

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA IN AND FOR ORANGE COUNTY  
GENERAL JURISDICTION DIVISION

JOHN VB DOE,

Plaintiff,

CASE NO.: 2024-CA-002138-O

v.

FLORIDA MULTICULTURAL  
DISTRICT COUNCIL OF THE  
ASSEMBLIES OF GOD, INC., and  
IGNITE LIFE CENTER, INC.

Defendants.

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**DEFENDANT FLORIDA MULTICULTURAL DISTRICT COUNCIL  
OF THE ASSEMBLIES OF GOD, INC.'S  
RESPONSE TO FIRST REQUEST FOR PRODUCTION PROPOUNDED BY  
PLAINTIFF JOHN VB DOE**

COMES NOW, the Defendant, FLORIDA MULTICULTURAL DISTRICT COUNCIL OF THE ASSEMBLIES OF GOD, INC., by and through its undersigned counsel, and pursuant to Rule 1.350, Florida Rules of Civil Procedure, responds to the First Request for Production propounded by the Plaintiff, JOHN VB DOE, as follows:

1. REQUEST: All documents referring or relating to Plaintiff or anyone purporting to act on Plaintiff's behalf.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous, and as posed, includes materials prepared and/or obtained in anticipation of litigation, work product, and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, none, other than presuit communications between Plaintiff's counsel and Defendant's insurance carrier, communications between Plaintiff's counsel, Co-Defendant's counsel and Defendant's counsel, pleadings filed in this lawsuit, Plaintiff's answers to Co-Defendant Ignite Life Center's First Set of Interrogatories, and Plaintiff's response to Co-Defendant Ignite Life Center's First Request for Production, including documents and materials produced, all of which should already be in Plaintiff's possession. See Defendant's Privilege Log.

2. REQUEST: All documents created in whole or in part by Plaintiff or on Plaintiff's behalf.

RESPONSE: None, other than presuit communications between Plaintiff's counsel and Defendant's insurance carrier, pleadings filed in this lawsuit, Plaintiff's answers to Co-Defendant Ignite Life Center's First Set of Interrogatories, and Plaintiff's response to Co-Defendant Ignite Life Center's First Request for Production, including documents and materials produced, all of which should already be in Plaintiff's possession.

3. REQUEST: All documents created prior to the filing of this lawsuit referring or relating to Gabriel Hemenez in your care, custody, and/or control.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous, and as posed, includes materials prepared and/or obtained in anticipation of litigation, work product, and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, none, other than correspondence received from Plaintiff's counsel, as to Plaintiff's claims and claims asserted by other individuals represented by Plaintiff's counsel. See Defendant's Privilege Log.

4. REQUEST: All documents referring or relating to complaints, allegations, suspicions, rumors, and/or reports of sexually inappropriate behavior in conjunction with the Ignite Summer Internship, including, but not limited to, Gabriel Hemenez, prior to August 2021 in your care, custody or control.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous and confusing, particularly as to time, and as posed, appears to include materials prepared and/or obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. More particularly, this request is vague, ambiguous and confusing with respect to the phrase "prior to August 2021," to the extent that it is not clear whether the request refers to alleged inappropriate behavior by Gabriel Hemenez which occurred prior to August 2021, or complaints of alleged inappropriate behavior involving Gabriel Hemenez made prior to August 2021. Without waiving the foregoing objection and reserving all rights, none, other than presuit communications between Plaintiff's counsel and Defendant's insurance carrier, pleadings filed in this lawsuit, Plaintiff's answers to Co-Defendant Ignite Life Center's First Set of Interrogatories, and Plaintiff's response to Co-Defendant Ignite Life Center's First Request for Production, including documents and materials produced, all of which should already be in Plaintiff's possession. See Defendant's Privilege Log.

5. REQUEST: All documents referring or relating to complaints, allegations, suspicions, rumors, and/or reports of sexually inappropriate behavior committed by any adult associated with Defendant Ignite Life Center against minor children prior to August 2021 in your care, custody and/or control.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous and confusing, particularly as to time, and the phrases “all documents referring or relating to” and “associated with,” and as posed, appears to include materials prepared and/or obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. More particularly, this request is vague, ambiguous and confusing with respect to the phrase “prior to August 2021,” to the extent that it is not clear whether the request refers to alleged inappropriate behavior by an adult or adults associated with Ignite Life Center which occurred prior to August 2021, or complaints of alleged inappropriate behavior involving an adult or adults associated with Ignite Life Center made prior to August 2021. Without waiving the foregoing objection, and reserving all rights, as to Gabriel Hemenez please see Defendant’s Response to Request No. 4.

Additionally, in a letter dated September 15, 2023, Defendant was informed by this Plaintiff’s counsel, of allegations of sexual misconduct allegedly perpetrated by Marcia Garcia Rondon against a female whose identity is, or reasonably should be, known to Plaintiff and/or his counsel, who, for the protection of the alleged victim’s privacy is identified herein as “Jane P.A. Doe.”

See also Defendant’s Privilege Log.

6. REQUEST: All documents referring or relating to the Ignite Life Summer Internship program, including, but not limited to rosters, volunteer applications, awards, trip applications, photographs, and media recordings, created or received between 2017 and 2022 in your care, custody and/or control.

RESPONSE: None.

7. REQUEST: All documents referring or relating to all DISTRICT programs, groups, or activities with which Gabriel Hemenez was associated at any time, including but not limited to rosters, volunteer applications, awards, trip applications, photographs, and media recordings.

RESPONSE: None.

8. REQUEST: All documents referring or relating to the relationship between DISTRICT and Defendant Ignite Life between 2012 and 2022.

RESPONSE: None; See Defendant's Answers to Interrogatories. Ignite Life Center has been a sovereign church, since approximately 1990.

9. REQUEST: All documents referring or relating to child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines created, implemented by, distributed, in effect, relied upon, and/or used by DISTRICT between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

10. REQUEST: All documents referring or relating to the creation, implementation, reliance upon, use, and/or distribution of child safety, child abuse prevention, and sexual abuse prevention policies, rules, regulations, and/or guidelines by DISTRICT between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

11. REQUEST: All documents referring or relating to how reports, complaints, suspicions, and/or rumors of child sexual abuse were to be handled by churches affiliated with DISTRICT, including how such information should be reported, investigated, and/or otherwise addressed, in effect between 2012 and 2012, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church.

See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

12. REQUEST: All documents referring or relating to the sexual abuse prevention training of employees, volunteers, and agents of the churches affiliated with DISTRICT, including, but not limited to, Defendant Ignite Life, in effect between 2012 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

13. REQUEST: All documents referring or relating to policies and procedures for sexual abuse prevention and/or reducing the risk of sexual abuse of children attending youth programming at the churches affiliated with DISTRICT in effect between 2012 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

14. REQUEST: All documents referring or relating to policies for evaluating, screening, selecting, approving, and/or deregistering individuals at churches affiliated with DISTRICT in effect between 2012 to 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous with respect to the terms "evaluating," "screening," "selecting," "approving," "deregistering" and "individuals at churches." Defendant further objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life

Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

15. REQUEST: All handbooks, rules, guidelines, and/or regulations issued to or made available to Ignite Life ministers, leadership, employees, volunteers, parents, and/or children between 2012 and 2022, regardless of when the documents were created, in your care, custody and/or control, regarding the sexual abuse of children.

RESPONSE: None.

16. REQUEST: All documents referring or relating to the supervision of children attending programs at churches affiliated with DISTRICT in effect between 2012 and 2022, regardless of when the documents were created.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials which are not relevant to any issue raised in Plaintiff's Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, as Plaintiff's Complaint occurred at locations and/or during events operated by Co-Defendant Ignite Life Center, a sovereign church. See Defendant's Answers to Interrogatories, Ignite Life Center has been a sovereign church, since approximately 1990.

17. REQUEST: All documents referring or relating to DISTRICT's involvement, however small, with the Ignite Life Summer Internship between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous with respect to the phrases "all documents referring or relating to DISTRICT'S involvement, however small." Without waiving the foregoing objection, and reserving all rights, see Defendant's Answers to Interrogatories. Ignite Life Center has been a sovereign church, since approximately 1990.

18. REQUEST: All documents referring or relating to the corporate, business, agency, and/or other relationship between you and Defendant Church.

RESPONSE: Defendant objects to this interrogatory inasmuch as it is overly broad, vague, and ambiguous, particularly with respect to the phrases "all documents referring or relating to" and "other relationship." Without waiving the foregoing objection and reserving all rights, none;

see Defendant's Answers to Interrogatories. Ignite Life Center has been a sovereign church since approximately 1990.

19. REQUEST: All communications between DISTRICT and Defendant Ignite Life regarding the allegations that are the subject of Plaintiff's Complaint.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks include materials obtained and/or prepared in anticipation of litigation, privileged communications to clergy as defined by §90.505, Florida Statutes, and materials protected by the common interests/joint defense privilege. Without waiving the foregoing objection, and reserving all rights, none.

20. REQUEST: All communications between DISTRICT and anyone else regarding the prevention, mitigation, and/or response to sexual abuse of children Defendant Ignite Life Center between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous and confusing, particularly with respect to time, and the phrases "anyone else" and "response to sexual abuse of children Defendant Ignite Life Center," and as posed, this request appears to include materials prepared and/or obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. See Defendant's Privilege Log.

21. REQUEST: All documents referring or relating to the financial relationship between DISTRICT and Defendant Ignite Life Center between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous, with respect to the phrase "financial relationship." Without waiving the foregoing objection, and reserving all rights, none.

22. REQUEST: Copies of each edition of the Assemblies of God Constitution and Bylaws in effect from 2012 to the present, regardless of when created.

RESPONSE: See attached.

23. REQUEST: Copies of each edition of the Florida Multicultural District's Constitution and Bylaws in effect from 2012 to the present, regardless of when created.

RESPONSE: See attached.

24. REQUEST: All transcripts and/or videos of deposition or other sworn testimony given by your employees, administrators, volunteers, pastors, or other agents in matters alleging sexual abuse committed between 2012 and the present by adults associated with youth programs at churches affiliated with DISTRICT, regardless of when the testimony was given.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous, particularly with respect to the term “other agents” and “by adults associated with youth programs,” and “churches affiliated with District.” Defendant further objects to this request inasmuch as the materials it seeks are irrelevant to any issue raised in Plaintiff’s Complaint, and the request is not reasonably calculated to lead to the discovery of admissible evidence, because Ignite Life Center has been a sovereign church since 1990. Without waiving the foregoing objections and reserving all rights, none.

25. REQUEST: All documents referring or relating to law enforcement, district attorney, state or federal government, agency, or other investigation of any facts alleged in Plaintiff’s Complaint. Such documents include but are not limited to citations, summons, letters, memoranda, photographs, videos, statements, reports, or investigative materials provided by, received from, or given to any state or federal government agency or any other entity in connection with any investigation conducted regarding the facts alleged in the Complaint.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague, ambiguous, particularly with respect to the phrases “all documents referring or relating to” and “any investigation,” and as posed, appears to include materials prepared and/or obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, Defendant has copies of materials from the State Attorney’s Office which were produced by Plaintiff in response to Co-Defendant Ignite Life Center’s First Request for Production. Otherwise, see Defendant’s Privilege Log.

26. REQUEST: Documents reflecting DISTRICT employees, volunteers and/or agents who were associated in any way with the Ignite Summer Internship at any time between 2012 and 2022.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, unduly burdensome, vague and ambiguous, particularly with respect to the phrases “documents reflecting”



and “associated in any way.” Moreover, this request, as posed is an “interrogatory in disguise.” Without waiving the foregoing objections, and reserving all rights, none.

27. REQUEST: All recorded or written statements taken by you, your agents, or representatives, including your insurance companies, of the parties to this action or any other people with knowledge of the facts alleged in the Complaint, referring or relating to the facts alleged in the Complaint.

RESPONSE: Defendant objects to this request inasmuch as the materials it seeks include materials prepared and/or obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, none.

28. REQUEST: All documents, including those created in anticipation of litigation, reflecting the names, addresses, and phone numbers of “occurrence witnesses,” or any witnesses to the incidents alleged in the Complaint. In lieu of producing work product documents, Defendant may produce a list of occurrence witnesses, including their addresses and phone numbers.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous with respect to the term “occurrence witnesses,” and as posed, seeks documents prepared and/or obtained in litigation, work product, documents protected by the common interest/joint defense privilege, and documents protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, none, other than presuit communications between Plaintiff’s counsel and Defendant’s insurance carrier, pleadings filed in this lawsuit, Plaintiff’s answers to Co-Defendant Ignite Life Center’s First Set of Interrogatories, and Plaintiff’s response to Co-Defendant Ignite Life Center’s First Request for Production, including documents and materials produced, all of which should already be in Plaintiff’s possession.

29. REQUEST: All communications sent to, from, or between employees, administrators, pastors, representatives, or other agents of Defendants referring or relating to the incidents alleged in the Complaint or the existence of this lawsuit, regardless of when such communications were created. Such communications should include but are not limited to emails, text messages, and social media messages sent from, received by, and/or maintained on email accounts, cellular phones, social media accounts, and/or servers owned by, maintained by, or associated with Defendants.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous, and as posed, seeks documents prepared and/or obtained in litigation, work product,

documents protected by the common interest/joint defense privilege, privileged communications to clergy as defined by §90.505, Florida Statutes, and documents protected by the attorney-client privilege. Without waiving the foregoing objections and reserving all rights, none.

30. REQUEST: All documents produced in discovery to any other party in this case.

RESPONSE: None.

31. REQUEST: All documents obtained by request or subpoena in this case.

RESPONSE: Defendant objects to this request inasmuch as it is overly broad, vague and ambiguous with respect to the phrase “by request,” and as posed would appear to include materials obtained in anticipation of litigation, work product and materials protected by the attorney-client privilege. Without waiving the foregoing objection and reserving all rights, none. See Defendant’s Privilege Log.

32. REQUEST: All non-privileged documents reflecting your communications with third parties regarding the allegations in this case.

RESPONSE: None.

33. REQUEST: All non-privileged documents relating to the District’s participation, including any District employee’s, representative’s, volunteer’s, or agent’s participation, in the criminal investigation(s) and prosecution(s) of Gabriel Hemenez on charges relating to sexual conduct with children.

RESPONSE: None.

34. REQUEST: All contracts and/or documents describing Gabriel Hemenez’s relationship with Defendant, including a written job description, and description of all obligations, rights, duties, and responsibilities of Gabriel Hemenez and Defendant.

RESPONSE: None.

35. REQUEST: All correspondence and records of communication between Gabriel Hemenez and any representative of Defendant referring or relating to the Plaintiff and/or the subject matter of this lawsuit.

RESPONSE: None.

36. REQUEST: All records of background checks, references, and other inquiries made by Defendant concerning Gabriel Hemenez prior to or during his period of affiliation with the District.

RESPONSE: None.

37. REQUEST: Any and all incident reports concerning Gabriel Hemenez.

RESPONSE: Defendant objects to this request inasmuch as it seeks materials prepared and/or obtained in anticipation of litigation, work product, materials protected by the common interest/joint defense privilege, and materials protected by the attorney-client privilege. Without waiving the foregoing objection, and reserving all rights, none.

38. REQUEST: Any and all recordings (digital, video, audio, security surveillance, or otherwise) of Gabriel Hemenez or Plaintiff on the date(s) of the subject incident(s), or of anyone discussing the subject incident referenced in the Complaint.

RESPONSE: None, other than those which may be included in published media accounts, following Gabriel Hemenez's arrest, which are public record.

39. REQUEST: For any documents withheld on the basis of privilege, provide a complete privilege log as required by Rule 1.280(b)(6).

RESPONSE: See Defendant's Privilege Log.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served and filed via the Florida Court's E-portal, to the following, on this 1st day of October, 2024:

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GROELLE & SALMON, P.A.

*/s/ Keith G. Shevenell, Esq.*

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