

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY FLORIDA
CIVIL DIVISION**

JOHN VB DOE,

Plaintiff,

vs.

CASE NO.: 2024-CA-002138-O

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

Defendant.

_____ /

**DEFENDANT'S, IGNITE LIFE CENTER, INC., RESPONSES
TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

COMES NOW, Defendant, IGNITE LIFE CENTER, INC., and responds to Plaintiff's

Request for Admissions as follows:

1. Admit that Plaintiff attended religious services at Ignite Life Center while he was a minor child.

RESPONSE: Admitted.

2. Admit that Plaintiff participated in the Ignite Summer Internship in 2021 as a minor child.

RESPONSE: Admitted.

3. Admit that Plaintiff stayed overnight in a dormitory operated by Ignite Life Center and under the supervision of Ignite Life Center at the Ignite Summer Internship in 2021.

RESPONSE: Admitted.

4. Admit that Mark Vega was the head pastor and leader of Ignite Life Center, Inc. between 2016 and the present.

RESPONSE: Admitted.

5. Admit that Lisa Vega was a pastor and leader of Ignite Life Center, Inc. between 2016 and the present.

RESPONSE: Admitted.

6. Admit that Esther Omeben was a pastor and leader of Ignite Life Center, Inc. in 2019.

RESPONSE: Admitted.

7. Admit that Nicholas Bruce was a pastor and leader of Ignite Life Center Inc. between 2018 and the present.

RESPONSE: Admitted.

8. Admit that Ramaday Velasquez was a pastor and leader of Ignite Life Center, Inc. in 2019.

RESPONSE: Denied.

9. Admit that Gabriel Hemenez was responsible for supervising children attending Ignite Summer Internship in 2021.

RESPONSE: Admitted.

10. Admit that Ignite Life did not report that Gabriel Hemenez was the subject of sexual abuse suspicions, rumors, reports, and/or complaints to law enforcement prior to February 2023.

RESPONSE: Admitted.

11. Admit that Ignite Life Center, Inc., operated the Ignite Summer Internship in 2021.

RESPONSE: Admitted.

12. Admit that Gabriel Hemenez sexually abused Plaintiff on property operated and/or controlled by Defendant Ignite Life Center, Inc., in 2021.

RESPONSE: Denied.

13. Admit that Defendant Ignite Life Center, Inc., received a report of sexual misconduct by Gabriel Hemenez in 2019.

RESPONSE: Denied as phrased.

14. Admit that Gabriel Hemenez admitted to engaging in non-consensual sexual contact with another person in 2019.

RESPONSE: Defendant objects to this request as it is vague, overbroad, and not limited in scope or time. Subject to the objection, admitted, upon information and belief, that following his arrest in 2023, Gabriel Hemenez admitted to police that he engaged in non-consensual sexual contact; otherwise, denied.

15. Admit that no one from Ignite Life reported the 2019 incident to law enforcement.

RESPONSE: Defendant objects to this request as the “2019 incident” is vague and ambiguous, and therefore, Defendant is unable to admit nor deny this request.

16. Admit that Ignite Life took no action to discipline or restrict Gabriel Hemenez’s involvement in Ignite Life after the 2019 incident.

RESPONSE: Defendant objects to this request as the “2019 incident” is vague and ambiguous, and therefore, Defendant is unable to admit nor deny this request.

17. Admit that Ignite Life received information that Gabriel Hemenez may have sexually abused a child in or around September 2022.

RESPONSE: Defendant objects to this request as it is vague and ambiguous, as it is unclear whether this request seeks an admission that abuse occurred in September 2022 or that reporting of abuse occurred in September 2022; either way, denied.

18. Admit that Ignite Life received information that Gabriel Hemenez may have sexually abused a second child in or around November 2022.

RESPONSE: Defendant objects to this request as it is vague and ambiguous, as it is unclear whether this request seeks an admission that abuse occurred in November 2022 or that reporting of abuse occurred in November 2022; either way, denied.

19. Admit that Ignite Life received information in 2019 that a child attending the Ignite Summer Internship may have been sexually abused by another child in her dormitory.

RESPONSE: Denied.

20. Admit that Ignite Life Center, Inc., was required to follow the District Defendant’s sexual abuse prevention, mitigation and/or response policies as a condition of association with Defendant District in 2021.

RESPONSE: Denied.

21. Admit that Ignite Life Center, Inc., has a financial relationship with Defendant District.

RESPONSE: Denied.

22. Admit that agents, employees, and/or volunteers of Defendant District were required to participate in the administration and operation of Ignite Summer Internship prior to 2022.

RESPONSE: Denied.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via E-Service to: Jessica D. Arbour, Esq. (jessica@adamhorowitzlaw.com) and Adam D. Horwitz, Esq. (adam@adamhorowitzlaw.com), Counsel for the Plaintiff, on this 27th day of September, 2024.

/s/ Madeline S. Villani
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