

IN THE CIRCUIT COURT OF CRAIGHEAD COUNTY, ARKANSAS
_____ DIVISION

**STEPHANIE DAVIS; SAMANTHA DAVIS;
ELIZABETH DRYER; VICTORIA COLLINS;
TAYLOR PERRIN; and JANE DOE 1**

PLAINTIFFS

vs. CASE NO. _____

**REFUGE CHURCH OF THE ASSEMBLIES
OF GOD, INC. OF JONESBORO, ARKANSAS;
ARKANSAS DISTRICT COUNCIL OF THE
ASSEMBLIES OF GOD; GENERAL COUNCIL
OF THE ASSEMBLIES OF GOD; CHARLES MICHAEL
GLOVER; BROTHERHOOD MUTUAL INSURANCE
COMPANY; CHURCH MUTUAL INSURANCE
COMPANY, S.I.; and JOHN DOES A-D**

DEFENDANTS

PLAINTIFFS' ORIGINAL COMPLAINT

COME NOW the Plaintiffs, by and through their undersigned attorneys, Joshua D. Gillispie, Hannah Bone, and Caitlin Malott of Gillispie Law Firm, and Joseph Gates of Gates Law Firm, PLLC, and for their causes of action against these Defendants state the following:

INTRODUCTION

1. The Assemblies of God enabled children’s minister Anthony “Tony” Waller to sexually exploit, molest, and film numerous young girls for approximately 15 years. Its leaders did this despite knowing that Waller was a child predator. Plaintiffs bring this lawsuit against the General Council of the Assemblies of God, the Arkansas District Council of the Assemblies of God, and Refuge Church of the Assemblies of God, Inc. (formerly First Assemblies of God of Jonesboro) for the active roles that each entity played in enabling this abuse, and for their tolerance towards child molesters within the ranks of their clergy – for prioritizing forgiveness of the sinner

and the reputation of the denomination over the protection of children. These entities will at times be referred to herein collectively as the “Assemblies of God.”

2. Waller, who is now serving a life sentence in prison, abused these Plaintiffs and other girls using the tools provided to him by the Assemblies of God: a position of trust, power, and authority; access to vulnerable young girls, including control over all children’s programs at Refuge Church; a physical space (the Refuge Church campus) where he was allowed to spend time alone with young girls in offices, closets, bathrooms, and other church spaces without fear of interference; freedom from oversight or supervision by his superiors so that he could feel safe and uninhibited; freedom from the enforcement of policies that would constrain his ability to abuse girls; freedom from the enforcement of rules or supervision that would constrain his ability to place multiple hidden cameras in bathrooms and showers used by young girls at Refuge Church; an environment that did not prioritize or adequately guard against the prevention of child sexual abuse by staff members; a staff untrained in how to respond to evidence of sexual grooming and misconduct; a staff untrained in mandated reporting requirements; leadership unwilling to follow Arkansas mandated reporting laws; and the knowledge that, if caught, the Assemblies of God would treat him with tolerance and forgiveness rather than reporting him or removing him. The Assemblies of God had the power to deprive Tony Waller of all these tools but chose not to.

3. Plaintiffs also bring this lawsuit against these Defendants for their role in covering up Waller’s crimes after leadership in these Defendant entities were presented with evidence of Waller’s deviant predilection for young girls as early as April of 2000; and after they obtained direct evidence of his crimes as early as 2004, when they not only learned about but quite literally discovered and removed one of the hidden cameras Waller had installed in a bathroom used by young girls – a bathroom in which Waller made girls perform nude stretching exercises pursuant

to a list of stretches he posted on the wall of the bathroom for anyone to see. To be as clear as possible, the Assemblies of God caught him red-handed; they had his camera; they had his list of nude stretches; they had statements from these Plaintiffs and their parents, as well as other girls and their parents; and yet they never stopped him or reported him.

4. Armed with all of this, do the Assemblies of God entities call the police? No. Do they make a report to the Arkansas Child Abuse Hotline, as required by Arkansas law? No. Do they fire Tony Waller? No. Do they remove Waller from children's ministry or the church homeschool program? No. Do they confiscate from Waller the untold hours of child pornography created in the Refuge Church? No.

5. Do they treat Tony Waller with compassion and forgiveness? Yes. Do they choose to tolerate his imperfect nature because, "Let him who is without sin among you cast the first stone"? Yes. Do they "restore him with a gentle hand" as Assemblies of God written policy suggests? Yes. Do they allow him to go right back to ministering to these same girls? Yes. Do they allow him to go right back to overseeing the homeschool program and other children's programs? Yes. Do they let him keep his hours and hours of recorded footage of nude little girls in the church, to do with as he may? Yes. Do they allow him to go right back to enjoying the same access, opportunity, and absence of supervision he used to achieve his pedophilic goals? Yes. Does Tony Waller continue to sexually exploit and molest girls, including using additional hidden cameras in the very same bathroom? Yes, for more than a decade after 2004.

6. Thus, Plaintiffs bring this lawsuit to shine further light on what happened to them and to others, to hold accountable those who were charged with and failed to protect them, and to obtain compensation for the devastating effects and damages Defendants' misconduct caused them.

7. Plaintiffs also seek punitive damages against these Defendants to make an example of them that will deter churches from similarly turning a blind eye to child sexual abuse by clergy and staff.

PARTIES

Plaintiffs

8. Plaintiff **Stephanie Davis** is an adult resident of the State of Arkansas. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action, Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

9. Plaintiff **Samantha Davis** is an adult resident of the State of Arkansas. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action, Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

10. Plaintiff **Elizabeth Dryer** is an adult resident of the State of Tennessee. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action, Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

11. Plaintiff **Victoria Collins** is an adult resident of the State of Florida. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action,

Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

12. Plaintiff **Taylor Perrin** is an adult resident of the State of Arkansas. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action, Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

13. Plaintiff **Jane Doe 1** is an adult resident of the State of Arkansas. At all times relevant to the tortious conduct alleged in this Complaint, Plaintiff was an unemancipated minor residing in Craighead County, Arkansas. At all times relevant to this action, Plaintiff attended Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God, part of the Arkansas District Council of the Assemblies of God.

Defendants

Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas

14. Defendant Refuge Church of the Assemblies of God, Inc. of Jonesboro, Arkansas, formerly known as Jonesboro First Assembly of God (“**Refuge Church**”) is registered with the state as an Arkansas nonprofit corporation located in Craighead County.

15. Refuge Church is an Assemblies of God church. It is a member of the Arkansas District Council of the Assemblies of God, part of the General Council of the Assemblies of God. Refuge Church's principal address is 1404 Stone Street Jonesboro, AR 72401.

16. Refuge Church may be served with process in this action by delivering summons and copy of this Complaint to its registered agent, Matt Smith, at 2881 CR 333 Bono, AR 72416.

17. Plaintiffs anticipate Refuge Church will claim entitlement to charitable immunity. Plaintiffs contest this, as a non-profit organization is not automatically entitled to charitable immunity. *Neal v. Sparks Regional Medical Center*, 375 Ark. 46, 51, 289 S.W.3d 8, 11 (2008). Furthermore, a church is not necessarily entitled to charitable immunity. See *LeMay v. Trinity Lutheran Church*, 248 Ark. 119, 450 S.W.2d 297 (1970). Rather, the doctrine of charitable immunity is to be given "a very narrow construction." *George v. Jefferson Hospital Association, Inc.*, 337 Ark. 206, 211, 987 S.W.2d 710, 712 (1999).

18. Absent a judicial determination of its charitable status, Refuge Church is the properly named Defendant in this case.

Arkansas District Council of the Assemblies of God

19. Defendant Arkansas District Council of the Assemblies of God, dba Arkansas Assemblies of God, ("**District Council**") is registered with the state as an Arkansas nonprofit corporation located in Pulaski County.

20. The District Council's principal address is 10924 Interstate 30, Little Rock, AR 72209.



21. The District Council may be served with process in this action by delivering summons and copy of this Complaint to its registered agent, Arkansas Assemblies of God, at 10924 Interstate 30, Little Rock, AR 72209.

22. The District Council is the governing organization overseeing the individual Assemblies of God churches in Arkansas, including Refuge Church. The District Council exercises supervisory control over member churches and those churches' pastors.

23. Furthermore, the District Council is, upon information and belief, recognized by the Internal Revenue Service as a tax exempt "central organization" authorized to facilitate group exemptions for its member churches, referred to by the IRS as "subordinate organizations." Refuge Church, for all times relevant to this action, was a "subordinate organization" that enjoyed tax-exempt recognition without obtaining its own letters of exemption, by virtue of their affiliation with the District Council, the parent organization. Pursuant to IRS Rev. Proc. 80-27, Sec. 4.02, a "central organization," as a requirement for group exemption status, must first establish that the subordinates to be included in the group exemption are both affiliated with it and "*subject to its general supervision or control*" (emphasis added). IRM 25.7.3.1.1. Upon information and belief, the District Council has made a sworn statement to the United States Internal Revenue Service that it would supervise and control Refuge Church.

24. The District Council exercises power over and maintains involvement in the operations of its member churches like Refuge Church, including the selection and hiring of pastors. The District Council, in fact, facilitates the process by which prospective pastors are vetted and provided their Assemblies of God “credentials,” a requirement for pastors serving within the district.¹ The District Council is authorized to examine, approve, and recommend candidates who qualify to serve as ministers, though final approval rests with the General Council of the Assemblies of God.

25. The District Council is also charged with handling disciplinary actions against pastors within the district. The District Council is expressly authorized by denomination bylaws to conduct investigations and suggest either rehabilitation plans or dismissal, with final say retained by the General Council of the Assemblies of God.

26. The District Council was directly involved in the Tony Waller matter, working with and providing guidance to Refuge Church leadership on how to handle the situation beginning no later than the early 2000s.

27. The District Council had supervisory control over Pastor Mike Glover, Refuge Church’s head pastor during times relevant to this action. The District Council made him a “credentialed” Assemblies of God pastor, had the power to suspend or remove his ministerial credentials and the power to remove him as the head pastor of Refuge Church at any time. The Assemblies of God Constitution and Bylaws expressly convey to the District Council this supervisory authority and control over pastors and churches within the district.

28. The District Council, at all times relevant, had supervisory control over Tony Waller. Waller was also “credentialed” by the District Council. The District Council had the

¹ <https://www.araog.org/credentials-information> (last accessed May 18,, 2026).

direct power to suspend or remove his ministerial credentials and the power to remove him from pastoring children at Refuge Church.

29. Plaintiffs anticipate the District Council will claim entitlement to charitable immunity. Plaintiffs contest this, as a non-profit organization is not automatically entitled to charitable immunity. *Neal v. Sparks Regional Medical Center*, 375 Ark. 46, 51, 289 S.W.3d 8, 11 (2008). Furthermore, a church is not necessarily entitled to charitable immunity. See *LeMay v. Trinity Lutheran Church*, 248 Ark. 119, 450 S.W.2d 297 (1970). Rather, the doctrine of charitable immunity is to be given “a very narrow construction.” *George v. Jefferson Hospital Association, Inc.*, 337 Ark. 206, 211, 987 S.W.2d 710, 712 (1999).

30. Absent a judicial determination of its charitable status, the District Council is the properly named Defendant in this case.

31. At all material times, District Council and Refuge Church were agents of the other in their joint efforts to fulfill the Assemblies of God mission in Arkansas.

General Council of the Assemblies of God

32. Defendant the General Council of the Assemblies of God (“**General Council**”) is principally located at 1445 N. Boonville Avenue, Springfield, MO 65802.

33. The General Council is the governing organization overseeing the District Council and the individual Assemblies of God churches in Arkansas, including Refuge Church. The General Council retains and exercises supervisory control over the Arkansas District Council and Arkansas member churches.



34. Furthermore, the General Council maintains final authority over the hiring and retention of those churches' pastors. Every year, the General Council issues a revised Constitution and Bylaws that include requirements for ministerial credentials, ministry positions, ministerial discipline, rehabilitation of ministers, and other organizational information. Regional district councils and the churches within those districts are bound by the Constitution and its Bylaws, as they are the governing documents of all Assemblies of God organizations. In being a part of the Assemblies of God religious organization, these district councils and local churches are required to follow the Constitution and Bylaws issued and revised by the General Council.

35. The Constitution and Bylaws issued by the General Council include language regarding ministerial credentials, ministerial appointments, the role of ministers and pastors within their communities, as well as the way in which their discipline and rehabilitation is to be handled.

36. The General Council has a General Council Credentials Committee ("GCCC"), which is operated and governed by the General Council and that retains the right of final say on

any ministerial appointments, discipline, and rehabilitation. The district councils are granted the authority to examine, approve, and recommend candidates who qualify to serve as ministers, but final approval and issuance of credentials is made by the General Council. In doing so, the General Council maintains a supervisory role over the hiring and retention of pastors through their regulation and express authority over ministerial credentials.^{2 3}

37. Additionally, the General Council Constitution and Bylaws dictate the causes for disciplinary action, the first of which is “Any moral failure involving sexual misconduct.” When discipline is required, district councils are granted the authority to conduct investigations and suggest either rehabilitation plans or dismissal. Once the district has determined what its suggestion is, it is to report it to the GCCC. Ultimately, the GCCC, i.e., the General Council, has the final say in the disciplinary and rehabilitation procedures and policies, either approving the plan or returning it to the district council for reassessment.

38. The General Council ultimately decides whether a pastor accused of sexual misconduct with a child remains an Assemblies of God pastor.

39. The General Council Constitution and Bylaws also state the terms under which rehabilitation can take place. These guidelines include the time period for which the rehabilitation shall last, which is supposed to be one year minimum for all disciplinary actions, but no less than two years for moral failure involving sexual misconduct. This indicates that there is an understanding that issues of moral failure involving sexual misconduct are of a more complex nature and will take more time to resolve, but that they still believe rehabilitation and return to a position of power is not just possible but recommended, in conformity with their forgiving faith.

² General Council Minutes Constitution and Bylaws 1993- Article VII Section 4.

³ <https://ag.org/About/Credentials> (last accessed May 18, 2026).

40. The procedures and requirements for rehabilitation leave some room for the district council to analyze and determine what they think is appropriate, but the most significant power rests with the General Council. For instance, the General Council dictates a rule preventing the notification of members of the Assemblies of God community when a pastor is credibly accused. Article X, Section 8, subsection e(1)(d) specifically states that “while a minister’s credentials are in a state of suspension [rehabilitation], his name shall not be removed from the ministerial roster, nor shall his disciplinary status be published in either the General Council or district council official publications.” The General Council maintains a custom and practice of protecting those accused, suspected, or confirmed to have engaged in “moral failure involving sexual misconduct” rather than the vulnerable members of the flock.

41. Furthermore, the General Council is, upon information and belief, recognized by the Internal Revenue Service as a tax exempt “central organization” authorized to facilitate group exemptions for its district councils and member churches, referred to by the IRS as “subordinate organizations.” The District Council and Refuge Church, for all times relevant to this action, were “subordinate organizations” that enjoyed tax-exempt recognition without obtaining their own letters of exemption, by virtue of their affiliation with the General Council, the parent organization. Pursuant to IRS Rev. Proc. 80-27, Sec. 4.02, a “central organization,” as a requirement for group exemption status, must first establish that the subordinates to be included in the group exemption are both affiliated with it and “*subject to its general supervision or control*” (emphasis added). IRM 25.7.3.1.1. Upon information and belief, the General Council has made a sworn statement to the United States Internal Revenue Service that it would supervise and control the District Council and Refuge Church.

42. The General Council exercised power over and maintained involvement in the operations of the District Council and its member churches like Refuge Church, as stated herein. The General Council has clearly established rules for how local churches are to operate at all levels, and churches like Refuge are required to follow them.

43. Furthermore, the General Council was directly involved in the Tony Waller matter, working with and providing guidance to the District Council and Refuge Church leadership on how to handle the situation beginning no later than the early 2000s.

44. The General Council, at all times relevant, had supervisory control over Mike Glover. The General Council made him a “credentialed” Assemblies of God pastor, had the power to suspend or remove his ministerial credentials, and the power to remove him as the head pastor of Refuge Church at any time.

45. The General Council, at all times relevant, had supervisory control over Tony Waller. Waller was also “credentialed” by the General Council. The General Council had the power to suspend or remove his ministerial credentials and the power to remove him from pastoring children at Refuge Church.

46. The General Council acknowledged its supervisory control and the duty that implies in a recent public statement to the Arkansas Democrat Gazette⁴:

- a. “Please know that The General Council of the Assemblies of God takes these matters very seriously. The General Council bylaws outline a well-established process in addressing such concerns regarding credential holders at any level.”

⁴ Frank Lockwood, *Lawsuit Accuses North Little Rock First Assembly of God Pastor of Sexual Abuse*, The Democrat Gazette, Feb. 4, 2026, <https://www.arkansasonline.com/news/2026/feb/03/lawsuit-accuses-north-little-rock-first-assembly-of-god-pastor-of-sexual-abuse/>.

- b. When there are reports or complaints of misconduct, “The superintendent of the district in which the alleged offense is reported to have occurred, or an appointed representative, shall conduct the investigation to determine their source and validity,” according to the bylaws.
- c. Grounds for disciplinary action include “moral transgression involving sexual misconduct.”

47. Plaintiffs anticipate the General Council will claim entitlement to charitable immunity. Plaintiffs contest this, as a non-profit organization is not automatically entitled to charitable immunity. *Neal v. Sparks Regional Medical Center*, 375 Ark. 46, 51, 289 S.W.3d 8, 11 (2008). Furthermore, a church is not necessarily entitled to charitable immunity. See *LeMay v. Trinity Lutheran Church*, 248 Ark. 119, 450 S.W.2d 297 (1970). Rather, the doctrine of charitable immunity is to be given “a very narrow construction.” *George v. Jefferson Hospital Association, Inc.*, 337 Ark. 206, 211, 987 S.W.2d 710, 712 (1999).

48. Absent a judicial determination of its charitable status, the General Council is the properly named Defendant in this case.

49. At all material times, General Council, District Council, and Refuge Church were agents of the other in their efforts to support Assembly of God churches in Arkansas.

Charles Michael “Mike” Glover

50. Charles Michael “Mike” Glover was the head pastor of Refuge Church at times relevant to this action. Glover, upon information and belief, resided in Craighead County at times relevant to this action.

51. Glover was a “credentialed” clergyman in the Assemblies of God denomination, having been provided credentials to lead Refuge Church by the District Council and the General Council.



52. The District Council, at all times relevant, had supervisory control over Mike Glover, including the power to suspend or remove his ministerial credentials and the power to remove him as the head pastor of Refuge Church.

53. The General Council, at all times relevant, had supervisory control over Mike Glover, including the power to suspend or remove his ministerial credentials and the power to remove him as the head pastor of Refuge Church.

54. Mike Glover, at times relevant, had supervisory control over Tony Waller, including specifically the power to control Waller’s access to children and the ability to remove Waller from pastoring children at the church.

55. Upon information and belief, Glover, acting on behalf of Refuge Church and the District Council and the General Council, and with the blessing of the District Council and the General Council, hired Waller, retained Waller, and failed to supervise Waller.

Brotherhood Mutual Insurance Company

56. Defendant Brotherhood Mutual Insurance Company (“**Brotherhood**”) is the Arkansas District Council’s liability insurance carrier for times relevant to this cause of action.

57. Brotherhood may be served with process through its registered agent, located at 6400 Brotherhood Way Fort Wayne, Indiana 46825.

58. Pleading in the alternative, Brotherhood is named directly in this action pursuant to Ark. Code Ann. § 23-79-210. Should there be a judicial determination that the District Council is entitled to charitable immunity, Plaintiffs maintain this action against Brotherhood.

Church Mutual Insurance Company

59. Defendant Church Mutual Insurance Company (“**Church Mutual**”) is Refuge Church’s liability insurance carrier for times relevant to this cause of action.

60. Church Mutual may be served with process through its registered agent, located at 300 Spring Building, Suite 900 Little Rock, AR 72201.

61. Pleading in the alternative, Church Mutual is named directly in this action pursuant to Ark. Code Ann. § 23-79-210. Should there be a judicial determination that Refuge is entitled to charitable immunity, Plaintiffs maintain this action against Church Mutual.

John Doe Defendants

62. Various individuals and entities not named as Defendants herein may have directly participated in the tortious conduct alleged herein, may have performed acts and made statements in furtherance thereof, or omissions, which contributed to or caused the tortious acts and resulting

damages outlined in this Complaint. These various individuals and entities may be employees, agents, affiliates, alter-egos, partners, joint-ventures, or insurance carriers of the named Defendants. While actively engaged in the management, direction or control of its affairs, each of the John Doe unknown tortfeasors may have performed each of the acts alleged herein, or alternatively, each of the John Doe unknown tortfeasors authorized or ordered duly authorized officers, agents, employees, insurance carriers or representatives to perform said acts. These tortfeasors, upon information and belief, permitted tortious acts to be committed in Arkansas.

63. One or more John Doe Insurance Companies served as the other named Defendants' liability insurance carrier for times relevant to this cause of action. While not yet identified, it may be necessary for these insurance companies to be named directly in this action pursuant to Ark. Code Ann. § 23-79-210. Should there be a judicial determination that Refuge Church or the District Council or the General Council is entitled to charitable immunity, Plaintiffs shall maintain this action against these John Doe Insurance Companies.

64. To the extent that such John Doe tortfeasor(s) or insurance companies are liable for some or all of Plaintiffs' damages, the identity of said tortfeasor(s) or insurance companies has not been determined as of this date, and it is necessary to conduct discovery in order to determine the identity of said tortfeasor(s) or insurance companies. Pursuant to Ark. Code Ann. § 16-56-125, Plaintiffs have attached as *Exhibit 1* an Affidavit and incorporated herein by reference to toll the statute of limitations for the wrongful actions and omissions alleged herein against the John Does A - D. If a John Doe tortfeasor or insurance carrier is identified for one or more of the causes of action listed below, Plaintiffs will amend this Complaint in accordance with Ark. Code Ann. § 16-56-125.

65. All Defendants named herein operate in joint enterprise, as if a single entity. Glover and Refuge Church are overseen by the District Council and the General Council, while the District Council is overseen by the General Council, causing each to be directly tied to the operations and obligations of the other. The entities are financially and structural intertwined, with a unified mission of growing and, most notably, *protecting* the Assemblies of God denomination.

66. Named Defendants, given their joint enterprise nature, shall at times be referred to herein collectively as "Defendants" or the "Assemblies of God."

JURISDICTION AND VENUE

67. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

68. Jurisdiction is proper under Ark. Code Ann. § 16-13-201, which states that circuit courts shall have original jurisdiction of all actions and proceedings for the enforcement of civil rights or the redress of civil wrongs, except when exclusive jurisdiction is given to other courts. Jurisdiction is also proper under Ark. Const., Art. 7, § 11, which states that circuit courts shall have jurisdiction in all civil cases.

69. This Court has jurisdiction over the parties.

70. Venue is proper under Ark. Code Ann. § 16-60-101(a), which states that all actions for damages for personal injury shall be brought in (1) the county in which a substantial part of the event or omissions giving rise to the cause of action accrued; (2) the county where an individual defendant resided at the time of the event or omission giving rise to the cause of action; or (3) in the county in which the plaintiff resided at the time of the event or omissions giving rise to the cause of action. Therefore, venue is proper in Craighead County, which meets all three requirements.

STATUTE OF LIMITATIONS

71. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

72. The claims of Plaintiffs are timely pursuant to the Arkansas delayed discovery statute, codified at Ark. Code Ann. § 16-56-130 (referred to herein as "Delayed Discovery Act"). The Delayed Discovery Act provides a victim of childhood sexual abuse three years to bring suit from when the victim "discovers the effect of the injury or condition attributable to the childhood sexual abuse." The Act is applicable to any victim of childhood sexual abuse who had not yet reached the age of 21 on August 13, 1993, the Act's effective date.

Stephanie Davis

73. Plaintiff **Stephanie Davis's** claims are timely under the Delayed Discovery Act.

74. Plaintiff was born in 1992. Plaintiff was sexually abused between approximately 2002 and 2005, while Plaintiff was approximately 9 to 13 years old. Not until at least 2024 did Plaintiff discover the effects of the injuries or conditions attributable to the childhood sexual abuse described herein.

75. Prior to that time, Plaintiff **Stephanie Davis** did not discover the effects of the injuries or conditions attributable to the childhood sexual abuse because of myriad reasons. First, those injuries and conditions are psychological, including specific conditions that likely include, but may not be limited to, anxiety, depression, and post-traumatic stress disorder.

76. These conditions are common consequences of child sexual abuse as recognized by the mental health community. The presence of any or all of these conditions commonly prevent victims of child sexual abuse from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until well into adulthood, or from making any kind of root cause

connection between conditions they are suffering from (and the effects of those conditions) and the childhood sexual abuse.

77. One or more of these conditions reasonably prevented Plaintiff **Stephanie Davis** from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until 2024.

78. Other reasons Plaintiff **Stephanie Davis** did not connect the effects of these injuries to the childhood sexual abuse she endured include, but are not limited to, the following:

- a. Stephanie has never received therapy or counseling and has therefore never been diagnosed with a mental illness. She has never had an opportunity to examine her injuries in a professional setting.
- b. The Assemblies of God disfavors secular counseling and views mental health treatment with suspicion. Children raised in the church, including specifically Stephanie, were taught that prayer, biblical scripture, and pastoral counseling were all that was needed – that to need more indicated a spiritual and moral failing. In this way, Defendants played a direct role in Plaintiff’s delayed discovery.
- c. Stephanie began experiencing what she now believes to have been debilitating depression almost immediately following her abuse at Refuge Church. She could not find the will to get out of bed in the morning. She stopped attending school. She got in trouble at school and was sent to an alternative school for a time. She then returned to high school but dropped out. She has no education beyond a GED.
- d. Stephanie gave birth to her first child at the age of 16, in 2009. Her life was a daily struggle to make ends meet and care for her son as a teenager. In 2013, at the age of 20, Stephanie married Brandon Raub; she had a second child in 2014, at the age

of 21. She had a third son in 2018. Stephanie divorced Brandon Raub in 2019, taking sole custody of the children.

- e. Two of her children, the two oldest boys, suffer from a rare respiratory condition known as plastic bronchitis, which is similar to cystic fibrosis. It is life-threatening. This was overwhelmingly Stephanie's top priority for years. It required regular hospitalization for both boys from approximately 2014 to the early 2020s. Her sons' health conditions, in addition to the daily struggle to care for three young children mostly by herself, permeated her conscious mind for years, leaving her with little opportunity to reflect on and unpack childhood traumas.

79. The effects of the injuries and conditions Stephanie attributes to the child sexual abuse at Refuge Church include but are not limited to sexual dysfunction, intimacy issues, the inability to see herself as more than a sex object to men, difficulty maintaining relationships, pervading feelings of shame, low self-esteem, poor impulse control, high risk behaviors as a teen (including those leading to teen pregnancy), dropping out of high school, difficulty interacting with men in positions of authority, and financial difficulties.

80. Stephanie did not discover these effects – connect them to the injuries and conditions caused by the child sexual abuse at Refuge Church – before 2024. Even at the time of Waller's criminal case circa 2015 and 2016, to the extent she knew she had been victimized, Stephanie did not connect her victimization to its harmful effects on her life. The triggering occurrences in her life that allowed Stephanie to make the discovery occurred approximately two years ago, including but not limited to:

- a. Stephanie has long worked as a waitress at Cracker Barrell. Approximately two years ago Tony Waller's sister-in-law, L.P., began working at Cracker Barrell. This

person is also the mother of two of Tony Waller's victims. Seeing this person on a near daily basis forced Stephanie to confront things about her own experiences that she would not have otherwise.

- b. NBC News, who was doing a series of stories on child sexual abuse within Assemblies of God churches nationally, contacted Stephanie in 2025, having found her name referenced as a potential witness when researching Tony Waller's criminal convictions.
- c. She and her sister Samantha begin talking at length when Samantha moved back to Arkansas recently, including about their experiences at the church with Waller. These conversations also helped lead the discovery.

81. Plaintiff **Stephanie Davis** has brought suit for claims based on childhood sexual abuse less than three years after discovering the effects of the injuries or conditions attributable to the childhood sexual abuse. Accordingly, her claims are timely under A.C.A. § 16-56-130.

82. Stephanie Davis's claims are also potentially timely pursuant to the Arkansas Justice for Vulnerable Victims Act, codified at Ark. Code Ann. § 16-118-118(b)(1), depending on the Arkansas Supreme Court's imminent opinion in *Nesmith*.

Samantha Davis

83. Plaintiff **Samantha Davis's** claims are timely under the Delayed Discovery Act.

84. Plaintiff **Samantha Davis** was born in 1991. She was sexually abused between approximately 2002 and 2005, while she was approximately 10 to 14 years old. Not until at least 2024 did she discover the effects of the injuries or conditions attributable to the childhood sexual abuse described herein.

85. Prior to that time, Plaintiff **Samantha Davis** did not discover the effects of the injuries or conditions attributable to the childhood sexual abuse because of myriad reasons. First, those injuries and conditions are psychological, including specific conditions that likely include, but may not be limited to, anxiety, depression, and post-traumatic stress disorder.

86. These conditions are common consequences of child sexual abuse as recognized by the mental health community. The presence of any or all of these conditions commonly prevent victims of child sexual abuse from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until well into adulthood, or from making any kind of root cause connection between conditions they are suffering from (and the effects of those conditions) and the childhood sexual abuse.

87. One or more of these conditions reasonably prevented Plaintiff **Samantha Davis** from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse before 2024.

88. Other reasons Plaintiff **Samantha Davis** did not connect the effects of these injuries to the childhood sexual abuse she endured include, but are not limited to, the following:

- a. Notably, the Assemblies of God disfavors secular counseling and views mental health treatment with suspicion. Children raised in the church, including specifically Samantha, were taught that prayer, biblical scripture, and pastoral counseling were all that was needed – that to need more indicated a spiritual and moral failing. In this way, Defendants played a direct role in her delayed discovery.
- b. Samantha gave birth to her first child when she was only 18, in 2009. She raised the baby while attending college fulltime and working. She married the child's father, Tyler Russell, in 2022. They had two more children, in 2016 and 2022,

respectively, when Samantha was 25 and 31. Samantha had little time to focus on her mental health.

- c. Samantha was diagnosed with cancer in 2016, for which she underwent a year of chemotherapy. Prior to her 2016 diagnosis, she underwent several surgeries to remove tumors. She was not declared cancer free until 2018. Cancer was the primary focus of her conscious mind during these years, in addition to caring for and supporting her young children.
- d. The only therapy she had before the date of discovery was cognitive behavioral therapy focused entirely on her cancer diagnosis. Samantha has never been afforded any counseling or therapy related to the childhood sexual abuse she experienced at the hands of the Assemblies of God.

89. The effects of the conditions may include but are not limited to stress, inability to trust, hypervigilance, difficulty maintaining close relationships outside of family, crisis of faith, and a distrust of organized religion that prevents raising her children in a church community. There were triggers that facilitated her discovery beginning approximately two years ago, including but not limited to:

- a. In the years following cancer, Samantha regained spirituality and Christianity, but she found herself with no place to express it and no place to share her spirituality with her children due to a fear and distrust of churches. Only recently has this problem arisen and only recently has she connected it to Refuge and Waller. In making that connection, Samantha began reflecting deeper on her childhood victimization.

- b. As her kids have gotten older and neared the same age she was during the Waller abuse, she began focusing on it more. It was like reliving those years. Through her children, she began reliving early adolescence, which was very triggering.
- c. Samantha left Arkansas in 2016 and did not move back until 2022. She and her sister Stephanie started talking more about their childhood, working through things together, and making discoveries about Waller's psychological impact on their adult lives.

90. Plaintiff **Samantha Davis** has brought suit for claims based on childhood sexual abuse less than three years after discovering the effect of the injuries or conditions attributable to the childhood sexual abuse. Accordingly, Plaintiff's claims are timely under A.C.A. § 16-56-130.

91. Samantha Davis's claims are also potentially timely pursuant to the Arkansas Justice for Vulnerable Victims Act, codified at Ark. Code Ann. § 16-118-118(b)(1), depending on the Arkansas Supreme Court's imminent opinion in *Nesmith*.

Elizabeth Dryer

92. Plaintiff **Elizabeth Dryer's** claims are timely under the Delayed Discovery Act.

93. Plaintiff was born in 1993. Plaintiff was sexually abused between approximately 2001 and 2005, while Plaintiff was approximately 8 to 12 years old. Not until at least 2025 did Plaintiff **Elizabeth Dryer** discover the effects of the injuries or conditions attributable to the childhood sexual abuse described herein.

94. Prior to that time, Plaintiff **Elizabeth Dryer** did not discover the effects of the injuries or conditions attributable to the childhood sexual abuse because of myriad reasons. First, those injuries and conditions are psychological, including specific conditions that likely include, but may not be limited to anxiety, depression, low self-esteem, and mood disorder.

95. These conditions are common consequences of child sexual abuse as recognized by the mental health community. The presence of any or all of these conditions commonly prevent victims of child sexual abuse from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until well into adulthood, or from making any kind of root cause connection between conditions they are suffering from (and the effects of those conditions) and the childhood sexual abuse.

96. One or more of these conditions reasonably prevented Plaintiff **Elizabeth Dryer** from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until 2025.

97. Other reasons Plaintiff **Elizabeth Dryer** did not connect the effects of these injuries to the childhood sexual abuse she endured include, but are not limited to, the following:

- a. The church conditioned Elizabeth to suppress her feelings about the Waller abuse. Elizabeth came forward in approximately 2004 to tell Pastor Glover that Waller was molesting her, and Pastor Glover rebuked her. She was shamed into saying that she was wrong, that it did not happen, and, eventually, she came to question herself. She was still uncomfortable being around Waller, but she accepted that her instincts must have been wrong, since that is what Refuge Church told her. This was gaslighting.
- b. She was conditioned to distrust herself. She was led to believe she was an overreactor, that her feelings were not valid. She told the church about something she knew as wrong and the church made her feel like a hysteric.
- c. She was not able to address her childhood sexual abuse with a therapist until January of 2025.

98. The effects of the conditions may include but are not limited to low self-esteem, self-doubt, subjecting herself to abuse in romantic relationships, severe inability to trust, an inability to accept that another person can love her, a distrust in instincts to protect herself, suicidal ideation, and a devaluing of her bodily integrity. There were triggers that facilitated her discovery beginning approximately two years ago, including but not limited to:

- a. Elizabeth first addressed her childhood sexual abuse with a therapist in January of 2025.
- b. Elizabeth underwent EMDR for the first time in June of 2025, which revealed to her that a reason she has subjected herself to abusive relationships as an adult is because of how the church treated her when she tried to come forward and stand up for herself in approximately 2004, which caused her to devalue her bodily integrity and to distrust her self-preservation instincts.

99. Plaintiff **Elizabeth Dryer** has brought suit for claims based on childhood sexual abuse less than three years after discovering the effects of the injuries or conditions attributable to the childhood sexual abuse. Accordingly, her claims are timely under A.C.A. § 16-56-130.

Victoria Collins

100. Plaintiff **Victoria Collins's** claims are timely under the Delayed Discovery Act.

101. Plaintiff **Victoria Collins** was born in 1990. She was sexually abused between approximately 2001 and 2005, while she was approximately 10 to 14 years old. Not until at least 2025 did she discover the effects of the injuries or conditions attributable to the childhood sexual abuse described herein.

102. Prior to that time, Plaintiff **Victoria Collins** did not discover the effects of the injuries or conditions attributable to the childhood sexual abuse because of myriad reasons. First,

those injuries and conditions are psychological, including specific conditions that likely include, but may not be limited to anxiety, depression, low self-esteem, eating disorders, and sexual aversion disorder.

103. These conditions are common consequences of child sexual abuse as recognized by the mental health community. The presence of any or all of these conditions commonly prevent victims of child sexual abuse from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until well into adulthood, or from making any kind of root cause connection between conditions they are suffering from (and the effects of those conditions) and the childhood sexual abuse.

104. One or more of these conditions reasonably prevented Plaintiff **Victoria Collins** from discovering the effects of the injuries or conditions attributable to the childhood sexual abuse until 2025.

105. Other reasons Plaintiff **Victoria Collins** did not connect the effects of these injuries to the childhood sexual abuse she endured include, but are not limited to, the following:

- a. Victoria was encouraged by the church to suppress her feelings concerning the Waller abuse. Similar to her sister, Elizabeth, Victoria was made to distrust her instincts, to distrust her belief that Waller was victimizing her. Not only that, the church even suggested to Victoria that the real problem was not Waller, but that she and her sister came from a broken home without a father. Victoria was shamed into accepting that she and her sister were responsible for creating unnecessary drama concerning Waller.
- b. Victoria suffered from obsessive-compulsive disorder that went undiagnosed until approximately 2023. While not caused by the abuse, the disorder contributed to

preventing her from recognizing the connections between the effects of her psychological injuries and the abuse by Waller. OCD causes a sufferer to become preoccupied with irrational obsessions, often to the exclusion of more relevant or immediate concerns. A sufferer often has much less control over the priorities of her conscious mind and can spend years “missing the forest for the trees,” to borrow the old idiom.

- c. Victoria was not provided any therapy as a child, which is often needed for victims to come to terms with their abuse and to comprehend its impact on their lives. She did not begin therapy until 2023.

106. The effects of the conditions may include but are not limited to intimacy issues, sexual aversion, suicidal ideation, self-doubt, low self-esteem, relationship problems, a misplaced belief that she must submit to men in order to be loved, and struggles in school. There were triggers that facilitated her discovery beginning approximately two years ago, including but not limited to:

- a. Victoria’s triggers are related to her sister’s. They were living together when Elizabeth began exploring the abuse by Waller in therapy in 2025. They began having in-depth conversations about what happened with Waller, and this helped Victoria begin to process her own trauma from those experiences.
- b. Victoria then, also in 2025, began having flashbacks of the nude stretching incidents after she began discussing Waller with her sister, who was addressing Waller in therapy at the time. She also began experiencing flashbacks of being alone with Waller in dark closets while playing, of him picking her up and groping her body under the guise of tickling.

107. Plaintiff **Victoria Collins** has brought suit for claims based on childhood sexual abuse less than three years after discovering the effect of the injuries or conditions attributable to the childhood sexual abuse. Accordingly, her claims are timely under A.C.A. § 16-56-130.

Taylor Perrin

108. Plaintiff Taylor Perrin's claims are timely pursuant to the Arkansas Justice for Vulnerable Victims Act, codified at Ark. Code Ann. § 16-118-118.

Jane Doe 1

109. Plaintiff Jane Doe 1's claims are timely pursuant to the Arkansas Justice for Vulnerable Victims Act, codified at Ark. Code Ann. § 16-118-118.

RELEVANT DENOMINATION BACKGROUND

110. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

111. The Assemblies of God maintains approximately 13,000 churches in the United States.

112. Founded in 1914 in Hot Springs, Arkansas, amid a nationwide Pentecostal revival, the Assemblies of God denomination is in many ways typical of other fundamentalist Christian sects, but in other ways it differs, such as the extent to which its rituals incorporate the supernatural – things like possession, speaking in tongues, divine healing, and snake charming.

113. Another way this denomination sets itself apart is its forgiving stance towards its pastors accused of pedophilia.

114. A recent NBC News investigation revealed a disturbing pattern dating back to at least the 1970s, whereby the denomination has made a practice of forgiving and reinstating pastors accused of molesting children.

115. “While some of the other largest Christian denominations now require safeguards such as background checks and mandatory reporting, “Assemblies of God leaders have resisted, arguing such rules would...defy a core biblical command: *to forgive*,” says NBC News.⁵

116. While pedophile clergy is an underreported problem in all churches, some Christian denominations, such as the Catholic church, have in recent decades chosen to make protecting children a top priority. In 2002, the U.S. Conference of Catholic Bishops adopted the "Charter for the Protection of Children and Young People" in response to its clergy sexual abuse crisis. Key reforms included a "zero-tolerance" policy, mandatory reporting of abuse to civil authorities, background checks, and the creation of a National Review Board.⁶ These sweeping reforms are believed to have made a profound difference in the Catholic Church.

117. Even the Southern Baptist Convention, which has, overall, done little to protect children from predatory pastors in its churches, made slight reforms in 2019 that made it easier for the Convention to expel member churches harboring predators.

118. Assemblies of God leaders, despite public acknowledgment of the problem dating back to the previous century, have steadfastly refused to put the safety of its children above loyalty to its pastors, even pastors who Assemblies of God leaders know are child predators.

119. Assemblies of God leaders have refused to institute simple reforms like reporting protocols or prevention training that would protect children from pedophile pastors in the denomination’s ranks.

120. Assemblies of God has historically chosen to focus its resources and energies on “rehabilitating” its pastors when they are caught molesting children. The denomination’s

⁵ <https://www.nbcnews.com/news/us-news/assembly-god-church-shield-predators-child-sex-abuse-allegations-rcna240213> (last accessed May 20, 2026).

⁶ <https://www.usccb.org/topics/catholic-safeguards/dallas-charter> (last accessed May 18, 2026).

rehabilitation process, “carried out by regional district councils [like the Arkansas District council] and overseen by the national office [the General Council],” involves predatory pastors stepping away from ministry for a period to undergo “Christian counseling,” according to NBC News, which obtained a copy of the denomination’s handbook for pastor restoration. Records of these pastor “restorations” are stored in the General Council’s office in Springfield, MO, where they are kept confidential. This is what happened with Tony Waller in the present matter.

121. Foremost among the handbook’s tenets is tenderness and forgiveness towards the pastors. Cherry-picking and using *Galatians* 6:1 out of context, the handbook reminds: “Brothers and sisters, if someone is caught in a sin, you who live by the Spirit should restore that person *gently*.”

122. In this present matter, it was the abundance of tenderness and forgiveness extended to pedophile children’s pastor Tony Waller by the Assemblies of God that resulted in these Plaintiffs’ abuse and resulting harms.

123. To understand what happened in Jonesboro, it is necessary to understand fundamentalist culture. A children's pastor is not simply a teacher or a Sunday morning babysitter. Within the culture of an Assemblies of God church, this person occupies a role that carries genuine spiritual weight. They are seen as called by God, trusted by the senior pastor, endorsed by the denomination, and welcomed into the lives of families at a deeply personal level. Children are taught to respect and obey them. Parents are expected to trust them blindly. The entire environment operates on the assumption that this person is safe — because why would God's church put an unsafe person in charge of children? That assumption creates the conditions for grooming before a single act of abuse ever takes place.

TIMELINE

124. **August 1973:** The Thirty-Fifth General Council of the Assemblies of God meets to revise the denomination's Constitution and Bylaws. The minutes reveal a significant development – the formal adoption of a process titled “Rehabilitation of Disciplined Ministers.”⁷ This is an internal rehabilitation program for pastors who engage in sexual misconduct and other immoral behaviors. It's focused on repentance, forgiveness, restoration, and secrecy. Pastors who engage in sexual misconduct undergo a “rehabilitation” process overseen by the District Superintendent and the General Council. The explicit goal of this process is “restoration” of the pastor to ministry, prioritizing forgiveness and mercy for any pastor who repents. During the process, the pastor's credentials are held by the District Council. Following the restoration process, the record of rehabilitation is kept by the General Council.⁸ Discipline “is to be redemptive in nature as well as corrective, and it is to be exercised as under a dispensation of mercy.”⁹ This is the program by which Assemblies of God pastors who sexually abuse children are allowed to remain in ministry after their crimes are discovered.

125. **1973 to 1997:** Hundreds of children nationwide are known to have been sexually abused by Assemblies of God pastors, though experts believe the true number of victims is likely *much* higher due to low reporting rates.

126. **August 1997:** The Forty-Seventh General Council of the Assemblies of God meets to revise the denomination's Constitution and Bylaws. An amendment to the denomination's bylaws known as “Resolution 10” is proposed, which would prohibit Assemblies of God churches from hiring pastors with criminal convictions for sexually abusing children. The General Council votes **not** to pass the amendment.¹⁰

⁷ *Minutes of the Thirty-Fifth General Council of the Assemblies of God*, pgs. 82-87.

⁸ *Minutes of the Thirty-Fifth General Council of the Assemblies of God*, pgs. 149-150.

⁹ *Minutes of the Thirty-Fifth General Council of the Assemblies of God*, p. 145.

¹⁰ *Minutes of the Forty-Seventh General Council of the Assemblies of God*, pgs. 46-47.

127. **1994 to 1999:** Tony Waller, who has struggled with sexual urges towards young girls since the age of 12, is finding it increasingly difficult to resist these urges. He begins using the internet for this purpose, and he preys on girls in his communities – first in his hometown of Marion, Arkansas, and then in Jonesboro. Waller, upon information and belief, victimizes girls in both Marion and Jonesboro prior to Refuge Church.

128. **1998 or 1999:** The Assemblies of God hires Tony Waller to serve as the children’s minister at Refuge Church, which was then called First Assemblies of God. The Assemblies of God credentials Waller as a minister. To be clear, Refuge Church employs a "children’s minister" *and* a “youth minister,” the former for young children and the latter for older teenagers. Waller is the “children’s minister.”

129. **August 1999:** The Forty-Eighth General Council of the Assemblies of God meets to revise the denomination’s Constitution and Bylaws. “Resolution 10” is again presented. The Executive Presbytery¹¹ rejects the resolution, which would have banned the hiring and credentialing of ministers known to have sexually abused children. It does not pass.¹² Notably, the General Council acknowledges that child sexual abuse within the denomination is a problem: “To be sure, the problem of child sexual abuse is a serious one.”¹³ Despite this explicit recognition of the problem, the General Council rejects the resolution, citing two interesting reasons. First:

*The resolution would impose on the General Council a legal duty to conduct criminal records checks on every applicant for credentials. Only in this way could the General Council be assured that an applicant had no prior conviction for child abuse. The cost and time involved in such a task would impose a substantial burden on the General Council. **Such a burden is not warranted at this time, since no court has found a denominational agency liable for the sexual misconduct of a minister on the basis of its failure to conduct criminal records checks.***¹⁴

¹¹ The Executive Presbytery functions as the board of directors for the General Council.

¹² *Minutes of the Forty-Eighth General Council of the Assemblies of God*, pgs. 37-38

¹³ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, pgs. 38

¹⁴ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, pgs. 38

The General Council, in other words, will only take on such a “burden” if liability might result from not doing so. This reasoning illustrates the prioritization of the bottom line over the safety of children. And second:

The standard set forth in Resolution 10 is inflexible. An applicant who has a previous criminal conviction for child sexual molestation would be ineligible for credentials under all circumstances, without exception. In fact, there may be circumstances in which such a rule would be unnecessarily severe. To illustrate, consider a person who was convicted of child sexual abuse prior to his conversion many years ago for a relatively minor infraction that occurred only once and involved an adolescent, and who has lived a blameless life ever since. Should such a person be forever barred from qualifying for ministerial credentials? Or should district and General Council credentials committees have the discretion to make judgments on a case-by-case basis, considering all the facts?¹⁵

Translation: the General Council wants to retain the ability to hire pastors known to have sexually molested children. In the Assemblies of God worldview there exists such a thing as “relatively minor” forms of child sexual abuse. A child molester’s “conversion” to the Assemblies of God denomination justifies letting that child molester minister to children under certain circumstances.

130. **August 1999:** The Forty-Eighth General Council of the Assemblies of God also sees the Executive Presbytery adopt “Resolution 4: Pornography and Obscenity.” Notably, the resolution specifically acknowledges that children used in the making of pornography suffer severe damages. “Pornography and obscenity cause harm to those (often women and children) who are abused in the production of it....” The materials “exploit persons made in god’s image, destroy healthy relationships....” The General Council resolves to urge government agencies to aggressively prosecute those who produce child sexual abuse material, to encourage churches to actively protect children from being harmed by child pornography, and to commit to an educational process within the denomination to inform members of the terrible harms associated with child pornography.¹⁶

¹⁵ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, p. 38.

¹⁶ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, pgs. 73-74.

131. **August 1999:** The Forty-Eighth General Council of the Assemblies of God also reiterates the process for handling pastors accused of sexual misconduct with children, stating that the superintendent of the District Council where the offense occurs is responsible for investigating to determine the validity of the accusation; and that the District may suspend or restrict the accused pastor's ability to minister during the investigation.¹⁷ The General Council reaffirms that a pastor who it determines sexually abused a child may be reinstated to ministry after a rehabilitation period of two years.¹⁸

132. **September 1999:** Waller, who works part-time as a bus driver for the Jonesboro School District while also serving as Refuge's children's pastor, begins stalking children at multiple elementary schools in Jonesboro.

133. **November 1999:** Waller develops an infatuation with an 11-year-old girl that he befriends while volunteering at CityYouth Ministries, a faith-based afterschool program in Jonesboro where Waller is known as "Brother Tony" because of his known position as an Assemblies of God children's pastor.

134. **November 1999 to April 2000:** Tony Waller regularly shows up at West Elementary School (now Jonesboro Microsociety Magnet) to have lunch with this 11-year-old girl and other children.

135. **November 1999 to April 2000:** Tony Waller is removing the little girl from CityYouth Ministries without permission. Waller is taking her places, including a Hampton Inn on one occasion. Waller is buying her new clothes. Waller keeps the little girl out until 1:00am on one other occasion. Waller is having the little girl spend the night at his residence. Waller is coming by the little girl's home three or four times a week asking to see her, sometimes late at night. The

¹⁷ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, p. 70.

¹⁸ *Minutes of the Forty-Eighth General Council of the Assemblies of God*, p. 73.

girl's mother must post a sign on the door stating no visitors after 9:30pm. *The little girl's mother tells police she only let all this go on because Waller was an Assemblies of God pastor.*¹⁹

136. **December 1999:** A teacher at Valley View Elementary School reports to school officials that she caught Waller on the playground during recess talking to little girls, and that he ran from her when she tried to approach him.

137. **February 2000:** A fifth-grade teacher at West Elementary complains to Ray Buhrmester, a student resource officer, that Waller is spending time in her classroom with children and that she is concerned.

138. **March 2000:** Waller's behavior at West Elementary, including calling the school repeatedly to speak with the 11-year-old girl, leads to an investigation within the school.

139. **April 12, 2000:** The Jonesboro Police Department receives a report of suspected child sexual abuse involving Waller and the 11-year-old girl.

140. **April 21, 2000:** Principal Ronald Williams personally stops Waller from entering the West Elementary cafeteria and tells Waller he can no longer come to the school to visit children. Waller leaves but then returns minutes later, determined to see the 11-year-old girl. Another staff member tries to stop him, but Waller forces his way into the cafeteria, obtains a meal tray, and finds the 11-year-old girl. School Resource Officer Buhrmester is called to escort Waller out of the cafeteria and into Principal William's office, where the two men reiterate to Waller that he must leave and not return. Waller leaves, but five minutes later he is observed circling the school in his car.

141. **April 24, 2000:** Jonesboro Police Detective Lynn Waterworth (now the Asst. Chief of Police in Jonesboro), along with Principal Williams (deceased) and School Resource Officer

¹⁹ Jonesboro Police Department Offense Report No. 2000-02701.

Buhrmester, personally visit Pastor Mike Glover at Refuge Church to report Waller's disturbing behavior towards this 11-year-old girl and other children.²⁰ They provide Glover a direct warning that Tony Waller is suspected of harming a child. *They explain to Pastor Glover that Waller, the man serving as Refuge's Children's Minister, has been banned from West Elementary School because of suspicions he was sexually abusing or at least trying to sexually abuse an 11-year-old girl.*

142. *April 24 to May 1, 2000:* Pastor Glover informs church and denomination leadership of the Waller problem. Nonetheless, Tony Waller continues serving as Refuge Church's Children's Minister as if nothing happened. The warning from police goes unheeded.

143. *Circa 2000:* Tony Waller begins sexually assaulting young girls at Refuge Church. Waller has placed multiple hidden cameras in a bathroom used by young girls at Refuge Church, as well as in a church ancillary building containing a shower sometimes used by girls. Waller is recording young girls undressing and in the nude at every opportunity. This is the start of what would eventually amount to thousands of hours of child pornography created at Refuge Church using the church's own children, including all of these Plaintiffs.

144. *Circa 2000 to 2001:* Pastor Glover is providing marriage counseling to Tony Waller and his wife, Angela Waller. Waller's addiction to pornography is a primary topic of the marriage counseling.

145. *Approx. 2001:* Rumors of Tony Waller's pornography addiction spread throughout the congregation, becoming a known fact amongst church leaders. Tony Waller continues serving as Refuge Church's Children's Minister.

²⁰ Jonesboro Police Department Offense Report No. 2000-02701.

146. *Fall 2001*: Tony Waller sexually assaults a child in his office at Refuge Church, a girl who shall be referred to herein as **Janus Doe Witness 1**.

147. *Circa 2001 to 2005*: Waller is molesting and filming Plaintiffs **Stephanie Davis, Samantha Davis, Elizabeth Dryer, and Victoria Collins**. The molestations occur under the guise of tickling, wrestling, and other physical play that allow Waller to touch and grope Plaintiffs' private areas over their clothes.

148. *Circa 2001 to 2005*: Waller has placed multiple hidden cameras in a bathroom used by young girls, one resting on a stool in the bathroom's storage closet that films into the bathroom through a hole where the closet's doorknob should be, and other cameras in the attic above the bathroom filming down into the bathroom over the toilet.

149. *Circa 2001 to 2005*: Waller forces the girls to enter this bathroom one by one, strip naked, and perform a series of stretches while completely nude. Waller explains to the girls that they must be completely naked in order to stretch with unrestricted muscle movement. Waller has taped a list of specific stretches that each girl must perform to the wall of the bathroom, where it remains for all to see for years. It specifies precisely where the girls are supposed to stand in the bathroom, which direction they are supposed to face, and what exercises they are to perform while facing that direction.

150. *Circa 2001 to 2005*: As an example, each girl is required to bend over and touch her toes while completely nude with her rear facing the closet door, behind which was the hidden camera. There is a mirror across from the closet door concealing the hidden camera, leaving no angle unrecorded.

151. *Circa 2001 to 2005*: This occurs multiple times per week during the time Plaintiffs **Stephanie Davis, Samantha Davis, Elizabeth Dryer, and Victoria Collins** participate in

children's programs at the church, including the homeschool program, resulting in countless hours of nude footage of these Plaintiffs.

152. *Circa 2004*: Plaintiffs **Stephanie Davis** and **Elizabeth Dryer** discover one of the cameras while playing hide and seek. It is the camera behind the bathroom's storage closet door. Parents find out and word spreads.

153. *Circa 2004*: Pastor Glover is aware children's pastor Tony Waller has been secretly recording nude little girls using the camera discovered by **Stephanie Davis** and **Elizabeth Dryer**. He sees the camera with his own eyes. He sees the list of stretches. He has the maintenance man fill the hole where the doorknob should be.

154. *Circa 2004*: **Stephanie Davis** and her mother, Ginger Davis, meet with senior pastor Mike Glover about the hidden camera. They report the bizarre nude stretching that was being secretly recorded. They also report Waller attempting to sexually assault **Stephanie Davis** after putting something in her drink. They even bring Glover the cup he used to drug her.

155. *Circa 2004*: Plaintiff **Elizabeth Dryer**, along with her mother, Lori Dryer, also meet with Pastor Mike Glover. Elizabeth Dryer tells Glover not only about the camera, but also that Waller has molested her. Glover treats them with derision.

156. *Circa 2004*: The Assemblies of God suspends Waller for approximately two to four weeks, after which Waller is allowed to fully resume his role as children's pastor with no restraints.

157. *Circa 2006 or 2007*: Waller begins sexually assaulting his nieces, aged 10 and 11, in his office at Refuge Church. These sexual assaults will go on for several years.

158. *Circa 2006*: Waller is caught secretly filming a young girl from the church undress. Her name is Courtney Blackburn and she is 12 at the time. Courtney's mother, Rhonda Kelly, reports the crime to Pastor Glover. Glover tells Courtney's mother that the matter will be handled

internally and suggests there is no need for police involvement. Later, Glover tells Ms. Kelly that Assemblies of God leadership “prayed over” the matter and received an answer from God: it is all a big misunderstanding, and Courtney is being overly sensitive.

159. ***Circa 2008 to 2014:*** Waller grooms, molests, sexually assaults, and secretly films a new generation of young girls that includes Plaintiffs **Taylor Perrin** and **Jane Doe 1**. Waller uses hidden cameras placed in multiple locations throughout the church, including in the exact same bathroom where the previous generation of girls were filmed stretching, to record these girls in the nude.

160. ***August 2014:*** The General Council of the Assemblies of God *first* votes to adopt a policy making pastors who engage in pedophilia and child sexual abuse ineligible for restoration to ministry. Prior to this, pastors who engaged in child sexual abuse are allowed to return to ministry.²¹ This new rule does not apply to pastors who were previously restored to ministry after molesting children: the General Council allows them to remain in ministry so long as they do not reoffend.²² Further, this new policy will not be included in the denomination’s written policies and procedures or operating manuals until 2021, making its 2014 adoption of dubious effect.

161. ***April 2015:*** Angela Waller decides to turn her husband in for his more than 15 years of crimes against children at Refuge Church.

162. ***May 2015:*** The Assemblies of God, fearful now that police are involved, fires Tony Waller, but only *after* he is formally arrested and charged with dozens of crimes related to his creation of child pornography within the Refuge Church – something church leadership knew without a doubt he was doing for more than a decade prior to his arrest.

²¹ 2021 District Office Manual for Ministerial Discipline and Restoration, p. 85.

²² 2021 District Office Manual for Ministerial Discipline and Restoration, pgs. 17, 85.

163. **October 2015:** Police discover footage recorded by multiple hidden cameras placed around church grounds, including one mounted over the toilet of the little girls' bathroom at Refuge Church and one in the showers of the ancillary building.

164. **October 2015:** Police discover black tape covering the doorknob hole in the girls' bathroom behind which Waller hid one of his cameras. This is significant because Refuge Church supposedly filled the hole back in 2004 by replacing the missing doorknob. In other words, Waller may have been allowed to remove the doorknob to resume filming girls from the bathroom storage closet at some point between 2004 and 2015.

165. **December 21, 2015:** Under police questioning, Waller admits to hiding video cameras in the bathrooms at the church and in the ancillary church building, and to recording a great deal of child sex abuse footage of many young girls from the church.

166. **2015:** Police ultimately discover more than 400,000 child porn images in Tony Waller's possession, much of which Waller had created using Refuge Church girls, including these Plaintiffs.

167. **2016:** Waller pleads guilty to child rape and is sentenced to life in prison.

168. **2021:** The General Council first adds to Assemblies of God written policy the rule stating pastors who engage in pedophilia and child sexual abuse are ineligible for restoration to ministry. This new rule contains a grandfather clause, as it does not apply to pastors who were previously restored to ministry after molesting children: the General Council allows them to remain in ministry so long as they do not reoffend, providing them one more strike.²³

FACTUAL ALLEGATIONS

²³ 2021 District Office Manual for Ministerial Discipline and Restoration, pgs. 17, 85-86.

169. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

170. At all times relevant to this action, Defendants owned, operated, maintained, staffed, and supervised children's ministry programs within Refuge Church, then known as First Assemblies of God of Jonesboro.

171. At all times relevant to this action, Defendants owned, operated, maintained, staffed, and supervised a homeschool program for congregant children at Refuge Church, then known as First Assemblies of God of Jonesboro.

172. Defendants had the power to hire, appoint, supervise, monitor, restrict, and fire each person working with children at the church.

173. Defendants chose Tony Waller, now serving a life sentence for child rape, to serve as the children's pastor at Refuge Church.

174. Waller was the children's pastor at Refuge Church from approximately 1999 to approximately 2015. Waller sexually abused two generations of young girls at Refuge Church over this time period.

175. Defendants empowered Tony Waller to run the children's programs at the church. Waller did so with the blessing of and under the supervision and control of head pastor Mike Glover, as well as leadership at the District Council and General Council levels.

176. Waller did so with the blessing of and under the supervision and control of the Assemblies of God.

177. Waller did so after being bestowed with his "credentials" from the General Council and District Council.

178. Waller, prior to being bestowed with this authority over Refuge Church's children, committed sexual misconduct against other children, including but not limited to an 11-year-old girl who was the subject of Jonesboro Police Dept. Offense Report No. 2000-02701.

179. Prior to bestowing Waller with this authority over Refuge Church's children and prior to providing Waller access to these Plaintiffs, the General Council, District Council, Refuge Church leadership, and senior pastor Mike Glover were all aware of child sexual abuse allegations against Tony Waller.

180. Tony Waller placed multiple hidden cameras in a single occupancy bathroom used by Plaintiffs and other young girls attending children's programs at the church. Waller placed a hidden camera in a storage closet inside the bathroom that filmed into the bathroom through an opening in the closet's doorknob. He also placed cameras in the attic above the bathroom that filmed down into the bathroom over the toilet. He also placed hidden cameras in a Refuge Church ancillary building that contained showers sometimes used by the girls.

181. Waller forced his first generation of victims to enter this bathroom one by one, strip naked, and perform a series of stretches while completely nude. Waller explained to the girls that they had to be naked in order to properly stretch, that clothing would restrict their movements. Unbeknownst to the girls, Waller was filming their nude stretches each day using his hidden cameras.

182. Waller created a list of specific stretches and taped it to the wall of the bathroom, where it remained for all to see for years. [Adult women sometimes used this bathroom as well. It was not restricted to children.] This list specified precisely where the young girl was supposed to stand in the bathroom, which direction she was supposed to face, and what exercise she was to do while facing that direction. For instance, each girl was required to bend over and touch her toes

while completely nude with her rear facing the closet door, behind which was the hidden camera. There was also a mirror across from the closet door concealing the hidden camera, so that no angle of the girl's nude body was left out of the shot.

183. Stretching was not Waller's only ploy for getting the girls to undress in the church bathroom. He came up with other activities that required a later generation of Refuge girls to be nude for his cameras. These included playing dress up, costumed theater performances, and numerous water activities. Waller kept an extensive collection of little girls clothing, bathing suits, and costumes at the church. It bears noting that Waller did not hide these things from his colleagues, just as he did not hide the bizarre list of stretches on the bathroom wall. After his arrest, police found boxes of little girls clothing in an unlocked room near Waller's church office that was regularly used by other church staff.

184. When Waller was finally arrested in 2015, police found over 400,000 videos and images of child sexual abuse material, a great deal of which consisted of videos and images of nude children, including these Plaintiffs, recorded inside the aforementioned bathroom at Refuge Church and in the ancillary building containing showers.

185. Detectives discovered a series of holes drilled into the bathroom ceiling, each one smaller than the next to it – this represented the improvements in camera technology over the 15 years Waller was doing this. As the cameras got smaller so did Waller's holes.

186. All Plaintiffs were secretly recorded multiple times a week during the years they participated in children's programs at the church, resulting in countless hours of nude footage of Plaintiffs – countless hours of child sexual abuse material.

187. Waller, in addition to recording sexually explicit videos and images of Plaintiffs, also physically molested Plaintiffs. Waller, under the guise of tickling and other physical play,

touched and groped Plaintiffs' private areas. Waller engaged Plaintiffs in games that allowed him physical contact with them, such as wrestling, hide-and-seek, chase, and a game called "sardines" in which he and the girl would squeeze into a tight space, such as a small closet.

First Generation Victims

188. Plaintiff **Stephanie Davis**, born in 1992, attended the homeschool program and participated in other children's programs run by children's pastor Tony Waller at Refuge Church from approximately 2002 to 2005, when she was approximately 9 to 13. Waller recorded sexually explicit videos and images of her as a child. Waller also molested her over the clothes on multiple occasions. Waller also attempted to sexually assault **Stephanie Davis** at the church after drugging her by putting something in her drink. Stephanie, having already discovered the hidden camera, got away before Waller could consummate the assault.

189. Plaintiff **Samantha Davis**, born in 1991, attended the homeschool program and participated in other children's programs run by children's pastor Tony Waller at Refuge Church from approximately 2002 to 2005, when she was approximately 10 to 14. Waller recorded sexually explicit videos and images of her as a child. Waller also molested her over the clothes on multiple occasions.

190. Plaintiff **Elizabeth Dryer**, born in 1993, did not formerly attend the homeschool program but did participate in other children's programs run by children's pastor Tony Waller at Refuge Church from approximately 2001 to 2005, when she was approximately 8 to 12. She spent afternoons with Tony Waller and other children in the homeschool program several days each week because her sister, **Victoria Collins**, was in the homeschool program. In addition to recording sexually explicit videos and images of her as a child, Tony Waller also molested Elizabeth Dryer over the clothes on multiple occasions under the guise of "wrestling" or other

forms of play. There was one particular occasion where Waller groped **Elizabeth Dryer's** butt while they were "wrestling." Even at that early age, she recognized that it was not incidental contact. She had wrestled with her brothers all her life and it never involved that. **Elizabeth Dryer** told a friend at the church who then told her mother. Pastor Glover learned of the allegation and met with **Elizabeth Dryer** and her mother, Lori Dryer, in or around 2004.

191. Plaintiff **Victoria Collins**, born in 1990, attended the homeschool program and participated in other children's programs run by children's pastor Tony Waller at Refuge Church from approximately 2001 to 2005, when she was approximately 10 to 14. Waller recorded sexually explicit videos and images of her as a child. Waller also molested her over the clothes on multiple occasions.

192. In or around 2004, **Stephanie Davis** and **Elizabeth Dryer** found the hidden camera in the bathroom's storage closet while playing hide and seek. The girls told others about finding the camera.

193. Around this same time, **Elizabeth Dryer** told others about Waller groping her butt while wrestling.

194. Pastor Mike Glover quickly called **Stephanie Davis** and her mother, Ginger Davis, to a meeting to discuss the hidden camera and allegations of sexual misconduct. During the meeting **Stephanie Davis** specifically told Glover that Waller was using the hidden camera to film the girls naked during their required stretching. Glover, of course, had the camera, its concealed location, and the bizarre list of stretches as physical proof, so there could be no doubt he already knew this. At this meeting **Stephanie Davis** also told Glover about being drugged by Waller and even brought him the cup Waller had spiked.

195. Around this same time, Pastor Glover also held a meeting with **Elizabeth Dryer** and her mother, Lori Davis, to discuss the hidden camera and allegations of sexual misconduct. During the meeting, **Elizabeth Dryer** told Pastor Glover not only about the hidden camera and the nude stretching, but also about Waller molesting her. Pastor Glover, despite having physical proof, including a written list of stretches ordering the girls to bend over spread eagle in the direction of where the hidden camera was discovered, accused **Elizabeth Dryer** of making false accusations and shamed her into agreeing that Waller did not molest her.

196. The Refuge Church board, the District Council, and the General Council were made aware of these new Waller problems in or around 2004.

197. The General Council, the District Council, the Refuge Church board, and Pastor Mike Glover suspended Waller for a period of two to four weeks so that he might undergo spiritual restoration, after which they allowed Waller to resume full duties as children's minister without restriction.

198. They also removed the hidden camera from the bathroom's storage closet and had the church's custodian, Mr. David Harrin, fill in the doorknob hole. Defendants took down the list of stretches and the girls were told they would no longer be doing stretches.

199. Defendants did not report Tony Waller to civil authorities. Instead, they allowed Waller to resume full access to Plaintiffs and other girls in the program, with no added precautions of any kind. They never provided Plaintiffs with any explanation for these decisions.

200. Additionally, and notably, Defendants allowed Waller to keep the camera discovered in the bathroom, along with the recorded footage of Plaintiffs and do with it as he pleased.

201. The General Council, District Council, the Refuge Church board, and Mike Glover also failed to remove the cameras hidden in the bathroom that had been installed in the attic above the ceiling, which Waller continued to use to record Plaintiffs and other girls in the nude. Rather, church officials specifically told Plaintiffs never to go in the attic.

202. The Defendants continued to expose **Stephanie Davis, Samantha Davis, Elizabeth Dryer, and Victoria Collins** to Waller following the discovery of the first hidden camera and the reports of sexual molestations. All four of these Plaintiffs continued to be preyed upon and touched inappropriately under the guise of incidental contact during play following this. All four of these Plaintiffs continued to be filmed nude and while using the bathroom by the additional hidden cameras placed in the attic following this, even if they were no longer being forced to stretch.

203. According to all Plaintiffs, there was almost never another adult present during the homeschool program or the other weekday children's programs, even after the revelations of 2004. It was always only Tony Waller and the children. These Plaintiffs cannot recall a single time that another adult checked on them during these countless hours they spent with Waller at the church multiple days a week for years. Not even after the revelations of 2004 did Defendants bother to supervise in the slightest Waller's time spent with these young girls.

204. Approximately two years after Plaintiffs found the camera, in or around 2006, another young girl at Refuge Church, 12-year-old Courtney Blackburn, caught Tony Waller secretly filming her undress. Blackburn's mother, Rhonda Kelly, reported the crime to Pastor Glover, just as Ginger Davis and Lori Dryer had approximately two years prior, and just as he had then, Mike Glover again did nothing. More specifically, Pastor Mike Glover told the mother that

he and other Assemblies of God leaders had “prayed over” the matter and received an answer from God: that it was all a big misunderstanding, and that Courtney was being overly sensitive.

205. Once again, the Defendants left Tony Waller in place as Refuge Church’s children’s pastor and head of the children’s programs with no restrictions and no supervision.

206. The Defendants all made it clear to these victims and their mothers that it was not their place to question God’s will. It was not their place to question the decisions of God’s chosen messengers. And it was not their place to question their decision to treat Tony Waller, a chosen and “credentialed” messenger of God, with tenderness and gentle forgiveness time after time, regardless of the known danger he posed to the church’s children.

Second Generation Victims

207. Due directly to the choices made by these Defendants, Tony Waller spent the next decade sexually abusing these and other children until he was finally arrested in 2015.

208. Two of Waller’s later victims include Plaintiffs **Taylor Perrin** and **Jane Doe 1**. Neither **Taylor Perrin’s** nor **Jane Doe 1’s** families attended Refuge Church. Both girls began attending the church as young girls because of their close friendship with Janus Doe Witness Two, a school peer whose family was very involved in Refuge Church.

209. Plaintiff **Taylor Perrin**, born in 2001, attended children’s programs run by children’s pastor Tony Waller at Refuge Church from approximately 2009 to 2014, when she was approximately 8 to 13. She was part of a small group of young girls who spent weekday afternoons alone with Tony Waller at the church for a number of years. This group included both **Jane Doe 1** and Janus Doe Witness Two.

210. Waller often picked **Taylor Perrin** up in the church van to bring her to the church for his children’s programs in the afternoons after school, and also on weekdays during summers.

She also attended Assemblies of God church camps led by Waller. This was all in addition to attending regular church services on Wednesday and Sunday. Waller recorded sexually explicit videos and images of Taylor as a child. Waller also molested her over the clothes on multiple occasions.

211. **Taylor Perrin** recalls that they were always alone with Tony Waller at the church. There never seemed to be other adults nearby. The church was their play area, and the play always included Tony Waller. They played hide-and-seek and other children's games, learned songs, made videos for the church, played dress up, performed costumed skits, and engaged in various water activities outside and in the ancillary church building across from the main chapel.

212. **Taylor Perrin** recalls that Waller spent time gaining her trust – acting like a playful father figure and encouraging her to open up to him – before he began engaging in overt sexual misconduct. For instance, he showed up at her school to have lunch with her, where he would attempt to recruit other little girls to the Refuge children's program.

213. Waller engaged **Taylor Perrin** in numerous acts of sexual misconduct, particularly from the ages of ten to twelve. This included molesting her over the clothes; Waller always found ways to place his hands on her chest and rear end or on her thigh moving it upwards, whether it be while hiding in a dark closet, while picking her up, while tickling her, or while utilizing other ploys that gained him access to her body. Waller also gave **Taylor Perrin** foot massages at the church when she was approximately 11.

214. Waller filmed video and created images of **Taylor Perrin** nude using hidden cameras located in the same bathroom he forced a previous generation of victims to perform nude stretching. Waller always had a reason for **Taylor Perrin** and the other girls to change their clothes in the bathroom. In the summers they had "water days" spent playing in kiddie pools and with

hoses outside in bathing suits. For this, Waller kept a large collection of little girls' bathing suits that he had them change into in the bathroom. He kept spare clothes of all kinds for little girls, including little girls' panties, which he routinely encouraged the girls to change into. He also had a collection of costumes for the girls to change into in the bathroom so they could perform in little skits or make announcement videos for the church. Taylor Perrin recalls getting fully undressed in this bathroom at Waller's behest on numerous occasions.

215. **Taylor Perrin** also specifically recalls that Tony Waller used the church's funds to purchase these little girls' items of clothing. She knows this because she went shopping with him on one occasion.

216. Sometime between approximately 2005 and 2008, Waller, or possibly Defendants, removed the cover on the doorknob hole in the bathroom closet, and sealed the door shut so that the girls could not learn what was in the closet. Upon information and belief, Waller was filming **Taylor Perrin** and other girls changing clothes using a camera hidden behind the door, in addition to the cameras in the attic that Plaintiffs now know for certain were filming the girls from above.

217. Waller particularly targeted Janus Doe Witness Two. Witnesses recall that on one occasion Waller peered down Janus Doe Witness Two's pants at her vaginal area and commented how he was impressed with her development, meaning her incipient pubic hair. He also molested Janus Doe Witness Two, according to witnesses.

218. At Assemblies of God church camps in the summers, Waller engaged **Taylor Perrin** and other girls in sexualized and demeaning "games" in open view of other adults, including other pastors and members of Assemblies of God leadership. **Jane Doe 1** also experienced these bizarre events at the Assemblies of God summer camps. There was one game created by Waller involving a metal bar with dangling chains on the end of which hung donuts.

The girls, wearing bathing suits, had to kneel with their hands tied behind their backs and compete to see who could eat the donuts fastest while Waller and other adults watched, presumably with approval.

219. Another Waller church camp game involved pudding-filled diapers placed on a table that the girls had to eat without using their hands, again while their hands were tied behind their backs and they were bent over the table at the waist. Remarkably, none of the other Assemblies of God adults questioned these bizarre and exploitive child performances directed by a man previously suspended for sexually abusing girls.

220. Plaintiff **Jane Doe 1**, born in 2001, attended the children's programs run by Tony Waller at Refuge Church from approximately 2010 to 2014, when she was approximately 9 to 13. In most ways, **Jane Doe 1's** experience mirrored **Taylor Perrin's**. For years she spent multiple afternoons every week participating in Tony Waller's children's programs at Refuge Church. She also occasionally spent time with Waller at the church on weekends. She often helped Waller create announcement videos for the church, which frequently required her to change into one of the little costumes Waller kept at the church.

221. Waller recorded sexually explicit videos and images of **Jane Doe 1** as a child. Waller also molested **Jane Doe 1** both *under* the clothes and over the clothes on multiple occasions.

222. Like **Taylor Perrin** and like the previous generation of Waller victims, **Jane Doe 1** has no memory of another adult being present or checking on Waller with the children. It was always Waller alone with the children. Waller was never supervised.

223. As he did with **Taylor Perrin**, Waller often required **Jane Doe 1** to undress and change clothes in a church bathroom now known to have contained hidden cameras. Waller's

various excuses for making her change were the same as with **Taylor Perrin** – costume performances, dress-up, water activities, etc.

224. **Jane Doe 1** recalls multiple incidents where they played games with Waller, such as hide-and-seek or chase, and Waller would pick her up and his hands would land on her private areas, and then he would pretend it was an accident.

225. Waller's activities with **Jane Doe 1** occurred in the main church, but also in the church's ancillary building. On at least one occasion, when **Jane Doe 1** was approximately 12, Waller recorded himself drugging her, molesting her, and showering with her in this church building – all of which Waller specifically confessed doing to Jonesboro police detectives after his arrest in 2015.²⁴ Waller put her in a bathing suit and then led her into the building. Once inside, he made her drink from a Styrofoam cup. After that, he put **Jane Doe 1** into a galvanized watering trough that he had already filled with water. Waller then dumped a powdery substance into the water and mixed it in, causing the water to become gelatinous. After several minutes, **Jane Doe 1** became visibly impaired by the drugs. She could no longer stand on her own and she asked Waller to take her to the doctor. Waller only laughed in response. Then he picked her up, groped her breasts, and placed her on the floor. **Jane Doe 1** attempted several times to stand but she could not. During one attempt she fell backwards and struck her head on a nearby refrigerator. Waller then pulled her swimsuit bottoms down to her knees, exposing her genitalia and running his hands all over her exposed body. Next, he carried her to a back room where he continued to molest her as he gave her a shower. Waller was wearing only underwear and a white tank top. Waller's hidden cameras in this building recorded all of it.²⁵

CAUSES OF ACTION

²⁴ See Jonesboro Police Dept. Incident Report No. 15-04718.

²⁵ See Jonesboro Police Dept. Incident Report No. 15-04718.

COUNT ONE: NEGLIGENT HIRING (against all Defendants)

226. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

227. Defendants negligently hired Tony Waller. Their negligence was a proximate cause of Plaintiffs' damages described in this Complaint. Defendants knew, or in the exercise of reasonable care should have known, that Waller's hiring subjected young girls to an unreasonable risk of harm.

228. At the time Defendants hired Waller, they were specifically aware that he struggled with an inappropriate attraction to young girls and were aware of allegations to this effect, including but not limited to the incidents described in Jonesboro Police Department Offense Report No. 2000-02701.

229. While the fulcrum of a negligent hiring claim is typically the adequacy of a background check, Defendants' prior experience with and knowledge of Waller makes that less significant here. In the event Defendants were to deny their prior knowledge of the issues that made Waller an unfit hire, then that would necessitate Waller's background check having been inadequately performed.

230. Regardless, there exists here a direct causal connection between either (1) Defendants' inadequate background check of Waller or (2) their decision to hire a man they already knew struggled with sexual attraction to young girls and the acts of sexual abuse for which Plaintiffs are attempting to hold Defendants liable.

231. For all of the reasons described herein, Defendants breached their duties to Plaintiffs. As a direct result of Defendants' negligent hiring, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

COUNT TWO: NEGLIGENT SUPERVISION (against all Defendants)

232. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

233. Defendants were negligent in their supervision of Waller. Their negligence was a proximate cause of Plaintiffs' damages described in this Complaint. They knew or in the exercise of reasonable care should have known that Waller subjected Plaintiffs and other young girls to an unreasonable risk of harm.

234. Negligent supervision and retention cases hinge on the element of foreseeability of the employee's actions. There is always a duty of reasonable care in the supervision of employees. However, when there is foreseeability, employers have a duty to control an employee for the protection of third parties even where the employee is acting outside the scope of employment. *Regions Bank & Trust v. Stone County Skilled Nursing Facility, Inc.*, 345 Ark. 555, 568, 49 S.W.3d 107, 115 (2001). Wallers' sexual abuse of Plaintiffs was foreseeable to Defendants at every turn.

235. In fact, it is "not necessary that the employer foresee the particular injury that occurred, but only that the employer reasonably foresee an appreciable risk of harm to others." *Saine v. Comcast Cable Vision of Arkansas, Inc.*, 354 Ark. 492, 126 S.W.3d 339 (2003). **However, in this case, the exact injuries suffered by Plaintiffs were specifically foreseeable to Defendants for all the reasons described in this lawsuit.**

236. Defendants' negligent supervision of Waller was a proximate cause of Plaintiffs' injuries because their injuries were the natural and probable consequence of Defendants' negligence and ought to have been foreseen in light of the circumstances existing at the time. See *Regions Bank & Trust v. Stone County Skilled Nursing Facility, Inc.*, 345 Ark. 555, 568, 49 S.W.3d 107, 115 (2001).

237. Here, Defendants knew, or in the exercise of reasonable care should have known, that Waller presented a risk of danger to Plaintiffs and other girls. See *Regions Bank & Trust*, 345 Ark. At 568, 49 S.W.3d at 113. See also *Saine*, 354 Ark. At 497, 126 S.W.3d at 342. Despite this, Defendants did nothing to control Waller or to protect Plaintiffs.

238. To the contrary, Defendants, upon information and belief, allowed Waller to serve as children's pastor and allowed Waller to run the children's programs despite their awareness of the risk he posed girls. Despite this knowledge, they took no action to monitor or constrain Waller's interactions with Plaintiffs and other young girls attending the church. Defendants' inaction is directly responsible for Plaintiffs' injuries. They knew or should have known that such inaction would result in the harm suffered by Plaintiffs, which it did. For all of the reasons described herein, Defendants breached their duty to Plaintiffs.

239. Defendants, as described herein, concealed their knowledge that Waller was a predator. They misrepresented that children were safe around Waller, when, in fact, girls attending the church and the children's programs were at an unreasonably heightened risk of sexual abuse by Waller, a risk of which Defendants were aware.

240. In addition, Defendants failed to inform, educate, or train staff in how to identify, prevent or respond to incidents of child sexual abuse; warn girls in their programs (or their parents) about this known danger; implement reasonable and feasible child abuse prevention policies; alert authorities to the nature and scope of this known danger, as required by law as mandatory reporters; or fire, discipline, or remove Waller or otherwise prevent him from accessing Plaintiffs. As a result, Waller sexually abused Plaintiffs.

241. Defendants bestowed great authority on Waller, which he used to befriend Plaintiffs and gain the trust of Plaintiffs. Defendants allowed Waller to do so and willingly vested this

authority in Waller despite having known or having should have known that he was a continuing sexual danger to young girls, and specifically to Plaintiffs.

242. Waller's sexual misconduct was foreseeable to Defendants as set out herein.

243. Defendants knew or should have known the danger that Waller presented before and during the time period in which Plaintiffs were abused. Despite this knowledge, Defendants ignored the danger and permitted Waller to prey upon Plaintiffs by failing to monitor and restrict Waller, failing to warn of the danger, failing to implement reasonable policies to prevent further abuse by Waller, and failing to report Waller.

244. For all of the reasons described herein, Defendants breached their duties to Plaintiffs. As a direct result of their negligent supervision of Waller, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

COUNT THREE: NEGLIGENT RETENTION (against all Defendants)

245. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

246. Defendants were negligent in their retention of Waller as children's pastor. Their negligence was a proximate cause of Plaintiffs' damages described in this Complaint. They knew, or in the exercise of reasonable care should have known, that Waller subjected Plaintiffs and other young girls to an unreasonable risk of harm.

247. For the reasons described throughout this Complaint, Defendants' decision to retain Waller, despite their knowledge of the danger he presented to young girls, was negligent and a proximate cause of Plaintiffs' damages.

248. For all of the reasons described herein, Defendants breached their duties to Plaintiffs. As a direct result of their negligent retention of Waller, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

COUNT FOUR: NEGLIGENCE (against all Defendants)

249. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

250. Defendants owed a duty of care to Plaintiffs, as described herein.

251. This duty included a duty to supervise Plaintiffs at the church, during the homeschool program, and during other children's programs.

252. Defendants utterly failed to do this.

253. At all relevant times hereto, Defendants and their agents were required to consider Plaintiffs' capacities to care for themselves and to protect them from foreseeable dangers created by their conditions as young children.

254. At all relevant times hereto, Defendants owed a duty of ordinary care to the children in their children's programs, including Plaintiffs.

255. At all relevant times hereto, it was within the scope of Defendants' professional services to provide a safe environment for Plaintiffs attending their programs.

256. At all relevant times hereto, Defendants had a duty to protect the children in their programs against foreseeable harm.

257. At all relevant times hereto, Defendants and their agents had a duty to furnish the care and attention reasonably required by the children attending their ministry programs.

258. Defendants breached their duties to Plaintiffs.

259. Defendants' breach of their duties was a proximate cause of Plaintiffs' injuries.

260. The harm suffered by Plaintiffs was foreseeable to Defendants, and they knew or should have known that Waller presented an unreasonable risk of harm to Plaintiffs and other minors.

261. At all relevant times hereto, Defendants, as well as their agents, had statutory and common law duties to monitor the welfare of the children in their ministry programs and to report any suspected abuse or neglect of such children to authorities.

262. At all relevant times hereto, Defendants and their pastors were mandated reporters, as defined in the Arkansas Child Maltreatment Act.

263. At all relevant times hereto, Defendants' administrators and directors were mandated reporters, as defined in the Arkansas Child Maltreatment Act.

264. At all relevant times hereto, Defendants' elders and board members were mandated reporters, as defined in the Arkansas Child Maltreatment Act.

265. Defendants and their agents failed to report reasonable suspicions of child maltreatment.

266. Defendants failed to establish clear boundaries and codes of conduct to be observed by pastors and other staff when interacting with minors.

267. Defendants failed to put in place policies and protocols to keep children safe from sexual predation.

268. Defendants failed to warn congregants and their children of the known danger.

269. Defendants failed to supervise the children attending Waller's children's programs.

270. In addition, Defendants failed to inform, educate, or train their staff in how to identify, prevent or respond to incidents of child sexual abuse; warn girls in their programs (or their parents) about this known danger; implement reasonable and feasible child abuse prevention

policies; alert authorities to the nature and scope of this known danger, as required by law; supervise the children participating in programs; or fire, discipline, or remove Waller or otherwise prevent him from accessing Plaintiffs. As a result, Waller sexually abused Plaintiffs.

271. The moving forces that resulted in Plaintiffs' child sexual abuse includes the following policies, customs, or practices of Defendants:

- a. A policy, custom, or practice of not providing training to all staff members on how to identify, investigate, report, and prevent grooming, boundary violations, or other predatory behavior by adults and agents towards children;
- b. A policy, custom, or practice of not adopting sufficient policies and procedures on how to identify, investigate, report, and prevent grooming, boundary violations, and predatory behavior by adults and agents towards children;
- c. A policy, custom, or practice of not enforcing policies and procedures on to how to identify, investigate, report, and prevent grooming, boundary violations, and predatory behavior by adults and agents towards children;
- d. A policy, custom, or practice of not reporting, tacitly authorizing, or otherwise ignoring reasonable suspicions, reports, and other information indicating ongoing misconduct by adults or agents towards children;
- e. A policy, custom, or practice of not investigating, corroborating, communicating, adequately documenting, or retaining reports and rumors of suspected sexual misconduct by adults and agents towards children;
- f. A policy, custom, or practice of concealing and not warning children and parents about known dangers to children of sexual misconduct, harassment, and abuse posed by certain adults and agents; and

- g. A policy, custom, or practice of restoring pastors credibly accused of child molestation to their posts after a brief suspension during which the pastors receive counseling within the Assemblies of God.

272. For all the reasons described herein, Defendants breached their duty to Plaintiffs. As a direct result of their negligence, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

COUNT FIVE: TORT OF OUTRAGE (against all Defendants)

273. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

274. Defendants willfully and wantonly engaged in extreme and outrageous conduct - they accepted for employment a man they already knew or should have known struggled with sexual attraction to young girls, and then they failed to supervise him. They retained him as a children's pastor for years despite knowing that he was a child predator, and they did so without supervising him.

275. Defendants' conduct, as described herein, proximately caused the injuries to Plaintiffs described herein.

276. Defendants betrayed the trust of Plaintiffs and the community in the most egregious manner, given the amount of evidence of danger posed by Waller that they systematically ignored for an unreasonably long period of time. Their conduct was extreme, outrageous, and utterly intolerable in a civilized community. Their conduct went beyond all possible bounds of decency.

277. For all of the reasons described herein, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

**COUNT SIX: VICARIOUS LIABILITY FOR NEGLIGENT OR OTHERWISE
TORTIOUS ACTS AND OMISSIONS OF PASTOR MIKE GLOVER AND OTHER
AGENTS (against Refuge Church, the District Council, and General Council)**

278. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

279. Defendants are vicariously liable for all acts and omissions of their agents and employees, implied or expressed, including specifically, but not limited to, the negligence of Pastor Mike Glover, as well as other staff, supervisors, elders, and other church leaders who were aware of the risk posed by Waller and whose inaction enabled Plaintiffs' abuse.

280. These staff members, supervisors, elders, and church leaders, including specifically Pastor Glover, were all acting within the course and scope of their authority and employment, and in furtherance of all other Defendants' interests, when they negligently allowed this perpetrator, whom Defendants knew posed a sexual danger to Plaintiffs and other young girls, to have access to Plaintiffs, and when they negligently failed to take any steps to prohibit Waller's actions or to protect Plaintiffs from him.

281. One or more agents of Defendants, including but not limited to Pastor Mike Glover, knew for a certainty that this perpetrator posed a sexual danger to Plaintiffs and other adolescent girls, but still did nothing to protect Plaintiffs or remove the threat, thereby allowing Plaintiffs' abuse to occur. It was in furtherance of Defendants' goals that Mike Glover and other agents breached their duties to Plaintiffs, as these agents, upon information and belief, believed they were acting in a way that furthered the Defendants' holy mission, whether that be by refusing to treat Waller with anything other than tenderness and forgiveness or by choosing to act in a way that would avoid a scandal for the Assemblies of God.

282. Defendants' agents' negligence, including that of Pastor Glover, was a proximate cause of Plaintiffs' damages, and it is imputed to all other Defendants pursuant to the doctrine of respondeat superior.

283. For all the reasons described herein, Defendants breached their duty to Plaintiffs. As a direct result of Glover's and other agents' negligence, which is imputed to Defendants, Plaintiffs have suffered injuries and damages in an amount more than that required for federal diversity jurisdiction.

COUNT SEVEN: CIVIL ACTION BY A CRIME VICTIM (against all Defendants)

284. Plaintiffs hereby incorporate by reference all previous paragraphs as if fully set forth herein.

285. The allegations contained herein meet the criminal statutory definition of *Sexual Assault Second Degree*. A person commits *Sexual Assault Second Degree* where he is "a teacher, principal, athletic coach, or counselor in a public or private school in a grade kindergarten through twelve (K-12), in a position of trust or authority, and uses his or her position of trust or authority over the victim to engage in sexual contact with a victim who is...a student enrolled in the public or private school and less than twenty-one (21) years of age." A.C.A. § 5-14-125(a)(6). Each act of *Sexual Assault Second Degree* committed by Waller gives Plaintiffs a civil cause of action pursuant to A.C.A. § 16-118-107 against these Defendants. Pursuant to A.C.A. § 16-118-107, Plaintiffs shall be entitled to recover their costs and attorney fees should they prevail on this cause of action.

286. The allegations contained herein meet the criminal statutory definition of *Sexual Indecency with a Child*. A person commits *Sexual Indecency with a Child* where he "causes or coerces another person who is less than fourteen (14) years of age to expose his or her sex organs

or the breast of a female with the purpose to arouse or gratify a sexual desire of the actor or another person.” A.C.A. § 5-14-110 (a)(5). Each act of *Sexual Indecency with a Child* committed by Waller gives Plaintiffs a civil cause of action pursuant to A.C.A. § 16-118-107 against these Defendants. Pursuant to A.C.A. § 16-118-107, Plaintiffs shall be entitled to recover their costs and attorney fees should they prevail on this cause of action.

287. The allegations contained herein meet the criminal statutory definition of *Permitting abuse of a minor*. A person commits this crime where he, being legally charged with the care or custody of a minor, recklessly fails to take action to prevent the abuse of a minor. A.C.A. § 5-27-221. Each act of *Permitting abuse of a minor* committed by Defendants gives Plaintiffs a civil cause of action pursuant to A.C.A. § 16-118-107 against these Defendants. Pursuant to A.C.A. § 16-118-107, Plaintiffs shall be entitled to recover their costs and attorney fees should they prevail on this cause of action.

288. The allegations contained herein meet the criminal statutory definition of *Engaging Children in Sexually Explicit Conduct for Use in Visual or Print Medium*. A person commits this crime where he “employs, uses, persuades, induces, entices, or coerces any child to engage in or who has a child assist any other person to engage in any sexually explicit conduct for the purpose of producing any visual or print medium depicting the sexually explicit conduct....” A.C.A. § 5-27-303(a). Each act of *Engaging Children in Sexually Explicit Conduct for Use in Visual or Print Medium* committed by Waller gives Plaintiffs a civil cause of action pursuant to A.C.A. § 16-118-107 against these Defendants. Pursuant to A.C.A. § 16-118-107, Plaintiffs shall be entitled to recover their costs and attorney fees should they prevail on this cause of action.

289. The allegations contained herein meet the criminal statutory definition of *Employing or Consenting to the Use of a Child in a Sexual Performance*. A person commits this

crime where he, knowing the character and content of the performance, authorizes or induces a child under eighteen (18) years of age to engage in a sexual performance. A.C.A. § 5-27-402(a). Each act of *Employing or Consenting to the Use of a Child in a Sexual Performance* committed by Waller gives Plaintiffs a civil cause of action pursuant to A.C.A. § 16-118-107 against these Defendants. Pursuant to A.C.A. § 16-118-107, Plaintiffs shall be entitled to recover their costs and attorney fees should they prevail on this cause of action.

290. These crimes are proximate causes of Plaintiffs' injuries. As a direct result of these crimes, Plaintiffs have suffered injuries and damages in excess of the amount required for federal diversity jurisdiction.

**COUNT EIGHT: VIOLATION OF THE ARKANSAS CHILD MALTREATMENT ACT
(against all Defendants)**

291. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

292. Defendants or their agents are mandated reporters under A.C.A. § 12-18-402(a)(1)(A) and § 12-18-402(b)(29).

293. Defendants or their agents had reasonable cause to believe that Waller was a sexual predator who groomed, sexually exploited, and sexually molested minors in his care, including these Plaintiffs.

294. Defendants or their agents purposely did not notify the Child Abuse Hotline.

295. As a proximate result, Waller continued to sexually abuse Plaintiffs and other children.

296. Pursuant to A.C.A. § 12-18-206, Defendants are liable for Plaintiffs' injuries and damages in excess of the amount required for federal diversity jurisdiction.

**COUNT NINE: VICARIOUS LIABILITY FOR VIOLATION OF THE ARKANSAS
CHILD MALTREATMENT ACT (against Refuge Church, the District Council, and
General Council)**

297. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

298. Arkansas law provides that certain individuals are mandatory reporters of suspected child maltreatment, which includes sexual abuse. Arkansas law provides both civil and criminal liability for a purposeful failure to report.

299. Pastor Glover, as a member of the clergy or a similar functionary of a religious organization, was a mandated reporter under A.C.A. § 12-18-402(a)(1)(A) and § 12-18-402(b)(29).

300. Glover had reasonable cause to suspect that children had been subjected to maltreatment when it was reported to him that Waller had been abusing Plaintiffs and other minors on church property.

301. Glover purposefully did not notify the Child Abuse Hotline.

302. At all material times, Glover was an agent of Refuge Church, the District Council, and the General Council.

303. At all material times, Glover was acting as an actual or apparent agent of the Defendants, and his failure to report the child maltreatment was motivated by and done in furtherance of all other Defendants' goals of protecting the Assemblies of God's reputation by preventing Waller's conduct from coming to light.

304. As a proximate result, Waller continued to sexually abuse Plaintiffs and other children.

305. Pursuant to A.C.A. § 12-18-206, Refuge Church, the District Council, and General Council are liable for Plaintiffs' injuries and damages in excess of the amount required for federal diversity jurisdiction.

DAMAGES

306. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

307. As a direct result of Defendants' conduct described herein, Plaintiffs have suffered childhood sexual abuse and resulting injuries, conditions, and damages as follows:

- a. Plaintiffs have suffered and will continue to suffer great pain of mind and body;
- b. Severe and permanent emotional distress and mental anguish;
- c. Physical manifestations of emotional distress;
- d. Embarrassment;
- e. Loss of self-esteem;
- f. Humiliation;
- g. Shame;
- h. Psychological injuries, including, but not limited to, anxiety, depression, post-traumatic stress disorder, intimacy struggles, and psychosexual disorder(s); and
- i. Any other damages proven by the evidence and available under Arkansas law.

AMOUNT OF DAMAGES

308. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

309. Plaintiffs' injuries and damages are in excess of the minimum amount required for federal court jurisdiction in diversity of citizenship cases, for which Plaintiffs should be awarded

a judgment as against Defendants in an amount to fully and fairly compensate them for each and every element of damages that they have suffered.

PUNITIVE DAMAGES (against all Defendants)

310. Plaintiffs hereby incorporate by reference the previous paragraphs as if fully set forth herein.

311. Defendants knew that Waller presented an unreasonably high risk of sexual abuse to young girls, and specifically to Plaintiffs. As described with particularity herein, Defendants and their agents, including pastors and other church leaders, knew that Waller posed a sexual danger to girls attending their ministry programs, and they knew this for an unreasonably long period of time prior to the end of Plaintiffs' abuse. Defendants knew that their systematic refusal to take sufficient steps to protect children from predators like Waller would almost certainly result in the sexual abuse of minors such as Plaintiffs.

312. Therefore, their conduct can only be described as willful and wanton, extreme and outrageous, and in reckless disregard of the consequences. Defendants displayed a conscious indifference to the rights, safety, and welfare of Plaintiffs and every other child attending children's programs at the time of Waller's predations.

313. Plaintiffs are seeking punitive damages to punish Defendants, and to deter similar actors from engaging in this conduct.

JURY DEMAND

314. Plaintiffs respectfully demand a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, by and through their undersigned attorneys, respectfully request recovery for all damages previously pled herein, and for compensatory damages for the reasons

previously pled and in an amount previously prayed for and/or allowed by common law or by statute, in an amount left to the sound discretion of the jury, but in an amount necessary to satisfy the jurisdictional limits of this Court or any other Court, unless said damages are set, in whole or in part, by statute, for punitive damages, for their attorneys' fees and all costs herein expended, and for all other relief to which Plaintiffs are justifiably entitled.

Respectfully submitted,

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By: /s/ Joshua D. Gillispie

Joshua D. Gillispie

IN THE CIRCUIT COURT OF CRAIGHEAD COUNTY, ARKANSAS
____ DIVISION

STEPHANIE DAVIS; SAMANTHA DAVIS;
ELIZABETH DRYER; VICTORIA COLLINS;
TAYLOR PERRIN; and JANE DOE 1

PLAINTIFFS

vs.

CASE NO. _____

REFUGE CHURCH OF THE ASSEMBLIES
OF GOD, INC. OF JONESBORO, ARKANSAS;
ARKANSAS DISTRICT COUNCIL OF THE
ASSEMBLIES OF GOD; GENERAL COUNCIL
OF THE ASSEMBLIES OF GOD; CHARLES MICHAEL
GLOVER; BROTHERHOOD MUTUAL INSURANCE
COMPANY; CHURCH MUTUAL INSURANCE
COMPANY, S.I.; and JOHN DOES A-D

DEFENDANTS

AFFIDAVIT OF PLAINTIFFS' ATTORNEY
PURSUANT TO ACA 16-56-125

COMES NOW AFFIANT, Joshua D. Gillispie, and hereby swears and affirms as follows to the best of his knowledge, information, and memory:

I hereby attest that Plaintiffs are unaware of the identities of the John Doe Defendants A-D. To the extent that such John Doe tortfeasor(s) or insurance carriers are liable for some or all of Plaintiffs' damages, the identity of said tortfeasor(s) or insurance companies has not been determined as of this date and it is necessary to conduct discovery in order to determine the identity of said tortfeasor(s) or insurance carriers, including but not limited to any liability insurers who may be liable pursuant to a direct action. If a John Doe Tortfeasor or insurance carrier is identified for one or more causes of action, Plaintiffs will amend this Complaint in accordance with Ark. Code Ann. 16-56-125.


SIGNATURE

Joshua D. Gillispie
PRINTED NAME

5/20/26
DATE

ACKNOWLEDGMENT

On this day, personally appeared before me Joshua D. Gillispie, known to me to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained. WITNESS my hand and official seal, this 20th day of May, 2026.

Dana E. Henderson
NOTARY PUBLIC

MY COMMISSION EXPIRES:

7-0-2026

