

IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY, FLORIDA

CHRISTOPHER LEWIS and NATALIE
LEWIS, as parents and natural
guardians of "J.L.", "S.L.", "R.L.", "J.L.2", "J.L.3",
"L.L.", "B.L.", "A.L." and "M.L.", and
JASON EVANS and MILISSA EVANS,
as parents and natural guardians
of "B.E." and "E.E.",

Plaintiffs,

v.

CASE NO.:

GLOBE INTERNATIONAL MINISTRIES, INC.,

Defendant.

COMPLAINT

Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "J.L.", "S.L.", "R.L.", "J.L.2", "J.L.3", "L.L.", "B.L.", "A.L." and "M.L.", and JASON EVANS and MILISSA EVANS, as parents and natural guardians of "B.E." and "E.E.", bring this action against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., (hereinafter referred to as "GLOBE") and allege:

1. Plaintiffs are the adoptive parents of Haitian children, who were residents of the "In the Father's Hands Children's Home" in Port-de-Paix, Haiti prior to their adoptions.
2. Plaintiffs and their adopted children are residents of the State of Florida.
3. Considering the nature of the facts and circumstances surrounding this case, Plaintiffs have listed their adopted children by initials only. Plaintiffs will serve a separate correspondence signed under oath identifying the names of the children contemporaneously with the serving of

this complaint.

4. Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., is an alleged Florida non-profit corporation which is authorized to do business in the state of Florida and at all relevant times had continuing contact with the state of Florida.

5. GLOBE on its website holds itself out to the public as a "missionary sending agency."

6. GLOBE's website and Missions Policy Manual confirms GLOBE "is fulfilling the 'Great Commission' by training, sending, supporting, and overseeing missionaries on the foreign field."

7. GLOBE actively solicits missionaries to join its organization.

8. GLOBE charges an application fee for applicants to become GLOBE missionaries.

9. After approval as GLOBE missionaries, GLOBE requires its missionaries to attend a missionary orientation at GLOBE headquarters in Pensacola, Florida. GLOBE charges its missionaries a fee to attend said orientation.

10. GLOBE missionaries actively seek to solicit donations and/or funding at the direction of the GLOBE directors.

11. GLOBE requires its missionaries to use GLOBE exclusively for their ministry fund managing purposes and missionaries are not allowed to engage in raising money or managing funds in separate personal or ministry accounts not affiliated with GLOBE.

12. All funds raised by GLOBE missionaries for both personal and ministry projects must be sent through GLOBE.

13. GLOBE retains ten percent (10%) of any funds raised by and/or donated to its missionaries for its own profit and use.

14. GLOBE requires its missionaries to send a minimum of 8 newsletters to potential donors

per year. GLOBE requires its logo, address and phone number to be on the newsletter.

15. GLOBE profits from all donations to its missionaries.

16. GLOBE has discretion to hire or accept persons and/or entities as its missionaries; trains its missionaries; supervises its missionaries; directs its missionaries; monitors its missionaries, including on site visits; promotes its missionaries work in foreign lands, including Haiti; and controls the conduct of its missionaries. Such conduct occurs primarily from Escambia County, Florida.

17. Lashbrook Family Ministry, with GLOBE's direction, assistance, and supervision established and operated a children's home and residential school in the republic of Haiti, the poorest country in the western hemisphere. The childrens' home and residential school was known as "In the Father's Hands Children's Home" in Port-de-Paix, Haiti.

18. At all times relevant to this complaint, Keith Lashbrook through Lashbrook Family Ministry was a GLOBE missionary. GLOBE chose to hire Keith Lashbrook and Lashbrook Family Ministry; directed Keith Lashbrook and Lashbrook Family Ministry; monitored Keith Lashbrook and Lashbrook Family Ministry; promoted Keith Lashbrook and Lashbrook Family Ministry; and controlled Keith Lashbrook and Lashbrook Family Ministry regarding the "In the Father's Hands Children's Home" located in Port-de-Paix, Haiti.

19. At all times relevant to this complaint, Lashbrook Family Ministry and GLOBE solicited donations for the "In the Father's Hands Children's Home" in Port-de-Paix, Haiti and profited from said donations.

20. Keith Lashbrook and Lashbrook Family Ministry were GLOBE missionaries and complied with the afore-described protocols and procedures regarding being GLOBE

missionaries in operating “ In the Father’s Hands Children’s Home.”

21. During the course of the operation of In the Father’s Hands Children’s Home, Keith Lashbrook and other staff and personnel for In the Father’s Hands Children’s Home sexually molested and assaulted the Haitian children, including Plaintiffs, residing at In the Father’s Hands Children’s Home on multiple occurrences.

22. Additionally, during the course of the operation of In the Father’s Hands Children’s Home, Keith Lashbrook and other staff and personnel for In the Father’s Hands Children’s Home created and allowed a culture of sexual abuse to exist at the home.

23. GLOBE knew or should have known of the aforementioned sexual molestation and culture of sexual abuse, which occurred on multiple occurrences at In the Father’s Hands Children’s Home, within the appropriate statutes of limitation.

24. On or about August 24, 2010, GLOBE admitted and acknowledged to potential adoptive families of the Haitian children, including Plaintiffs, and other donors to GLOBE and Lashbrook Family Ministry that sexual assaults occurred and a culture of sexual abuse existed at In the Father’s Hands Children’s Home.

25. GLOBE did not commit any criminal act or violate any penal statute or ordinance at any time relevant to this lawsuit. Neither did anyone at commit such acts at GLOBE’s direction.

26. The primary location of GLOBE’s negligent acts and omissions alleged herein is Escambia County, Florida.

COUNT I -- NEGLIGENCE

27. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

28. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "J.L.", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

29. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

30. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "J.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

31. "J. L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

32. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "J.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "J.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT II-- NEGLIGENCE

33. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

34. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "S.L.", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

35. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting

with the Haitian children at In the Father's Hands Children's Home.

- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

36. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "S.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

37. "S.L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

38. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "S.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "S.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT III -- NEGLIGENCE

39. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

40. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "R.L", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

41. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

42. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "R.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

43. "R. L." suffered significant physical and emotional injuries as a result of the

aforementioned negligent acts and omissions.

44. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "R.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and naturals guardian of "R.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT IV -- NEGLIGENCE

45. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

46. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "J.L.2", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

47. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.

- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

48. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "J.L.2" was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

49. "J. L.2" suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

50. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "J.L.2" has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "J.L.2", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT V -- NEGLIGENCE

51. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

52. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "J.L.3", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

53. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

54. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "J.L.3" was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

55. "J. L.3" suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

56. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "J.L.3" has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "J.L.3", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT VI -- NEGLIGENCE

57. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

58. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "L.L", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

59. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting

with the Haitian children at In the Father's Hands Children's Home.

- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

60. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "L.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

61. "L. L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

62. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "L.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "L.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT VII -- NEGLIGENCE

63. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

64. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "B.L.", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

65. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

66. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "B.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

67. "B. L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

68. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "B.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "B.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT VIII -- NEGLIGENCE

69. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

70. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "A.L", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

71. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting

with the Haitian children at In the Father's Hands Children's Home.

- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

72. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "A.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

73. "A. L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

74. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "A.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parents and natural guardians of "A.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT IX -- NEGLIGENCE

75. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

76. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "M.L", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

77. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

78. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "M.L." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

79. "M. L." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

80. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "M.L." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, CHRISTOPHER LEWIS and NATALIE LEWIS as parent and natural guardians of "M.L.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT X -- NEGLIGENCE

81. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

82. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "B.E", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

83. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting

with the Haitian children at In the Father's Hands Children's Home.

- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

84. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "B.E." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

85. "B.E." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

86. As a direct, foreseeable, and proximate result of Defendant's above-mentioned negligent acts and/or omissions, "B.E." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, JASON EVANS and MILISSA EVANS, as parents and natural guardians of "B.E.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.

COUNT XI -- NEGLIGENCE

87. Plaintiffs re-allege and incorporate by reference paragraphs one (1) through twenty-six (26).

88. At all times relevant to this action, GLOBE owed a duty of care to the Haitian children, including Plaintiff, "E.E", who resided at the In the Father's Hands Children's Home in Port-de-Paix, Haiti.

89. At all times relevant to this action, GLOBE negligently failed to satisfy that duty by, inter alia:

- a. Failing to properly hire and/or affiliate with persons of proper reputation and character knowing said persons would be involved with working with the Haitian children at the In the Father's Hands Children's Home.
- b. Failing to properly train and/or direct those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- c. Failing to properly monitor or oversee those persons and/or entities interacting with the Haitian children at In the Father's Hands Children's Home.
- d. Failing to properly warn the Haitian children and/or their representatives of the culture of sexual abuse which existed at In the Father's Hands Children's Home.

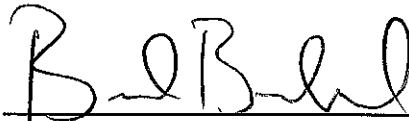
90. As a direct, foreseeable and proximate result of GLOBE's negligent acts and omissions, "E.E." was sexually assaulted and was subjected to a culture of sexual abuse at In the Father's Hands Children's Home.

91. "E.E." suffered significant physical and emotional injuries as a result of the aforementioned negligent acts and omissions.

92. As a direct, foreseeable, and proximate result of Defendant's above-mentioned

negligent acts and/or omissions, "E.E." has been seriously injured resulting in pain and suffering, loss of capacity for the enjoyment of life, emotional and mental anguish, potential loss of ability to earn income and expense of medical care/treatment. The losses are permanent and continuing and Plaintiff will continue to suffer such losses into the future.

WHEREFORE, Plaintiffs, JASON EVANS and MILISSA EVANS, as parents and natural guardians of "E.E.", request judgment against Defendant, GLOBE INTERNATIONAL MINISTRIES, INC., as follows: (i) damages in excess of the jurisdictional amount; (ii) reasonable costs; (iii) such other and further relief as the Court may deem just and proper; and (iv) a trial by jury on all issues so triable.



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