless
27 systematically scoured Harvest Riverside’s substantial video archive to remove any
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1 footage of Havsgaard. When Harvest Riverside’s director of videography asked if the
2 material would be returned, he was told “no.”

3 1029. The purging of the record erased many years of evidence of Havsgaard’s
4 high standing at Harvest Riverside, his close relations with Laurie, and Harvest
5 Riverside’s fundraising for the Harvest Homes in California.

6 1030. Several years earlier, Harvest Riverside instructed one of its employees,
7 Brandon Stark, to scrub any mention of Havsgaard from its website.

8 **D. The Cover-Up Works for Harvest Riverside and Laurie**

9 1031. In the years since the cover-up, Harvest Riverside has flourished. Its
10 estimated annual revenues are at least \$52 million, generating at least \$13 million in
11 free cash flow. Harvest Riverside and Laurie together own and lease properties
12 conservatively valued at over \$100 million, including a 30-acre campus in Riverside,
13 and luxury homes in California and Hawaii, the latter with a hot tub on a cliff
14 overlooking the ocean. Laurie has written over 70 books, has a television show and a
15 highly successful podcast. His national prominence continues to grow.

16 **X. CONCLUSION**

17 1032. Plaintiffs and many others came to the Harvest Homes as discarded,
18 deprived children seeking dignity and stability. They were promised care and
19 compassion, but were sexually, physically and emotionally abused over many years,
20 then dumped back out onto the streets. Nearly 20 years later, it is time for their
21 suffering to end.

22 1033. Plaintiffs spent an average of 6.5 years in the Harvest Homes. Havsgaard
23 was able to keep them there so long because, as he cynically calculated, they were
24 desperate to stay off the streets, would not want to make waves, and anyway no one
25 would take their word over his if they did complain.

26 1034. Worst of all, Havsgaard’s cynicism was precisely right. His prediction
27 that no one would do much to stop him was correct.

1 1035. Laurie sent Havsgaard to Romania, chose him to run Harvest Riverside’s
2 mission there, and thereafter acted as if he and Harvest Riverside had no obligation—
3 moral, religious or legal—to make sure the Homes were properly run. There were no
4 regular inspections, no policies, no staff training, no hotlines, no safeguarding
5 protocols, no follow up when disturbing stories got back to California, and no effective
6 supervision as Havsgaard energetically abused Plaintiffs and scores of other children.
7 Yet Harvest Riverside, Laurie, and Schutte happily reaped praise and donations in
8 California as they refused to admit the grim reality of their Romanian mission.

9 1036. When Laurie finally sent an inspection team in 2004 headed by Schutte
10 to dig into the details after receiving dreadful reports that could not be ignored, Schutte
11 came back to California with conclusive proof that Havsgaard was an active pedophile
12 presiding over bedlam.

13 1037. Even then, Laurie did nothing to help the children. Instead, he let
14 Havsgaard remain in control for another four years of inflicting sexual abuse on the
15 powerless, and then welcomed him back to a life of comfort and esteem in California
16 with a generous gift of severance payments and public praise.

17 1038. In 2018, after reports of sexual misconduct by other senior Calvary
18 ministers became widely reported, Laurie said:

19 It is a great disappointment to me when a pastor fails. A pastor
20 needs to be a good example. He is a spiritual leader. People
21 expect pastors to live morally and to be honest. That is a
22 realistic expectation. They expect it of Christians, certainly they
have that expectation of a Christian leader.

23 1039. One might expect Laurie’s commendable determination to live morally
24 and honestly to be reflected in his stance toward the terrible results of Defendants’
25 misconduct in Romania, but so far that has not been evident.

26 1040. Havsgaard is an unrepentant lawbreaker, but he has ample company in the
27 ugly saga of the Harvest Homes. Laurie, Schutte and Harvest Riverside also continue
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1 to deny and cover up the suffering they have caused Plaintiffs and other children for
2 the last two decades. They knowingly created the conditions that posed a substantial
3 risk of child sexual abuse, let them run unchecked for years, and then, once the dreadful
4 consequences could no longer be ignored, conspired to cover up those crimes. They
5 continued to take money from unsuspecting church members, none of whom were ever
6 told what Harvest Riverside leaders knew about Havsgaard's pedophilia, even after
7 there were no Homes left.

8 1041. Defendants are properly subject to the power of the State of California
9 and United States to punish this long record of misconduct, and to the power of the
10 public to abhor it. Plaintiffs thus turn to this Court for redress.

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1 1048. It was or should have been reasonably foreseeable to Harvest Riverside,
2 Laurie and Schutte that by putting and maintaining Havsgaard, a known child sex
3 abuser, in charge of Harvest Homes, Havsgaard would expose Plaintiffs and other child
4 residents of Harvest Homes to other child sex abusers, including Manescu.

5 1049. It was or should have been reasonably foreseeable to Harvest Riverside,
6 Laurie and Schutte that Havsgaard, a known child sex abuser, would create a system
7 to facilitate his own sexual abuse of Plaintiffs and other minors as well as Manescu's
8 abuse of Plaintiffs and other minors.

9 1050. Harvest Riverside, Laurie and Schutte assumed responsibility for the
10 safety of Plaintiffs whose parents were not present while Plaintiffs were residents of
11 Harvest Homes.

12 1051. At all material times, Harvest Riverside, Laurie and Schutte were able to
13 control Havsgaard's conduct related to his custody and care of Plaintiffs and other child
14 residents of the Harvest Homes.

15 1052. At all material times, Harvest Riverside, Laurie and Schutte were able to
16 control Manescu's conduct related to his custody and care of Plaintiffs and other child
17 residents of the Harvest Homes.

18 1053. At all material times, Harvest Riverside, Laurie and Schutte owed
19 Plaintiffs a duty of reasonable care to protect him from foreseeable injury and abuse
20 while Plaintiffs resided within the Harvest Homes in Havsgaard's custody and care,
21 and while Plaintiffs relied upon the assurance of Harvest Riverside, Laurie and Schutte
22 of safety and protection.

23 1054. Harvest Riverside, Laurie and Schutte breached their duties by failing to
24 take any reasonable steps or implement any reasonable safeguards for Plaintiffs'
25 protection.

26 1055. Harvest Riverside, Laurie and Schutte breached their duties to Plaintiffs
27 by putting Havsgaard, a man with an extensive history of child sexual abuse they knew
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1 or should have known of, in charge of children's homes; locating those homes in a
2 country known to attract pedophiles and have weak and corrupt governmental
3 institutions; not regularly inspecting the homes; not regularly checking with staff at the
4 homes about conditions there; not instituting regular training for staff about
5 recognizing and reporting child abuse; not having any safeguarding policies or
6 guardrails in place; instituting lax financial controls such that Havsgaard and/or
7 Manescu were easily able to divert funds into purchases for their sexual favorites and
8 hush money for employees; ignoring reports from credible sources that Havsgaard was
9 an active pedophile taking advantage of children at the homes; after receiving further
10 and conclusive proof of Havsgaard's pedophilia in 2004, leaving him in charge without
11 any reduction in his powers or changes in the way the homes were run or supervised;
12 not reporting Havsgaard to the authorities in California or Romania; not investigating
13 whether Manescu and/or any other persons hired or instructed by Havsgaard with care
14 and custody of Plaintiffs were sexually abusing Plaintiffs and/or other child residents
15 of Harvest Homes; not reporting Manescu to the authorities in Romania; continuing to
16 praise Havsgaard in public despite knowing him to be a pedophile; not trying to
17 identify Havsgaard's victims or help them recover.

18 1056. At all material times, Laurie and Schutte personally participated in,
19 authorized, directed the wrongful action and inaction by Harvest Riverside and its
20 authorized agents in breach of Defendants' duty of reasonable care.

21 1057. At all material times, Harvest Riverside, Laurie and Schutte were guilty
22 of oppression, fraud, and/or malice insomuch as they, individually or collectively,
23 acted with intent or willful and conscious disregard for the rights or safety of Plaintiffs,
24 subjecting Plaintiffs to cruel and unjust hardship under the circumstances.

25 1058. As a direct, foreseeable and proximate cause of Harvest Riverside's,
26 Laurie's and Schutte's breach of their respective duties of reasonable care, Plaintiffs
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1 suffered compensable injuries, including physical and emotional injuries as set forth
2 herein.

3 *NEGLIGENCE PER SE*

4 1059. Plaintiffs restate the allegations set forth in the preceding paragraphs.

5 1060. In or around 1999 and continuing thereafter while Plaintiffs were
6 residents in the care of Havsgaard in the Harvest Homes, Harvest Riverside, Laurie
7 and Schutte and their employees and agents received complaints in their professional
8 capacity and within the scope of their employment that minimally raised a reasonable
9 suspicion that Havsgaard was engaging in sexually inappropriate and abusive conduct
10 with Plaintiffs.

11 1061. At all material times, Plaintiffs were minors under the age of 18 years old.

12 1062. At all material times, Harvest Riverside, Laurie and Schutte and their
13 employees and agents were mandated reporters within the meaning of Cal. Pen. Code
14 § 11165.7.

15 1063. By statute, each of Laurie and Schutte and the employees and agents of
16 Harvest Riverside had a duty to present to appropriate authorities the reports of
17 suspected child abuse, neglect, and sexual abuse Plaintiffs suffered while in the care
18 of the Harvest Homes.

19 1064. At no material time did Laurie, Schutte or the agents or employees of
20 Harvest Riverside report their reasonable suspicions of Havsgaard's and/or Manescu's
21 sexual abuse of Plaintiffs and other minors to appropriate authorities.

22 1065. The failure to report Havsgaard's and/or Manescu's sexual abuse as
23 required by statute constitutes negligence per se.

24 1066. At all material times, Defendants were guilty of oppression, fraud, and/or
25 malice insomuch as they, individually or collectively, acted with intent or willful and
26 conscious disregard for the rights or safety of Plaintiffs, subjecting Plaintiffs to cruel
27 and unjust hardship under the circumstances.

1 1067. As a direct and proximate cause of the failure to report Havsgaard's and/or
2 Manescu's sexual abuse of Plaintiffs, Plaintiffs continued to suffer sexual, physical,
3 and emotional abuse by Havsgaard and/or Manescu while Plaintiffs remained in the
4 care of the Harvest Homes, resulting in the injuries and damages individually set forth
5 herein.

6 *NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS*

7 1068. Plaintiffs restate the allegations set forth in the preceding paragraphs.

8 1069. Harvest Riverside, Laurie and Schutte negligently failed to deal with
9 Plaintiffs in good faith including, but not limited to, by engaging in outrageous conduct
10 by unreasonably, maliciously, oppressively failing to remove Havsgaard and/or
11 Manescu from their positions and from access to children even after discovering that
12 Havsgaard and/or Manescu were sexually abusing Plaintiffs and other children.

13 1070. As a result of the actions and inaction of Harvest Riverside, Laurie and
14 Schutte, Plaintiffs have suffered severe emotional distress of such substantial and
15 enduring quality that no reasonable person in a civilized society can be expected to
16 endure it.

17 1071. Plaintiffs have suffered from serious emotional distress including but not
18 limited to weekly nightmares, depression, PTSD, and suicidal thoughts.

19 1072. The negligent failure by Harvest Riverside, Laurie and Schutte to deal
20 with Plaintiffs in good faith was a substantial factor in causing Plaintiffs' severe
21 emotional distress.

22 1073. As a result, Plaintiffs have suffered damages as set forth in this complaint.
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1 **SECOND CAUSE OF ACTION**

2 **NEGLIGENT SUPERVISION**

3 ***All Plaintiffs Against All Defendants***

4 1074. Plaintiffs restate the allegations in the preceding paragraphs.

5 1075. At all material times, Havsgaard was an employee and/or agent of Harvest
6 Riverside.

7 1076. At all material times, Harvest Riverside, Laurie and Schutte owed
8 Plaintiffs a legal duty to reasonably and adequately supervise the employees and agents
9 selected and entrusted to run the Harvest Homes.

10 1077. By their action and inaction, Harvest Riverside, Laurie and Schutte
11 breached their duties of reasonable and adequate supervision when they failed, despite
12 known and foreseeable risks of sexual abuse in the Harvest Homes, to regularly inspect
13 the homes; to regularly check with staff at the homes about conditions there; to institute
14 safeguarding policies or mechanisms; to educate, train, or warn Plaintiffs and potential
15 victims of Havsgaard and/or Manescu and their parents; to institute proper financial
16 controls to keep Havsgaard and/or Manescu from readily diverting funds into
17 purchases for their sexual favorites and hush money for employees and others who
18 might report his illegal acts; to act on reports from credible sources that Havsgaard was
19 an active pedophile taking advantage of Plaintiffs and other children at the Harvest
20 Homes after receiving conclusive proof of his pedophilia and theft; to recall Havsgaard
21 or change the way the homes were run and inspected; not investigating whether
22 Manescu and/or any other persons hired or instructed by Havsgaard with care and
23 custody of Plaintiffs were sexually abusing Plaintiffs and/or other child residents of
24 Harvest Homes; and to timely report Havsgaard and/or Manescu to authorities in
25 California or Romania.

26 1078. At all material times, Laurie and Schutte personally participated in,
27 authorized, or directed the wrongful action and inaction by Harvest Riverside and its
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1 authorized agents in breach of Harvest Riverside’s, Laurie’s and Schutte’s duty of
2 reasonable and adequate supervision.

3 1079. At all material times, Harvest Riverside, Laurie and Schutte were guilty
4 of oppression, fraud, and/or malice insomuch as they, individually or collectively,
5 acted with intent or willful and conscious disregard for the rights or safety of Plaintiffs,
6 subjecting Plaintiffs to cruel and unjust hardship under the circumstances.

7 1080. The failure of Harvest Riverside, Laurie and Schutte to reasonably and
8 adequately supervise Havsgaard, Manescu, and other employees and agents in Harvest
9 Homes was a direct, proximate, and substantial factor in causing Plaintiffs to suffer
10 compensable injuries, including physical and emotional injuries as set forth herein.

11 **THIRD CAUSE OF ACTION**

12 **NEGLIGENT RETENTION**

13 ***All Plaintiffs Against All Defendants***

14 1081. Plaintiffs restate the allegations in the preceding paragraphs.

15 1082. At all material times, Havsgaard was an employee and/or agent of Harvest
16 Riverside.

17 1083. At all material times, Laurie and Schutte had the authority to control the
18 terms and conditions of Havsgaard’s employment with Harvest Riverside, including
19 the authority to terminate his employment.

20 1084. During his employment with Harvest Riverside, Havsgaard was or
21 became unfit or incompetent to perform the work for which he was hired.

22 1085. During his employment with Harvest Riverside, Havsgaard’s unfitness
23 and/or incompetence created a particular risk to others, including Plaintiffs.

24 1086. Harvest Riverside, Laurie and Schutte knew or should have known
25 Havsgaard was or became unfit and/or incompetent to perform the work for which he
26 was hired because of the particularized risk to others.

1 1087. Despite actual or constructive knowledge of Havsgaard’s unfitness to
2 perform the work for which he was hired, Harvest Riverside, Laurie and Schutte failed
3 to take appropriate remedial action to terminate Havsgaard or otherwise alter the terms
4 and conditions of his employment to address Havsgaard’s particularized risk of harm
5 to Plaintiffs.

6 1088. Havsgaard’s unfitness and/or incompetence harmed Plaintiffs.

7 1089. The negligence of Harvest Riverside, Laurie and Schutte in retaining
8 Havsgaard despite actual and constructive notice of Havsgaard’s unfitness and/or
9 incompetence was a direct, proximate, and substantial factor in causing Plaintiffs’
10 harm.

11 1090. At all material times, Laurie and Schutte personally participated in,
12 authorized, or directed the wrongful action and inaction by Harvest Riverside and its
13 authorized agents in breach of the duty of Harvest Riverside, Laurie and Schutte not to
14 retain an unfit person.

15 1091. At all material times, Harvest Riverside, Laurie and Schutte were guilty
16 of oppression, fraud, and/or malice insomuch as they, individually or collectively,
17 acted with intent or willful and conscious disregard for the rights or safety of Plaintiffs,
18 subjecting Plaintiffs to cruel and unjust hardship under the circumstances.

19 1092. The failure of Harvest Riverside, Laurie and Schutte to reasonably and
20 adequately supervise Havsgaard and other employees and agents in the Harvest Homes
21 was a direct, proximate, and substantial factor in causing Plaintiffs to suffer
22 compensable injuries, including physical and emotional injuries as set forth herein.

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1 **FOURTH CAUSE OF ACTION**

2 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

3 ***All Plaintiffs Against All Defendants***

4 1093. Plaintiffs restate the allegations in the preceding paragraphs.

5 1094. By their actions and inaction, Defendants engaged in outrageous conduct
6 that is so extreme as to exceed all bounds of decency in a civilized society.

7 1095. By their actions and inaction, Defendants acted knowingly and willingly
8 with the intent or with reckless disregard of the probability of causing emotional
9 distress despite actual and constructive knowledge of Plaintiffs' peculiar susceptibility
10 to emotional distress due to their young age, unstable living conditions, and previous
11 sexual and emotional abuse by Havsgaard and/or Manescu.

12 1096. As a result of the actions and inaction of Defendants, individually or
13 collectively, Plaintiffs have suffered severe emotional distress of such substantial and
14 enduring quality that no reasonable person in a civilized society can be expected to
15 endure it.

16 1097. The actions and inaction of Defendants were the direct and proximate
17 cause of Plaintiffs' severe emotional distress.

18 1098. At all material times, Laurie personally participated in, authorized, or
19 directed the wrongful and outrageous action and inaction by Harvest Riverside and its
20 authorized agents which resulted in Plaintiffs' damages.

21 1099. At all material times, Defendants were guilty of oppression, fraud, and/or
22 malice insomuch as they, individually or collectively, acted with intent or willful and
23 conscious disregard for the rights or safety of Plaintiffs, subjecting them to cruel and
24 unjust hardship under the circumstances.

25 1100. As a result, Plaintiffs have suffered damages as set forth in this complaint.
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1 **FIFTH CAUSE OF ACTION**

2 **CIVIL CONSPIRACY IN VIOLATION OF CALIFORNIA LAW**

3 ***All Plaintiffs Against All Defendants***

4 1101. Plaintiffs restate the allegations in the preceding paragraphs.

5 1102. Defendants conspired with others both known and unknown, and continue
6 to conspire, to commit intentional infliction of emotional distress, sexual battery,
7 negligence, negligence per se, negligent infliction of emotional distress, negligent
8 supervision, negligent retention, and sex trafficking offenses, and to cover up those
9 offenses and the conspiracy.

10 1103. Defendants and Manescu formed a group of two or more persons who
11 conspired and agreed to a common plan or design to commit tortious acts, including
12 intentional infliction of emotional distress, sexual battery, negligence, negligence per
13 se, negligent infliction of emotional distress, negligent supervision, negligent
14 retention, and sex trafficking.

15 1104. Defendants formed the conspiracy on an unknown date no later than 1999,
16 when Cojocnean, working as an agent of Harvest Riverside, learned from Roman, the
17 Harvest Homes and Local Foundation Finance Director, that Roman had evidence of
18 Havsgaard's pedophilia, and reported this to officials at Harvest Riverside.

19 1105. Defendants had actual knowledge that tortious acts including intentional
20 infliction of emotional distress, sexual battery, negligence, negligence per se, negligent
21 infliction of emotional distress, negligent supervision, negligent retention, and sex
22 trafficking were planned by the co-conspirators and concurred and participated in the
23 tortious scheme with knowledge of its unlawful purpose.

24 1106. Defendants intended to aid their co-conspirators in the commission of the
25 planned tortious acts, including intentional infliction of emotional distress, sexual
26 battery, negligence, negligence per se, negligent infliction of emotional distress,
27 negligent supervision, negligent retention, and sex trafficking.

1 1107. Defendants committed numerous wrongful acts, including intentional
2 infliction of emotional distress, battery, negligence, negligence per se, negligent
3 infliction of emotional distress, negligent supervision, negligent retention, and sex
4 trafficking against Plaintiffs in the State of California pursuant to their agreement with
5 their co-conspirators.

6 1108. Defendants committed overt acts in California in support of the
7 conspiracy that included, among others, the following:

- 8 a. Continuously funding Havsgaard and the Harvest Homes after
9 receiving notice of Havsgaard's and/or Manescu's sexual battery of
10 Plaintiffs and other minors;
- 11 b. Discussing, assisting in, facilitating, and processing donations for
12 Havsgaard's activities in Romania;
- 13 c. Failing to institute financial controls and audit procedures to
14 identify and stop Havsgaard's and/or Manescu's misuse of Harvest
15 Riverside funds to serve their sexual predation of Plaintiffs and
16 other minors;
- 17 d. Failing to institute routine inspections, safeguarding policies or
18 guardrails at the Harvest Homes;
- 19 e. Leaving Havsgaard and/or Manescu in their positions after
20 receiving notice of their sexual battery of Plaintiffs and other
21 minors;
- 22 f. Threatening Harvest Riverside employees with termination if they
23 raised internal complaints or legal claims against Laurie or the
24 organization; and
- 25 g. Covering up and otherwise failing to report Havsgaard's and/or
26 Manescu's sexual battery of Plaintiffs and other minors to
27 appropriate authorities.

1 1109. Even after concluding Havsgaard was a pedophile, Defendants paid
2 Havsgaard \$200,000 and kept quiet about his history of assaults, leaving him at the
3 helm of the Harvest Homes to abuse existing residents and attract new ones for abuse.

4 1110. Defendants' affirmative conduct in furtherance of the conspiracy was
5 undertaken with the express and/or implied agreement or understanding that Laurie
6 and Schutte and others would facilitate and/or enable the intentional infliction of
7 emotional distress, sexual battery, negligence, negligence per se, negligent infliction
8 of emotional distress, negligent supervision, negligent retention, and sex trafficking in
9 order to enrich themselves and Harvest Riverside.

10 1111. At the time Laurie and Schutte joined the conspiracy, they were aware
11 that Havsgaard and/or Manescu had committed many past acts of sexual, physical and
12 emotional abuse of children who resided at the Harvest Homes.

13 1112. Plaintiffs were damaged as a direct result of Defendants' agreement and
14 actions in furtherance of the conspiracy.

15 1113. Defendants' conduct has caused and continues to cause Plaintiffs serious
16 and permanent harm and damage.

17 **SIXTH CAUSE OF ACTION**

18 **AIDING AND ABETTING**

19 ***All Plaintiffs Against Laurie and Schutte***

20 1114. Plaintiffs restate the allegations in the preceding paragraphs.

21 1115. In committing the acts alleged herein, Laurie and Schutte had actual
22 knowledge of the torts of sexual battery, intentional infliction of emotional distress,
23 and sex trafficking being committed by Havsgaard.

24 1116. Through their action and inaction, Laurie and Schutte knowingly gave
25 substantial assistance to Havsgaard's commission of sexual battery, intentional
26 infliction of emotion distress and sex trafficking on Plaintiffs.

1 1117. As an actual and proximate cause of the wrongful and malicious acts of
2 Laurie and Schutte, Plaintiffs have suffered physical, emotional, and psychological
3 harms in an amount to be proven at trial.

4 **SEVENTH CAUSE OF ACTION**

5 **TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT**
6 **(“TVPRA”), 18 U.S.C. §§1591(a) and 1595(a)**

7 ***All Plaintiffs Against All Defendants***

8 1118. Plaintiffs restate the allegations in the preceding paragraphs.

9 1119. Defendants knowingly used the instrumentalities and channels of
10 interstate and foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1).

11 1120. Havsgaard knowingly recruited, enticed, harbored, transported, provided,
12 obtained, advertised, maintained, patronized, and/or solicited Plaintiffs for the purpose
13 of causing them to engage in commercial sex acts through force, fraud, or coercion in
14 violation of 18 U.S.C. § 1591(a).

15 1121. Section 1591(a) applies extraterritorially to sex trafficking in Romania by
16 virtue of 18 U.S.C. § 1596(a) because an alleged offender, Havsgaard, is a national of
17 the United States.

18 1122. Defendants’ conduct caused Plaintiffs serious and permanent harm,
19 including, without limitation, physical, psychological, financial, and reputational
20 harm, that is sufficiently serious, under all the surrounding circumstances, to compel a
21 reasonable person of the same background and in the same circumstances to perform
22 or to continue performing commercial sexual activity, in order to avoid incurring that
23 harm. As victims of sex trafficking in violation of 18 U.S.C. § 1591(a), Plaintiffs may
24 bring a civil action against Havsgaard as a perpetrator, and against Laurie, Schutte and
25 Harvest Riverside as beneficiaries pursuant to 18 U.S.C. § 1595(a).

1 1123. Laurie, Schutte, and Harvest Riverside knowingly benefited by receiving
2 something of value from participation in a venture that they knew or should have
3 known was engaging in sex trafficking in violation of 18 U.S.C. § 1591(a).

4 1124. As a result, Plaintiffs have suffered damages as set forth in this complaint.

5 **EIGHTH CAUSE OF ACTION**

6 **ILLICIT SEXUAL CONDUCT IN FOREIGN PLACES IN VIOLATION OF 18**
7 **U.S.C. §§ 2423(c) and 2255**

8 ***All Plaintiffs Against Havsgaard***

9 1125. Plaintiffs restate the allegations in the preceding paragraph.

10 1126. In violation of 18 U.S.C § 2423(c), Havsgaard is a U.S. citizen who
11 travelled to Romania and engaged in coerced sexual abuse of Plaintiffs.

12 1127. Havsgaard engaged in a commercial sex act with Plaintiffs.

13 1128. Plaintiffs were minors at the time of the events complained of herein.

14 1129. As a direct result of Havsgaard’s violations as described herein, Plaintiffs
15 have suffered and will continue to suffer from the psychological and economic
16 damages as described above.

17 1130. Plaintiffs seek remedies to which they are entitled under 18 U.S.C §
18 2255(a) including actual damages and the costs associated with this suit, including a
19 reasonable attorney’s fee.

20 **DEMAND FOR JURY TRIAL**

21 1131. Plaintiffs hereby demand a jury trial in this action.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiffs seek a judgment against Defendants awarding the
24 following relief:

- 25 A. Damages in amounts to be established at trial, including without limitation,
26 damages for past, present, and future emotional pain and suffering, ongoing
27 and severe mental anguish and physical injuries, loss of past, present and
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1 future enjoyment of life, and past and future lost earnings and earning
2 capacity, and out-of-pocket expenses, punitive damages and liquidated
3 damages;

4 B. Pre- and post-judgment interest;

5 C. Attorney's fees;

6 D. A fund administered by the Court to locate and compensate victims of
7 Defendants yet unknown; and

8 E. Such other and further relief as the Court may deem just and proper.
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10 Dated: March 6, 2026

11 McALLISTER OLIVARIUS

12 By: /s/ Jan Cervenka

13 Jan Cervenka

14 *Attorneys for Plaintiffs*
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