

1 **McAllister Olivarius**

2 Jan Cervenka (SBN 344997)

3 Dr. Ann Olivarius (*pro hac vice* motion forthcoming)

4 Dr. John F.O. McAllister (*pro hac vice* motion forthcoming)

5 641 Lexington Avenue, 13th Floor

6 New York, NY 10022

7 Telephone: (212) 433-3456

8 hcervenka@mcolaw.com

9 *Attorneys for Plaintiff*

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

11 MARIAN BARBU,

12 Case No.: 5:25-cv-02428

13 Plaintiff,

14 **COMPLAINT**

15 vs.

16 **DEMAND FOR JURY TRIAL**

17 HARVEST CHRISTIAN FELLOWSHIP,
18 GREG LAURIE, RICHARD SCHUTTE,
19 and PAUL HAVSGAARD,

20 Defendants.

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1 Plaintiff Marian Barbu (“Plaintiff,” “Barbu” or “Marian”), by and through his
 2 attorneys, McAllister Olivarius, files this Complaint against Defendants Harvest
 3 Christian Fellowship (“Harvest Riverside”), Greg Laurie (“Laurie”), Richard
 4 Schutte (“Schutte”), and Paul Havsgaard (“Havsgaard”) (collectively,
 5 “Defendants”), for damages and other relief. In support of these claims, Plaintiff
 6 alleges as follows:

7 **INTRODUCTION**

8 1. In 2000 through 2008 when Plaintiff was eight to 16 years old, he was
 9 sexually abused by Defendant Paul Havsgaard on many occasions.

10 2. Havsgaard was a pastor and an employee of Defendant Harvest
 11 Riverside, based in Riverside, California, and is arguably one of the most prolific
 12 child sex abusers alive in America today, having committed thousands of individual
 13 acts of abuse. Havsgaard managed the network of orphanages/foster homes where
 14 Plaintiff resided (“Harvest Homes”). The Harvest Homes were operated, funded, and
 15 administered by Harvest Riverside, whose long-time leader and unquestioned
 16 authority is Defendant Greg Laurie. Defendant Schutte, Harvest Riverside’s
 17 Missions Pastor, had operational responsibility under Laurie for supervising the
 18 Harvest Homes.

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

21 4. In the decade between 1998 and 2008, when Defendants operated the
 22 Harvest Homes in Romania, Havsgaard savagely molested and terrorized scores of
 23 Romanian children, including Plaintiff, a child in his custody and care.

24 5. When Plaintiff was a minor residing in the Harvest Homes, Havsgaard
 25 sadistically stripped and spanked him. During these punishments, Havsgaard would
 26 digitally penetrate Plaintiff’s anus and would also fondle Plaintiff’s penis and
 27 testicles. Havsgaard would be erect during this sexual abuse and was sexually
 28 abusing Plaintiff for his own sexual pleasure.

1 6. Sometimes Havsgaard abused Plaintiff without spanking, by inserting
2 his finger in Plaintiff's anus, and rubbing, stroking, and sexually touching Plaintiff's
3 penis and testicles.

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

9 8. Havsgaard was a senior pastor at Harvest Riverside and kept that
10 position as he embarked in 1998 on a foreign mission to Romania, then the sex
11 trafficking capital of Europe, at the direction of Harvest Riverside, Laurie, and
12 Schutte.

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

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

1 11. Finally, by 2004, Havsgaard's abuse had become so notorious that an
2 American missionary from another Calvary church in California, Steve Quarles,
3 heard about it and complained to Schutte in Riverside, ultimately prompting Schutte,
4 the pastor in charge of all missionary work at Harvest Riverside and Laurie's trusted
5 lieutenant, to authorize an inspection by Quarles and two other Calvary ministers.

6 12. Quarles and his team performed the inspection in October 2004. They
7 were so alarmed that they requested that Schutte come see for himself.

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

15 14. But Havsgaard was an important fundraiser for Laurie's church whose
16 "good works" also brought credit to Laurie. As senior Harvest figures told Quarles,
17 Havsgaard "is very important because he's the face of the ministry. He's the one
18 who goes and talks to the churches and raises the money. And we can't have him
19 not be part of things." Firing Havsgaard would have hurt donations and possibly
20 unleash a scandal that would hurt Laurie's reputation.

21 15. So, despite proof that Havsgaard was a devious and unrelenting
22 pedophile, and despite knowing they had provided him a perfect laboratory of
23 desperate and vulnerable children to exploit, Harvest Riverside, Laurie and Schutte
24 did nothing. They did not fire, suspend, withdraw or discipline Havsgaard. They
25 neither reported him to the authorities, as was their duty under California law, nor
26 instituted any new policies or procedures at the Harvest Homes. They did nothing to
27 protect the children there, who remained completely subject to Havsgaard's
28

1 domination and voracious sexual abuse. Nor did they do anything to offer support to
 2 Havsgaard's victims.

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

6 17. During this extended period, Havsgaard continued to abuse the children
 7 of the Harvest Homes, both those who were already there and many new ones he
 8 was left free to recruit, without any new restraints imposed by Harvest Riverside,
 9 Laurie or Schutte.

10 18. Laurie even authorized a gift to Havsgaard of some \$200,000 in
 11 severance as he continued in his post as if nothing had happened. Romanian
 12 authorities were told nothing.

13 19. In 2009, a year after Havsgaard's return from Bucharest, Laurie called
 14 him “a pastor who faithfully served the Lord for many years at Harvest Christian
 15 Fellowship, the church where I pastor,” and even compared his work in Romania to
 16 that of Moses with the Israelites, because his “life demonstrates the power that just
 17 one godly person can have.”¹

18 20. Since his return to California in 2008, Havsgaard has continued to work
 19 at Calvary churches in California linked to Harvest Riverside, with unsupervised
 20 access to children, which Defendants could easily have stopped but did not.

21 21. The cover-up has worked well for Laurie. As Havsgaard raped his way
 22 through scores of children in Harvest's care including Plaintiff and returned to a
 23 comfortable life in California, Laurie grew in national prominence and wealth, with
 24 a \$5.5 million home in Newport Beach, a home in Hawaii, a \$90,000 car, a top-rated
 25 podcast, and a Hollywood movie.

26
 27
 28 ¹ Greg Laurie, *What One Can Do*, Crosswalk (June 23, 2009), <https://www.crosswalk.com/faith/spiritual-life/what-one-can-do-11604878.html>.

22. In sharp contrast, Plaintiff and the scores of other Romanian victims of Havsgaard's abuse and Defendants' cover-up went back on the streets with no money, no plan for the future, no medical care, no therapy for the PTSD and other medical and psychological damage that Defendants caused, and certainly no gifts of severance payments such as Havsgaard enjoyed. Defendants promised them security and support, betrayed that promise with years of sexual abuse, then chucked them on the street without an iota of practical support or human sympathy.

23. Defendants have continued to conspire to cover up these horrors for which they were all responsible, a cover-up that has succeeded for 20 years—until now.

24. The failure of Harvest Riverside, Laurie and Schutte to investigate Havsgaard took place in California. They made money in California by using their Romanian venture to raise funds and brought children to California to raise more, where Havsgaard sexually abused them. Their failure to supervise or remove Havsgaard and warn future victims took place in California. The ongoing cover-up has been directed from California.

25. As a result of the acts and omissions that took place in California, Plaintiff was sexually abused and sexually trafficked by Havsgaard and has suffered permanent physical and psychological injuries.

JURISDICTION AND VENUE

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

27. This Court further has subject matter jurisdiction over Plaintiff's California state law claims pursuant to 28 U.S.C. § 1337(a), as the claims are so

1 related to claims within the Court's original jurisdiction that they form part of the
 2 same case or controversy under Article III of the United States Constitution.

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

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

10 **CHOICE OF LAW & STATUTE OF LIMITATIONS**

11 30. Cal. Civ. P. Code § 361 permits Plaintiff's California state law claims
 12 even though Plaintiff is Romanian because Plaintiff is bringing claims which arose
 13 in California and are based on acts and omissions that occurred in California. Both
 14 the substantive and procedural law of California apply to Plaintiff's California law
 15 claims.

16 31. At the time of commencing this action, Plaintiff is under 40 and entitled
 17 to bring claims arising from child sex abuse under California law. *See* Cal. Civ. P.
 18 Code § 340.11(r) (2024).

19 32. Due to circumstances resulting from Defendants' sex trafficking
 20 scheme, it was previously impracticable for Plaintiff to bring a case under 18 U.S.C.
 21 §1595.

22 33. Plaintiff, to the extent applicable here, has pursued his rights diligently
 23 and was impeded because of extraordinary threats and coercion that Defendants
 24 applied to Plaintiff during the period of his residency in the Harvest Homes. Plaintiff
 25 was further impeded in pursing his claims by the extraordinary mental and emotional
 26 damage that Defendants inflicted on Plaintiff, and the disappearance of Havsgaard
 27 and Harvest back to California after 2008, leaving no evident route of redress to a
 28 young, traumatized and functionally illiterate Romanian.

1 34. Defendants conspired to and did fraudulently conceal the sexual
2 assaults perpetrated against Plaintiff and other Romanian children.

3 35. Defendants' wrongful and/or negligent acts and omissions as described
4 below were a substantial factor in bringing about childhood sex abuse of Plaintiff
5 which caused him injury.

6 36. As a result, to the extent necessary, all applicable statutes of limitations
7 should be equitably tolled.

PARTIES

I. PLAINTIFF

Figure 1: Marian Barbu, circa 2004



37. Plaintiff Marian Barbu (“Marian” or “Barbu”) is a citizen of Romania and a former resident of the Harvest Homes.

38. Marian 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 was 15.

39. In or around 2000, when Marian was eight years old, police found him living alone on the street and took him to Havsgaard. Marian was acutely vulnerable, desperate for food, shelter and stability. Havsgaard invited him into Harvest's care.

1 At various points Marian lived at the Buftea, Dămăroaia, and Bârlogeni homes, all
2 of which were established by Harvest Riverside at Laurie's direction and run day-
3 to-day by Havsgaard.

4 40. Havsgaard regularly physically and sexually abused Marian, who was
5 at all relevant times a child under the custody, care and supervision of Defendants,
6 for eight years until he left the Harvest Homes at the age of 16. It was reasonably
7 foreseeable to Defendants that Havsgaard would sexually abuse Marian, as they
8 knew or should have known about Havsgaard's rampant sexual abuse of scores of
9 other children in the Harvest Homes.

10 **II. DEFENDANTS**

11 **A. Greg Laurie**

12 41. Laurie was born in 1952. He currently resides in Newport Beach,
13 California in a home worth an estimated \$5,144,100 as of June 2025. At all material
14 times herein, Laurie was a resident of California.

15 *Figure 2: Laurie preaching*



26 42. Laurie is the co-founder and Senior Pastor of Harvest Riverside. He has
27 supreme authority and makes all important decisions concerning Harvest Riverside.
28

Figure 3: Laurie crusade Dodger stadium, 2012



43. Energetic and resourceful, Laurie has also become a successful author, podcaster and national figure. With his oratorical skills, books, podcasts, TV broadcasts, and regular crusades, Laurie is often likened to Billy Graham and sits on the Board of Directors of the Billy Graham Evangelical Association. His podcast has been among the top 100 most popular in the United States.

44. Laurie's crusades typically attract hundreds of thousands of people to the biggest stadiums in the Los Angeles area.

45. Laurie's wood-paneled office is full of pictures of him in the company of important politicians, religious leaders and actors.

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

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1 *Figure 4: Laurie at the Hollywood premiere of Jesus Revolution, with Cathe, and*
2 *actors Joel Courtney and Anna Grace Barlow who played them in the film*



17 **B. Richard Schutte**

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

25 48. Schutte is and was, at all material times herein, a resident of California.

1 **C. Harvest Christian Fellowship**

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

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

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

24 52. Frisbee, himself a victim of child sex abuse, was later excommunicated
 25 from the Calvary movement because he was gay, and the story of Harvest
 26 Riverside’s origins told in *Jesus Revolution* minimizes Frisbee’s involvement and
 27 arguably amplifies the credit given to Laurie for Harvest Riverside’s early success.
 28 Frisbee’s widow Connie says, “I can testify that Greg Laurie is not a truth teller. He

1 has built his ministry on Lonnie's foundation while erasing Lonnie from the story."

2 The producers of *Jesus Revolution* did not speak to her, she says, after Laurie told

3 them she was dead. Nevertheless, Laurie successfully developed the Bible study

4 group in Newport Beach. He and his wife Cathe (they started dating when she was

5 15 and he was 18, and married after she graduated from high school) proved a

6 reliable anchor for attracting followers.

7 53. Harvest Riverside is now one of the largest churches in the United

8 States, supporting a congregation of approximately 15,000 each Sunday that

9 continues to grow. Harvest Riverside's mission is "to know God and make Him

10 known." It has an active program in Hawaii where Laurie and other ministers

11 maintain luxury homes.

12 54. Since 1990, Harvest Riverside has organized regular Harvest Crusades,

13 which have reached millions of people. It is a member of Calvary Chapel, a non-

14 denominational association of evangelical churches, numbering 1,800 in the United

15 States and additional locations abroad.

16 55. In 2017, Harvest Riverside joined the Southern Baptist Convention.

17 This was considered a coup for the Southern Baptists because of Laurie's

18 prominence in the evangelical movement.

19 **D. Paul Havsgaard**

20 56. Paul Havsgaard was born in 1949 and now lives in Forest Hills,

21 California. At all material times herein, he was a resident of California.

22 57. He is the oldest of seven children. Their father was an alcoholic who

23 was chronically out of work and frequently beat the children, and their mother was

24 a nurse who was often absent because she had to support her struggling family.

25 58. Havsgaard grew up in Riverside, California and attended Ramona High

26 School, graduating in 1967, and married his high school girlfriend Kathy Warrick

27 ("Kathy") when she was 16. He then joined the Navy, serving on a destroyer off the

28 coast of Vietnam as an aviation electrician's mate. He took some college classes but

1 does not have a degree, and did not attend seminary. He and Kathy divorced in 2007
2 and have both remarried.

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

11 60. Laurie selected Havsgaard to run Harvest Homes in Romania in part
12 because they had worked closely together for decades running Harvest Riverside.

13 61. Havsgaard became Assistant Pastor in charge of Children's Ministry at
14 Harvest Riverside in 1976. In the early 1980s, he left Harvest to become senior
15 pastor at the Calvary Chapel of the High Desert in Victorville, California. He liked
16 running a church of his own, but as Harvest Riverside grew and Laurie began to
17 travel more, Laurie thought Havsgaard would make a suitable senior deputy and
18 asked him to return. Havsgaard accepted because it gave him a chance to operate in
19 a growing organization with larger reach than his isolated congregation.

20 62. When Havsgaard returned to Harvest Riverside in 1984, many people
21 viewed him as the second most powerful pastor next to Laurie and a possible
22 competitor for the top job. It was a new, entrepreneurial organization, growing
23 rapidly. Neither Laurie nor Havsgaard had a college degree or had worked outside
24 the Calvary movement, which did not have established traditions or specific
25 credentials required for leadership. That meant personal followings were an
26 important barometer for pastors, and Havsgaard was popular with many at Harvest
27 Riverside.

28

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

Figure 5: Havsgaard baptizing a young man as pastor of Calvary Chapel of the High Desert, 1982



• Baptismal

Photo / RITA SMITH

Paul Havgaard, pastor of the Calvary Chapel of the High Desert, dips 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 Havgaard at the mass baptism.

GENERAL ALLEGATIONS

I. HARVEST RIVERSIDE ESTABLISHES CHILDREN'S HOMES IN ROMANIA

A. Origins of the Harvest Homes

64. As reported in *Calvary Chapel Magazine*, Havsgaard “first came to Romania on an outreach in 1998 as an assistant to Greg Laurie, who is a nationally known Calvary Chapel evangelist and pastor.”² Visiting under the auspices of a

² Tom Price, *Saving One Child at a Time*, Calvary Chapel Magazine, 2002, at 7.

1 group called Samaritan's Purse, Havsgaard distributed shoeboxes of gifts to children
2 in Bucharest on behalf of Harvest Riverside.

3 65. The experience induced Havsgaard to suggest, and Laurie to approve,
4 a permanent Harvest mission in Romania.

5 66. Romania was well known in the 1990s for attracting pedophiles,
6 because in addition to the grinding poverty that drove many people, including
7 children, into sex work, the country's institutions were weak and corrupt, and
8 foreigners could easily evade punishment. In fact, Bucharest was widely regarded as
9 the pedophilia capital of Europe.

10 67. Later in 1998, Havsgaard returned to Bucharest with Kathy to
11 implement a plan Laurie had approved to build up Harvest Riverside's presence in
12 Romania ("Harvest Homes") and established a local Romanian entity, the *Fundatia*
13 *Harvest Romanian* ("Local Foundation"), to handle the formalities.

14 68. While Defendants delegated much of the day-to-day running of the
15 Harvest Homes to Havsgaard in Romania, key decisions were made in California by
16 Laurie and Schutte in keeping with Laurie's position of supreme authority at Harvest
17 Riverside, and because an important object of the Romanian venture was to bring
18 financial benefits and prestige to Harvest Riverside and Laurie.

19 **B. The Harvest Homes Were a Fundraising Vehicle for Laurie and**
20 **Harvest Riverside**

21 69. The Harvest Homes were designed in part as a fundraising and
22 marketing tool for Harvest Riverside, which was able to attract more money and
23 positive regard for itself and Laurie in the United States by highlighting its charitable
24 efforts in Romania.

25 70. Defendants conducted regular and substantial fundraising programs in
26 California based on the Romanian venture.

27 71. Defendants established a California charity, ARK, to raise money in the
28 United States for the Harvest Homes and other international projects and to promote

1 the Harvest organizations. Harvest and ARK, in partnership, conducted many
2 fundraising events in California. The money raised in these joint fundraisers went
3 through the California corporation and was then redistributed to Harvest Riverside
4 and other Harvest Riverside ventures.

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

10 73. Defendants set up ARK in California to be a fundraising vehicle for
11 their activities in Romania and became a conduit for members of Harvest Riverside
12 to donate funds meant for Harvest Riverside’s activities in Romania, in addition to
13 funds sent directly by Harvest Riverside.

14 74. Harvest Riverside and Laurie effectively controlled ARK.

15 75. Money from Harvest Riverside and ARK paid employees of the Local
16 Foundation.

17 76. ARK used Harvest Riverside’s and Laurie’s resources and contacts to
18 raise money, including using Harvest Riverside’s main fundraising telephone
19 number in California.

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

26 78. For years, Harvest Riverside deposited large sums of money
27 supposedly designated for Harvest Homes’ operating costs directly into Havsgaard’s
28 personal bank account. Havsgaard then used large portions of these funds to buy

1 things for himself as well as abundant presents and alcohol for his child sex victims
2 to keep them pliant, and to buy silence from Harvest staff about his child abuse.

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

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

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

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

81. When Havsgaard was 12 to 18 years old, he repeatedly raped his younger sister Mary M. (who was eight to 14 years old at the time), threatening beatings and death if she reported him.³

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

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

³ Pseudonyms are employed in this Complaint to protect the anonymity of certain minor victims of Defendants, in the form of a first name plus an initial for the surname, such as "Abigail A." or "Peter P."

1 84. At a later point, Samantha S. concluded she had to make sure Harvest
 2 Riverside knew that her brother was a danger to children. She already found it
 3 strange that Havsgaard's big ego, bullying and volatile temper had not already set
 4 back his career. Given what she knew about his voracious sexual interest in children,
 5 she thought it likely he had been abusing them as a minister too, and worried it was
 6 all being covered up to protect Laurie and Harvest Riverside.

7 85. Samantha S. decided to put Havsgaard's pedophilia on the record with
 8 the organization. She met with a Harvest Riverside lay leader, Nehemias Quintanilla,
 9 who was teaching a Spanish Bible study course. The meeting took place at a coffee
 10 shop in the Redlands area.

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

13 87. Quintanilla replied, "This happens in a family if they learn it from
 14 another generation. That's just what happens." But Quintanilla also told Samantha
 15 S. that a letter critical of Havsgaard had been circulated among the Harvest Riverside
 16 congregation, implying that he respected her decision to report him, and ended the
 17 conversation there.

18 88. Upon information and belief, shortly after Samantha S.'s report to
 19 Quintanilla about Havsgaard's history of sexual abuse, Quintanilla told his superiors
 20 at Harvest Riverside about her allegations. On information and belief, they took no
 21 action in response.

22 2. *Havsgaard Molests His Foster Daughter*

23 89. While a pastor at Harvest Riverside, Havsgaard also molested a foster
 24 daughter, Julia J. starting in or around 1986, when he was in his late thirties, and she
 25 was 15 or 16.

26 90. Julia J. reports: "One day I was at the dryer, and Paul came up behind
 27 me and pushed himself onto me. His penis was erect. He knew my history and that
 28

1 being molested was what put me in foster care to begin with. I froze. He backed
 2 away and left the garage.”

3 91. Shortly thereafter, when Julia J. was in her bedroom, Havsgaard “came
 4 in, crouched down, slipped his hand in my underpants, and inserted his finger into
 5 my anus. Before he put his finger in my underpants, he put it in his mouth as though
 6 he had done it many times before. Every time he did it, it was the same thing. I lived
 7 there for over a year and a half. It happened five or six times during that period.”

8 3. Kathy Havsgaard Arrives in Bucharest Aware of Havsgaard’s
 9 Unsuitability for the Role

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

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

25 94. The fact that Harvest Riverside was able to send an apparently
 26 wholesome married couple to Romania was an important reassurance to Romanian
 27 authorities that the Harvest Homes would be properly run, and a plus for fundraising
 28 in California. Kathy joined Havsgaard on the Board of the Local Foundation.

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

2 95. Havsgaard never learned Romanian. Accompanied by a translator, he
 3 recruited children off the streets, most commonly by buying them McDonald's meals
 4 and promising a better life. Once he recruited a few children who spoke English, he
 5 used them (instead of an adult translator) to recruit more children. The youngest
 6 resident he recruited was four years old.

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

11 97. Laurie, Schutte and Harvest Riverside sent Havsgaard approximately
 12 \$17,000 a month, which in Romania at that time had huge purchasing power.

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

16 99. Defendants sent the funds from California directly into Havsgaard's
 17 personal bank account. From there he transferred funds for the Harvest Homes'
 18 operation into the Local Foundation's Romanian bank account based on requests
 19 from the local Finance Director, Eugen Roman ("Roman"). Roman did not have
 20 visibility into what Havsgaard did with the rest of the money.

21 100. The Winter 2002 edition of the *Calvary Chapel Magazine* had an eight-
 22 page article, "Saving One Child At A Time – Harvest Romania" that displayed many
 23 gripping photos of Romanian street children, illustrating the moving story of Harvest
 24 Riverside's decision to establish a network of children's homes in Romania under
 25 Havsgaard. The article quoted Havsgaard as being "concerned about pedophiles that

1 travel throughout Europe to engage abandoned children in their perverted practices.
 2 They find Romania's street children easy prey."⁴

3 *Figure 6.a: Page from Calvary Chapel Magazine, Winter 2002,
 4 showing Havsgaard, in red shirt, talking to street children in Bucharest*



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



13
 14 Paul Havsgaard's gregarious nature draws the street children to his side.

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 25
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 27
 28
 Gcalvary Chapel Magazine



Bucharest



The Modesto team pose in front of the castle in Sinaia.

CC Bucharest
 Coast 2 Coast Missions
 (714) 691-9495
 missions@ccchb.org
 www.ccchb.org

"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 when 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 paint 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

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 logistics, 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 Present, Arlene and Wendy, and their four children moved there from Germany. The family felt God's call to work 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 the village. The team has called 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 6.b: Zoomed-in extract from Figure 6.a,
 showing the US phone number for Harvest Homes in Romania

21
 22
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 28
 Harvest Romania
 Phone 011-40-92-794-766
 US Phone (909) 687-6902
 e-mail: harvestromania@aol.com

⁴ Price, *supra*, at 7.

Figure 6.c: Zoomed-in extract from Figure 6.a, discussing Havsgaard's work in Romania

“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.

2 Corinthians 4:8-9

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

102. Fundraising materials in the United States for the Harvest Homes also listed Harvest Riverside's California phone numbers as the method of contact.

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

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

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

5 105. Owning the Buftea property allowed Havsgaard to increase recruitment.

Figure 7: The Buftea home in 2017



18 106. By 2000, Laurie authorized the purchase of two more homes to house
19 the growing number of children in Havsgaard's care, one in the Dămăroaia district
20 in north Bucharest for housing girls and young boys, and a smaller one in Strada
21 Bârlogeni, mostly for boys.

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

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

Figure 8: Bible study at Harvest, which Havsgaard typically led



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

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

II. HAVSGAARD'S SEXUAL ABUSE OF PLAINTIFF AND OTHER CHILDREN WAS RAMPANT

A. Havsgaard Used Defendants' Authority and Resources to Groom Scores of Children for Sex

111. 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.

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

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

6 1. *Havsgaard's Multiple Forms of Child Sexual Abuse*

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

11 115. He often got erect, which the children could feel through his clothes.

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

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

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

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

22 120. For boys, he also fondled their penis and scrotum.

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

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

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

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

12 125. Beyond the "spankies" with or without anal digital penetration, for both
13 boys and girls, Havsgaard had multiple ways of sexually abusing the children in his
14 charge, who were as young as four:

- 15 a. He took shirtless photos of the boys saying they were for their
16 American sponsors but actually used them for his own sexual
17 gratification.
- 18 b. He showed them pornography on computers and on his phone at
19 the Harvest homes;
- 20 c. He made the children join him in watching pornography, both
21 straight and gay, commenting favorably, normalizing sexual
22 activity;
- 23 d. While walking or sitting with children, he repeatedly touched both
24 boys' and girls' intimate areas, including their inner thighs and
25 groins;
- 26 e. He fondled the children's thighs and crotch on car trips while they
27 sat in the passenger's seat as he drove;

- 1 f. He took boys to spend nights in a hotel room alone with him, or
- 2 on lengthy rides in his car late at night, during which he continued
- 3 his touching, grooming and other sexual activities;
- 4 g. He watched the children shower and bathe naked, often while
- 5 masturbating himself;
- 6 h. He masturbated in the boys' bedrooms, sometimes while groping
- 7 one or more boys;
- 8 i. He forced boys to masturbate him;
- 9 j. He forced boys to accept masturbation from him;
- 10 k. He forced boys to give him oral sex;
- 11 l. He forced boys to accept oral sex from him;
- 12 m. He forced boys to have anal sex with him;
- 13 n. He would remove fecal matter from the children's anuses and lick
- 14 his fingers; and
- 15 o. He took and kept videos of sexual encounters with boys and girls,
- 16 which was child pornography.

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

21 127. Havsgaard's perverse murmurings added to the harm and upset from
22 Havsgaard's sexual abuse.

23 128. Stories circulating about Havsgaard's abuse of the children caused
24 outsiders to deride residents of the homes as gay, a terrible stigma in Romania at that
25 time.

26 129. Like other child sex abuse victims, many residents of the homes were
27 in complete tumult about their sexual identity.

1 130. Beyond Havsgaard's regular sexual conquest of boys, he also assaulted
 2 the girls. Havsgaard would undress them and force them on top of his lap. He would
 3 then brutally spank their bare bottoms. Whilst he was spanking some of them, he
 4 would touch himself.

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

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

12 2. *Havsgaard Lavishes Rewards on His Favorites, Further*
 13 *Corrupting the Ethos of the Homes*

14 133. The children, at sea in this abusive environment, learned that giving
 15 into Havsgaard's predation brought rewards.

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

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

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

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

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

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

6 3. *Children Were Terrified of Havsgaard’s Abuse of Others*

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

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

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

14 143. 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
 17 go out?”

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

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

21 145. 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,
 24 which was apparently caused by leftover sexual lubricant or semen. Other times,
 25 children spotted dark stains on Leo L.’s trousers.

26 146. In or around 2007, when Havsgaard broke his leg, he requested that
 27 another minor resident of the Harvest Homes, Roxana-Maria Turuianu, tend to him
 28 in various ways. On at least one occasion, Havsgaard asked Roxana to wash him and

1 got an erection. Mihai Petcu walked past and saw Havsgaard masturbating himself
 2 while Roxana washed his feet.

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

8 148. Another child, Bogdan Ionescu (“Bogdan”), witnessed Havsgaard
 9 perform oral sex on Leo L. In or around 2006, Bogdan went to the bathroom, which
 10 was located near Havsgaard’s bedroom upstairs in Buftea. Havsgaard’s bedroom
 11 door was left slightly ajar, and Bogdan could see Havsgaard kneeling on the floor,
 12 shirtless, while Leo L. sat in front of him on the couch sucking Havsgaard’s penis.

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

23 5. Children Repeatedly Witness Havsgaard Having Sex with One
 24 of the Boys in His Care, Mark M.

25 150. Cristian Aeroaiei (“Cristian”) also walked in on Havsgaard performing
 26 oral sex on another boy, Mark M., in the home. Cristian had been looking for
 27 Havsgaard because he was promised money to buy new jeans. Although Cristian
 28 was surprised by what he saw, he did not leave; he just asked Mark M. to translate

1 his request for cash so Havsgaard would understand it. Havsgaard then grabbed a
 2 handful of money and gave it to Cristian, showing no embarrassment over the sexual
 3 crime he was in the act of committing. Havsgaard returned to the blow job as soon
 4 as Cristian started to leave the room.

5 151. Alexandru. also shared a room with Mark M., who would beg
 6 Alexandru not to leave the room, telling him, “don’t leave, Paul is coming again to
 7 suck my dick.”

8 6. *Havsgaard Installed Video Recording Equipment in the Attic*
 9 *Where He Regularly Abused Children*

10 152. Photography has been a lifetime hobby for Havsgaard.

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

15 154. This equipment is consistent with reports that Havsgaard took videos
 16 of naked children.

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

19 7. *A Life-Long Child Sex Abuser, Havsgaard Was Cruel and*
 20 *Perverse*

21 156. Havsgaard used his total power over the children not just to gain sexual
 22 access, but to express his nasty and dominating personality.

23 157. For example, Havsgaard put brothers in different homes to keep them
 24 isolated and increase his own power over them. He put children who displeased him
 25 out on the street in the winter, letting them plead in the cold and dark for re-entry.

26 158. Havsgaard strangled and smothered children with pillows, letting go
 27 just before they lost consciousness, had them tied to beds and radiators, and kept
 28 them under “room arrest” for days.

1 159. Havsgaard would promise children they could see their families but
2 then never permit it, or he would grant, but then withdraw, permission, to prove he
3 was the boss or make them more pliable.

4 160. Havsgaard kicked children out of the homes without notice, without
5 any place to go or funds to tide them over.

6 161. Havsgaard took the children to use computers at the internet café owned
7 by Cătălin Manescu (“Manescu”), who worked as a Harvest Romania driver and was
8 later promoted by Havsgaard to Finance Director, located on Starada Mitropolit
9 Varlaam. They also used a computer at the Buftea house with internet capability,
10 often to watch porn with Havsgaard’s encouragement and participation.

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

14 163. In the evenings, Havsgaard also took boys to bathhouses where men,
15 usually foreign tourists, would pay to wash and masturbate the boys, or for the boys
16 to masturbate them.

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

19 165. The misery of Havsgaard’s regime extended to his wife, Kathy. She
20 saw less and less of him, because “he always had a boy with him.” Excluded by
21 Havsgaard from anything significant, and lacking purpose, Kathy “crocheted
22 constantly” and taught this to some of the girls to have something useful to do.
23 Havsgaard remained autocratic and emotionally distant, and she felt lonely and
24 besieged in the acutely dysfunctional homes, to the point where she was constantly
25 taking Valium to feel less awful. Things were so bad that Kathy built up a supply of
26 Valium in case she had to commit suicide—and she was not a powerless child like
27 Plaintiff, but an adult, an American, the wife of the man in charge, and a director of
28 the Local Foundation.

1 166. She returned to the United States and divorced Havsgaard in 2007.

2 **B. Havsgaard Exploits Sponsors in California to Abuse Children**

3 **1. Havsgaard's Fundraising Trips to California**

4 167. Defendants in California had an active fundraising program for the
5 Bucharest homes.

6 168. One aspect was Havsgaard's regular fundraising trips to California
7 during which he spoke at Harvest Riverside during Laurie's services and at other
8 churches. He went for several weeks every Christmas, and at other times too. Laurie
9 enjoyed how the Romanian program reflected well on Harvest Riverside and him.

10 169. During the Christmas trips, he usually brought children living in the
11 Harvest Homes with him to show them off and elicit more sympathy and money
12 from donors. They considered this a great privilege and he mainly picked his
13 favorites, who were most inured to acceding to his sexual demands.

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

16 *Figure 9: Harvest Homes children in California on the beach with hosts*



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

7 *Figure 10: Two Harvest Homes children in California*



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

24 173. Several times they were 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.

27 174. She observed: “In Romania, Paul frequently took the same group of
 28 teenage boys with him on private outings. He showered them with gifts—clothes,

1 sweets and other items—while the younger children were excluded,” which made
 2 them upset. “The boys who went with him always returned quiet, never explaining
 3 where they had been or what had happened. This secrecy, combined with his
 4 favoritism, left me deeply uneasy. Although I did not personally witness physical
 5 abuse, I came to suspect that Paul might be a pedophile. The staff suspected
 6 something was wrong, but no one felt able to act at the time.”

7 2. *False Promises to and About Sponsors*

8 175. Another fundraising program tried to establish a direct connection
 9 between sponsors in California and individual children in Romania.

10 176. The families in California sent care packages and money to their
 11 sponsored children, sometimes as much as \$500 per month.

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

17 178. The sponsorship program, with its promise of a rosy future after
 18 Harvest, was another lie Havsgaard exploited to line his own pockets while enticing
 19 sex and compliance from the children.

20 179. Some children spoke periodically to their sponsor families and told
 21 them they never saw any of this money. The sponsor families reported this back to
 22 Harvest Riverside, Laurie and Schutte, but Defendants kept Havsgaard in place
 23 nonetheless.

24 3. *Exploiting Promises of Adoption*

25 180. Another form of cruelty came from Havsgaard’s assurances to many
 26 children that they were to be adopted by their sponsor families and live in the United
 27 States. Some children discussed this possibility with their future California families
 28 by video call, and the families were enthusiastic.

1 181. In one instance, two children, Bogdan Ionescu (“Bogdan”) and Cristina
2 Popescu, were told that Harvest Riverside had prepared the documents needed for
3 their adoption and move to America, and all that was required was Havsgaard’s
4 signature in front of some officials at the airport.

5 182. At the airport, Havsgaard pulled Bogdan aside to go to the bathroom.
6 Inside, Havsgaard went to grab the boy's penis, but Bogdan objected.

7 183. Havsgaard used this as an excuse to refuse to sign the papers, and both
8 children were forced to return to the Harvest Homes. They were crushed that
9 Havsgaard had thwarted their near-escape.

10 184. Back at the homes, Bogdan was spanked and sexually assaulted by
11 Havsgaard as a further punishment for resisting sexual abuse at the airport.

C. Children in Harvest Homes Suffer Intense Trauma as a Result of Havsgaard's Abuse

14 185. Being a child at Harvest Homes was the opposite of the settled,
15 supportive home life Defendants advertised: it was a cruel and hypocritical jungle
16 that taught the way to survive was to give sex to Havsgaard, and to lie.

17 186. But the alternative, the children knew, would be awful: living on the
18 street, sleeping on newspapers, dirty, always hungry, fearful, vulnerable to violence
19 and even death.

187. Having to live with the possibility of physical and sexual abuse every
20 day based on the changing whims of Havsgaard as the price for food and a bed was
21 immensely stressful, indeed traumatic.
22

188. If they accused a rich and powerful American pastor of sex abuse, they
23 were sure that poor street kids like themselves would be disbelieved and kicked out.
24

25 189. Some channeled their stress and misery into suicide attempts, including
26 by hanging, by cutting their wrists, by drinking chlorine and many by taking pills.
27 Havsgaard did nothing to help. Once they got better, he abused them again.

1 **III. HAVSGAARD REPEATEDLY SEXUALLY ABUSES PLAINTIFF**

2 **A. Abuse from Havsgaard at Harvest**

3 190. Havsgaard sexually abused Plaintiff soon after he arrived at Harvest, in
 4 multiple ways. At that point Marian was eight years old.

5 191. Havsgaard often sat Marian on his lap and said he liked when Marian
 6 was a “good boy,” while kissing Marian on his neck and chest. Havsgaard rubbed
 7 his hand up and down Marian’s chest in a sexual way.

8 192. Once Marian was physically capable of getting erections, Havsgaard
 9 tried to arouse him.

10 193. Havsgaard would take Marian into his bedroom alone, closed the door,
 11 and showed him pornographic videos. Havsgaard proceeded to masturbate as he
 12 kissed Marian’s neck and groped his genitals.

13 194. At night while Marian laid in bed (with other boys in a shared bedroom),
 14 Havsgaard would enter, kiss Marian’s neck, caress his thighs and touch him all over
 15 his body in a sexual manner. Marian observed Havsgaard similarly kiss and touch
 16 the other boys in the room.

17 195. Havsgaard would also touch Marian’s penis to get Marian or himself
 18 sexually aroused. Each time, Marian objected aloud, sometimes loud enough to
 19 bother Havsgaard, in which case he would put a pillow over Marian’s face and press
 20 down. Marian felt that he was going to suffocate.

21 196. Havsgaard also spanked Marian at least six times. Havsgaard’s true
 22 purpose was not discipline but sexual abuse. Havsgaard took Marian into a room
 23 alone and ordered him to get naked, watching while he did so. Sometimes,
 24 Havsgaard also undressed himself. Havsgaard then laid Marian naked across his
 25 knees, stroked Marian’s buttocks, rubbed Marian’s anus, and spanked him.
 26 Havsgaard became sexually aroused and forced Marian to touch his erect penis.

27 197. Marian would shout in pain and out of fear for his safety. To keep
 28 Marian’s shouts from echoing around the house, Havsgaard would choke him and

1 say “it will all be over soon.” Nobody ever came to help Marian and stop
 2 Havsgaard’s abuse, even when other Harvest staff were present.

3 198. Marian told Havsgaard that he did not like his touching and that he was
 4 attracted to girls.

5 199. Havsgaard would come into the shared bathroom while Marian and
 6 other boys were taking baths, watching while the boys bathed together. At times,
 7 Havsgaard was holding toilet paper and towels while masturbating.

8 200. Marian once entered Havsgaard’s office and saw him masturbating.
 9 When Havsgaard noticed Marian, he said, “wait, I’ll finish and wash my hands, and
 10 then I’ll talk to you.” Marian felt extremely uncomfortable, but Havsgaard did not
 11 seem to be concerned as he finished pleasuring himself.

12 201. Havsgaard was used to performing sex acts in front of Marian and the
 13 other boys without consent. Havsgaard appeared to find special pleasure in abusing
 14 the children in front of each other. In front of other boys, he would order Marian to
 15 pull down his trousers and then touch his buttocks and spank him under the guise of
 16 punishment. He would also force the boys to show their penises to one another
 17 during these corporal punishment sessions.

18 202. In addition to sexual assault, Havsgaard also physically assaulted
 19 Marian. On one occasion, he hit Marian’s head against a bedframe. Another time,
 20 he threw Marian against a wall so aggressively that his scalp split.

21 203. Marian lived in constant fear that Havsgaard would rape him.

22 **B. Abuse from Havsgaard while on trips**

23 204. Havsgaard took Marian on several trips to the mountains and seaside in
 24 Romania.

25 205. Once during these trips, Havsgaard came into the bathroom of Marian’s
 26 room when he was alone, pulled down his own trousers so that his penis was visible,
 27 touched Marian’s buttocks, and masturbated while directing Marian to shower.
 28

1 Marian pleaded “No Paul, please no,” worried that Havsgaard might escalate to rape
2 since they were alone.

3 206. On another trip, Havsgaard entered Marian’s bedroom, closed the door,
4 and kissed him on his neck and thighs. Other boys were in the room when this
5 happened, but they were either asleep or pretending to be so that Havsgaard did not
6 do the same to them.

7 207. These trips occurred more frequently when members of Harvest
8 Riverside visited the homes because Havsgaard wanted to impress them. Paul and
9 Cathy Cross in particular joined on several trips. Havsgaard still sexually abused
10 Marian and the other boys while traveling, taking advantage of the greater privacy
11 hotels afforded than the Harvest Homes.

12 **C. Abuse from Harvest staff**

13 208. For failings real and imagined, staff would force Marian to stand facing
14 a wall as they beat him with tree branches.

15 209. They also forced Marian to kneel on broken walnut shells for hours
16 while keeping his hands in the air, and hit him if he moved.

17 210. When Marian became nervous or agitated, the staff tied him to his bed.

18 211. When he was around 15 years old, the staff handcuffed Marian to a
19 radiator next to his bed and left him alone for hours. This occurred some four times.

20 212. All this was under Havsgaard’s control, as he was the unquestioned
21 director of the homes as structured by Laurie, Schutte and Harvest Riverside.

22 **D. Awareness of abuse of others at Harvest**

23 213. Marian regularly witnessed other children being sexually and
24 physically abused by Havsgaard and occasionally other staff.

25 214. Marian heard and saw Havsgaard spank and fondle other boys
26 including Denis-Vasile Octuparu (“Denis”), Bogdan, and George-Adrian Vasile
27 (“Adrian”).

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

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

6 217. Even now, Marian is afraid to go to the United States because he
7 believes someone may find him and kill him because of what he knows about
8 Havsgaard, Laurie and Harvest Riverside.

9 **E. Harvest staff's knowledge of the abuse**

10 218. Marian knows that the Harvest staff were aware that Havsgaard
11 sexually abused him and the other boys. The staff would frequently threaten to call
12 Havsgaard when Marian misbehaved because they knew the boys feared Havsgaard
13 would "discipline" them by more sexual abuse.

14 219. Havsgaard changed the staff often to avoid them seeing more of his
15 behavior. Marian remembers Havsgaard firing employees who tried to stand up to
16 him about his abuse.

17 **F. Plaintiff Barbu's suffering**

18 220. Marian lived in constant fear of sexual abuse by Havsgaard, and
19 believed that at any moment, Havsgaard would escalate the abuse to rape. He felt
20 that he was living in a torture chamber inside a prison.

21 221. At one point, Marian ran away, but soon recognized he had nowhere to
22 go and no way to support himself. He returned to beg Havsgaard to be allowed back.

23 222. Havsgaard agreed, but only on the condition that he could continue to
24 sexually abuse Marian.

25 223. Marian did not want to experience more abuse but could not find any
26 other option.

27 224. Marian attempted suicide four times while living at the Harvest homes.
28

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

3 226. Marian also cut himself with broken jars, thrust screws into his wrists,
4 and hit his head against a wall.

5 *Figure 11: Scar from self-harm on Marian's wrist, 2023*



16 227. Marian still has scars on his hip, feet, and knee from times he self-
17 harmed while living at Harvest.

18 **G. Circumstances of leaving Harvest**

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

21 229. Havsgaard, believing that Marian was too troublesome, kicked him out
22 of the homes and threw him onto the streets.

23 **H. Marian is also given false promises of adoption**

24 230. At one point, Havsgaard told Marian that he would be adopted by an
25 American sponsor family and move to the United States.

26 231. Marian believed him. He desperately wanted to leave Harvest for a
27 better life. Nothing ever materialized.

1 232. Marian came to understand that this was just another lie from
 2 Havsgaard, another way to procure sex and compliance from the children, and boost
 3 Havsgaard's twisted ego as if he were a generous benefactor.
 4 Havsgaard never permitted any child to be adopted because he feared that they could
 5 destroy him, Laurie and Harvest Riverside by revealing that Harvest's major
 6 program in Romania was actually a madhouse run by a sadistic pedophile.

7 **IV. HARVEST RIVERSIDE IS GIVEN REPEATED NOTICE THAT HAVSGAARD IS**
 8 **SEXUALLY ABUSING CHILDREN AT THE HARVEST HOMES**

9 **A. Romanian Staff Quickly Recognized Havsgaard as a Pedophile**

10 233. Employees of the Local Foundation, Directors of the Local Foundation,
 11 and visitors from Harvest Riverside (including employed ministers) all quickly
 12 developed suspicions that Havsgaard was a child abuser, and word of this got back
 13 to Harvest Riverside in California.

14 234. Children at the Harvest homes repeatedly complained about being
 15 sexually abused, both to each other and to responsible adults, including the cook
 16 "Mama Tina" Radu Florea, the night watchman Paul Crivceac ("Crivceac"), and the
 17 Finance Director Eugen Roman ("Roman").

18 235. Kathy, Havsgaard's wife and a Director of the Local Foundation, had
 19 known Havsgaard was a pedophile since at least 1994, when she was present for a
 20 family discussion convened by his sisters to get his apology for raping them when
 21 they were little girls. In Romania, she also suspected Havsgaard's abuse but did not
 22 believe she should or could act on it. She was entirely dependent on Havsgaard in
 23 an unwelcoming foreign country for her entire existence—income, food, shelter, and
 24 adult conversation in English (she did not speak Romanian)—and subordinated any
 25 worries that arose about what he was doing to children in the Harvest Homes to her
 26 duties of devotion and obedience as a wife as taught by Laurie and the doctrine at
 27 Harvest, which had been her lodestar for 30 years. To oppose or publicly rebuke him
 28 was actually inconceivable.

1 **B. Peter P. Reports Havsgaard's Sexual Abuse to Harvest Homes**
 2 **Staff**

3 236. Peter P. was a homeless child when he met Havsgaard. He moved into
 4 one of the Harvest Homes in or around 1998. He was an early source of reports to
 5 Local Foundation officials about Havsgaard's sexual abuse. As is typical of sex
 6 abuse survivors, he tried different routes to get help from responsible adults,
 7 escalating over time as he kept being ignored.

8 237. Havsgaard's abuse of Peter P. was consistent with that of other children.
 9 Havsgaard regularly pulled down Peter P.'s trousers and underwear and spanked his
 10 bare bottom; sometimes Havsgaard would let his hand linger, massage Peter P.'s
 11 buttocks, kiss them, or put his finger in Peter P.'s anus, which was painful and
 12 shocking.

13 238. Peter P. noticed that Havsgaard had favorites, on whom he would lavish
 14 gifts and special trips. Peter P. was not a favorite and complained to Havsgaard about
 15 getting less than the others. To console him, Havsgaard invited Peter P. into town.

16 239. After the trip, when Peter P. was sleeping on the top bunk of his room,
 17 Havsgaard came in and began to caress and massage him. Havsgaard put his hands
 18 under Peter P.'s clothes and around his buttocks. Because it was difficult to reach
 19 him on the top bunk, Havsgaard asked the boy in the bottom bunk to switch with
 20 Peter P. The boy did, giving Havsgaard greater access to Peter P.'s body. Havsgaard
 21 massaged and caressed Peter P.'s buttocks for half an hour. Peter P. understood this
 22 was the price he paid for his special outing that day.

23 240. When Peter P. was 12 or 13 years old, he broke his leg. With Peter P.
 24 especially vulnerable, Havsgaard insisted on washing Peter P. with his own hands.
 25 Havsgaard would caress Peter P.'s back and chest, and then move on to his buttocks
 26 and penis. He would massage his genitals for 25 minutes or more. When Peter P.
 27 asked him to stop, Havsgaard told him that he was "like a son" to him, and to relax.

1 241. Another time, Havsgaard and Peter P. were in the garden for a “father-
2 son” talk. During the conversation, Havsgaard proceeded to perform manual sex on
3 Peter P.

4 242. On another occasion, Peter P. recalled Havsgaard having a heart-to-
5 heart with him about how proud he was of Peter P. Once again, Havsgaard put his
6 hands down Peter P.’s trousers and began performing manual sex on him.

7 243. Havsgaard asked Peter P., “Do you mind if you get a little bit wet?”
8 Then, standing behind Peter P., Havsgaard began to masturbate so that he could
9 ejaculate on Peter P.’s buttocks.

10 244. Havsgaard then rubbed his erect penis against Peter P.’s buttocks and
11 attempted to rape him anally, aggressively asserting his authority by violently biting
12 Peter P. Peter P. was terrified and managed to flee, a memory that still haunts him.

13 245. Peter P. felt confused and trapped. He could not reconcile Havsgaard’s
14 abuse with the man he was supposed to trust as father figure and pastor. He knew he
15 could not question the abuse without risking eviction and further assaults.

16 246. Peter P.’s response to this dilemma was to become more defiant.

17 247. Peter P. told staff members about the abuse, including the cook, Mama
18 Tina, and Crivceac, the night caretaker. Nothing changed.

19 248. Peter P. wanted to provide more definitive proof so the adults at Harvest
20 could no longer pretend everything was normal.

21 249. One night in 2002, Peter P. invited a group of boys and Crivceac into
22 the living room and phoned Havsgaard on speakerphone without telling him.

23 250. In Peter P.’s words, this is what followed:

24 I asked [Havsgaard] what he would do if I came to his apartment. He said
25 we would play. I asked him if he would give me a blow job. He said he
26 wouldn’t force and would only do it if I liked it. I said no, I didn’t like it. I
27 asked him if he liked it. Paul said he’d like to “suck me.” Paul had made a
28 full confession to the room, including the staff assembled there, without
realizing it. Then Paul said he would have one of his favorites the next night
anyway.

1 **C. A Couple from Harvest Riverside Encounters Signs of Child**
 2 **Abuse by Havsgaard and Reports Back to California**

3 251. Another Harvest Riverside congregant, Randi Douthitt (“Douthitt”),
 4 visited the Harvest Homes in approximately 2002. She recalls that Havsgaard was
 5 always asking for money for the children, and she had raised \$10,000 to help. When
 6 she arrived, she could see the children needed winter coats and suggested using the
 7 money for this purpose. Havsgaard refused. He also refused to let her give the
 8 children Bibles. Both of these refusals surprised her.

9 252. She was also surprised at the dilapidated state of the Homes. The walls
 10 were dirty and there was a big pile of broken bicycles.

11 253. She noticed that Havsgaard spent excessive amounts of time with Mark
 12 M., including late at night, and not with his wife. She also saw that Havsgaard
 13 showered Mark M. and another favorite, Stefan S., with gifts.

14 254. Douthitt knew that Havsgaard had rented a separate apartment for
 15 Stefan S., so he could stay there at age 17 with his girlfriend, who then had a baby
 16 at age 16, which she did not think taught proper Christian values.

17 255. At the same time, Havsgaard was very harsh with other children; he
 18 always had at least one child on lockdown.

19 256. Douthitt had gone to Bucharest with a friend, Cheryl, who was
 20 supposed to check the books. Havsgaard gave her only very limited access to
 21 financial information.

22 257. All this disturbed Douthitt sufficiently that she returned to the Harvest
 23 homes two weeks later with her husband John, a minister employed by Harvest
 24 Riverside.

25 258. The Douthitts offered to paint the dirty walls and to fix the bicycles, but
 26 Havsgaard would not let them. They offered to stay in Bucharest to help him for
 27 several months, but Havsgaard refused that too. The Douthitts got the impression

1 that Havsgaard did not want them to know what was going on in the Harvest Homes.
 2 They did not see direct evidence of pedophilia, but they suspected it.

3 259. When the Douthitts returned to California, they heard from an official
 4 at Harvest Riverside who wanted to know what they had seen at the Homes. They
 5 gave a full report of what they had witnessed and their impressions of Havsgaard.

6 **D. Roman Triggers Investigation by Harvest Riverside**

7 1. *Roman Learns of Havsgaard's Sexual Abuse of Children*

8 260. As early as 2001, a woman Harvest hired as an educator told Roman,
 9 the Finance Director and board member of the Local Foundation, that there was
 10 something suspicious happening between Stefan S. and Havsgaard. She suspected
 11 that Havsgaard was a pedophile.

12 261. Roman then asked Stefan S. if Havsgaard had been abusing him. Stefan
 13 S. denied this, but told the other boys that Roman had “figured it out.”

14 262. The news of Roman’s discussion with Stefan S. reached Havsgaard,
 15 who summoned Roman to an urgent meeting with Kathy Havsgaard also present.

16 263. Havsgaard tried to gaslight Roman, asking “How could you think I
 17 would harm [the children]?”

18 264. Roman remained suspicious. He made a friend at Harvest Riverside,
 19 Dan Cojocnean (“Cojocnean”), who was originally from Romania and immigrated
 20 to California. Cojocnean was in charge of assembling contributions to the Harvest
 21 Homes from members of Harvest Riverside in California, and then arranging their
 22 transport to Romania as an agent of Harvest Riverside and ARK. On their behalf, he
 23 visited the Harvest Homes three times. No later than 1999, Roman told Cojocnean
 24 that he feared Havsgaard was a pedophile.

25 265. Cojocnean told Roman that when Havsgaard went back to California
 26 for his fundraising trips, he badmouthed Roman as dishonest, apparently seeking to
 27 “prebut” any possible criticisms of his own behavior.

1 266. Havsgaard apparently suspected that Roman had told Cojocnean about
2 his pedophilia, so Havsgaard then badmouthed Cojocnean to people at Harvest too.

3 267. On information and belief, Cojocnean told his supervisors at Harvest
4 about his suspicions of Havsgaard's pedophilia. Cojocnean eventually became
5 disgusted that Harvest Riverside was leaving Havsgaard in place and taking
6 advantage of the people whose donations he was canvassing for Romania, so he left
7 the church.

8 268. Roman felt intimidated by Havsgaard but continued to collect evidence
9 about his illicit behavior.

10 269. In 2003, Roman went to the Buftea home and asked the staff if
11 Havsgaard was doing anything unusual at night. The night staff told him that
12 Havsgaard was often out with a boy named Julian J.

13 270. Roman learned that Havsgaard had ordered the night watchman,
14 Crivceac, not to log his nocturnal travels with boys. Crivceac said to Roman it
15 seemed evident Havsgaard was having sex with Julian J.

16 271. Roman found receipts that corroborated Havsgaard's late-night trips
17 with Julian J. and other boys, showing repeated purchases of snacks for two people
18 after midnight at gas stations on the Bucharest ring road including purchases of
19 alcohol.

20 272. Armed with this new evidence, Roman confronted Havsgaard, who
21 claimed he was taking Julian J. out "to evangelize him." Roman did not believe this.

22 273. Roman then discovered that Havsgaard was paying his driver, Marcel
23 Musceleanu, \$600 per month, compared to the \$400 per month Roman was earning
24 as Finance Director—a huge salary for a driver, much more than the Local
25 Foundation needed to pay at standard rates.

26 274. This suggested to Roman that Havsgaard was using Harvest money to
27 buy silence from his driver about where he was taking him, who was with him, and
28 what he was doing.

1 275. Roman also learned that Havsgaard was paying Manescu, another
 2 driver who also ran an internet café Havsgaard liked to go to, directly in cash and
 3 without receipts, which also signaled Havsgaard was trying to hide something.

4 276. Finally, Julian J. disclosed to Roman that Havsgaard had committed
 5 sexual acts with another child. Mama Tina, the cook, also told Roman that Peter P.
 6 had come into the kitchen very upset and asked Mama Tina if she knew what
 7 Havsgaard “did to the children.”

8 277. Roman spoke to Mugur Dragomir, a lawyer friend and former police
 9 colonel, who said the evidence was sufficient to destroy Havsgaard and Harvest’s
 10 reputation.

11 278. While stopping Havsgaard was important to Roman, Roman did not
 12 want to destroy the Harvest Homes and force the children back into the streets.

13 279. By October 2004, Roman thought he had enough evidence confirming
 14 Havsgaard’s pedophilia and confronted him again. Roman then gave Havsgaard 30
 15 days to have Laurie choose and announce Havsgaard’s replacement.

16 2. *Harvest Riverside Investigates Havsgaard in 2004*

17 280. Havsgaard did contact Laurie and Schutte about Roman’s ultimatum,
 18 but, on information and belief, he falsely accused Roman of stealing money and of
 19 trying to obscure that theft by accusing Havsgaard of child abuse.

20 281. At about this same time, Steve Quarles, a Calvary minister working in
 21 Romania, heard reports that Havsgaard was abusing the children in the homes. He
 22 left a phone message at Harvest Riverside laying this out in a way he expected would
 23 generate a rapid response. No one called him back.

24 282. Disturbed by the strange silence, he asked the pastor from his home
 25 church in California, John Dunkan of Calvary Chapel Lake Elsinore, to call on his
 26 behalf and implore Harvest Riverside to investigate.

27 283. Some weeks later, Quarles was home in California and happened to be
 28 in the Lake Elsinore church office when he took a phone call in the absence of Pastor

1 Dunkan. A person he believes to be Schutte said, “We have a problem. One of your
2 missionary pastors has made an awful accusation about Paul Havsgaard.” Schutte
3 was angry. Quarles told Schutte that in fact he was the source of the accusation, and
4 a tense conversation ensued.

5 284. Several days later, as he was being driven to the airport to go back to
6 Romania, Quarles received another call from Schutte, who was much more amiable.
7 Schutte asked Quarles if he would replace Havsgaard and run the Harvest Homes.
8 Quarles did not want the job but agreed to perform an audit of the Harvest Homes.
9 Anticipating that Havsgaard would be fighting for his professional life, Quarles said
10 he would run the audit only if he could have the help of two other Calvary pastors
11 working in Romania, Shane Herman (“Herman”) and Bob Keenan (“Keenan”).
12 Schutte agreed.

13 285. The three performed the audit in October 2004.

14 286. Quarles, Herman and Keenan interviewed staff at all the houses being
15 run by Havsgaard and discovered turmoil.

16 287. Crivceac, the night caretaker, provided a statement to the audit team,
17 stating that his wife, a cleaner at the homes, had told him that things there were “not
18 right,” so he had kept his eyes open and began seeing suspicious behavior by
19 Havsgaard.

20 288. Crivceac reported that Havsgaard was “overly touchy” with the kids,
21 looking to cuddle them much too often. He gave some boys large amounts of
22 attention and would go out at night with a single boy at a time, not returning until
23 well past midnight.

24 289. Crivceac also reported that Havsgaard took one particular favorite, Leo
25 L., on trips and gave him many gifts. When Crivceac asked Leo L. where Havsgaard
26 took him, Leo L. refused to answer.

27 290. Havsgaard would also regularly take individual boys into the attic for
28 extended periods.

1 291. Three boys—Alexandru M., Peter P. and Mark M.—had told Crivceac
 2 that Havsgaard had sexually abused them, and Peter P. often loudly and publicly
 3 proclaimed this.

4 292. Quarles was so alarmed by what he learned from Crivceac and others
 5 that he insisted to Schutte that he come see the Harvest Homes for himself.

6 293. In November 2004, Schutte, accompanied by Wes Denham
 7 (“Denham”), another senior Calvary pastor on the board of ARK, arrived in
 8 Bucharest to see the Harvest Homes on behalf of Harvest Riverside and Laurie. They
 9 met with the audit team of Quarles, Herman and Keenan, who told the visiting chiefs
 10 from headquarters the following findings from their survey of the homes:

- 11 a. Ample money was arriving from Harvest Riverside, some
 12 \$17,000 a month, but Havsgaard was spending some \$5,000 of it
 13 without receipts or other records. Because dollars went a long
 14 way in Romania at that time, these were substantial sums,
 15 particularly as the siphoning accumulated over the years.
- 16 b. They had seen receipts gathered by Roman which showed
 17 Havsgaard taking boys to hotels hours away from Bucharest, and
 18 going on trips with them in Bucharest where they would buy
 19 snacks and alcohol after midnight.
- 20 c. Roman had told the audit team that he had heard multiple
 21 accounts of sexual abuse by Havsgaard from both staff and
 22 children in the homes.
- 23 d. Roman had told them that he also understood that Havsgaard had
 24 been arrested for child abuse in Romania.

25 294. Schutte and Denham then met with Roman directly. Their line of
 26 questioning surprised Roman, who was worried about Havsgaard’s sexual abuse,
 27 because the visitors avoided that topic to focus on Havsgaard’s misuse of Harvest
 28 Riverside money.

1 295. Roman answered their questions, telling them how suppliers were not
 2 being paid because Havsgaard was not providing him with enough funds despite the
 3 regular payments from Harvest Riverside, and produced detailed accountings over
 4 many months. Schutte was shocked and asked for a copy, which Roman provided.
 5 Schutte then promised that Harvest Riverside would pay the shortfall and send it
 6 directly to the Local Foundation's account, bypassing Havsgaard to whom Harvest
 7 Riverside had previously sent all California funds directly.

8 296. Roman also raised his worries about Havsgaard as a pedophile. He gave
 9 the visitors an account of Havsgaard's inappropriate spending on late-night
 10 excursions with the boys, and relayed reports from other staff about Havsgaard's
 11 abuse.

12 297. At the end of the meeting, Schutte took him aside and directed him to
 13 stop talking about any child abuse by Havsgaard. Schutte then returned to California.

14 298. Even so, Quarles was now persuaded that Havsgaard was a pedophile.
 15 He was based in Romania and called Roman to say he was thinking of reporting
 16 Havsgaard to the police.

17 299. Roman worried that the homes might collapse and told Quarles that
 18 replacing Havsgaard would be better than abruptly getting him sent to jail and
 19 leaving the Harvest Homes leaderless.

20 300. Quarles pursued the idea of replacing Havsgaard quickly with his
 21 contacts at Harvest Riverside in California.

22 301. Several weeks later, Schutte returned to Romania.

23 302. Quarles believed the overwhelming evidence that Havsgaard was a
 24 pedophile and thought firing him from Harvest was essential. He told Schutte and
 25 Denham, "Paul [Havsgaard] needs to be on that plane with you when you leave
 26 tomorrow. He doesn't need to be another day in Romania. He is an embarrassment
 27 to every single missionary and Christian worker. Get him out of here and into
 28 counselling."

1 303. That started out as the plan. Schutte, Pastor Shane Herman and a
2 Romanian businessman, Robert Dinca, met with Roman and told him that Havsgaard
3 would be on a plane to California in the next few days, but Roman also had to resign.

4 304. Apparently, Defendants wanted a “clean sweep” of the old regime and
5 no one in power left to reveal their failings to authorities in Romania or California.
6 Quarles and Herman were going to take over for Havsgaard, and Dinca was going
7 to take over for Roman.

8 305. But Havsgaard refused to leave, and Defendants acquiesced. When the
9 time came for Havsgaard to go, Schutte and Denham told Quarles that Havsgaard
10 “is very important because he is the face of the ministry. He’s the one who goes and
11 talks to the churches and raises the money. We can’t not have him be part of things.”

12 306. This answer had to reflect the views of Laurie, the ultimate authority at
13 Harvest Riverside who had set the entire Romanian enterprise in motion and had
14 taken credit for it. This was an acutely sensitive matter, Havsgaard was Laurie’s
15 long-time collaborator, and the idea that Schutte decided this independently of
16 Laurie is not credible.

17 307. This reply was so shocking that Quarles told Harvest leaders he
18 “wanted to have nothing to do with them after this.”

19 308. The result was that Havsgaard was not replaced. Schutte and Denham
20 went back to California leaving Havsgaard in command in Romania, the same as
21 before—except with added powers. Instead of appointing Dinca as Finance Director
22 as Schutte had arranged, Laurie and Schutte let Havsgaard appoint Manescu, his
23 driver who ran the internet café where he often took boys for sex-cam work, at a
24 highly inflated salary. Manescu had no background for the position and had good
25 reason to go on protecting Havsgaard.

26

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1 **V. HARVEST RIVERSIDE AND LAURIE COVER UP HAVSGAARD'S CHILD SEX**
 2 **ABUSE**

3 309. Schutte and/or Denham reported the disturbing results of their inquiry
 4 mission to Laurie at Harvest Riverside when they returned to California.

5 310. The scale of Havsgaard's crimes and his rank incompetence in running
 6 the Harvest Homes should have been anticipated by Laurie and were easily
 7 discoverable by all Defendants from the start of Havsgaard's time in Bucharest.
 8 Nevertheless, the clear notice of Havsgaard's pedophilia, theft, and chaotic
 9 management that Schutte brought back with him from Bucharest in 2004 gave
 10 Harvest Riverside, and Laurie, an obligation to take immediate corrective action.

11 311. Instead, they did nothing.

12 312. Defendants did not recall Havsgaard for questioning.

13 313. Defendants did not put Havsgaard on leave.

14 314. Defendants did not discipline Havsgaard.

15 315. Defendants did not require Havsgaard to attend counselling.

16 316. Defendants did not induce Havsgaard to retire.

17 317. Defendants did not fire Havsgaard.

18 318. Defendants did not shut down the Harvest homes.

19 319. Defendants did not send competent administrators to replace or
 20 supervise Havsgaard.

21 320. Defendants did not introduce any guard rails to prevent Havsgaard from
 22 further abusing children in Romania.

23 321. Defendants did not institute mechanisms for children or staff at Harvest
 24 Homes to report future abuse by Havsgaard.

25 322. Defendants did not arrange for medical or psychological help for the
 26 affected boys and girls.

27 323. Defendants did not order any more inspection trips or other inquiries,
 28 nor did Laurie or Schutte visit themselves.

324. Defendants did not immediately report Havsgaard to the police or child protection authorities in Romania or the United States, although Schutte, Denham, and Laurie were at all material times “mandatory reporters” of child sex abuse under California law, and this obligation extended to abuse committed outside of California, especially by one of their employees.

325. Instead of taking any of the meaningful actions listed above, Laurie made the strategic decision to cover up the scandal. He turned a blind eye, and thus so did everyone else at Harvest Riverside.

326. Defendants protected their money by cutting back on the amounts they sent to Havsgaard to run the Harvest Homes but otherwise acted as if everything was fine.

327. Defendants had a legal and moral obligation from the day they opened the Harvest Homes in Romania in 1998 to assure they were run safely.

328. Instead, Defendants ignored repeated evidence of Havsgaard's abuse of children in California before he left for Romania, and again from his arrival in Bucharest in 1998.

329. The abuse the children endured after 2004, when Laurie, Schutte and Harvest Riverside clearly knew all about it but simply ignored their legal and moral obligation to intervene, is especially reprehensible.

A. After the Cover-Up, Harvest Homes Get Poorer while Child Sexual Abuse Remains Rampant

330. Once he weathered Defendants' consequence-free investigation, Havsgaard retaliated against Roman for blowing the whistle and fired him.

331. Despite Havsgaard's pedophilia and long misuse of Harvest funds, he was given authority over Harvest's Romanian accounts at the bank, appointing his poorly educated driver Manescu to be Finance Director, at a highly inflated salary he knew depended on Havsgaard's continued good standing with Harvest Riverside.

1 332. Manescu sometimes refused to pay the staff, likely pocketing their
 2 wages.

3 333. As Finance Director, Manescu required that some of the children work
 4 12-hour shifts in his internet café at less than minimum wage. When they protested,
 5 he threatened to throw them out of the Harvest Homes. When the children
 6 complained to Havsgaard, he did nothing to protect them.

7 334. Manescu derided Mariana Constantin (“Constantin”), the regular social
 8 worker, for caring for the children and told her not to bother, since they all came
 9 from the streets and were “just garbage” anyway.

10 335. Manescu knew about Havsgaard’s sexual abuse of children. Knowing
 11 that Havsgaard got away with it, Manescu felt emboldened to abuse children himself.
 12 Manescu primarily preyed on minor girls, either by groping their breasts, touching
 13 them in a lingering way, and pressuring them to have sex with him. He would force
 14 girls out of the homes and into a van, where he then sexually assaulted them.
 15 Mimicking Havsgaard, Manescu thereafter gave his victims extra privileges and/or
 16 gifts.

17 **B. Once Defendants finally Close Harvest Homes, its Children Have
 18 Nowhere to Go; Many Turn to Sex Work**

19 336. Under the joint leadership of Havsgaard and Manescu, with much of
 20 the shrinking money still coming from California being diverted to their personal
 21 use, the homes became even more dangerous. Food and heat were sporadic, and the
 22 danger of more abuse by Havsgaard was constant.

23 1. *Havsgaard’s Supervisors Leave Him Unchastened*

24 337. Constantin, a social worker, inspected the Harvest Homes for the
 25 Romanian government between 2004 and 2005, among many other facilities on her
 26 roster. Her assignment was to check only for sufficient food and living conditions
 27 and she did not have time to interview any children. In 2005, Harvest advertised a
 28 job for a resident teacher in the Buftea home, which she thought would be more

1 interesting and a shorter commute, and got the job. Constantin was surprised because
 2 Havsgaard hired evangelical Christians only, and Constantin is Orthodox. She
 3 concluded that he thought her presence would reassure the next social worker who
 4 would not feel a need to look deeply into his operation.

5 338. Constantin says she “realized that something strange was definitely
 6 happening to the boys.” She asked Mama Tina, the cook, who said “don’t ask, bad
 7 things are happening” and started crying. Mama Tina told her that she had lots of
 8 children at home, so she had to keep her mouth shut or lose her job.

9 339. Constantin saw that Havsgaard had favorites and regularly took them
 10 away for one-on-one expeditions, after which the boys would come back subdued
 11 and not disclose where they had gone or what they had done. When she remonstrated
 12 with him and said the boys should be in school, he would say the boy in question
 13 needed some extra attention because he had had a bad day.

14 340. After she developed a good relationship with the boys, they told her
 15 that Havsgaard had ordered them not to talk about what they were doing, and that
 16 they were scared of being kicked out if they did.

17 341. Some boys ultimately confessed to her that Havsgaard was abusing
 18 them but told her not to tell anyone so they did not end up back on the street. She
 19 told them that together they could figure out a better path, but they were too scared.

20 342. Unable to get any direct confessions, Constantin looked for physical
 21 evidence like photos when she moved around the house but never found any. She
 22 came to feel impotent and guilty, and ultimately quit, convinced that Havsgaard was
 23 an active pedophile at the Harvest Homes.

24 343. Monique Smith, an American visitor who spent several months a year
 25 in the homes starting in 2002, noticed that as early as 2005, conditions had
 26 deteriorated significantly, particularly at the girls’ home in Dămăroaia.

27 344. The children did not have regular meals and were often fed bread
 28 sandwiches and cabbage.

1 345. There was no running hot water in the bathroom for at least a month,
 2 and the staff boiled water to mix with cold water to bathe.

3 346. As the money ran out, Harvest Riverside and Laurie made no provision
 4 for the children's further housing, safety, welfare or education.

5 347. When the Harvest Homes finally closed, Defendants dumped the
 6 children on the street and gave them no exit money, no plan, not even a number to
 7 call in an emergency.

8 348. Few had any education that would help them survive safely, let alone
 9 prosper; some were not even literate.

10 349. Many roamed the streets hungry, homeless, in despair and fear, and
 11 were routinely assaulted. Laurie and Harvest abandoned them.

12 350. Having learned from Havsgaard that the route to survival was to sell
 13 their bodies to him and others, many turned to sex work.

14 **VI. AFTER HARVEST HOMES CLOSE, PLAINTIFF STRUGGLES WHILE**
 15 **DEFENDANTS THRIVE**

16 **A. Plaintiff's Present Circumstances**

17 351. Marian has struggled since his experiences at Harvest Homes. He lived
 18 in constant fear of sexual abuse by Havsgaard, and believed that at any moment,
 19 Havsgaard would escalate the abuse to rape. He felt that he was living in a torture
 20 chamber inside a prison.

21 352. Marian is functionally illiterate, as he was not educated at the Harvest
 22 Homes. Due to Havsgaard's scheme to persistently assault and terrorize him and
 23 other children, he suffers from severe, complex Post-Traumatic Stress Disorder,
 24 anxiety disorders, substance abuse disorders, and Major Depressive Disorder.
 25 Marian has not yet been able to travel to a country where he could be examined by
 26 a neuroscience professional, but his behaviors and apparent cognitive difficulties
 27 indicate he has suffered frontal lobe damage due to his exposure to severe violence,
 28 trauma and sexual abuse.

Figure 12: Marian Barbu, 2023



353. Also because of Defendants' scheme to abuse the Romanian children, Marian has remained in abject poverty his entire adult life. He has not been able to stay employed or sober and has been intermittently homeless throughout his adulthood.

354. Without any meaningful education, Marian had no means to support himself after he was kicked out at 16.

355. To survive, Marian broke into cars, stole cars, and sold drugs for which he was arrested.

356. Marian also had paid sex with men to buy food even though he identifies as heterosexual. Marian understands that because of his experience at Harvest, he became conditioned to selling his body to survive.

357. Marian has life-long medical conditions as a result of Defendants' actions. He takes medication as a result but suffers from serious side effects that prevent him from working.

1 358. Marian lives off disability benefits. He receives approximately \$216 per
 2 month which is not enough to support himself and his family, so he goes to a charity
 3 for food.

4 359. Marian continues to exhibit symptoms from his time at Harvest. He
 5 struggles with chronic depression, severe anxiety, hallucinations, beliefs of being
 6 persecuted, and severe Post-Traumatic Stress Disorder. Marian struggles to sleep at
 7 night and takes Depakine (sodium valproate), a mood stabilizer, and Trittico
 8 (trazadone), an antidepressant, day and night.

9 **B. Havsgaard has Continued His Ministry, Protected and Even
 10 Praised by Laurie**

11 360. The cover-up strategy chosen by Laurie and Harvest Riverside involved
 12 turning down their fundraising featuring Romanian homeless children slowly so
 13 people in California would not see any abrupt change of direction and would
 14 continue to donate, while also slowly shutting off the money spigot to Bucharest,
 15 causing the Harvest Homes to slowly wither and finally die for lack of funds.

16 361. That process of quiet extrication, delicately orchestrated by Defendants,
 17 took four more years, until 2008, during which Havsgaard remained in charge and
 18 licensed by Laurie to sexually abuse scores of children thousands of more times.

19 362. Laurie gave Havsgaard a substantial gift in a series of severance
 20 payments totaling approximately \$200,000.

21 363. When the homes did close, Havsgaard returned to the United States
 22 with an unblemished record and no restrictions, a noble missionary coming home.

23 364. In 2009—a year after the closure of the Harvest Homes and five years
 24 after the Schutte mission had found evidence of Havsgaard’s theft and industrial-
 25 grade pedophilia—Laurie praised Havsgaard publicly. Laurie described Havsgaard
 26 as “a pastor who faithfully served the Lord for many years at Harvest Christian
 27 Fellowship, the church where I pastor,” and compared his work in Romania to that

1 of Moses with the Israelites, because his “life demonstrates the power that just one
 2 godly person can have.”⁶

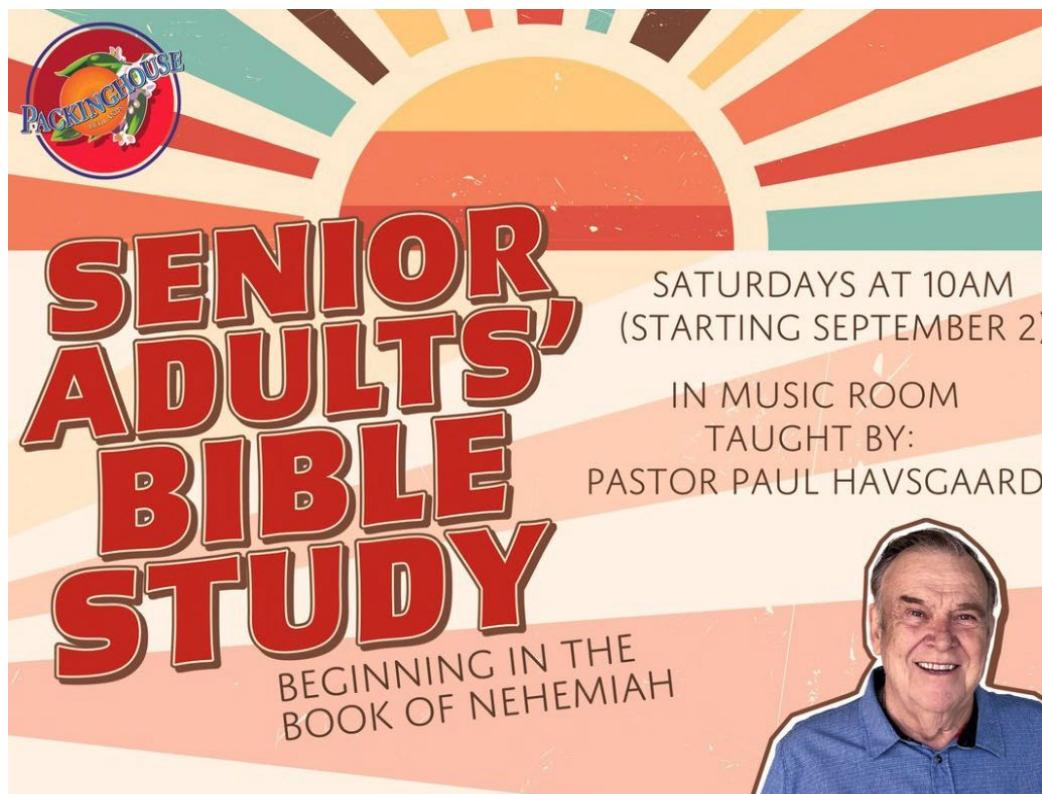
3 365. Havsgaard was permitted to take up duties in the Calvary Chapel
 4 network.

5 366. Laurie, Schutte and Harvest Riverside did not warn any of these
 6 churches about Havsgaard’s compulsive pedophilia and violence.

7 367. Throughout his post-Bucharest pastoral work in California, Havsgaard
 8 has continued to have unsupervised access to children.

9 368. In 2012, Havsgaard became Pastor at Calvary the Cross in Riverside, a
 10 15-minute drive from Laurie’s office at Harvest Christian Fellowship.

11 *Figure 13: Ad in a Packinghouse Facebook post showing Havsgaard as
 12 a respected religious figure in circles close to Harvest Riverside,
 13 August 17, 2023*



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1 369. On September 2, 2023, Havsgaard led a senior adults' Bible study at
 2 the Packinghouse Christian Fellowship, run by Probert.

3 370. Havsgaard has periodically visited Tijuana, Mexico with Robert
 4 Probert, like him one of the original incorporators of Calvary Chapel Riverside, the
 5 precursor to Harvest Riverside. Their declared mission is to minister to poor people.
 6 Tijuana, like Bucharest, has one of the highest rates of child trafficking and child
 7 prostitution in the world.

8 371. As recently as August 5, 2025, Havsgaard advertised himself on
 9 LinkedIn as "Open to Work" as a bereavement counselor.

10 372. Havsgaard now leads a quiet life in retirement close to Riverside,
 11 spending hours a day online. Topics in which Havsgaard has expressed public online
 12 interest in the past two years include: "Feeling awkward after his last Google search
 13 on his phone and how to delete it," "Removing his personal information from Google
 14 searches," "How to screen record someone with an Android phone," "Banks
 15 watching him move large sums of money in his bank account," "How to quickly
 16 remove your browsing history with a short keystroke," "Wiping data from phones
 17 and computers before selling them," "Deleting his Google drive cache," and
 18 "Converting VHS tapes to digital." The collection of pornography Havsgaard
 19 showed to children in Bucharest was on VHS, as were the tapes used in the cameras
 20 set up in the attic rooms where he had sex with children.

21 373. Other topics he searched include "The deep cost of his sin" and "Can
 22 we forgive when an offender won't repent?"

23 374. In 2014, Havsgaard married Susan Marlowe. Between them they have
 24 at least ten grandchildren. They moved to Forest Falls, California, where
 25 Havsgaard's office is located in a remote section of the house alongside the guest
 26 bedroom where the grandchildren stay. Laurie did not warn Marlowe about
 27 Havsgaard's history of prolific bullying and sexual abuse.

1 **C. Harvest Riverside Flourishes**

2 375. In the years since the cover-up, Harvest Riverside has flourished. Its
3 estimated annual revenues are at least \$52 million, generating at least \$13 million in
4 free cash flow. Harvest Riverside and Laurie together own and lease properties
5 conservatively valued at over \$100 million, including a 30-acre campus in Riverside,
6 and luxury homes in California and Hawaii. Laurie has written over 70 books, has a
7 television show and highly successful podcast. Laurie's national prominence only
8 continues to increase.

9 **VII. CONCLUSION**

10 376. Plaintiff and many others came to the Harvest Homes as discarded,
11 deprived children seeking dignity and stability. They were promised care and
12 compassion, but were sexually, physically and emotionally abused over many years,
13 then dumped back out onto the streets. Nearly 20 years later, it is time for their
14 suffering to end.

15 377. Children spent an average of 6.5 years in the Harvest Homes.
16 Havsgaard was able to keep them there so long because, as he cynically calculated,
17 they were desperate to get off the streets, and no one would care enough about street
18 urchins like them to do anything to help them.

19 378. Worst of all, Havsgaard's cynicism was precisely right. Certainly his
20 prediction that no one would do much to stop him accurately describes the other
21 Defendants.

22 379. Laurie sent Havsgaard to Romania, chose him to run Harvest
23 Riverside's mission there, and thereafter acted as if he and Harvest Riverside had
24 nothing to do with the Harvest Homes they set up—no regular inspections, no
25 policies, no staff training, no safeguarding protocols, no following up when
26 disturbing stories got back to California—no effective supervision as Havsgaard
27 energetically abused scores of children. Yet they happily reaped praise and donations
28 as they refused to see the grim reality of their Romanian outpost.

1 380. When Laurie finally had to send an inspection team in 2004 headed by
2 Schutte to dig into the details after receiving dreadful reports that could not be
3 ignored, Schutte came back with conclusive proof that Havsgaard was an active
4 pedophile presiding over bedlam.

5 381. Even then, Laurie did nothing to help the children. Instead he let
6 Havsgaard remain in control for another four years of inflicting sexual abuse on the
7 powerless, and then welcomed him back to a life of comfort and esteem in California
8 with a generous gift of severance payments and public praise.

9 382. In 2018, after reports of sexual misconduct by other senior Calvary
10 ministers became widely reported, Laurie said:

11 It is a great disappointment to me when a pastor fails. A pastor needs to be
12 a good example. He is a spiritual leader. People expect pastors to live
13 morally and to be honest. That is a realistic expectation. They expect it of
Christians, certainly they have that expectation of a Christian leader.

14 383. One might expect Laurie's commendable determination to live morally
15 and honestly to be reflected in his stance toward the terrible results of Defendants'
16 misadventures in Romania, but so far that has not been evident.

17 384. Havsgaard is an unrepentant lawbreaker, but he has ample company in
18 the ugly saga of the Harvest Homes. Laurie, Schutte and Harvest Christian
19 Fellowship also continue to deny and cover up the suffering they have caused
20 Plaintiff and his colleagues for the last two decades. They knowingly created the
21 conditions that posed a substantial risk of child sexual abuse, let it run unchecked
22 for years, and then, once the dreadful consequences could no longer be ignored,
23 conspired to cover up those crimes.

24 385. Defendants are properly subject to the power of the State of California
25 and United States to punish this long record of misconduct, and to the power of the
26 public to abhor it. Plaintiff thus turns to this Court for redress.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

NEGLIGENCE

Against Harvest Riverside, Laurie and Schutte

GENERAL NEGLIGENCE

386. Plaintiff restates the allegations set forth in the preceding paragraphs.

8 387. The conduct and actions of Harvest Riverside, Laurie and Schutte
9 created an environment in which Havsgaard for decades abused minor children,
10 including Plaintiff, who was a minor at the time of Havsgaard's sexual assaults.

11 388. Harvest Riverside, Laurie, and Schutte were in a special relationship
12 with Plaintiff. Harvest Riverside, Laurie and Schutte created, funded, and controlled,
13 set policy, and were responsible for all aspects of managing the Harvest Homes.
14 Harvest Riverside voluntarily took Plaintiff into the Harvest Homes and agreed to
15 care for and provide for Plaintiff who was a child under the age of 18.

16 389. At all material times, Plaintiff was a resident of Harvest Homes in the
17 custody and care of Defendants.

18 390. Prior to the last time Plaintiff was sexually abused by Havsgaard,
19 Harvest Riverside, Laurie and Schutte were aware and/or on notice of Havsgaard's
20 sexual misconduct with minors. By performing the acts alleged herein, it was or
21 should have been reasonably foreseeable to Harvest Riverside, Laurie and Schutte
22 that by continuously exposing and making Plaintiff available to Havsgaard, they
23 created a risk of harm to Plaintiff and made Plaintiff's position worse.

24 391. Harvest Riverside, Laurie and Schutte allowed and empowered
25 Havsgaard to represent himself as their employee and/or agent when he recruited
26 Plaintiff and other children, which gave Plaintiff an expectation and right to be
27 protected by Harvest Riverside, Laurie and Schutte.

1 392. Harvest Riverside, Laurie and Schutte assumed responsibility for the
2 safety of Plaintiff whose parents were not present while Plaintiff was a resident of
3 Harvest Homes.

4 393. At all material times, Harvest Riverside, Laurie and Schutte were able
5 to control Havsgaard's conduct related to his custody and care of Plaintiff and other
6 child residents of the Harvest Homes.

7 394. At all material times, Harvest Riverside, Laurie and Schutte owed
8 Plaintiff a duty of reasonable care to protect him from foreseeable injury and abuse
9 while Plaintiff resided within the Harvest Homes in Havsgaard's custody and care,
10 and while Plaintiff relied upon the assurance of Harvest Riverside, Laurie and
11 Schutte of safety and protection.

12 395. Harvest Riverside, Laurie and Schutte breached their duties by failing
13 to take any reasonable steps or implement any reasonable safeguards for Plaintiff's
14 protection.

15 396. Harvest Riverside, Laurie and Schutte breached their duties to Plaintiff
16 by putting Havsgaard, a man with an extensive history of child sexual abuse they
17 knew or should have known of, in charge of children's homes; locating those homes
18 in a country known to attract pedophiles and have weak and corrupt governmental
19 institutions; not regularly inspecting the homes; not regularly checking with staff at
20 the homes about conditions there; not instituting regular training for staff about
21 recognizing and reporting child abuse; not having any safeguarding policies or
22 guardrails in place; instituting lax financial controls such that Havsgaard was easily
23 able to divert funds into purchases for his sexual favorites and hush money for
24 employees; ignoring reports from credible sources that Havsgaard was an active
25 pedophile taking advantage of children at the homes; after receiving further and
26 conclusive proof of Havsgaard's pedophilia in 2004, leaving him in charge without
27 any reduction in his powers or changes in the way the homes were run or supervised;
28 not reporting Havsgaard to the authorities in California or Romania; continuing to

1 praise Havsgaard in public despite knowing him to be a pedophile; not trying to
 2 identify Havsgaard's victims or help them recover.

3 397. At all material times, Laurie and Schutte personally participated in,
 4 authorized, directed the wrongful action and inaction by Harvest Riverside and its
 5 authorized agents in breach of Defendants' duty of reasonable care.

6 398. At all material times, Harvest Riverside, Laurie and Schutte were guilty
 7 of oppression, fraud, and/or malice insomuch as they, individually or collectively,
 8 acted with intent or willful and conscious disregard for the rights or safety of
 9 Plaintiff, subjecting Plaintiff to cruel and unjust hardship under the circumstances.

10 399. As a direct, foreseeable and proximate cause of Harvest Riverside's,
 11 Laurie's and Schutte's breach of their respective duties of reasonable care, Plaintiff
 12 suffered compensable injuries, including physical and emotional injuries as set forth
 13 herein.

14 *NEGLIGENCE PER SE*

15 400. Plaintiff restates the allegations set forth in the preceding paragraphs.

16 401. In or around 1999 and continuing thereafter, while Plaintiff was a
 17 resident in the care of Havsgaard in the Harvest Homes, Harvest Riverside, Laurie
 18 and Schutte and their employees and agents received complaints in their professional
 19 capacity and within the scope of their employment that minimally raised a
 20 reasonable suspicion that Havsgaard was engaging in sexually inappropriate and
 21 abusive conduct with Plaintiff.

22 402. At all material times, Plaintiff was a minor under the age of 18 years
 23 old.

24 403. At all material times, Harvest Riverside, Laurie and Schutte and their
 25 employees and agents were mandated reporters within the meaning of Cal. Pen.
 26 Code § 11165.7.

27 404. By statute, each of Laurie and Schutte and the employees and agents of
 28 Harvest Riverside had a duty to present to appropriate authorities the reports of

1 suspected child abuse, neglect, and sexual abuse Plaintiff suffered while in the care
 2 of the Harvest Homes.

3 405. At no material time did Laurie, Schutte or the agents or employees of
 4 Harvest Riverside report their reasonable suspicions of Havsgaard's sexual abuse of
 5 Plaintiff to appropriate authorities.

6 406. The failure to report Havsgaard's sexual abuse as required by statute
 7 constitutes negligence per se.

8 407. At all material times, Defendants were guilty of oppression, fraud,
 9 and/or malice insomuch as they, individually or collectively, acted with intent or
 10 willful and conscious disregard for the rights or safety of Plaintiff, subjecting
 11 Plaintiff to cruel and unjust hardship under the circumstances.

12 408. As a direct and proximate cause of the failure to report Havsgaard's
 13 sexual abuse of the Plaintiff, Plaintiff continued to suffer sexual, physical, and
 14 emotional abuse by Havsgaard while Plaintiff remained in the care of the Harvest
 15 Homes, resulting in the injuries and damages individually set forth herein.

16 *NEGLIGENT INFILCTION OF EMOTIONAL DISTRESS*

17 409. Plaintiff restates the allegations set forth in the preceding paragraphs.

18 410. Harvest Riverside, Laurie and Schutte negligently failed to deal with
 19 Plaintiff in good faith including, but not limited to, by engaging in outrageous
 20 conduct by unreasonably, maliciously, oppressively failing to remove Havsgaard
 21 from his position and from access to children even after discovering that he was
 22 sexually abusing Plaintiff and other children.

23 411. As a result of the actions and inaction of Harvest Riverside, Laurie and
 24 Schutte, Plaintiff suffered severe emotional distress of such substantial and enduring
 25 quality that no reasonable person in a civilized society can be expected to endure it.

26 412. Plaintiff has suffered from serious emotional distress including but not
 27 limited to nightmares, depression, PTSD, and suicidal thoughts.

413. The negligent failure by Harvest Riverside, Laurie and Schutte to deal with Plaintiff in good faith was a substantial factor in causing Plaintiff's severe emotional distress.

414. As a result, Plaintiff has suffered damages as set forth in this complaint.

SECOND CAUSE OF ACTION

NEGLIGENCE SUPERVISION

Against Harvest Riverside, Laurie and Schutte

415. Plaintiff restates the allegations in the preceding paragraphs.

9 416. At all material times, Havsgaard was an employee and/or agent of
10 Harvest Riverside.

11 417. At all material times, Harvest Riverside, Laurie and Schutte owed
12 Plaintiff a legal duty to reasonably and adequately supervise the employees and
13 agents selected and entrusted to run the Harvest Homes in Romania.

14 418. By their action and inaction, Harvest Riverside, Laurie and Schutte
15 breached their duties of reasonable and adequate supervision when they failed,
16 despite known and foreseeable risks of sexual abuse in the Harvest Homes, to
17 regularly inspect the homes; to regularly check with staff at the homes about
18 conditions there; to institute safeguarding policies or mechanisms; to educate, train,
19 or warn potential victims of Havsgaard and their parents; to institute proper financial
20 controls to keep Havsgaard from readily diverting funds into purchases for his sexual
21 favorites and hush money for employees and others who might report his illegal acts;
22 to act on reports from credible sources that Havsgaard was an active pedophile taking
23 advantage of children at the homes after receiving conclusive proof of his pedophilia
24 and theft, to recall Havsgaard or change the way the homes were run and inspected;
25 and to timely report him to authorities in California or Romania.

26 419. At all material times, Laurie and Schutte personally participated in,
27 authorized, or directed the wrongful action and inaction by Harvest Christian

1 Fellowship and its authorized agents in breach of Harvest Riverside's, Laurie's and
2 Schutte's duty of reasonable and adequate supervision.

3 420. 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
6 Plaintiff, subjecting Plaintiff to cruel and unjust hardship under the circumstances.

7 421. The failure of Harvest Riverside, Laurie and Schutte to reasonably and
8 adequately supervise Havsgaard and other employees and agents in Harvest Homes
9 was a direct, proximate, and substantial factor in causing Plaintiff to suffer
10 compensable injuries, including physical and emotional injuries as set forth herein.

THIRD CAUSE OF ACTION

NEGLIGENCE RETENTION

Against Harvest Riverside, Laurie and Schutte

422. Plaintiff restates the allegations in the preceding paragraphs.

15 423. At all material times, Havsgaard was an employee and/or agent of
16 Harvest Riverside.

17 424. At all material times, Laurie and Schutte had the authority to control
18 the terms and conditions of Havsgaard's employment with Harvest Riverside,
19 including the authority to terminate his employment.

20 425. During his employment with Harvest Riverside, Havsgaard was or
21 became unfit or incompetent to perform the work for which he was hired.

22 426. During his employment with Harvest Riverside, Havsgaard's unfitness
23 and/or incompetence created a particular risk to others, including Plaintiff.

24 427. 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
26 he was hired because of the particularized risk to others.

27 428. Despite actual or constructive knowledge of Havsgaard's unfitness to
28 perform the work for which he was hired, Harvest Riverside, Laurie and Schutte

1 failed to take appropriate remedial action to terminate Havsgaard or otherwise alter
2 the terms and conditions of his employment to address Havsgaard's particularized
3 risk of harm to Plaintiff.

4 429. Havsgaard's unfitness and/or incompetence harmed Plaintiff.

5 430. The negligence of Harvest Riverside, Laurie and Schutte in retaining
6 Havsgaard despite actual and constructive notice of Havsgaard's unfitness and/or
7 incompetence was a direct, proximate, and substantial factor in causing Plaintiff's
8 harm.

9 431. At all material times, Laurie and Schutte personally participated in,
10 authorized, or directed the wrongful action and inaction by Harvest Riverside and its
11 authorized agents in breach of the duty of Harvest Riverside, Laurie and Schutte not
12 to retain an unfit person.

13 432. At all material times, Harvest Riverside, Laurie and Schutte were guilty
14 of oppression, fraud, and/or malice insomuch as they, individually or collectively,
15 acted with intent or willful and conscious disregard for the rights or safety of
16 Plaintiff, subjecting Plaintiff to cruel and unjust hardship under the circumstances.

17 433. The failure of Harvest Riverside, Laurie and Schutte to reasonably and
18 adequately supervise Havsgaard and other employees and agents in the Harvest
19 Homes was a direct, proximate, and substantial factor in causing Plaintiff to suffer
20 compensable injuries, including physical and emotional injuries as set forth herein.

21 **FOURTH CAUSE OF ACTION**

22 **INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

23 *Against Harvest Riverside, Laurie, and Schutte*

24 434. Plaintiff restates the allegations in the preceding paragraphs.

25 435. By their actions and inaction, Defendants engaged in outrageous
26 conduct that is so extreme as to exceed all bounds of decency in a civilized society.

27 436. By their actions and inaction, Defendants acted knowingly and
28 willingly with the intent or with reckless disregard of the probability of causing

1 emotional distress despite actual and constructive knowledge of Plaintiff's peculiar
2 susceptibility to emotional distress due to his young age, unstable living conditions,
3 and previous sexual and emotional abuse by Havsgaard.

4 437. As a result of the actions and inaction of Defendants, individually or
5 collectively, Plaintiff suffered severe emotional distress of such substantial and
6 enduring quality that no reasonable person in a civilized society can be expected to
7 endure it.

8 438. The actions and inaction of Defendants were the direct and proximate
9 cause of Plaintiff's severe emotional distress.

10 439. At all material times, Laurie personally participated in, authorized, or
11 directed the wrongful and outrageous action and inaction by Harvest Riverside and
12 its authorized agents which resulted in Plaintiff's damages.

13 440. At all material times, Defendants were guilty of oppression, fraud,
14 and/or malice insomuch as they, individually or collectively, acted with intent or
15 willful and conscious disregard for the rights or safety of the Plaintiff, subjecting
16 him to cruel and unjust hardship under the circumstances.

17 441. As a result, Plaintiff has suffered damages as set forth in this complaint.

FIFTH CAUSE OF ACTION

CIVIL CONSPIRACY IN VIOLATION OF CALIFORNIA LAW

20 *Against Harvest Riverside, Havsgaard, Laurie and Schutte*

21 442. Plaintiff restates the allegations in the preceding paragraphs.

22 443. Defendants conspired with others both known and unknown, and
23 continue to conspire, to commit intentional infliction of emotional distress, sexual
24 battery, negligence, negligence per se, negligent infliction of emotional distress,
25 negligent supervision, negligent retention, and sex trafficking offenses, and to cover
26 up those offenses and the conspiracy.

27 444. Defendants formed a group of two or more persons who conspired and
28 agreed to a common plan or design to commit tortious acts, including intentional

1 infliction of emotional distress, sexual battery, negligence, negligence per se,
2 negligent infliction of emotional distress, negligent supervision, negligent retention,
3 and sex trafficking.

4 445. Defendants formed the conspiracy on an unknown date no later than
5 1999, when Cojocnean, working as agent of Harvest Riverside, learned from Roman,
6 the Harvest Homes and Local Foundation Finance Director, that Roman had
7 evidence of Havsgaard's pedophilia, and reported this to officials at Harvest
8 Riverside.

9 446. Defendants had actual knowledge that tortious acts including
10 intentional infliction of emotional distress, sexual battery, negligence, negligence
11 per se, negligent infliction of emotional distress, negligent supervision, negligent
12 retention, and sex trafficking were planned by the co-conspirators and concurred and
13 participated in the tortious scheme with knowledge of its unlawful purpose.

14 447. Defendants intended to aid their co-conspirators in the commission of
15 the planned tortious acts, including intentional infliction of emotional distress,
16 sexual battery, negligence, negligence per se, negligent infliction of emotional
17 distress, negligent supervision, negligent retention, and sex trafficking.

18 448. Defendants committed numerous wrongful acts, including intentional
19 infliction of emotional distress, battery, negligence, negligence per se, negligent
20 infliction of emotional distress, negligent supervision, negligent retention, and sex
21 trafficking against Plaintiff in the State of California pursuant to their agreement
22 with their co-conspirators.

23 449. Defendants committed overt acts in California in support of the
24 conspiracy that included, among others, the following:

25 a. Continuously funding Havsgaard and the Romanian homes after
26 receiving notice of Havsgaard's sexual battery of minors,
27 including Plaintiff;

- b. Assisting in and facilitating fundraising for Havsgaard's activities in Romania;
- c. Failing to institute financial procedures or checks to curb Havsgaard's misuse of Harvest Riverside funds to serve his sexual predation of minors;
- d. Failing to institute routine inspections, safeguarding policies or guardrails at the Harvest Homes;
- e. Leaving Havsgaard in post after receiving notice of his sexual battery of minors, including Plaintiff; and
- f. Failing to report Havsgaard's sexual battery of minors to appropriate authorities.

450. Even after concluding Havsgaard was a pedophile, Defendants paid Havsgaard \$200,000 and kept quiet about his history of assaults, leaving him at the helm of the Harvest Homes to abuse existing residents and attract new ones for abuse.

451. Defendants' affirmative conduct in furtherance of the conspiracy was undertaken with the express and/or implied agreement or understanding that Laurie and Schutte and others would facilitate and/or enable the intentional infliction of emotional distress, sexual battery, negligence, negligence per se, negligent infliction of emotional distress, negligent supervision, negligent retention, and sex trafficking in order to enrich themselves and Harvest Riverside.

452. Plaintiff was damaged as a direct result of Defendants' agreement and actions in furtherance of the conspiracy.

453. Defendants' conduct has caused and continues to cause Plaintiff serious and permanent harm and damage.

SIXTH CAUSE OF ACTION

AIDING AND ABETTING

Against Laurie and Schutte

454. Plaintiff restates the allegations in the preceding paragraphs.

455. In committing the acts alleged herein, Laurie and Schutte had actual knowledge of the torts of sexual battery, intentional infliction of emotional distress, and sex trafficking being committed by Havsgaard.

456. Through their action and inaction, Laurie and Schutte knowingly gave substantial assistance to Havsgaard's commission of sexual battery, intentional infliction of emotion distress and sex trafficking on Plaintiff.

457. As an actual and proximate cause of the wrongful and malicious acts of Laurie and Schutte, Plaintiff suffered physical, emotional, and psychological harms in an amount to be proven at trial.

SEVENTH CAUSE OF ACTION

TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT

(“TVPRA”), 18 U.S.C. §§1591(a) and 1595(a)

Against Havsgaard, Laurie, Schutte, and Harvest Riverside

458. Plaintiff restates the allegations in the preceding paragraphs.

459. Defendants knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1).

460. Havsgaard knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and/or solicited Plaintiff for the purpose of causing him to engage in commercial sex acts through force, fraud, or coercion in violation of 18 U.S.C. § 1591(a).

461. Section 1591(a) applies extraterritorially to sex trafficking in Romania by virtue of 18 U.S.C. § 1596(a) because an alleged offender, Havsgaard, is a national of the United States.

462. Defendants' conduct caused Plaintiff serious and permanent harm, including, without limitation, physical, psychological, financial, and reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, in order to avoid incurring that harm. As a victim of sex trafficking in violation of 18 U.S.C. § 1591(a), Plaintiff may bring a civil action against Havsgaard as a perpetrator and against Defendants as beneficiaries pursuant to 18 U.S.C. § 1595(a).

463. Laurie, Schutte, and Harvest Riverside knowingly benefited by receiving something of value from participation in a venture that they knew or should have known was engaging in sex trafficking in violation of 18 U.S.C. § 1591(a).

464. As a result, Plaintiff has suffered damages as set forth in this complaint.

EIGHTH CAUSE OF ACTION

**ILLICIT SEXUAL CONDUCT IN FOREIGN PLACES IN VIOLATION OF
18 U.S.C. §§ 2423(c) and 2255**

Against Havsgaard

465. Plaintiff restates the allegations in the preceding paragraph.

466. In violation of 18 U.S.C § 2423(c), Havsgaard is a U.S. citizen who travelled to Romania and engaged in coerced sexual abuse of Plaintiff.

467. Havsgaard engaged in a commercial sex act with Plaintiff.

468. Plaintiff was a minor at the time of the events complained of herein.

469. As a direct result of Havsgaard's violations as described herein, Plaintiff has suffered and will continue to suffer from the psychological and economic damages as described above.

470. Plaintiff seeks remedies to which he is entitled under 18 U.S.C § 2255(a) including actual damages and the costs associated with this suit, including a reasonable attorney's fee.

1 **DEMAND FOR JURY TRIAL**

2 471. Plaintiff hereby demands a jury trial in this action.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff seeks a judgment against Defendants awarding the
5 following relief:

6 A. Damages in amounts to be established at trial, including without
7 limitation, damages for past, present, and future emotional pain and
8 suffering, ongoing and severe mental anguish and physical injuries, loss
9 of past, present and future enjoyment of life, and past and future lost
10 earnings and earning capacity, and out-of-pocket expenses, punitive
11 damages and liquidated damages;

12 B. Pre- and post-judgment interest;

13 C. Attorney's fees;

14 D. A fund administered by the Court to locate and compensate victims of
15 Defendants yet unknown; and

16 E. Such other and further relief as the Court may deem just and proper.

17
18 Dated: September 16, 2025

19 McALLISTER OLIVARIUS

20 By: /s/ Jan Cervenka

21 Jan Cervenka

22 *Attorneys for Plaintiff*