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IN THE THIRD JUDICIAL DISTRICT COURT

IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

COLLIN TIMOTHY, ERIC TIMOTHY,
and BARBARA TIMOTHY BOWEN as
Guardian for Caleb and Lily Bowen,
minor children,

Plaintiffs,

vs.

GORDON BOWEN,

Defendant.

COMPLAINT AND JURY DEMAND

Civil No. _____

Honorable _____

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COME NOW Plaintiffs, Collin Timothy, Eric Timothy, and Barbara Timothy Bowen as Guardian for Caleb and Lily Bowen, minor children, and complain of Defendant Gordon Bowen as follows:

PARTIES

1. Plaintiff Collin Timothy ("Collin") is an individual residing in the State of California.
2. Plaintiff Eric Timothy ("Eric") is an individual residing in Salt Lake County, State of Utah.
3. Plaintiff Barbara Timothy Bowen (sometimes referred to herein as "Barbara Boyce," "Barbara Boyce Timothy," "Barbara Timothy Bowen" or "Barbara"), the mother and guardian of Caleb and Lily Bowen, minor children, is an individual residing in Salt Lake County, State of Utah.
4. Plaintiff Lily Bowen ("Lily") is a nine-year-old minor child residing with her mother Barbara Timothy Bowen in Salt Lake County, State of Utah.
5. Plaintiff Caleb Bowen ("Caleb") is a six-year-old minor child residing with his mother Barbara Timothy Bowen in Salt Lake County, State of Utah.
6. Defendant Gordon Bowen ("Gordon Bowen" or "Gordon") is an individual residing in New York City, New York.

*W. Gordon
Plaintiff*

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JURISDICTION AND VENUE

- 7. This Court has jurisdiction of this case pursuant to Utah Code Ann. §78A-5-102.
- 8. Venue is proper in this court pursuant to Utah Code Ann §78B-3-307.

FACTS

2009	2009
81	84
—	—
28	25

- 9. Collin was born August 9, 1981.
- 10. Eric was born January 25, 1984.
- 11. Collin and Eric's natural parents were Steven Timothy and Barbara Boyce Timothy.
- 12. In 1994, Steven Timothy died of brain cancer.
- 13. At the time of Steven Timothy's death, Collin was 13 years of age and Eric was 10 years of age.
- 14. Barbara Boyce and Gordon Bowen were classmates at Highland High School.
- 15. Barbara Boyce and Gordon Bowen went their own ways after high school, both serving LDS missions.
- 16. Unbeknownst to Barbara Boyce, Gordon Bowen was preoccupied with marrying her and believed that God had chosen her as his mate.
- 17. In 1976, just four days prior to her scheduled marriage to Steven Timothy, Barbara Boyce was teaching a class for missionaries when Gordon Bowen pulled her out of class at the Salt Lake Mission Home and in desperation told her that he had been in the mountains

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fasting and praying for ten days and God had told him she was to marry him, not Steven Timothy.

18. In 1992, two years before Steven Timothy died of brain cancer, Gordon Bowen wrote an essay titled "Dearest Savior" and dedicated it to "Barbara and Jesus, My Only True Loves."

cite from dearest savior ✓ see 10

19. After Steven Timothy died, Gordon Bowen convinced Barbara Boyce Timothy to marry him in 1995.

20. Gordon Bowen's marriage proposal to Barbara Boyce Timothy was after Gordon Bowen had been fired from the New York-headquartered advertising agency, McCann Erickson, and had returned to Utah, in debt. Gordon Bowen had been fired for "unacceptable behavior," the details of which were not disclosed.

✓

21. Rumors abounded that he was gay, rumors he denied.

Bowen

what he did (copy 10/10)

22. Gordon Bowen had close contacts with several LDS Church leaders and was under pressure from LDS Church leadership to marry.

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23. Gordon Bowen indicated to Barbara Boyce Timothy that he was trying to "rebrand" or "resurrect" himself.

24. In 1995, Gordon Bowen asked Barbara Boyce Timothy to marry him.

25. Barbara Boyce Timothy confided to her father, Alma Boyce, that someone had told her that Gordon might be homosexual, and requested her father's help in determining the truth.

26. In July, 1995, Alma Boyce interviewed Gordon Bowen, specifically asking if he was homosexual, if he had ever been involved with or engaged in homosexual relations of any kind, and if he was inclined toward or had any interest in homosexuality.

27. Gordon Bowen answered Alma Boyce's questions unconditionally in the negative, saying that he was not so inclined and had no such interest. On the strength of Gordon Bowen's representations, Alma Boyce told Barbara Boyce Timothy that he felt she could safely marry Gordon Bowen if she chose to.

28. After the marriage, Gordon Bowen fixated on Barbara Boyce Timothy's two younger sons, Collin and Eric. — ages

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29. Gordon Bowen provided Collin and Eric with lavish gifts (BMW's) and trips, inviting them to spend time in his apartments in Boston and New York City, insisting that they regularly sleep in the same bed with him.

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30. In April, 1999, Gordon Bowen sexually molested Collin during a vacation in St. John's.

31. The incident went unreported for several years.

32. During the night at issue, while sharing the same bed with Gordon Bowen at Gordon Bowen's insistence, Gordon Bowen moved in on Collin, slipping his hand in Collin's shorts and fondling his genitals. Collin woke up sick and horrified.

33. A second approach was made shortly thereafter and Collin curled up in a ball on the edge of the bed, hoping to avoid any further encounters.

begin to describe in detail

34. Collin fears that there were other such occurrences, perhaps many, when he was asleep in Gordon Bowen's bed with him at other times and locations.

35. Gordon Bowen got Collin involved in modeling. ^{Gordon} He had his friend Joe Moe take photos of Collin with just underwear on, sitting in the sand - photos he said Collin could use for his portfolio. Gordon always had that photo of Collin on his desk, wherever he moved. ^{wright stack-}

36. Gordon Bowen placed Collin with a modeling agency in New York City, which had Collin do a photo shoot for Maxim's Magazine. To Collin's embarrassment, the article for which they used Collin's photos was entitled "SEX 911."

37. Gordon Bowen also designed a program when Collin was in high school where he meticulously measured Collin's and Eric's bodies, with the explanation that he was charting their physical progress and development from their workouts. The measurements were taken all over their bodies, but especially uncomfortable was the measurement of their waistlines and upper thighs. ^{low}

38. In early 2001, Gordon Bowen encouraged Collin to serve an LDS mission.

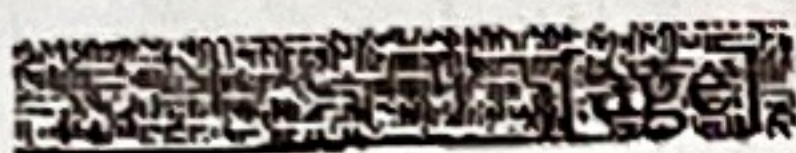
39. Gordon Bowen knew Salt Lake Tribune reporter Peggy Fletcher-Stack and encouraged her to do a story about Collin's missionary experience from beginning to end.

40. What the stories did not report is how Collin came home briefly in early Spring 2002 to deal with a medical problem and discovered male pornography on the laptop belonging to his step-father, Gordon Bowen.

41. In early 1996, Gordon Bowen sublet an apartment in New York City from Betty Kahn's friend, Vanna, under the representation that he would be very low-key and behave more like a frequent houseguest than a tenant. Gordon Bowen agreed he wouldn't have anyone else stay in the apartment, except his family when they visited New York.

42. Contrary to his promise, Gordon Bowen had a parade of young men in and out of the apartment which almost caused Vanna to lose her lease.

43. Gordon Bowen, as indicated above, bought Eric a BMW when he was



44. Gordon Bowen wrote in his journal that God told him that this car was his way of "controlling Eric."

45. Gordon Bowen frequently took Eric on expensive trips, including to the Academy Awards, Wimbledon, and the Detroit Auto Show.

46. Gordon Bowen entered in his journal that God had told him that Eric needed hard, masculine love from Gordon; that Eric had felt sexual desire towards Gordon; and that all of Barbara Boyce Timothy's boys were sexually wounded. He wrote that he was told by God that they came into life that way genetically, that Steven Timothy's "stuff" is in them, and that he (Gordon) was called to heal Barbara Boyce Timothy's family line, the Boyce line, the Timothy line, and that such efforts would be fulfilling a mission from God.

47. In June 2003, Collin and Eric went to live with Gordon Bowen in New York City and Collin worked for Gordon Bowen's advertising company.

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48. Gordon Bowen flew his personal "therapists," David Hamblin and Kisi Watkins, to New York City to treat Collin and Eric using exorcism.

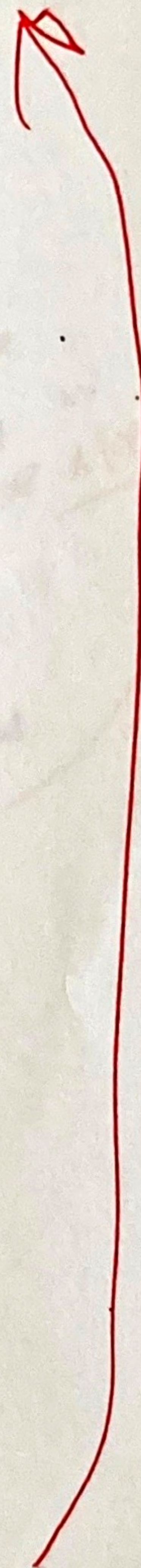
49. David Hamblin and Kisi Watkins's assignment with Collin and Eric, as carried out, was to convince Collin and Eric that their mother was "off her rocker" and that if she left Gordon Bowen, she would be making a serious mistake and that God would be very angry with her.

50. David Hamblin and Kisi Watkins told Collin and Eric that the LDS Church did not want to excommunicate Gordon but that their mother had caused such a stir by exposing Gordon's homosexuality that they had to do it to save face.

51. David Hamblin and Kisi Watkins accused Collin and Eric of doing things that were morally wrong and illegal.

52. David Hamblin and Kisi Watkins also told Collin and Eric that their father, Steven Timothy, was a sexual deviant and that they had inherited his problem and that Gordon, in contrast, was a wonderful man who had done nothing wrong.

53. David Hamblin and Kisi Watkins told Collin and Eric that Gordon Bowen was not homosexual and had only gone to male escorts to find comfort and solace devoid of any sexual impropriety, and that Collin and Eric were both sexual deviants who were full of evil spirits and needed help from David Hamblin to cast out those evil spirits the way he had cast the evil spirits out of Gordon Bowen.



54. This nightmare took place for three days. Gordon Bowen participated on the third day, confirming everything David Hamblin and Kisi Watkins had said.

55. On the third day, Gordon Bowen stole Collin's and Eric's passports and airline tickets (for travel the next day) which they had purchased to attend a University of Utah class.

56. David Hamblin and Kisi Watkins used classic brainwashing techniques to destroy Collin and Eric's self-concept and to substitute Gordon Bowen in their minds for their father and their mother.

57. Collin and Eric didn't know enough to recognize the techniques then, but later realized that David Hamblin and Kisi Watkins were trying to alienate them from their mother and father, which caused them severe emotional distress.

58. When Eric was 14 years of age, Gordon Bowen made him and Dustin Swan wrestle each other in their underwear while rolling around in the sprinklers and Gordon Bowen asked Eric to "moon" him (Gordon Bowen).

59. At the time, Gordon Bowen was taking photographs and promising to make the boys Abercrombie models.

60. At age 16 or 17 in approximately 2000 or 2001, Eric was on a trip alone with Gordon Bowen in New York City or Boston.

61. Again, on that trip, Gordon Bowen insisted that Eric sleep in the same bed with him.

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62. Eric, thinking his step-father Gordon Bowen was asleep, turned the television on to a pornographic movie, became sexually aroused, and began masturbating.

63. To his surprise and shock, Gordon Bowen rose from his bed and came to Eric, placing his hand on Eric's hand and genitals to assist him with the masturbation process.

64. The incident was so shocking and terrifying to Eric that he repressed any memory of it and of any other such incidents until Dr. Juan Mejia, through counseling, was able to assist Eric in recalling the incident in March or April, 2009.

65. At age 19, Eric became severely depressed, had to drop out of all of his classes at the University of Utah, and was diagnosed with depression and anxiety by Dr. Bernard Grosser, a Professor of Psychiatry at the University of Utah.

66. Dr. Laura A. Czajkowski of the Sleep Wake Clinic at the University of Utah Medical Center indicated in her evaluation of Eric that he showed all the signs of having been sexually molested.

67. Eric has had recurring bad dreams and other indicators that there are other instances of sexual abuse perpetrated upon him by Gordon Bowen that remain repressed.

68. Two children were born during the marriage of Barbara Timothy Bowen and Gordon Bowen, Lily, born August 1, 2000 and Caleb, born April 15, 2003.

69. Barbara Timothy Bowen and Gordon Bowen are the natural mother and father of Lily and Caleb.

70. While watching Lily alone on August 23, 2002, Gordon called five phone numbers linked to male escort services.

71. When confronted about this incident, Gordon acknowledged making the calls, but stated he couldn't remember if he had the male prostitute come up that time or not.

72. Lily has expressed on several different occasions, according to C. Haydee Mas, Ph.D, that she does not want to go with her father on visitation. She has stated different reasons which have included "I don't like his new house, not fun things there, and he's scary." When Dr. Mas questioned her about what made him scary, Lily replied "when he puts my brother and I on his car and drives and when he grabs between my legs, his finger hurts when in my bum hole and his face is scary."

73. When Lily was very young, Gordon told Barbara he was jealous he could not nurse her and said he wished he could nurse her with his penis.

74. When Gordon had taken Lily by himself at about 20 months of age, Lily became focused on her vagina, including inserting objects in it.

75. During the summer of 2003, Lily began masturbating and rubbing her genitals against the furniture.

76. After one of Lily's times of being left alone with Gordon Bowen, Barbara was changing her diaper and noticed how she sat up and had an unusual preoccupation with her vagina, inserting her finger and other objects on the changing table into it.

77. Gordon would often play with Lily in only a bathrobe, wearing nothing underneath, and do a game where he would ask her to go through his legs and he would pretend to go through her legs.

78. Lily was getting dressed on the morning of Sept. 4, 2004, when Barbara told her that she didn't have to take a nap because she was going with Gordon. Lily was being dressed with pull-ups and protested that she wanted to wear panties so she could "sleep with Gordon."

79. In approximately ~~2004~~ Lily and Caleb were in the bathtub when Lily leaned over and spontaneously placed her mouth on Caleb's penis.

80. During the period of ~~2004 to 2007~~ Gordon was constantly licking Lily's fingers and asking her to lick his during visitations.

81. Dr. Thomas Harrison treated Lily ~~from 2004 to 2007~~

82. Dr. Thomas Harrison reported major concerns from his visits with Lily, including the fact that Lily has a preoccupation with her labia, clitoris, and vaginal opening, which preoccupation, he indicates, is far greater than usual for a female child of her age and development.

83. Lily first exhibited this preoccupation behavior after she had been alone with Gordon on two occasions at about age eighteen months.

84. Lily has engaged in masturbation and self-stimulation while reading a book in Dr. Harrison's office.

85. Dr. Harrison has observed Lily tightly pressing her legs together, locking her feet together and tightening her thighs and abdominal muscles while rocking up and down when she was sitting on her mother's lap.

86. Dr. Harrison observed Lily continue this behavior while sitting alone in a chair or on the floor.

87. Dr. Harrison was concerned that Lily would not be interrupted or distracted from her intense masturbation for more than a few seconds before she would reengage.

88. Dr. Harrison reported that Lily appeared to be in a dissociate state while engaging in these behaviors, that she was intent on finishing or coming to some climax in her efforts notwithstanding his efforts to engage her in reading or listening to a book, or to redirect her attention elsewhere.

89. During the period of ~~2001 to 2003~~ Lily engaged in masturbation and self-stimulation at home on four or five occasions when she was watching a video or TV.

90. When Lily was four years of age, Dr. Harrison concluded that Lily has a masturbation/self-stimulation problem which is far greater than what is normal for a child her age.

91. Gordon Bowen has exhibited an obsession with Lily that is beyond normal, which caused one visitation supervisor, Julie Thorsen, who had been sexually abused as a young girl, to worry that Gordon was "priming" Lily, that watching Gordon play with Lily in a seductive way made her very uncomfortable and concerned for Lily.

92. At age seven, Lily has been reported to have pulled her pants down and wiggled her bum to a neighbor friend as well as urinating in the neighbor friend's yard.

93. This same neighbor friend indicated that on three or four occasions Lily took her into their bathroom and pulled down her pants and showed her vagina and anus.

bowed

94. The neighbor friend's mother has grounded her from playing with Lily.

95. In 2002, while still married to Barbara, Gordon took Lily from the house by himself for a few hours about three times, intentionally isolating himself with her.

96. One such occasion was when Barbara attended an Elder's Quorum party at a neighbor's home. Gordon showed up unexpectedly and then spent the duration of the party alone with Lily upstairs.

97. On another occasion, at a party at another neighbor's home, Gordon kept Lily in the back room with everyone else socializing in the living room.

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98. Gordon Bowen, even today, has Lily and Caleb sleep naked with him so that the three of them are naked together in bed.

no Gordon not naked

changed

99. Gordon Bowen often played what he called the "robber game" with Lily and Caleb and as part of the game he would have Caleb pull his pants down and show his bum and, on occasion, put his bum in Gordon's face.

100. Lily told her mother she would pull down her pants too during the robber game.

101. Part of the "robber game" was to have Caleb and Lily ride on top of Gordon Bowen's car while Gordon drove it. On at least one occasion, Caleb fell off the car.