

**IN THE CIRCUIT COURT IN AND FOR SANTA ROSA COUNTY, FLORIDA
FIRST JUDICIAL CIRCUIT
CIVIL DIVISION**

K.S.
parent and guardian of and on
behalf of her minor daughter **G.S.**,
A Florida Resident

Plaintiff,

v.

CASE NO:

**** JURY TRIAL DEMANDED****

RYAN SCOTT WALSH,
A Florida Resident,
DANIEL WESLEY MORRIS,
A Florida Resident,
KENNETH SHAWN YORK,
A Florida Resident,
GULF BREEZE UNITED METHODIST CHURCH
A Florida Not for Profit Corporation,
**THE ALABAMA-WEST FLORIDA CONFERENCE
OF THE UNITED METHODIST CHURCH, INC.**
An Alabama Non-Profit Corporation

Defendants.

_____ /

COMPLAINT

COMES NOW, the Plaintiff, K.S., as parent and natural guardian of and on behalf of her minor daughter, G.S. by and through undersigned counsel, and demands judgment against the Defendants, **RYAN SCOTT WALSH, DANIEL WESLEY MORRIS, KENNETH SHAWN YORK, GULF BREEZE UNITED METHODIST CHURCH,** and **THE ALABAMA-WEST FLORIDA CONFERENCE OF THE UNITED METHODIST CHURCH, INC.** and alleges as grounds therefore:

JURISDICTION, VENUE, & PARTIES

1. This is an action in excess of Thirty Thousand Dollars (\$30,000.00), exclusive of interest and costs.



2. Plaintiff K.S., parent and guardian of and on behalf of his/her minor daughter G.S. (“Minor Plaintiff”) is an adult resident of Santa Rosa County, Florida.
3. At all times material, K.S. was the parent and natural guardian of Minor G.S., who at the time of the incident complained of was a girl of 13 years of age.
4. At all times material, Defendant Ryan Scott Walsh (“Defendant Walsh”) was a resident of the Santa Rosa County, Florida.
5. At all times material, Defendant Daniel Wesley Morris (“Defendant Morris”) was a resident of Santa Rosa County, Florida.
6. At all times material, Defendant Kenneth Shawn York (“Defendant York”) was a resident of Santa Rosa County, Florida.
7. At all times material, Defendant Gulf Breeze United Methodist Church (“Defendant Church”) is a Florida Not for Profit Corporation with its principal place of business in Santa Rosa County, Florida. Defendant Gulf Breeze United Methodist Church’s principal place of business is located at 75 Fairpoint Drive, Gulf Breeze, Florida 32561.
8. At all times material, Defendant The Alabama-West Florida Conference of the United Methodist Church, Inc. (“Defendant Conference”) is an Alabama Not for Profit Corporation.
9. The purported nature of Defendant Conference’s business is for charitable, literary, educational and scientific purposes. The Defendant Conference is responsible for the management of or otherwise superintends the Defendant Church and its pastors. The Defendant Conference is responsible for the actions of its clergy, including Defendant Walsh’s supervisors and for the complete and thorough implementation of mandated child protection policies at Defendant Church to prevent child sexual abuse and other sexual misconduct at Defendant Church.
10. Defendant Conference is engaged in substantial and not isolated activity within the State of Florida, including the governance of Defendant Church and other Methodist Churches throughout the panhandle of Florida.



11. Venue is proper in Santa Rosa County as the events that give rise to this cause of action took place in Santa Rosa County, Florida, and all material witnesses are residents of Santa Rosa County, Florida.
12. Florida law applies to this case as the most significant relationship test is satisfied since the events giving rise to this action occurred in Florida, the Plaintiff is a resident of Florida, most witnesses to this event are located within the state of Florida,
13. The Plaintiff and her family members are being identified by initials because of the sensitive nature of these allegations, the status of Minor Plaintiff as a Minor now and at the time of the incidents and all Defendants are in possession of the actual identity of these individuals through correspondence provided previously.
14. The Plaintiff has filed, together with this Complaint, a motion for protective order requesting that this Honorable Court prevent the public disclosure of their true identities in any pleading or filings in this case or otherwise.

GENERAL ALLEGATIONS

15. Minor Plaintiff has a date of birth of October 5, 2006, making her 13 years of age at or around January 2020 and was in middle school.
16. In 2019, Minor Plaintiff, through her parents, joined Defendant Church in efforts to seek counseling from a previous sexual abuse that took place while she was in the fourth grade.
17. Minor Plaintiff's parents were hopeful that Defendant Church's community would provide Minor Plaintiff with the support she needed while placing her in a safe environment.
18. At all times material, Defendants were aware of Minor Plaintiff's previous abuse.
19. Defendant Church offers many opportunities for minors and families to become active and involved in Church activities. As a result, Pastors, like Defendant Walsh, have abundant and frequent contact with minors, individually and in groups.
20. Because of the opportunities to be with minors, religious institutions, like Defendant Church, attract an extraordinary number of pedophiles, child molesters, and sex abusers.



21. High ups at religious institutions, including Defendant Church, Defendant Morris, Defendant York, and Defendant Conference, are well aware of the attraction of the Church to those who will do serious harm to minors.
22. Such persons who do serious harm to minors seek employment by the Church as pastors and small group leaders, where they will obtain privacy with minors and control over them. As religious figures, they wield enormous influence over minors.
23. Instead of exercising due care and diligence to protect minors under these circumstances, Defendants Morris, York, Church and Defendant Conference give its staff, including Defendant Walsh, complete discretion and freedom to have personal and private encounters with minors.
24. At all times material, Minor Plaintiff was a member of Defendant Church, and actively involved in Defendant Church's youth program.
25. Defendant Church is managed by Defendant Conference. All churches within the Defendant Conference, including Defendant Church, are subject to the rules and policies contained in the *Book of Resolutions* and the *Book of Discipline* of the United Methodist Church. The *Book of Resolutions* contains the text of all resolutions or pronouncements on issues approved by the General Conference (of the United Methodist Church) and which are currently valid. The *Book of Resolutions* contains not only the resolutions and policy statements passed by the most recent General Conference, but also all such statements still considered to represent the position of the United Methodist Church. The text of any resolution is considered the official position of the denomination on that subject. The *Book of Resolutions* includes the denomination's social principles and guidelines for expressing ministry.¹
26. The General Conference of the United Methodist Church, in April 1996, passed a resolution aimed at reducing the risk of child sexual abuse in the church.

¹ <https://www.umc.org/en/content/glossary-book-of-resolutions-the>



27. At the 2016 Annual Conference Session, Defendant Conference adopted what is known as the “Safe Sanctuaries and Minimum Standards.”
28. Each church within Defendant Conference’s control was to adopt this policy, and implementation was “the responsibility of the Pastor in Charge, the governing body, and a permanent Safe Sanctuaries Committee (SSC).”
29. Required by this policy, each church, including Defendant Church, was to “obtain background checks on all persons serving with children, youth, or at-risk or vulnerable adults” as well as additional screening measures.
30. This policy also adopted the “two adult rule” which required that “a minimum of two adults who are not related to each other shall be utilized in all programming with children, youth, and at-risk or vulnerable adults.”
31. Upon information and belief, the second adult that was to be present during the youth program at Defendant Church was deployed overseas and not present at all times material.
32. At all times material, Defendant Walsh was employed by Defendant Church as the Church’s Youth Pastor.
33. At all times material, Defendant Church was governed by and subject to the Methodist Church Policy as a Methodist Church within Defendant Conference.
34. In fact, upon information and belief, Defendant Conference went as far as nominating Defendant Walsh as the University of West Florida/Pensacola State College Wesley Foundation Vice Chair for 2019, giving more authority to Defendant Walsh.
35. As part of his role as Defendant Church’s Youth Director, Defendant Walsh was frequently put into situations where he was supervising minor children, such as Minor Plaintiff.
36. Given his position with Defendant Church, Defendant Walsh was an authority figure within the Church community, particularly to minors like Minor Plaintiff.
37. Minor Plaintiff, given her active involvement with Defendant Church’s youth program, spent almost every Sunday morning and Sunday evening, as well as at least one weekday afternoon



with Defendant Walsh on Defendant Church property between September 2019 and February 2020.

38. At all times material, Defendant Church allowed Defendant Walsh to be in close communication with minors while on Defendant Church property, including taking minors out of town overnight field trips.
39. For example, in October of 2019, Defendant Walsh, in the scope of his employment with Defendant Church and/or Defendant Conference, led a group youth trip to Orlando, Florida to visit Busch Gardens.
40. Minor Plaintiff was one of the attendees of this group youth trip to Orlando.
41. While Defendant Walsh was chaperoning this trip to Busch Gardens, two minor children on the trip were caught using illegal drugs.
42. Defendant Walsh was permitted by Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference to handle the individuals involved without oversight by Defendants.
43. Despite this incident, Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference did nothing and continued to allow Defendant Walsh to be alone with minor children in the scope of his employment.
44. At all times material, Defendants provided Defendant Walsh a laptop computer device (“Laptop”) to utilize in the scope of his work, including the ability to send iMessages and conduct FaceTime calls.
45. Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference encouraged Defendant Walsh to use electronic media to promote Church youth programs.
46. Defendants targeted youth via social media to promote Church programs.
47. Defendant Morris promoted and facilitated Defendant Church Youth Ministries services and other youth events wherein Defendant Morris assumed responsibility for the welfare of minors, and specifically of Minor Plaintiff.



48. Defendant York promoted and facilitated Defendant Church Youth Ministries services and other youth events wherein Defendant York assumed responsibility for the welfare of minors, and specifically of Minor Plaintiff.
49. Defendant Church promoted and facilitated Defendant Church Youth Ministries services and other youth events wherein Defendant Church assumed responsibility for the welfare of minors, and specifically of Minor Plaintiff.
50. At all times material, Defendants knew or should have known that Defendant Walsh was communicating with minors via FaceTime, text message, iMessage, and other forms of online communication.
51. Defendant Walsh provided Defendants with the passwords to these devices and accounts but Defendants never checked or monitored said devices and accounts.
52. This Laptop was at all times material property of Defendant Church, and was not Defendant Walsh's personal computer.
53. Upon information and belief, between October 2019 and February 2020, Defendant Walsh utilized Defendant Church's laptop to send sexually explicit messages to Minor Plaintiff in violation of Fla. Stat. Sect. 847.0135.3.
54. Upon information and belief, Defendant Walsh spent time alone with Minor Plaintiff while on Defendant Church property in the line and scope of his employment with Defendant Church.
55. Upon information and belief, in January of 2020, Defendant Walsh sent Minor Plaintiff nude photographs of himself in violation of Fla. Stat. Sect. 847.011 on Church devices.
56. Upon information and belief, in January of 2020 Defendant Walsh met with Minor Plaintiff kissed her, and touched her inappropriately.
57. Upon information and belief, one of many text messages found on Defendant Church's Laptop between Defendant Walsh and Minor Plaintiff included messages that read "I think I like younger girls because I feel like more of a man." and "I would very much enjoy the



opportunity to fuck you.” (Messages between Minor Plaintiff and Defendant Walsh on February 3, 2020).

58. Upon information and belief, conversations like those mentioned in paragraph 57 were frequent, and took place between Minor Plaintiff and Defendant Walsh over the course of months.
59. Upon information and belief, many of these messages were sent from church property via church devices.
60. Defendant Walsh was arrested in February of 2020 on charges of transmitting obscene material to a minor, lewd and lascivious behavior involving a minor, and using a computer to seduce or solicit a child. On October 10, 2022, Defendant Walsh was found guilty of all three counts and sentenced to 166.025 months (14.66 years) in the custody of the Florida Department of Corrections.
61. Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference knew or should have known that Defendant Walsh was sending inappropriate messages to Minor Plaintiff and other minors.
62. When Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference found out about the inappropriate messages, Defendants Church, Defendant Morris, Defendant York, and/or Defendant Conference intended to discipline Defendant Walsh internally, rather than report him to the authorities.
63. It was not until Defendant Walsh admitted to felonious touching of Minor Plaintiff that Defendant Church, Defendant Morris, Defendant York, and/or Defendant Conference decided to inform authorities.
64. Defendants were reluctant to report Defendant Walsh for the felonious messaging alone since his director supervisors, Defendant Morris and Defendant York, both had special relationships with Defendant Walsh.



65. These special relationships prevent Defendants from being objective and treating Defendant Walsh with ordinary and reasonable supervision.
66. At all times material, Defendant Morris and Defendant York had close personal relationships with Defendant Walsh.
67. At all times material, Defendant York had a personal relationship with Defendant Walsh and never questioned his behavior.
68. Defendant Morris performed the marriage ceremony between Defendant Walsh and his then wife prior to Defendant Walsh's employment with Defendant Church.
69. At all times material, Defendant Morris considered Defendant Walsh to be like a "son" and has known Defendant Walsh since he was fourteen (14) years old and never thought to question his actions until it was too late.
70. At all times material, Defendant Morris created an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff.
71. At all times material, Defendant York created an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff.
72. At all times material, Defendant Church created an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff.
73. At all times material, Defendant Defendant Conference created an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff.
74. At all times material, Defendant Morris knew, or in the exercise of reasonable care should have known, that Defendant Walsh was unfit, dangerous, and a threat to the health, safety and welfare of the minors entrusted to his counsel, care, and protection.
75. At all times material, Defendant York knew, or in the exercise of reasonable care should have known, that Defendant Walsh was unfit, dangerous, and a threat to the health, safety and welfare of the minors entrusted to his counsel, care, and protection.



76. At all times material, Defendant Church knew, or in the exercise of reasonable care should have known, that Defendant Walsh was unfit, dangerous, and a threat to the health, safety and welfare of the minors entrusted to his counsel, care, and protection.
77. At all times material, Defendant Conference knew, or in the exercise of reasonable care should have known, that Defendant Walsh was unfit, dangerous, and a threat to the health, safety and welfare of the minors entrusted to his counsel, care, and protection.
78. With such actual and/or constructive knowledge, Defendant Morris provided Defendant Walsh with unfettered access to Minor Plaintiff and gave him unlimited and uncontrolled privacy.
79. With such actual and/or constructive knowledge, Defendant York provided Defendant Walsh with unfettered access to Minor Plaintiff and gave him unlimited and uncontrolled privacy.
80. With such actual and/or constructive knowledge, Defendant Church provided Defendant Walsh with unfettered access to Minor Plaintiff and gave him unlimited and uncontrolled privacy.
81. With such actual and/or constructive knowledge, Defendant Conference provided Defendant Walsh with unfettered access to Minor Plaintiff and gave him unlimited and uncontrolled privacy.
82. At all times material, Defendant Walsh was acting as an agent of Defendant Church and/or Defendant Conference.
83. At all times material, Defendant Morris was acting as an agent of Defendant Church and/or Defendant Conference.
84. At all times material, Defendant York was acting as an agent of Defendant Church and/or Defendant Conference.



COUNT ONE
NEGLIGENCE AGAINST DEFENDANT WALSH

85. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.
86. At all times material, Defendant Walsh owed a duty to perform his church activities in a reasonable manner.
87. Defendant Walsh owed a duty to exercise reasonable care in the execution of his pastoral duties while employed as a Youth Pastor at Defendant Church.
88. Defendant Walsh performed his pastoral role by using more physical touching than the average reasonable Youth Pastor.
89. Defendant Walsh was aware of Minor Plaintiff's past history of sexual abuse.
90. Defendant Walsh breached this duty in one of more of the following ways including but not limited to:
- (a) Using his position of authority within the Church to gain access to minors, like Minor Plaintiff;
 - (b) Using his position of authority within the Church to target minors, like Minor Plaintiff;
 - (c) Using his position of authority within the Church to influence minors, like Minor Plaintiff;
 - (d) Using his position of authority within the Church to spend time alone with minors, like Minor Plaintiff;
 - (e) Using his position of authority within the Church to communicate directly with minors, like Minor Plaintiff, in a sexually inappropriate and abusive manner;
 - (f) Using his knowledge of Minor Plaintiff's vulnerabilities to target Minor Plaintiff.
91. Minor Plaintiff was sexually abused by Defendant Walsh.
92. As a direct and proximate result of Defendant's negligence, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.



WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant Walsh and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

COUNT TWO
BATTERY AGAINST DEFENDANT WALSH

93. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.
94. Defendant Walsh, on numerous occasions, committed harmful and/or offensive contact on Minor Plaintiff.
95. At all times material, Defendant Walsh had the intent to cause such harmful and/or offensive contact.
96. Defendant Walsh committed repeated acts of sexual abuse against Minor Plaintiff in violation of Chapter 800 of the Florida Statutes, which recognizes as a crime the lewd and lascivious behavior committed by Defendant Walsh.
97. As a direct and proximate result of Defendant Walsh's actions, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff demands judgment against Defendant Walsh for compensatory damages, costs and such other and further relief as this Court deems just and proper following a trial by jury. Plaintiff intends to move to amend the complaint in accordance with Florida Statutes to assert a claim for punitive damages.

COUNT THREE
NEGLIGENCE AGAINST DEFENDANT MORRIS

98. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.
99. At all times material, Defendant Morris owed a duty to Minor Plaintiff to use reasonable care to ensure the safety, care, well being and health of Minor Plaintiff while she was under the care, custody or in the presence of Defendant Walsh.



100. Defendant Morris' duties encompassed the hiring, retention and supervision of Defendant Walsh.

101. At all times material, Defendant Morris had a duty to properly screen, supervise, and monitor Defendant Walsh to ensure that any inappropriate or wrongful conduct would not occur.

102. Defendant Morris breached his duty to perform his functions with reasonable care in one or more of the following ways:

- (a) By failing to protect Minor Plaintiff from sexual assault and lewd and lascivious acts committed by the agent and employee of Defendant Church;
- (b) By failing to do an adequate background check, failing to perform an appropriate psychological evaluation or profile, and failing to make sufficient inquiry as to the qualifications of Defendant Walsh;
- (c) By failing to properly restrict Defendant Walsh from unsupervised access to children, and/or further failing to take any action to prevent sexual abuse of individuals after having received information concerning similar past acts;
- (d) By creating an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff;
- (e) By failing to act reasonably in his duties to supervise and manage a youth ministry program at Defendant Church and in his duties to supervise and protect the Minor Plaintiff and other youth at Defendant Church, including in the prevention and reporting of child sexual abuse;
- (f) By failing to guard against or warn Minor Plaintiff of the dangers which Defendant Morris knew or reasonably should have known existed, and acted in clear contravention of their own policies and those of the Methodist Church Policy;



- (g) By failing to control and/or monitor Defendant Walsh's use of Church devices to communicate with minors despite having all passwords and usernames to conduct such monitoring.
- (h) By failing to reasonably meet his responsibility to implement the Methodist Church Policy or any other effective or meaningful Safe Sanctuary Policy at Defendant Church.
- (i) By having inadequate policies and procedures in place to protect children it was entrusted to care for and protect, including Minor Plaintiff and/or failing to enforce said policies and procedures.
- (j) By failing to keep Defendant Church premises and programs safe for minors, and specifically failing to keep Defendant Church premises and youth programs safe for Minor Plaintiff.

103. As a direct and proximate result of Defendant's negligence, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant Morris and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

COUNT FOUR
NEGLIGENCE AGAINST DEFENDANT YORK

104. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.

105. At all times material, Defendant York owed a duty to Minor Plaintiff to use reasonable care to ensure the safety, care, well being and health of Minor Plaintiff while she was under the care, custody or in the presence of Defendant Walsh.

106. Defendant York's duties encompassed the hiring, retention and supervision of Defendant Walsh.



107. At all times material, Defendant York had a duty to properly screen, supervise, and monitor Defendant Walsh to ensure that any inappropriate or wrongful conduct would not occur.

108. Defendant York breached his duty to perform his functions with reasonable care in one or more of the following ways:

- (a) By failing to protect Minor Plaintiff from sexual assault and lewd and lascivious acts committed by the agent and employee of Defendant Church;
- (b) By failing to do an adequate background check, failing to perform an appropriate psychological evaluation or profile, and failing to make sufficient inquiry as to the qualifications of Defendant Walsh;
- (c) By failing to properly restrict Defendant Walsh from unsupervised access to children, and/or further failing to take any action to prevent sexual abuse of individuals after having received information concerning similar past acts;
- (d) By creating an environment which fostered child sexual abuse against children it had a duty to protect, including Minor Plaintiff;
- (e) By failing to act reasonably in his duties to supervise and manage a youth ministry program at Defendant Church and in his duties to supervise and protect the Minor Plaintiff and other youth at Defendant Church, including in the prevention and reporting of child sexual abuse;
- (f) By failing to guard against or warn Minor Plaintiff of the dangers which Defendant York knew or reasonably should have known existed, and acted in clear contravention of their own policies and those of the Methodist Church Policy;
- (g) By failing to control and/or monitor Defendant Walsh's use of Church devices to communicate with minors despite having all passwords and usernames to conduct such monitoring.
- (h) By failing to reasonably meet his responsibility to implement the Methodist Church Policy or any other effective or meaningful Safe Sanctuary Policy at Defendant Church.



- (i) By having inadequate policies and procedures in place to protect children it was entrusted to care for and protect, including Minor Plaintiff and/or failing to enforce said policies and procedures.
- (j) By failing to keep Defendant Church premises and programs safe for minors, and specifically failing to keep Defendant Church premises and youth programs safe for Minor Plaintiff.

109. As a direct and proximate result of Defendant's negligence, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant York and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

COUNT FIVE
NEGLIGENCE AGAINST DEFENDANT CHURCH
(Vicarious Liability)

- 110. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.
- 111. Under Florida law, a principal is responsible for the acts of its employees if the acts are committed in the scope of the employee's employment.
- 112. At all times material, Defendant Walsh was an employee and/or agent of Defendant Church acting in the line and scope of his employment.
- 113. At all times material, Defendant Morris was an employee and/or agent of Defendant Church acting in the line and scope of his employment.
- 114. At all times material, Defendant York was an employee and/or agent of Defendant Church acting in the line and scope of his employment.
- 115. Defendants Walsh, Morris, and York are alleged to have committed the negligence described above in Counts One, Three, and Four in the line and scope of their employment with Defendant Church.



116. As a direct and proximate result of Defendants negligence as set out above, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant Church and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

COUNT SIX
NEGLIGENCE AGAINST DEFENDANT CONFERENCE

117. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.

118. At all times material, Defendant Conference had a duty to Minor Plaintiff to exercise reasonable care in the supervision of Defendants Walsh, York, Morris, and Church.

119. Defendant Conference breached said duty in one or more of the following ways:

1. By failing to reasonably supervise Defendants Morris and York to insure that Church policies were being followed;
2. By failing to reasonable train Defendants Morris and York to insure that Conference policies were being followed;
3. By failing to provide specific electronic device inspection procedures and policies to reasonably assure church officers that Church devices and domains were not being utilized for illicit purposes;

120. At all times material, Defendant Conference owed a duty to Minor Plaintiff to use reasonable care to ensure the safety, care, well being, and health of Minor Plaintiff while she was under the care, custody or in the presence of Defendant Walsh.

121. Defendant Conference's duties encompassed the hiring, retention, and supervision of Defendant Walsh.



122. At all times material, Defendant Conference had a duty to properly screen, supervise, and monitor Defendant Walsh to ensure that any inappropriate or wrongful conduct would not occur.

123. As a direct and proximate result of Defendant's negligence, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant Conference and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

COUNT SEVEN
NEGLIGENCE AGAINST DEFENDANT CONFERENCE
(Vicarious Liability)

124. Plaintiff adopts and incorporates her allegations in paragraphs 1 -84 as if set out here in full.

125. Under Florida law, a principal is responsible for the acts of its employees if the acts are committed in the scope of the employee's employment.

126. At all times material, Defendant Walsh was an employee and/or agent of Defendant Conference acting in the line and scope of his employment.

127. At all times material, Defendant Morris was an employee and/or agent of Defendant Conference acting in the line and scope of his employment.

128. At all times material, Defendant York was an employee and/or agent of Defendant Conference acting in the line and scope of his employment.

129. Defendants Walsh, Morris, and York are alleged to have committed the negligence described above in Counts One, Three, and Four in the line and scope of their employment with Defendant Conference.



130.As a direct and proximate result of Defendants negligence as set out above, Minor Plaintiff suffered severe and permanent psychological, emotional and physical injuries, shame, humiliation, and the inability to lead a normal life.

WHEREFORE, Plaintiff on behalf of Minor Plaintiff hereby demands judgment against Defendant Church and damages against him to the fullest extent permitted by Florida law along with any additional award of fees and costs if permitted following a trial by jury.

Respectfully submitted,

/s/ Joseph A Zarzaur, Jr.
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NOTICE OF PROVIDING SERVICE E-MAIL ADDRESS

PLEASE TAKE NOTICE that the following e-mail address is to be used for mandatory electronic service pursuant to Florida's Rule of Judicial Administration Rule 2.516: joe@zarzaurlaw.com, service@zarzaurlaw.com.

Respectfully submitted,

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