

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 PRODUCTION

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

Request for Admissions as follows:

1. All documents naming, referencing, or depicting the named Plaintiff or Plaintiff's immediate family members, including but not limited to membership records, Ignite Life Summer Internship rosters and other documents, yearbooks, photographs, church bulletins, and correspondence.

RESPONSE: Defendant objects to this request as it is vague, overbroad, unduly burdensome, not limited in scope or time, and because it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, Plaintiff's membership records are attached.

2. All documents created in whole or in part by Plaintiff or for Plaintiff.

RESPONSE: Defendant objects to this request as it is vague, overbroad, unduly burdensome, not limited in scope or time, and because it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, Plaintiff's membership records are attached.

3. All documents referring or relating to Gabriel Hemenez. Such documents would include but are not limited to:

a. documents referring or relating to his membership with, involvement with, attendance at, employment with, training with, or participation in Ignite Life Center (hereinafter, “Defendant Church”) and/or Defendant’s youth groups, programs, and/or activities, including the Ignite Life Summer Internship program;

b. documents referring or relating to disciplinary action or investigations taken against him by either of the Defendants;

c. documents referring or relating to disciplinary actions or investigations taken against anyone else by either of the Defendants;

d. documents referring or relating to disciplinary actions or investigations taken against him by either of the Defendants due to allegations that he acted sexually inappropriately with youth involved in youth groups, programs, and/or activities, including the Ignite Life Summer Internship program; and

e. documents referring or relating to his involvement in disciplinary actions or investigations taken against anyone else by either of the Defendants due to allegations that anyone else acted sexually inappropriately with youth involved in youth groups, programs and/or activities, including the Ignite Life Summer Internship program.

RESPONSE: All responsive documents in Defendant’s possession related to Gabriel Hemenez are attached.

4. All documents referring or relating to complaints, allegations, information, and/or reports of sexually inappropriate behavior committed by Gabriel Hemenez, or any other youth group, activity, and/or program volunteers associated with Defendant Church’s prior to August 2021.

RESPONSE: Defendant is not in possession of any documentation referring or relating to complaints, allegations, information and/or reports of sexually inappropriate behavior committed by Gabriel Hemenez prior to August 2021.

5. All documents referring or relating to formal or informal, oral or written, complaints, allegations, or reports you received or were notified about at any time of sexually inappropriate behavior against minor children participating in Defendant Church’s youth group, activities, and/or programs, including but not limited to the Ignite Life Summer Internship, prior to August 2021.

RESPONSE: Defendant objects to this request as it is overbroad, not limited in scope or time, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, prior to August 2021, Defendant did not receive any complaints of sexually inappropriate behavior involving minors participating in the Ignite Summer Internship program.

6. All documents identifying the children attending the Ignite Summer Internship in 2021.

RESPONSE: Defendant objects to this request as it seeks confidential information regarding minor children, not a party to this suit, and because it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence.

7. All documents identifying the adult leaders, employees, volunteers, and agents participating in the Ignite Summer Internship in 2021.

RESPONSE: Attached.

8. 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, relied upon, and/or used by Defendant Church between 2016 and 2022.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, attached.

9. 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 Defendant Church between 2016 and 2022.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, attached.

10. All documents referring or relating to the rules and procedures for reporting suspicions that a child was sexually abused while participating in an Ignite Life program in effect between 2016 and 2023, regardless of when the document was created.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, attached.

11. All documents referring or relating to the training of Ignite Life Center ministers, leaders, employees, volunteers, and agents involved Ignite Life's youth programs at any level from 2016-2023, regardless of when the documents were created, on matters of sexual abuse prevention, mitigation, and reporting. This request, includes, but is not limited to, printed and/or digital training materials.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, attached.

12. All documents referring or relating to policies for evaluating, screening, selecting, approving, and/or deregistering individuals to participate as Ignite Life Center's youth group, activity, and/or program volunteers from 2016 to 2023.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, the Ignite Summer Internship Staff Selection Process Policy is attached.

13. All handbooks, rules, guidelines, and/or regulations distributed to or made available to youth participating in youth groups, activities, and/or programs associated with, supervised by, or sponsored by Defendant Church between 2016-2023.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, the July 2021 Ignite Summer Internship manual provided to volunteers and participants is attached.

14. All handbooks, rules, guidelines, and/or regulations distributed to or made available to Ignite Life Center youth program volunteers who volunteered with youth groups, activities, and/or programs, including but not limited to the Ignite Life Summer Internship, associated with, supervised by, or sponsored by Defendant Church between 2016-2023.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, the July 2021 Ignite Summer Internship manual provided to volunteers and participants is attached. The July 2021 Ignite Summer Internship job titles and descriptions are also attached, as well as Ignite Life Center PSA Policies and Procedures Manual, which was provided to Ignite Life Center volunteers during the stated time period.

15. All documents referring or relating to the administration, supervision, control, and/or implementation of programming for youth at Defendant Church, between 2016 and 2022.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, documentation regarding the organizational structure of Ignite Life Center, Ignite School of Ministry and Ignite Summer Internship at the time of the incident alleged in the Complaint are attached.

16. All documents referring or relating to the responsibilities, duties, roles, activities, and/or goals of Ignite Life Summer Internship program volunteers who volunteered with Internship programs associated with, supervised by, or sponsored by Defendant Church between 2016 and 2022.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, the July 2021 Ignite Summer Internship job titles and descriptions is attached.

17. All documents depicting or explaining the corporate, business, agency, and/or other relationship between Defendant Church and Defendant District.

RESPONSE: Attached.

18. All documents depicting or explaining any ways in which Defendant Church is required to follow policies, rules, or regulations of Defendant District.

RESPONSE: Attached.

19. All documents depicting or explaining any ways in which Defendant District has the right to control the day-to-day-activities of Defendant Church.

RESPONSE: Defendant Ignite maintains its autonomy as a church, but is denominationally affiliated with the Assemblies of God and, therefore, adheres to the District's constitution and bylaws, which are attached.

20. All documents showing, referencing, or explaining the financial relationship between Defendant Church and Defendant District.

RESPONSE: Attached.

21. All documents referring or relating to the relationship between Ignite Summer Internship and the leaders, agents, employees, and/or volunteers of Defendant District between 2016 and 2022.

RESPONSE: The District does not participate in Defendant Ignite's youth programming or Ignite Summer Internship; therefore, none in Defendant's possession.

22. All Ignite Life Center constitutions, bylaws, and organizational charts in effect from 2016 to the present.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, Ignite Life Center's bylaws are attached.

23. All transcripts and/or videos of deposition or other sworn testimony given by your employees, administrators, volunteers, pastors, or other agents in legal matters pertaining to allegations that a child was sexually abused while participating in Ignite Life Center activities or while in Ignite Life Center's care.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, none.

24. All documents referring or relating to any 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: Attached.

25. Documents reflecting all pastors, administrators, and employees of Defendant Church between 2013 and 2023.

RESPONSE: Defendant objects to this request as it is overbroad, and to the extent that it seeks documentation not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding said objection, documentation regarding the organizational structure of Ignite Life Center, Ignite School of Ministry and Ignite Summer Internship at the time of the incident alleged in the Complaint are attached.

26. Documents referring or relating to all communications between any pastor and Plaintiff, or anyone purporting to act on Plaintiff's behalf, regarding the subject matter of this lawsuit since July 2021. This includes, but is not limited to, text messages, direct messages, and emails.

RESPONSE: Defendant objects to this request as it is overbroad, vague, ambiguous and unlimited in scope. Notwithstanding said objection, the documentation in Defendant's possession related to the Plaintiff's allegations and investigations of same is attached.

27. 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 as it seeks information protected by the attorney work product privilege. Notwithstanding said objection, the statements are attached.

28. 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 is presently unaware of any witnesses to the incident alleged in the Complaint; therefore, none in Defendant’s possession. Defendant will provide a Witness List in accordance with the Trial Order.

29. 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 as it is overbroad, vague, ambiguous and unlimited in scope and time. Notwithstanding said objection, the documentation in Defendant’s possession related to the allegations and investigations of same is attached.

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

RESPONSE: None.

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

RESPONSE: None.

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

RESPONSE: Defendant objects to this request as it is overbroad, vague, ambiguous and unlimited in scope and time. Notwithstanding said objection, the documentation in Defendant’s possession related to the allegations and investigations of same is attached.

33. All documents relating to Defendant Church’s participation, including any Church 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: Attached.

34. Gabriel Hemenez's job application and all documents submitted by him in connection with seeking employment with Defendant Church.

RESPONSE: Defendant objects to this request, as Gabriel Hemenez was never employed by Ignite Life Center. Notwithstanding said objection, all documents in Defendant's possession related to Gabriel Hemenez are attached.

35. All documents and other materials considered by Defendant Church in determining whether to employ Gabriel Hemenez.

RESPONSE: Defendant objects to this request, as Gabriel Hemenez was never employed by Ignite Life Center. Notwithstanding said objection, all documents in Defendant's possession related to Gabriel Hemenez are attached.

36. Any and all records reflecting job/character references submitted by Gabriel Hemenez in connect with seeking employment and any records reflecting Defendant Church's contact with those references.

RESPONSE: Defendant objects to this request, as Gabriel Hemenez was never employed by Ignite Life Center. Notwithstanding said objection, all documents in Defendant's possession related to Gabriel Hemenez are attached.

37. All records reflecting a termination or separation of employment between Defendant Church and Gabriel Hemenez.

RESPONSE: None in Defendant's possession.

38. All contracts and/or documents describing Gabriel Hemenez's relationship with Defendant Church, including a written job description, and description of all obligations, rights, duties, and responsibilities of Gabriel Hemenez.

RESPONSE: Attached.

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

RESPONSE: None in Defendant's possession.

40. All records of background checks, references, and other inquiries made by Defendant Church concerning Gabriel Hemenez prior to or during his period of employment and/or affiliation with Defendant Church.

RESPONSE: Attached.

41. Any and all incident reports concerning Gabriel Hemenez. Please submit a complete Privilege Log for any reports which Defendant will assert are protected work product.

RESPONSE: Defendant objects to this request as it is overbroad, vague, ambiguous and unlimited in scope and time. Defendant further objects to this request to the extent that it seeks documents protected by the work product privilege. Notwithstanding said objection, Defendant is in possession of an Incident Report dated 12/10/2022, and which is identified on Defendant's Privilege Log.

42. 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 in Defendant's possession.

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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