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**THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

v.

DAVID HAMBLIN, ROSELLE
STEVENSON, DAVID LEAVITT,
GORDON BOWEN, BRIAN CAPENER,
RANDALL LAKE, PAUL LARSEN, DOES
1-100, and THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS, a
corporation

Defendants.

FIRST AMENDED COMPLAINT

JURY DEMANDED

Case No.: 2:25-cv-00783-HCN

Judge Nielson

PLAINTIFFS JANE DOE 1 and JANE DOE 2 (“Plaintiffs”) allege as follows:

INTRODUCTION

1. This action is brought under the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. §§ 1584, 1589, 1590, 1591, 1593A, 1594, and 1595, by Plaintiffs Jane Doe 1 and Jane Doe 2 (“Plaintiffs”), who were subjected to acts of child and adult sex trafficking,

forced labor, abuse, and modern slavery as minors and adults over the span of a decade in multiple states within the United States, Mexico and many Native American Reservations.

2. Plaintiffs were born into a family within the Church of Jesus Christ of Latter-day Saints (“LDS Church”) and were trafficked by their parents, grandparents, and senior members of the LDS Church, including high authorities in the LDS Church, as part of an organized child sex trafficking enterprise. This enterprise spanned Utah, California, Arizona, Nevada, and New York, and exploited Plaintiffs’ age and obedience through their religious upbringing.

3. The abuse was cloaked in religious rituals, conducted on church property, and perpetuated by individuals holding positions of authority within the LDS Church, creating a culture of silence, control, and impunity which enabled that trafficking to persist undetected for years.

4. Defendants knowingly perpetrated, facilitated, benefitted from, and/or participated in a venture that engaged in the trafficking of Plaintiffs in violation of the TVPRA.

5. Defendants’ actions as described herein were the result of willful and malicious and/or intentionally fraudulent conduct, and/or conduct that manifests a knowing and reckless indifference toward, and a disregard of, the rights of others.

6. The LDS Church, as a Defendant, knew or should have known that its facilities were used in furtherance of the sex trafficking enterprise, and failed to take reasonable actions to prevent the sexual exploitation of the Plaintiffs on its property and/or by individuals in its employ.

7. Plaintiffs seek damages and all available relief under federal law.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 18 U.S.C. § 1595.

9. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to the claims occurred in this District, including

trafficking, abuse, and acts of facilitation.

10. The Court has personal jurisdiction over the Defendants, many of whom reside or conduct regular business in this District and/or have purposefully directed activities toward this forum.

PARTIES

11. Jane Doe 1 is an adult individual and resident of the United Kingdom. She was between the ages of 17 and 27 when the events took place and is a survivor of child sex trafficking.

12. Jane Doe 2 is an adult individual and resident of California. She was between the ages of 9 and 19 when the events took place and is a survivor of child sex trafficking.

13. David Hamblin ("Hamblin") is an individual residing in Utah. He is the father of the Plaintiffs and a central organizer and perpetrator of the trafficking scheme.

14. Roselle Stevenson ("Stevenson") is an individual residing in Utah. She is the mother of the Plaintiffs and orchestrated much of the Plaintiffs' grooming, training, and trafficking.

15. David Leavitt is the former Utah County Attorney and a resident of Scotland. He knowingly participated in and benefitted from the trafficking venture and directly abused and raped the Plaintiffs.

16. Gordon Bowen is an individual residing in Utah. He directly participated in the trafficking and sexual abuse of the Plaintiffs.

17. Brian Capener is an individual residing in California. He is a filmmaker who directly participated in the abuse of Plaintiffs and collaborated with Hamblin and Stevenson to produce and distribute pornographic films involving the Plaintiffs.

18. Randall Lake is an individual residing in Utah. He is an artist who directly participated in the abuse of Plaintiffs and used the Plaintiffs as subjects during instances of sexual

abuse and exploitation under the pretense of artistic inspiration and to make a profit.

19. Paul Larsen is an individual residing in Utah. He is a media producer who directly participated in the abuse of Plaintiffs and worked with Brian Capener to record, edit, and distribute pornographic content featuring the Plaintiffs.

20. DOES 1-100 are individuals and entities whose identities are presently unknown who participated in or benefitted from the trafficking venture described herein.

21. The LDS Church is headquartered in Salt Lake City, Utah. A significant portion of the abuse suffered by the Plaintiffs—at the hands of the other named Defendants or other clients of the trafficking enterprise—occurred on Church property in Utah and in other states.

FACTUAL ALLEGATIONS

22. Plaintiffs Jane Doe 1 and Jane Doe 2 were born in 1986 and 1994, respectively, to a multigenerational family deeply embedded in Church culture and leadership. Their parents, grandparents, and various members of their family occupied top positions within the Church. Their family was regarded as a powerful and influential group in the Mormon Church, which enabled them to use the Plaintiffs' faith, fear, and isolation to groom them, as well as their two older sisters, for sexual exploitation from infancy.

23. Between 2003 and 2013, Plaintiffs were subjected to a systematic regime of abuse that involved training, coercion, rape, forced sexual performances, pregnancy by rape, forced abortions, and all forms of human trafficking and modern slavery across state lines, under the pretense of LDS religious rites and ceremonies.

24. Plaintiffs were trafficked for commercial sex acts to local persons in different states, as well as to LDS Church members, Church leadership, and "clients" brought in by their parents, grandparents, and other relatives. These acts were exchanged for money, services, political influence, and material goods (e.g., alcohol, drugs, and valuable artifacts from the Native

American and art community).

25. The trafficking enterprise was intergenerational. Plaintiffs' parents, Defendants Daniel Hamblin and Roselle Stevenson, were primary architects of the trafficking scheme. They worked alongside Plaintiffs' grandparents—Richard Llyod Anderson and Carma Dejon Anderson, both now deceased. Richard Anderson was a well-known lawyer, professor, and theologian in the Church, and used his connections to the Church to form the basis of the "clientele" to whom he would traffic the Plaintiffs for financial benefit. Abuse against the Plaintiffs frequently occurred at the Andersons' home during this time.

26. The trafficking enterprise was, at times, ritualized. Plaintiffs were forced to perform sexual acts on a daily basis. Some of these sexual acts were part of what their abusers called "lessons," and often took place on or around LDS religious holidays, in temple-like ceremonies, or at "Family Nights," where abuse was normalized and videotaped.

27. Defendants David Hamblin and Roselle Stevenson drugged Plaintiffs and trained them in sexual "performance" techniques by relying on threats, physical abuse, and religious indoctrination, among others.

28. One of the components of this trafficking enterprise was the creation and distribution of child pornography, orchestrated by Defendants David Hamblin and Roselle Stevenson, who commissioned, directed, and facilitated the production of explicit films and photographs featuring Plaintiffs for use in their commercial sex trafficking scheme. Plaintiffs' rape and sexual abuse was filmed, photographed, and advertised to select clientele. Plaintiffs were dressed and posed in sexually suggestive ways and coached to appear willing participants during the abuse.

29. Plaintiffs were routinely trafficked to other states including Arizona, Nevada, New

York, Florida, and New Mexico. Plaintiffs were also trafficked internationally in Mexico, among other countries. Defendants David Hamblin and Roselle Stevenson, as well as the Andersons and other individuals, transported the Plaintiffs and arranged for their abuse while they were traveling.

30. Defendants were aware of and participated in these trafficking activities. They benefited directly and greatly from the exploitation of the Plaintiffs.

31. Efforts by Plaintiffs to report the abuse to LDS Church authorities, law enforcement, or family members were routinely ignored, dismissed, or actively suppressed. In some cases, LDS Church attorneys and officials threatened Plaintiffs to remain silent about the abuse they suffered.

32. As a result of this sustained trafficking operation, Plaintiffs have suffered lifelong physical, emotional, and psychological harm.

THE SEX TRAFFICKING VENTURE AT ISSUE

33. Throughout their lives, Plaintiffs have been forced to perform sex acts on clients for the personal and financial benefit of defendants David Hamblin and Roselle Stevenson, the Andersons, and others.

34. At the heart of the venture was a child prostitution ring run by Hamblin and Stevenson from the Hamblin family home in Provo, Utah.

35. From a very young age, Plaintiffs, alongside their older sisters, were taught to perform sex acts on “clients” who visited the Hamblins’ home. Hamblin and Stevenson taught Plaintiffs how to act “seductively” and how to fulfill clients’ sexual fantasies. Plaintiffs were frequently forced to practice these sex acts on Hamblin and Stevenson and were punished when they refused.

36. “Clients”—friends of the Hamblin family—would visit the Hamblin family home for what were dubbed “Family Nights.” During Family Nights, Plaintiffs were forced to perform

sex acts on these visitors and were raped by these “clients.”

37. Hamblin and Stevenson charged fees to these “clients” to rape Plaintiffs and customized the fees based on the clients’ specific requests. Plaintiffs were given specific instructions on the roles they were to play—acting seductively, helpless and frightened, wearing a blindfold, being gagged and/or tied up, acting like an animal, acting like a baby whilst wearing a cloth diaper and a pacifier, pretending to be asleep, being tortured or caged or wearing a paper bag over their heads—to fulfill the clients’ fantasies.

38. Some clients also wanted sexual performances. Some clients especially enjoyed watching incest and would request performances between the children or between a child and a parent. Some clients also wanted to watch sexual performances between the Plaintiffs and their pets or other animals. Bestiality was often a part of the pornographic material. Pets and animals were also used as collateral or to control Plaintiffs out of empathy and/or fear.

39. Plaintiffs were also forced, by Defendants Hamblin and Stevenson, to perform home abortions when they became pregnant as a result of the sexual abuse.

40. Stevenson kept meticulous notes and files of the services, and the monies paid, and she charged clients extra if there was any sign of visible extra bruising or trauma, if it had not been previously agreed to between Stevenson and the clients.

41. During the early 2000s, the Plaintiffs also spent time living with their grandparents, the late Richard and Carma Anderson. The Andersons repeatedly arranged for the rape of the Plaintiffs, which occurred in the Anderson home, on Church property, or out of state. “Clients” of the Andersons included Defendants David Leavitt and Gordon Bowen, alongside senior members of the Church.

42. Hamblin and Stevenson also established a child pornography venture to further

exploit and profit from Plaintiffs. Between 2003 and 2010, Hamblin and/or Stevenson took photographs and videos of the Plaintiffs for their child pornography business. They would host “screening nights” where they would watch the pornographic movie with clients. After the screening, Plaintiffs would be forced to join the viewers, dressed as in the videos, and provide the same services that were depicted in the movie. These sex acts were performed in exchange for payment and other benefits provided to Hamblin and Stevenson by the clients.

43. Hamblin and Stevenson sold and traded these pornographic images and videos for profit. They enlisted the assistance of other Defendants, including Capener, Lake, and Larsen, to produce these pornographic images and videos.

44. Plaintiffs were frequently threatened and physically harmed if they refused to participate in these sex acts and pornographic films. Punishment for refusal to participate included Hamblin and Stevenson beating them, tying them up naked, torturing them, caging them for extended periods ranging from hours to days, starving them of food and/or water, and isolating them. Hamblin and Stevenson would also psychologically torment Plaintiffs when they refused to participate, including by becoming menacing and aggressive towards Plaintiffs, threatening them, and controlling them with violence.

45. Hamblin and Stevenson frequently threatened to release the pornographic images and videos of Plaintiffs if they refused to participate in the sex acts and abuse.

INDIVIDUAL DEFENDANTS’ ROLES AND PARTICIPATION IN THE TRAFFICKING SCHEME

David Hamblin

46. David Hamblin is the biological father of both Plaintiffs, as well as their two older sisters. He is a central figure in the trafficking scheme and directly participated in the sexual abuse, grooming, coercion, and exploitation of his daughters.

47. Hamblin was previously licensed as a therapist in the state of Utah. Hamblin used his professional credentials as a therapist to gain access to vulnerable individuals and to create a facade of legitimacy around the abuse.

48. Hamblin used his psychotherapy practice as a front to facilitate trafficking. Under the guise of providing therapy, he allowed and encouraged his clients to sexually abuse his daughters, the Plaintiffs and their older sisters, as part of their “treatment.” For example, during individual sessions, Hamblin would at times introduce a Plaintiff to a client and present her as a form of “healing.” Plaintiffs were coerced to perform sex acts—including oral sex and vaginal and anal rape—on adult men under Hamblin’s direction. Hamblin claimed these acts were necessary for the psychological healing of his clients.

49. Hamblin orchestrated and facilitated the interstate trafficking of his daughters, repeatedly arranging for their sexual exploitation by third parties. These acts were not only premeditated and coordinated, but also yielded significant personal and financial benefits to Hamblin.

50. Hamblin additionally played a critical role in producing and directing pornographic materials featuring the Plaintiffs and their older sisters and used these materials for commercial purposes within the trafficking venture.

51. Hamblin raped and abused both Plaintiffs, often on a daily basis. This included raping both Plaintiffs in their home, during pornographic filming sessions and photo shoots, and at events he held with individuals he invited to his home and elsewhere.

Roselle Stevenson

52. Roselle Stevenson is the biological mother of the Plaintiffs and their two older sisters and is a primary architect and enforcer of the trafficking scheme.

53. Stevenson regularly raped, traumatized, and groomed Plaintiffs and their sisters

from an early age for sexual exploitation, including by orchestrating training sessions that were designed to show Plaintiffs how to behave and sexually gratify the “clients.”

54. Stevenson threatened and punished Plaintiffs when they refused to submit to the sexual abuse and rape perpetrated by these “clients.”

55. Stevenson also personally participated in the abuse of Plaintiffs. In one incident in 2003, Stevenson forced Jane Doe 1 into her bedroom by holding a knife to her throat. Once in the bedroom, Stevenson sexually assaulted Jane Doe 1 while holding the knife to her stomach. When Jane Doe 2 entered the room and saw Jane Doe 1 crying, Stevenson threatened to do the same to Jane Doe 2 if she did not leave.

56. Stevenson also directed and participated in the production of child pornography involving the Plaintiffs.

57. Stevenson handled communications, health checks of clients, scheduling, and logistical arrangements with the clients who would rape and abuse the Plaintiffs. Many of these clients were business or family friends of Hamblin and Stevenson and their network.

58. Stevenson would also arrange for the Plaintiffs to be transported to their grandfather, Richard Anderson. Anderson would subsequently traffic the Plaintiffs to his own network, primarily comprised of Church authorities.

59. Stevenson personally profited from the sexual exploitation of her daughters. She facilitated the involvement of third parties and personally trafficked Plaintiffs across multiple states and internationally to prostitute them to “clients,” frequently in exchange for financial compensation.

David Leavitt

60. David Leavitt is the former Utah County Attorney.

61. Leavitt personally hosted, led, and participated in the abuse of Plaintiffs and

facilitated further trafficking through his role in the community and his access to legal and political systems.

62. Leavitt was known among members of the venture as the person responsible for helping cover up the abuse, planting misinformation, and intimidating potential witnesses or victims.

63. Leavitt—along with Hamblin and Stevenson—participated in the sexual abuse and rape of both Plaintiffs and their older sisters on several occasions between 2001 and 2006. These rapes often took place at the Andersons’—the Plaintiffs’ grandparents’ home.

64. On one occasion, Jane Doe 1 and one of her older sisters were forced by Hamblin and Stevenson to perform sexual acts in front of Leavitt. Leavitt and Hamblin then sodomized and raped Jane Doe 1 and her older sister.

65. On at least one occasion between the years 1990 and 1992, Plaintiffs were touched unwantedly in intimate parts by Defendant Leavitt during a family camping trip in Arizona and at other locations, who knew that this touching would cause affront or alarm.

66. On more than one occasion between the years 1993 and 1998, Defendant Leavitt sexually assaulted Plaintiff Jane Doe 1 at the Hamblin family home in Provo, Utah.

67. On more than one occasion on or about the spring or summer of 1999, Defendant Leavitt drugged and sexually assaulted Plaintiffs Jane Doe 1 and Jane Doe 2 at the Leavitt family home in Nephi, Utah. On another occasion in 2009, Leavitt raped Jane Doe 2 at his home in Utah.

68. Leavitt hosted gatherings at his home at which Plaintiffs, and other minors, were abused, and Leavitt received payments from “clients” who attended these gatherings.

69. Leavitt’s actions, omissions, and authority directly contributed to the perpetuation of the trafficking scheme. Leavitt received personal benefits from his involvement, including

sexual access to trafficked victims.

Gordon Bowen

70. Gordon Bowen is a former associate of David Hamblin and a direct participant in the trafficking venture.

71. In the 1980s, Bowen was a client of David Hamblin's, who was then a licensed psychologist. In their therapy sessions, Hamblin facilitated the repeated rape of his eldest daughter, Plaintiffs' sister, to "heal" Bowen of his childhood abuse.

72. Thereafter, Bowen was a consistent client of the trafficking enterprise. Between 2001 and 2006, Bowen repeatedly assaulted Jane Doe 1 and Jane Doe 2 outside of therapy sessions, including at his home and at the Andersons' home.

73. Bowen hosted gatherings at his home at which Plaintiffs, and other minors, were abused, and Bowen received payments from "clients" who attended these gatherings.

74. Bowen threatened Plaintiffs and engaged in violent sexual acts, including vaginal and anal rape, spanking, and humiliation, for his own sexual gratification under the pretext of psychological recovery.

75. Bowen was known within the sex trafficking venture as the "Punisher." Bowen, along with Hamblin, held "training sessions" for other families at his home, during which he taught parents how to punish and sexually abuse their children.

Brian Capener

76. Brian Capener is a filmmaker who directed and produced pornographic films featuring the Plaintiffs, often under the guise of producing content with "artistic merit" and always for a profit.

77. Capener collaborated with Hamblin and Stevenson to stage, choreograph, film, and distribute videos that depicted the sexual abuse and rape of Plaintiffs.

78. Capener personally participated in the abuse, including raping the Plaintiffs during or following filming sessions. He filmed close-ups of sexual acts, directed the Plaintiffs to act out orgasms and other expressions, and ensured footage was usable for clients of the trafficking ring.

79. Capener financially profited from the sale of the pornographic films featuring the Plaintiffs and reinforced the Plaintiffs' objectification as commodities to be exploited.

Randall Lake

80. Randall Lake is an artist who used Plaintiffs as subjects for his artwork while they were being sexually abused.

81. On multiple occasions, Lake orchestrated orgies, often under the guise of seeking "artistic inspiration" and always for a profit. Lake sketched or photographed the Plaintiffs while they were raped and sexually exploited by Lake and his guests.

82. Lake directed the Plaintiffs to perform humiliating acts and engage in sexual acts with adults while he documented the scenes. Lake also participated in the sexual abuse of Plaintiffs.

83. Lake financially profited from the sale of his artwork featuring the Plaintiffs. He used this pornographic material featuring the abuse of Plaintiffs for personal gain.

Paul Larsen

84. Paul Larsen worked with Brian Capener to produce pornographic films featuring the Plaintiffs.

85. Larsen participated in the trafficking enterprise by abusing Plaintiffs and other children, as well as assisting with the production, editing, and distribution of videos and images that graphically depicted the sexual abuse and exploitation of minors. Both during and outside of the pornographic film production, Larsen sexually abused Plaintiffs.

86. Larsen was present during filming sessions and was aware that the content involved

child victims, yet he continued his involvement for financial benefit and personal gratification. Larsen financially profited from the sale of the pornographic films featuring the Plaintiffs.

87. Larsen acted in concert with other members of the trafficking venture and is jointly liable for the harm inflicted upon the Plaintiffs.

LDS Church

88. Plaintiffs and their older sisters were frequently abused on LDS Church property in Utah and other states. This abuse was often facilitated by Church members—including Defendants Hamblin and Stevenson, as well as Plaintiffs' grandparents—and perpetrated by Defendants and other Church members.

89. Between 2000 and 2006, both Plaintiffs were repeatedly raped in buildings owned and operated by the LDS Church in Salt Lake City, Utah. The sexual abuse and exploitation of the Plaintiffs occurred in chapels and the offices of Church leadership, as well as other administrative buildings owned and operated by the Church. The Plaintiffs were frequently raped or sexually abused by Church leadership at these locations.

90. The Church knew or should have known that the trafficking was taking place on Church property and failed to take reasonable steps to prevent sexual exploitation of the Plaintiffs occurring on Church property.

PLAINTIFFS' EFFORTS TO REPORT THE ABUSE TO THE LDS CHURCH

91. Senior members of the LDS Church have been aware of the abuse suffered by Plaintiffs since at least 2003 but have failed to act or in any way assist Plaintiffs in reporting and seeking accountability for the abuse.

92. In fact, at various points, individuals and entities directly associated with the LDS Church have attempted to intimidate Plaintiffs and prevent them from reporting the abuse.

93. Jane Doe 1 first began reporting details of her abuse by Defendant Hamblin to the Provo police in 2011. On or about May 28, 2013, Jane Doe 1 received a call from a partner at a law firm that is widely known to represent the LDS church, threatening her and pressuring her not to pursue a criminal case against Hamblin. Jane Doe 1 was also advised by a Relief Society counselor not to progress in her pursuit of a criminal case against Hamblin.¹

94. In 2012, another senior member of the LDS Church visited Jane Doe 2 and one of her older sisters in California in an attempt to silence them and prevent them from reporting the abuse. This senior member later visited Jane Doe 1 in London and stated that an email sent by Provo Police Victim Advocate, Traci Anderson, requesting a meeting with a senior member of the LDS Church to discuss the Plaintiffs' and their sisters' abuse had been "passed around" to various Church authorities. The senior member promised she would follow up regarding the abuse. She never did.

95. Victim Advocates employed by the Provo Police Department have reached out to senior members of the LDS Church to seek assistance with their investigations of Plaintiffs' abuse, but their inquiries have been repeatedly ignored.

FIRST CLAIM FOR RELIEF

Trafficking Victims Protection Reauthorization Act — Sex Trafficking of Children by Force, Fraud, or Coercion: Direct Liability (18 U.S.C. §§ 1591(a)(1), 1595)

Against DEFENDANTS DAVID HAMBLIN AND ROSELLE STEVENSON

96. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

97. Defendants David Hamblin and Roselle Stevenson knowingly and in interstate

¹ The Relief Society is an LDS women's organization whose stated mission is to provide temporal and spiritual relief to women and others in need.

commerce recruited, enticed, harbored, transported, provided, obtained, maintained, and patronized Plaintiffs for the purpose of engaging in commercial sex acts as minors.

98. These acts were carried out using force, fraud, coercion, and threats of serious harm.

99. Defendants Hamblin and Stevenson knew, or were in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause Plaintiffs to engage in these commercial sex acts.

100. Hamblin and Stevenson transported Plaintiffs to multiple locations, including across state lines, to perform sex acts for clients who would pay Hamblin and Stevenson money for the sex acts performed by Plaintiffs.

101. Hamblin and Stevenson also profited from Plaintiffs' sex acts by starting a child pornography business involving Plaintiffs.

102. Hamblin and Stevenson punished Plaintiffs physically and psychologically when they refused to engage in these commercial sex acts.

103. Plaintiffs were minors at the time and unable to consent. The conduct constitutes direct liability for sex trafficking of children under 18 U.S.C. § 1591(a)(1), and Plaintiffs seek relief pursuant to 18 U.S.C. § 1595.

SECOND CLAIM FOR RELIEF

Trafficking Victims Protection Reauthorization Act — Sex Trafficking of Children by Force, Fraud, or Coercion: Beneficiary Liability (18 U.S.C. §§ 1591(a)(2), 1595)

Against ALL DEFENDANTS

104. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

105. Defendant Hamblin knowingly benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Defendant Hamblin

directly participated in the sex trafficking venture involving the commercial exploitation of Plaintiffs for financial gain. He received financial benefits from Plaintiffs' abuse, including payments from clients who sexually abused Plaintiffs.

106. Defendant Stevenson knowingly benefitted from her participation in a venture which she knew, or should have known, engaged in an act in violation of the TVPRA. Defendant Stevenson directly participated in the sex trafficking venture involving the commercial exploitation of Plaintiffs for financial gain. She received financial benefits from Plaintiffs' abuse, including payments from clients who Stevenson recruited to sexually abuse Plaintiffs at the Hamblin family homes in Provo and Spring City, Utah.

107. Defendant Capener knowingly benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Capener knew, or should have known, that Hamblin and Stevenson used force and threats to coerce Plaintiffs into performing sex acts. Capener financially benefited from the sex trafficking venture by recording pornographic films featuring Plaintiffs and distributing those films to others for his personal financial gain.

108. Defendant Lake benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Lake knew, or should have known, that Hamblin and Stevenson used force and threats to coerce Plaintiffs into performing sex acts. Lake financially benefitted from the sex trafficking venture by using Plaintiffs' sexual abuse for his artwork and distributing that artwork to others for his personal financial gain.

109. Defendant Larsen benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Larsen knew, or should have known, that Hamblin and Stevenson used force and threats to coerce Plaintiffs into performing sex

acts. Larsen financially benefitted from the sex trafficking venture by assisting with the production, editing, and distribution of videos and images that graphically depicted the sexual abuse of Plaintiffs, and distributing such videos to others for his personal financial gain.

110. Defendant Gordon Bowen benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Bowen hosted gatherings at his home at which Plaintiffs, and other minors, were abused, and Bowen received payments from “clients” who attended these gatherings.

111. Defendant David Leavitt benefitted from his participation in a venture which he knew, or should have known, engaged in an act in violation of the TVPRA. Leavitt hosted gatherings at his home at which Plaintiffs, and other minors, were abused, and Leavitt received payments from “clients” who attended these gatherings.

112. All Defendants received something of value from their involvement, including financial benefits, and are liable under 18 U.S.C. § 1591(a)(2) and § 1595.

THIRD CLAIM FOR RELIEF

Trafficking Victims Protection Reauthorization Act — Attempt or Conspiracy (18 U.S.C. §§ 1594, 1595)

Against ALL DEFENDANTS

113. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

114. Defendants knowingly and willfully conspired to commit sex trafficking in violation of 18 U.S.C. § 1591, and/or attempted to do so, in violation of 18 U.S.C. § 1594.

115. These Defendants knowingly agreed with one or more individuals to recruit, entice, harbor, transport, provide, obtain, advertise, or maintain Plaintiffs, knowing or in reckless disregard of the fact that Plaintiffs would be caused to engage in a commercial sex act through

force, threats of force, fraud, coercion, torture or abuse of legal process or vulnerability.

116. In furtherance of this conspiracy and/or attempt, Defendants engaged in overt acts, including but not limited to: coordinating the movement, isolation, or control of Plaintiffs; facilitating or profiting from the commercial sexual exploitation of Plaintiffs; manipulating or coercing Plaintiffs to comply with sexual acts under duress, physical violence, or psychological control; and using threats, surveillance, false promises, or physical restraint to maintain control over Plaintiffs.

117. Defendants' conduct constitutes a conspiracy and/or attempt to violate 18 U.S.C. § 1591, and Plaintiffs are entitled to bring a civil action under 18 U.S.C. § 1595.

118. As a direct and proximate result of Defendants' actions, Plaintiffs have suffered physical and emotional harm, economic loss, psychological trauma, and other damages, in an amount to be proven at trial.

119. Plaintiffs are also entitled to recover attorneys' fees, costs, and punitive damages to the extent permitted by law.

FOURTH CLAIM FOR RELIEF

Trafficking Victims Protection Reauthorization Act — Involuntary Servitude (18 U.S.C. §§ 1584, 1595)

Against DEFENDANTS DAVID HAMBLIN AND ROSELLE STEVENSON

120. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

121. Defendants David Hamblin and Roselle Stevenson knowingly and willfully held Plaintiffs in involuntary servitude in violation of 18 U.S.C. § 1584.

122. Hamblin and Stevenson forced Plaintiffs to engage in sex acts with clients as part of Defendants' sex trafficking venture by both threat of and use of physical restraint or injury.

123. Hamblin and Stevenson threatened and punished Plaintiffs physically and psychologically when they refused to engage in sex acts with clients.

124. Defendants received something of value from their involvement, including financial benefits, and are liable under 18 U.S.C. § 1584 and 18 U.S.C. § 1595.

FIFTH CLAIM FOR RELIEF

Trafficking Victims Protection Reauthorization Act — Forced Labor (18 U.S.C. §§ 1589, 1595)

Against DEFENDANTS DAVID HAMBLIN AND ROSELLE STEVENSON

125. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

126. Defendants David Hamblin and Roselle Stevenson knowingly obtained the labor and services of Plaintiffs in violation of 18 U.S.C. § 1589.

127. Plaintiffs' labor and services were obtained by means of force and serious harm, as well as threats of force or serious harm to themselves or another person.

128. Defendants Hamblin and Stevenson knew or were in reckless disregard of the fact that Plaintiffs' labor and services were obtained by means of force, threats of force, means of serious harm, and threats of serious harm.

129. Defendants Hamblin and Stevenson knowingly benefitted, both financially and by receiving items of value, from their involvement in obtaining the labor and services of Plaintiffs by means of means of force, threats of force, means of serious harm, and threats of serious harm.

130. Defendants' conduct constitutes a violation of 18 U.S.C. § 1589, and Plaintiffs are entitled to bring a civil action under 18 U.S.C. § 1595.

SIXTH CLAIM FOR RELIEF

Battery – Utah Common Law

Against DEFENDANT DAVID LEAVITT

131. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

132. Defendant Leavitt intentionally and unlawfully touched Plaintiffs and caused harmful and/or offensive contact without Plaintiffs' consent.

133. Plaintiffs Jane Doe 1 and Jane Doe 2 did not at any time consent to Defendant Leavitt's conduct and were harmed thereby. Defendant Leavitt's actions were willful, wanton, malicious, and oppressive, and justify the imposition of punitive and exemplary damages.

134. As a direct and proximate result of Defendant's sexual battery, Plaintiffs Jane Doe 1 and Jane Doe 2 suffered and continue to suffer emotional distress, mental anguish, humiliation, physical pain, and other damages in an amount to be proven at trial.

SEVENTH CLAIM FOR RELIEF

Battery – Utah Common Law

**Against DEFENDANTS HAMBLIN, STEVENSON, LEAVITT, BOWEN, CAPENER,
LAKE, and LARSEN**

135. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

136. Defendants intended to cause harmful and/or offensive contact with Plaintiffs.

137. Plaintiffs were beaten, tied up, tortured, and caged by Defendant Hamblin and Stevenson as punishment when Plaintiffs refused to participate in sex acts and pornographic films.

138. Defendants Hamblin, Stevenson, Leavitt, Bowen, Capener, and Lake each participated in the rape and sexual and physical abuse of both Plaintiffs.

139. As described herein, all Defendants performed countless other violations of Plaintiffs' bodies.

140. The contact described herein was harmful and/or offensive at law.

141. As a result, Plaintiffs have sustained serious psychological and emotional damage for which Defendants were the proximate cause.

EIGHTH CLAIM FOR RELIEF

Assault — Utah Common Law

**Against DEFENDANTS HAMBLIN, STEVENSON, LEAVITT, BOWEN, CAPENER,
LAKE, and LARSEN**

142. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

143. Defendants intended to cause harmful and/or offensive conduct to Plaintiffs.

144. Defendants intended to cause imminent apprehension of harmful and/or offensive conduct in Plaintiffs

145. As described herein, Defendants performed countless violations of Plaintiffs' bodies.

146. The Defendants acted deliberately with the intent to cause harmful and/or offensive contact with the Plaintiffs, contact which included rape, sexual abuse, and physical abuse.

147. As described herein, all Defendants performed countless other violations of Plaintiffs' bodies.

148. Defendants acted deliberately to cause imminent apprehension of their harmful and/or offensive contact in Plaintiffs through their repeated rapes, sexual abuse, physical abuse, and threats.

149. Plaintiffs were in imminent apprehension of this harm. As a result, Plaintiffs have

sustained serious psychological and emotional damage for which the Defendants were the proximate cause.

NINTH CLAIM FOR RELIEF

Negligent Infliction of Emotional Distress

Against ALL DEFENDANTS

150. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs as though fully set forth herein.

151. In the alternative, Plaintiffs bring a cause of action for Negligent Infliction of Emotional Distress. Defendants unintentionally caused emotional distress to Plaintiffs.

152. Defendants should have realized that their conduct involved an unreasonable risk of causing the distress, otherwise than by knowledge of the harm or peril of a third person.

153. Defendants, from the facts known to them, should have realized that the distress, if it were caused, might result in illness or bodily harm to Plaintiffs. The acts of Defendants described herein above constitute outrageous and intolerable conduct which offends the generally accepted standards of decency and morality.

154. As a result of Defendants' acts, Plaintiffs have suffered severe and continuing emotional distress including anxiety and panic attacks; depression; PTSD; social withdrawal; loss of enjoyment of life; and other physical symptoms of severe emotional distress.

155. Plaintiffs have sought therapy in an effort to heal from the emotional distress caused by Defendants.

156. By their acts, Defendants proximately caused severe and permanent emotional damages in an amount to be proven at trial.

TENTH CLAIM FOR RELIEF

Negligence

Against DEFENDANT LDS CHURCH

157. Plaintiffs reallege and incorporate by reference the allegations set forth in all preceding paragraphs as though fully set forth herein.

158. Defendant Church owed a general duty of reasonable care to Plaintiffs under Utah law to avoid acts or omissions that created an unreasonable risk of harm to others, including the Plaintiffs.

159. Defendant Church breached that duty by failing to act as a reasonably prudent organization under similar circumstances, including by failing to exercise due care in its oversight and management of its property and the actions of its leadership and members; failing to take reasonable precautions to prevent sexual abuse; failing to ensure safe conditions on its premises; and failing to adequately respond to allegations of abuse.

160. As a direct and proximate result of Defendant Church's negligence, the Plaintiffs suffered physical, emotional, and psychological harm, as well as related economic damages.

161. Plaintiffs seek compensatory damages, interest, costs, and any other relief the Court deems just and equitable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in their favor and against all Defendants as follows:

1. Awarding Plaintiffs compensatory damages in an amount to be determined at trial, including damages for physical and emotional pain and suffering, mental anguish, loss of enjoyment of life, and other non-economic harms;

2. Awarding Plaintiffs punitive and exemplary damages in an amount sufficient to

punish Defendants and deter others from engaging in similar conduct according to Utah Code Ann. § 78B-8-201 and applicable law;

3. Awarding attorneys' fees and costs pursuant to 18 U.S.C. § 1595 and other applicable law;

4. Awarding pre- and post-judgment interest as permitted by law;

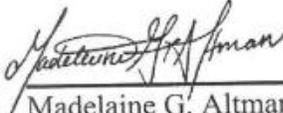
5. Granting such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all claims so triable.

DATED:

By: /s/ Andy G. Deiss
Andrew G. Deiss
Deiss Law PC


Madelaine G. Altman
Madelaine G. Altman
The Guernica37 Centre for International Justice