

**IN THE COMMON PLEAS COURT OF DELAWARE COUNTY,  
CIVIL DIVISION**

<b>JANE DOE 1</b>	)	Case No.:
	)	
&	)	Judge:
	)	
<b>JOHN DOE 1</b>	)	<b><u>COMPLAINT</u></b>
	)	
&	)	(Jury Demand Endorsed Hereon)
	)	
<b>JANE DOE 2</b>	)	Angela H. Hartford (0106765)
	)	Charles E. Boyk (0000494)
Plaintiffs,	)	Andrea R. Young (0096334)
v.	)	Charles E. Boyk Law Offices, LLC
	)	1500 Timberwolf Drive
<b>VINEYARD USA</b>	)	Holland, OH 43528
c/o Elgie Justice	)	Telephone: (419) 241-1395
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<b>VINEYARD CHURCH OF DELAWARE COUNTY</b>	)	Attorneys for Plaintiffs
c/o Michael Hansen	)	
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Sunbury, OH 43074	)	
	)	
&	)	
	)	
<b>DANIEL R. MEYER</b>	)	
143 Glen Mawr Cir.	)	
Delaware, OH 43015	)	
	)	
&	)	
	)	
<b>GOSPEL OF WHOLENESS, LLC</b>	)	
c/o Daniel Meyer	)	
3521 N State Route 61	)	
Sunbury, OH 43074-9318	)	
	)	
Defendants.	)	

Now come Plaintiffs Jane Doe 1, John Doe 1, and Jane Doe 2, by and through undersigned counsel, and hereby file this Complaint, arising from Defendant Daniel R. Meyer's sexual exploitation of Jane Doe 1 and Jane Doe 2 in the context of his role as a pastor and pastoral counselor. In support of this Complaint, Plaintiffs state as follows:

**THE PARTIES**

1. Plaintiff Jane Doe 1 is an adult female and a resident of Galena, Delaware County, Ohio. Jane Doe 1 wishes to remain anonymous to the public because this action involves matters of the utmost intimacy and allegations of deeply personal and embarrassing conduct inflicted upon her by Defendant Daniel Meyer. Disclosure of her identity would create a significant risk of retaliation and increased emotional distress, and would expose her to misuse of personal information, resulting in further personal and professional harm.
2. Plaintiff John Doe 1 is an adult male and the husband of Jane Doe 1. John Doe 1 resides with Jane Doe 1 in Galena, Delaware County, Ohio. John Doe 1 also wishes to remain anonymous to the public given the sensitive nature of the subject matter of this Complaint and the impact of the events described herein upon his family.
3. At all relevant times, Plaintiffs, Jane Doe 1 and John Doe 1, have been married and are legal spouses.
4. Plaintiff Jane Doe 2 is an adult female and a resident of Euclid, Cuyahoga County, Ohio. Jane Doe 2 wishes to remain anonymous to the public because this action involves matters of the utmost intimacy and allegations of deeply personal and embarrassing conduct inflicted upon her by Defendant Daniel Meyer. Disclosure of her identity would create a significant risk of retaliation and increased emotional distress, and would expose her to misuse of personal information, resulting in further personal and professional harm.

5. To safeguard Plaintiffs' identities and given the sensitive nature of the subject matter of this Complaint, Plaintiffs proceed using pseudonyms. *See Doe v. Roe*, 2024-Ohio-2716, ¶ 12 (8th Dist.), citing *Doe v. Porter*, 370 F.3d 558 (6th Cir. 2004) ("a party may proceed under a pseudonym where a plaintiff's privacy interests substantially outweigh the presumption of open judicial proceedings"). Plaintiffs' true identities will be disclosed to Defendants upon service of this Complaint.
6. In furtherance of protecting of their identities, the Plaintiffs' addresses have been omitted from the caption due to the highly sensitive and personal nature of the allegations contained herein.
7. At all times material hereto, Defendant, VINEYARD USA aka VINEYARD NATIONAL CHURCH PLANTING ("VINEYARD USA"), was and continues to be an organization or entity with their principal office located at 5115 Grove West Boulevard, Stafford, Texas.
8. Based upon information and belief, VINEYARD USA, was the parent organization of Defendant VINEYARD CHURCH OF DELAWARE COUNTY and controlled or had rights of control over the management and operation of VINEYARD CHURCH OF DELAWARE COUNTY at all times relevant to this Complaint.
9. According to their Articles of Incorporation filed in the State of Texas, on June 7, 2001, VINEYARD USA, was and is "organized to serve as the parent entity for all churches in the United States that identify themselves as Vineyard churches and to provide those churches with leadership resources and other reasonable and necessary services required by their member churches and their pastors."
10. Defendant VINEYARD CHURCH OF DELAWARE COUNTY (aka "Vineyard Delaware County"), is an incorporated religious association located in Delaware County, Ohio.
11. Defendant DANIEL R. MEYER is an individual and resident of Delaware County, Ohio.

12. Defendant Daniel Meyer was employed by VINEYARD USA and/or VINEYARD CHURCH OF DELAWARE COUNTY as the President, Pastor, and counselor of the Sunbury Ohio Church location.

13. Upon information and belief, Defendant GOSPEL OF WHOLENESS, LLC is an Ohio limited liability company organized under Ohio law, owned and managed by Defendant Daniel Meyer, with its principal place of business in Delaware County, Ohio.

### **JURISDICTION AND VENUE**

14. The Delaware County Common Pleas Court has original jurisdiction over this matter pursuant to R.C. 2305.01.

15. Venue is proper in this Court pursuant to Ohio Civ. R. 3(C)(6) because this is the county where all or part of Plaintiffs' claims for relief arose.

16. Pursuant to Civ.R. 8(A), Plaintiffs state that they seek a judgment in excess of Twenty-Five Thousand Dollars (\$25,000.00).

### **FACTUAL ALLEGATIONS**

17. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

18. Defendant Daniel Meyer ("Meyer") is a former pastor and founder of Vineyard Church of Delaware County (hereinafter "VCDC"), located at 1001 W. Cherry Street, in Sunbury, Ohio 43074.

19. Upon information and belief, VCDC is operated and/or managed under Vineyard USA, a global Christian organization that operates churches throughout the United States under the "Vineyard" name and umbrella, and in accordance with its practices and beliefs.

20. Vineyard USA publicly promotes itself as a faith-based organization that operates with the

desire “to know the Bible, do what it says, and experience the way of living it describes.”

21. At all times relevant to this Complaint, Meyer served, or held himself out, as a pastor and pastoral counselor/mental health professional, operating through and under the auspices of Vineyard USA and/or VCDC.
22. Upon information and belief, Meyer regularly provided, or purported to provide, mental health services, counseling, pastoral counseling, and/or therapeutic services for compensation or remuneration at Vineyard USA and VCDC.
23. Prior to founding VCDC, Meyer served as an associate pastor at Vineyard Columbus—another nearby Vineyard Church—where he was in charge of the counseling department.
24. As a founder and lead pastor, Meyer also served as a regional pastor for Vineyard USA with oversight authority over multiple churches, including VCDC.
25. In this capacity, Meyer developed and promoted a counseling methodology known as the “Gospel of Wholeness,” through which he counseled congregants and others, including Jane Doe 1 and Jane Doe 2.
26. In 2006, this counseling methodology led to the creation of Gospel of Wholeness, LLC, which VCDC and/or Vineyard USA adopted and incorporated into their practices.
27. Meyer retired from his formal role as pastor in August 2018. Despite his retirement, Vineyard USA, VCDC, and Gospel of Wholeness, LLC continued to platform Meyer in public preaching roles and provided him with free and unrestricted access to private church office spaces and administrative staff services, which he used to continue providing counseling services to individuals through VCDC.
28. Vineyard USA’s, VCDC’s, and Gospel of Wholeness, LLC’s conduct in continuing to provide Meyer access to its premises, resources, and congregation after his retirement

reasonably caused its congregants and counselees to view Meyer as an endorsed, trusted, and authorized agent of the church.

29. Upon information and belief, Vineyard USA, VCDC, and Gospel of Wholeness, LLC knew or, in the exercise of reasonable care, should have known that Meyer lacked formal training in professional counseling and had been previously accused of inappropriate conduct with women.
30. Despite this knowledge, these Defendants nevertheless permitted Meyer to meet privately and alone with vulnerable congregants, both on church premises and at his personal residence, thereby creating and perpetuating an unreasonable risk of harm.
31. Meyer routinely exploited his position of pastoral authority to gain the trust of emotionally vulnerable women who came to him seeking counseling. He employed a pattern of grooming that included establishing emotionally intimate “father/daughter” dynamics, exerting emotional control over emotionally vulnerable women, and using surveillance technology to monitor his counselees’ locations.
32. Upon information and belief, several other women who were members of Vineyard Church of Delaware County have come forward with allegations of similar abuse by Meyer.
33. Upon information and belief, Vineyard USA and/or VCDC required its pastors, employees, staff members, and/or church workers to sign confidentiality agreements, nondisclosure agreements, or similar agreements restricting the disclosure of internal church matters, misconduct, complaints, personnel issues, and/or information concerning church leadership. Such agreements had the effect of discouraging disclosure, limiting transparency, and concealing information concerning misconduct within Vineyard churches, including misconduct by pastors and church leaders.

## FACTUAL ALLEGATIONS RELATING TO JANE DOE 1

34. At all times relevant to this Complaint, Jane Doe 1 was a counselee of Defendant Daniel Meyer and viewed him as a pastor, pastoral counselor, and spiritual authority figure.
35. After disclosing that she was experiencing distressing recollections of childhood sexual abuse, Jane Doe 1 accepted Meyer's offer to provide counseling in or about 2017.
36. At the time Jane Doe 1 began receiving counseling from Meyer, she was in an emotionally impaired and susceptible state.
37. Meyer was aware of her emotional vulnerability and the fragile state in which she came to him.
38. Over the course of the counseling relationship, Meyer established a "father/daughter" dynamic with Jane Doe 1, telling her that she was "one of the special ones" and that "God pointed you out to me."
39. Jane Doe 1 came to view Meyer as a father figure, which was the emotional dynamic he deliberately cultivated.
40. Meyer used the Life360 mobile application to track Jane Doe 1's location, which he framed as being available and ready for her, but which was in fact a means of surveillance and emotional control inconsistent with any legitimate counseling relationship.
41. Meyer's counseling sessions with Jane Doe 1 took place at VCDC's church offices and at Meyer's private residence in Sunbury, Delaware County, Ohio.
42. Beginning in or about 2020, Meyer initiated and engaged in unwanted physical contact with Jane Doe 1 during their counseling sessions, including embracing and kissing her.
43. When Meyer first attempted to kiss Jane Doe 1, she dodged his advances and later told him she was crying, did not want such conduct, and was scared, as she viewed him as a father figure.

44. Despite her refusal, Meyer persisted, and his conduct escalated over time to include oral sex and digital penetration.
45. The unwanted sexual contact occurred in Meyer's church office, where he deliberately ensured privacy by closing the blinds, and during sessions at his private residence after sessions began occurring there due to the global pandemic.
46. Beginning in or about 2022, Meyer engaged in sexual intercourse with Jane Doe 1. This conduct continued through approximately July 2025.
47. Such conduct occurred despite Jane Doe 1's expressed reluctance, distress, statements that she did not want to continue, and episodes of emotional shutdown, fear, and paralysis.
48. At all relevant times, Meyer occupied a position of pastoral and spiritual authority over Jane Doe 1.
49. Meyer knowingly exploited Jane Doe 1's vulnerability, including her history of trauma and her reliance on him for counseling and spiritual guidance because of this history.
50. As a direct and proximate result of Meyer's conduct, Jane Doe 1 has suffered serious psychological and emotional injuries, including diagnoses of anxiety, depression, and post-traumatic stress disorder. Prior to disclosing the abuse, Jane Doe 1 lost ten pounds, ceased eating normally, experienced recurring nightmares, and suffered suicidal ideation. After disclosure, she experienced dissociative episodes in which she did not recognize her own family members. She has incurred and continues to incur medical and therapeutic expenses, including ongoing therapy and psychiatric care, and her injuries are believed to be permanent in nature.

**FACTUAL ALLEGATIONS FACTS RELATING TO JANE DOE 2**

51. In 2009, Jane Doe 2 attended a service at VCDC in Sunbury, Delaware County, Ohio. At the conclusion of the service, she went forward for prayer, at which point Meyer prayed over her.
52. After confiding in Meyer that she had suffered abuse at the hands of her father, Meyer offered to provide counseling; Jane Doe 2 accepted, and the two began a weekly counseling relationship.
53. Initially, counseling sessions were held in Meyer's office at VCDC.
54. Meyer adopted the role of a spiritual father figure for Jane Doe 2, representing to her that he had "a father's heart" for her and that she was one of his "spiritual kids." Jane Doe 2 came to view Meyer as a father figure, as Meyer intended.
55. In 2010, Jane Doe 2 began working part-time for Delaware City Vineyard, then under Meyer's authority as a regional pastor, and later transitioned to a full-time position; at this time, Meyer maintained regional oversight of multiple Vineyard churches, including Delaware City Vineyard and VCDC.
56. Over the course of a pastoral counseling relationship spanning nearly two decades, Meyer deliberately cultivated Jane Doe 2's trust and fostered a deep emotional dependence upon him.
57. Meyer exercised substantial control over Jane Doe 1 and Jane Doe 2 by requiring communications through an encrypted messaging application and by creating a "secret" email account for their correspondence.
58. As part of his pattern of control and secrecy, Meyer required Jane Doe 1 and Jane Doe 2 to delete their text messages and provide proof of such deletion.

59. Meyer further exploited his position of spiritual authority and the confidential nature of the counseling relationship by initiating increasingly intrusive and inappropriate inquiries into Jane Doe 2's personal life, including questions of a sexualized nature.
60. Beginning in or about 2020, Meyer's conduct escalated, including discussing kissing Jane Doe 2, sending sexualized communications, and requesting photographs of her.
61. In the spring of 2020, Jane Doe 2 continued her counseling sessions with Meyer at his private residence in Sunbury, Delaware County, Ohio, due to the global pandemic. During these sessions, Meyer's conduct escalated to include inappropriate and nonconsensual physical contact, including kissing and the touching of intimate areas of Jane Doe 2's body.
62. Meyer also engaged in sexual contact with Jane Doe 2 during counseling sessions at VCDC's church offices, deliberately ensuring privacy by closing the blinds and posting a "do not disturb" sign on the door.
63. Meyer further required Jane Doe 2 to attend counseling sessions at his private residence, which he characterized as "foreplay lessons," during which he engaged in extensive kissing, caressing, and sexual touching of her body.
64. From approximately 2020 through 2025, Meyer's conduct further escalated to include oral sex, genital contact, and digital penetration.
65. The last sexual encounter between Meyer and Jane Doe 2 occurred on May 31, 2025.
66. Throughout the course of the relationship, Meyer required Jane Doe 2 to keep the sexual contact secret, including specifically forbidding her from disclosing it to her own therapist.
67. Jane Doe 2 did not understand the manipulative and abusive nature of her pastoral relationship with Meyer until 2025, when, after disclosing the details to her therapist, she was informed that the conduct constituted sexual abuse and that the relationship was not consensual.

68. As a direct and proximate result of Meyer's conduct, Jane Doe 2 suffered severe mental anguish and emotional distress throughout the relationship, including feelings of violation, helplessness, and coercion. Following the termination of the sexual relationship, Jane Doe 2 suffered suicidal ideation. She required increased therapeutic treatment and an increased medication dosage in response to the deterioration of her mental health. Jane Doe 2's injuries are believed to be permanent in nature.

**FIRST CAUSE OF ACTION**  
***(Sexual Battery — Defendant Daniel R. Meyer)***

69. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

70. As described above, Meyer intentionally and knowingly engaged in unwanted, harmful, and offensive sexual contact with Jane Doe 1, including nonconsensual kissing, physical contact, and sexual intercourse on several occasions from approximately 2020 through 2025. Despite Jane Doe 1's initial refusal and protest, Meyer persisted in escalating physical and sexual contact, including sexual intercourse, which continued through approximately July 2025.

71. At all times, Meyer occupied a position of pastoral and spiritual authority over Jane Doe 1. He exploited that position to gain access to her, to foster and maintain her emotional dependence upon him, and to manipulate that dependence in order to engage in sexual conduct with her.

72. As further described above, Defendant Meyer inappropriately, intentionally, and knowingly engaged in unwanted, harmful, and offensive sexual contact with Jane Doe 2 over an extended period commencing in Spring of 2020 and continuing through May 31, 2025. This contact included kissing; touching of intimate body parts including her breasts and buttocks; digital penetration in the church office and at Meyer's private residence; oral intercourse; and

genital contact.

73. At all times, Meyer occupied a position of pastoral, spiritual, and supervisory authority over Jane Doe 2, having served as her pastor, pastoral counselor, and regional leader with authority over the church at which she was once employed. He exploited that position of authority and the trust inherent in the counseling relationship to engage in sexual contact with her.
74. Jane Doe 1 and Jane Doe 2 did not freely or voluntarily consent to any sexual conduct or contact with Meyer; any apparent acquiescence was the direct product of his abuse of authority, coercive “father figure” dynamic, and sustained grooming, and therefore was not knowing, voluntary, or legally valid consent.
75. At the time of the sexual conduct and contact, both Jane Doe 1 and Jane Doe 2 were emotionally dependent upon Meyer as a result of his counseling relationship and manipulation. Any submission was induced by therapeutic deception, including Meyer’s misuse of his pastoral role and representations that the conduct was connected to their emotional or spiritual well-being, and was not the product of their independent, voluntary judgment.
76. Jane Doe 1 and Jane Doe 2 reasonably believed they had no meaningful choice when Meyer initiated sexual contact and submitted only due to the power and authority he exercised over them. Their compliance was the product of coercion and control inherent in that relationship, not voluntary agreement. Meyer further required secrecy and expressly prohibited disclosure of the conduct to anyone, including their mental health professionals, and took extensive measures to maintain that secrecy, including requiring that their electronic communications occur through encrypted messaging applications.
77. Meyer’s sexual contact with Jane Doe 1 and Jane Doe 2 was intentional, harmful, and

offensive, and was inflicted upon them without their meaningful consent.

78. Meyer's harmful conduct and contact with Jane Doe 1 and Jane Doe 2 can be construed as nothing other than for Meyer's own sexual gratification.

79. Meyer's acts as described herein constitute sexual battery against both Jane Doe 1 and Jane Doe 2.

80. As a direct and proximate result of Meyer's sexual battery of Jane Doe 1, she has suffered serious physical and psychological trauma, including diagnoses of anxiety, depression, and post-traumatic stress disorder, incurred medical and therapeutic expenses, and suffered severe mental anguish and suffering, emotional distress, loss of enjoyment of life, and suicidal ideation. Jane Doe 1's injuries are believed to be permanent in nature and will require future medical care and economic loss, and she will continue to endure severe mental anguish and emotional distress.

81. As a direct and proximate result of Meyer's sexual battery of Jane Doe 2, she has suffered serious psychological trauma and emotional distress, including severe mental anguish, feelings of violation, suicidal ideation, and deterioration and/or exacerbation of her mental health, requiring increased therapeutic and medical treatment. Her injuries are believed to be permanent in nature, and she will continue to require future medical care and economic loss, and she will continue to endure severe mental anguish and emotional distress.

**SECOND CAUSE OF ACTION**  
***(Assault — Defendant Daniel R. Meyer)***

82. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

83. The acts of Meyer, as described above, constitute an intentional offer or attempt—without authority or consent—to cause harmful or offensive contact Jane Doe 1 and Jane Doe 2, and

placed each in reasonable apprehension of such contact.

84. Meyer's sexual conduct and contact with Jane Doe 1 and Jane Doe 2 was intentional, harmful, offensive, and nonconsensual.

85. Jane Doe 1 and Jane Doe 2 did not consent to such contact; any apparent acquiescence was the result of manipulation, coercion, and abuse of authority, and was not knowing or voluntary.

86. Meyer's conduct placed both Jane Doe 1 and Jane Doe 2 in reasonable apprehension of further unwanted physical contact.

87. Meyer's conduct constitutes assault under Ohio law.

88. As a direct and proximate result of Meyer's conduct upon Jane Doe 1 and Jane Doe 2, all Plaintiffs have suffered severe and ongoing emotional distress, mental anguish, and psychological harm. Jane Doe 1 has suffered diagnoses of anxiety, depression, and post-traumatic stress disorder, suicidal ideation, and dissociative episodes. Jane Doe 2 has suffered suicidal ideation, deterioration and/or exacerbation of her mental health, and requires increased therapeutic and medical intervention. John Doe 1 has suffered severe emotional distress as a result of witnessing the impact of Meyer's conduct on Jane Doe 1 and their marriage. These injuries are believed to be permanent in nature, and Plaintiffs will continue to require future medical care, incur future economic losses, and continue to suffer severe mental anguish and emotional distress.

### **THIRD CAUSE OF ACTION**

#### ***(Intentional Infliction of Emotional Distress — Defendant Daniel R. Meyer)***

89. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

90. By his actions as described herein, Meyer intended to cause Jane Doe 1 and Jane Doe 2 severe emotional distress and/or he knew or should have known that his conduct would cause them to suffer emotional distress and mental anguish that no reasonable person could be expected to endure.
91. Meyer's conduct was extreme and outrageous beyond the bounds of decency and utterly intolerable in a civilized society. Such conduct includes, without limitation: sexually exploiting women who came to him in emotional crisis seeking pastoral counseling; deliberately establishing an artificial "father/daughter" relationship with emotionally vulnerable women to facilitate sexual access; using the Life360 mobile application to surveil and monitor the locations of his counselees; exercising control, secrecy, and surveillance over Jane Doe 1 and Jane Doe 2; engaging in sexual contact with his counselees on church premises; and continuing such conduct despite their visible distress and objections.
92. Meyer intended to cause, or recklessly disregarded the substantial probability of causing, severe emotional distress to Jane Doe 1 and Jane Doe 2.
93. As a direct and proximate result of Meyer's intentional infliction of emotional distress upon Jane Doe 1 and Jane Doe 2, each did in fact suffer severe and ongoing emotional distress, mental anguish, psychological harm, and other damages as described herein.

**FOURTH CAUSE OF ACTION**

*(Negligent Hiring — Defendants Vineyard USA, Vineyard Church of Delaware County, and Gospel of Wholeness, LLC)*

94. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

95. Defendants Vineyard USA, VCDC, and Gospel of Wholeness, LLC have a duty to provide a safe environment for its congregants and counselees, which includes the duty to hire and retain fit and competent individuals.
96. At all times relevant to this Complaint, Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC employed and/or retained Meyer as a pastor and counselor.
97. Meyer was unfit and incompetent for his pastoral and counseling roles for which Vineyard USA, VCDC, and Gospel of Wholeness, LLC hired and/or empowered him.
98. Vineyard USA, VCDC, and Gospel of Wholeness, LLC knew or, through the exercise of reasonable care, should have known that Meyer was unfit and/or unsuitable to serve as a pastor, pastoral counselor, or counselor at VCDC or elsewhere, including in light of prior inappropriate conduct, complaints, red flags, or other warning signs.
99. Alternatively, upon information and belief, Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC failed to conduct adequate background checks, screening, or inquiry into Meyer's fitness to serve as a pastor or counselor.
100. Vineyard USA, VCDC, and Gospel of Wholeness, LLC breached its duty of care in hiring, enabling, and/or empowering Meyer as a pastor and counselor, thereby creating a foreseeable risk of harm to its congregants and counselees, including the Plaintiffs.
101. As result of Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's actions and/or omissions, they created, permitted, and/or perpetuated the very harm Plaintiffs—and likely many other victims—suffered that they should have safeguarded against.
102. As a proximate result of the Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's negligent hiring of Meyer, Plaintiffs suffered the injuries and harm described herein.

**FIFTH CAUSE OF ACTION**

***(Negligent Training — Defendants Vineyard USA, Vineyard Church of Delaware County, and Gospel of Wholeness, LLC)***

103. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

104. Vineyard USA, VCDC, and Gospel of Wholeness, LLC have a duty to develop, implement, and properly train its employees, including pastors and counselors, on policies regarding boundaries, ethical conduct, and the prevention and reporting of abuse.

105. Upon information and belief, Vineyard USA, VCDC, and Gospel of Wholeness, LLC failed to develop and/or failed to adequately train its employees on those policies.

106. Specifically, Vineyard USA, VCDC, and Gospel of Wholeness, LLC breached their duty by failing to adequately train Meyer in maintaining appropriate counseling boundaries and avoiding exploitation of vulnerable congregants and counselees.

107. This failure created an unreasonable risk of harm to Plaintiff and others.

108. As a direct and proximate result of the Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's negligent training, Meyer engaged in the misconduct described herein, which Vineyard USA, VCDC, and Gospel of Wholeness, LLC should have trained its employees to safeguard against.

109. As a proximate result of Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's negligent hiring and/or training of Meyer, Plaintiffs suffered serious physical and psychological harm as described herein.

**SIXTH CAUSE OF ACTION**

***(Negligent Supervision/Retention — Defendants Vineyard USA, Vineyard Church of Delaware County, and Gospel of Wholeness, LLC)***

110. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.
111. Vineyard USA, VCDC, and Gospel of Wholeness, LLC each have a duty to supervise Meyer's conduct and to ensure that those operating under its auspices did not use its premises, resources, and organizational credibility to harm the congregants and counselees who trusted the church.
112. Vineyard USA, VCDC, and Gospel of Wholeness, LLC allowed Meyer continued and unrestricted access to its church offices, premises, and congregation after his retirement in August 2018, without establishing any formal accountability structure, defining his post-retirement duties, or placing any meaningful limitations on his access to vulnerable individuals.
113. By continuing to platform Meyer and provide him unrestricted access to church premises and congregants/counselees after his retirement, Vineyard USA, VCDC, and Gospel of Wholeness, LLC entrusted him with the means to continue the very conduct described in this Complaint, despite knowing or having reason to know that he was unfit to serve as an unsupervised pastor, pastoral counselor, or counselor.
114. Vineyard USA, VCDC, and Gospel of Wholeness, LLC each failed to appropriately supervise Meyer and failed to establish policies or accountability structures that would have prevented or detected the misconduct described herein.
115. Defendants Vineyard USA, VCDC, and Gospel of Wholeness, LLC also each have a duty to safeguard their congregants and counselees from employees and agents who were unfit and/or presented a risk of harm to congregants and counselees.
116. Upon information and belief, Defendants Vineyard USA, VCDC, and Gospel of Wholeness, LLC knew or should have known, prior to and during the period of Meyer's abuse

of Jane Doe 1 and Jane Doe 2, that Meyer was unfit to serve in a pastoral counseling capacity, posed a risk of harm to the vulnerable congregants and counselees he served, had no formal training in professional counseling, and/or had previously been accused of inappropriate conduct with women.

117. Upon information and belief, Defendants Vineyard USA, VCDC, and Gospel of Wholeness, LLC also knew or should have known that clergy and pastoral abuse had been reported within numerous other Vineyard churches across the country and in Ohio, making the risk of abuse by pastors, pastoral counselors, and spiritual leaders foreseeable and requiring reasonable safeguards to protect congregants and counselees.

118. Still, in the course and scope of his employment, Meyer was enabled to befriend and groom Jane Doe 1 and Jane Doe 2 while they each were congregants/counselees of VCDC.

119. So despite their knowledge, Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC either failed to reasonably supervise Meyer and monitor for potential abuse or observed Meyer's misconduct but disregarded it.

120. Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC failed to take adequate measures to supervise Meyer, address his unfitness, and/or protect Jane Doe 1 and Jane Doe 2 from the harm his continued access posed.

121. Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC also failed to take adequate measures to address and safeguard against future sexual misconduct, including by terminating their relationship with Meyer and ending his access to their premises, resources, congregants, and counselees.

122. Instead, Vineyard USA, VCDC, and/or Gospel of Wholeness, LLC retained Meyer in a pastoral counseling capacity, continued to platform him publicly, and provided him with

continued access to church office space and administrative staff services after his formal retirement in August 2018.

123. Vineyard USA, VCDC, and Gospel of Wholeness, LLC's failures constitute a breach of their duty to safeguard its congregants and counselees from Meyer's unfitness and/or sexual propensities.

124. Because of Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's failures, Meyer, while acting on behalf of and in the course and scope of his employment/agency, and in the presence of other clergy/co-workers, befriended and groomed Jane Doe 1 and Jane Doe 2.

125. As a proximate result of Vineyard USA's, VCDC's, and Gospel of Wholeness, LLC's negligent hiring, training, supervision, and/or retention of Meyer, Plaintiffs suffered serious physical and psychological harm as described herein.

**SEVENTH CAUSE OF ACTION**  
***(Negligent Infliction of Emotional Distress — All Defendants)***

126. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

127. Defendants owed Plaintiffs a duty to exercise reasonable care in the provision of pastoral counseling, supervision, and oversight.

128. Defendants breached that duty through negligent acts and omissions, including but not limited to, failing to implement reasonable safeguards and failing to protect Plaintiffs from foreseeable harm.

129. It was reasonably foreseeable that Defendants' conduct would cause serious, severe emotional distress to Plaintiffs.

130. As a direct result of Defendants' conduct, Plaintiffs did in fact suffer severe emotional distress, including diagnosed conditions requiring medical and psychological treatment.

131. Defendants’ negligence was a direct and proximate cause of Plaintiffs’ injuries and resulting damages as set forth herein.

**EIGHTH CAUSE OF ACTION**  
*(Loss of Spousal Consortium – All Defendants)*

132. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

133. At all relevant times, John Doe 1 was the legal spouse of Jane Doe 1 and remains her legal spouse.

134. John Doe 1 states that, as a direct and proximate result of Defendants’ conduct, as described herein, he has suffered the loss of his wife’s companionship, society, services, and consortium, and has endured severe emotional distress in witnessing the devastating impact of Meyer’s conduct on his wife and their marriage.

135. John Doe 1 further states that, as a direct and proximate result of the Defendants’ conduct, his enjoyment and quality of life and his ability to carry on the normal activities of his daily life with his spouse have been impaired.

**NINTH CAUSE OF ACTION**  
*(Joint Enterprise Liability, Alter Ego, Agency — Defendants Vineyard USA and Vineyard Church of Delaware County)*

136. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

137. As set forth above, the Defendants, Vineyard USA and VCDC, are commonly controlled entities, which have intertwined their operations and resources to achieve a common business purpose, to an extent that their separate identities have essentially been merged into a single entity.

138. Any assertions by Vineyard USA and VCDC that they're separate entities with an independent and separate existence is nothing more than a sham and part of a scheme to perpetrate fraud, promote injustice, and unlawfully evade existing legal and fiduciary obligations.
139. Vineyard USA and VCDC are fundamentally indistinguishable, such that disregarding their separate identities is necessary to avoid an unjust or inequitable result.
140. Vineyard USA and VCDC are vicariously liable for the actions of each other because they're affiliated under the umbrella of a single business entity.
141. Vineyard USA and VCDC have disregarded the separateness by commingling the two companies' affairs on an interchangeable and/or joint basis and by confusing the otherwise separate properties, records, and/or control of the companies because the two share common employees, share the same office space and resources, have similarity in name, and have merged accounting and/or other legal operations.
142. In the alternative, to the extent that Vineyard USA and VCDC are found to be separate legal entities, each remain liable for the acts and omissions of each other because they engaged in a joint venture and enterprise to act in concert in the operation, management, and promotion of business related to the church, and agreed to a common purpose of operating and managing this business venture. Vineyard USA and VCDC shared an equal right to direct, control, and govern the movements and conduct of each, which arises out of an express or implied agreement, a common purpose, and a community of pecuniary interest in that common purpose.
143. As a consequence of the joint venture, Vineyard USA and VCDC owed Plaintiffs a joint duty to exercise reasonable care in providing a safe environment and to protect against

foreseeable harm. Moreover, joint venturers are liable as joint principals for the torts of their own and each other's servants committed while acting within the course of their employment.

144. Vineyard USA and VCDC acted as agents for one another and ratified or authorized the acts or omissions of one another. Vineyard USA and VCDC also held themselves out as being one unified enterprise and operation known as "Vineyard Church."

145. At all relevant times, Meyer was acting as a dual servant of Vineyard USA and VCDC and was acting within the scope of his employment/agency with both entities. Consequently, Vineyard USA and VCDC are liable for the harm caused by Meyer during the scope of his employment/agency.

146. Therefore, Vineyard USA and VCDC are liable to Plaintiffs for all damages allowed by law for injuries, harm, and losses sustained by Plaintiffs as a result of Meyer's and/or their own independent tortious conduct.

**TENTH CAUSE OF ACTION**  
***(Punitive Damages – All Defendants)***

147. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully rewritten herein.

148. Meyer deliberately targeted emotionally vulnerable women seeking pastoral counseling, systematically groomed them over extended periods, engaged in sexual misconduct while fully acknowledging in real time that the conduct was wrong, required his victims to maintain secrecy, and surveilled their movements using a mobile tracking application.

149. Meyer's conduct was willful, wanton, malicious, and in reckless disregard of Plaintiffs' rights and safety.

150. Meyer knowingly abused a position of trust and authority for personal gratification.

151. Vineyard USA, VCDC, and Gospel of Wholeness, LLC also acted with conscious disregard for the safety of others by failing to properly screen, train, and supervise Meyer despite known and/or foreseeable risks.

152. Vineyard USA, VCDC, and Gospel of Wholeness, LLC further perpetuated Meyer's abuse by providing him with unsupervised access to vulnerable individuals, as well as resources, authority, and institutional stature at VCDC, thereby enabling and facilitating the misconduct described herein.

153. The acts of Defendants described herein constitute malicious, willful, and wanton conduct undertaken with conscious disregard for the rights and well-being of Plaintiffs.

154. Specifically, the Defendants' acts described herein constitute malice as that term is used in RC. 2315.21 and interpreted by the courts of the State of Ohio. The Defendants' conduct was outrageous and taken with a conscious disregard for the rights and well-being of Plaintiffs, had a great probability of causing substantial harm to Plaintiffs, and did in fact cause substantial harm to Plaintiffs.

155. Therefore, Plaintiffs are entitled to and demand punitive damages against the Defendants in an amount to be determined by the trier of fact.

WHEREFORE, Plaintiffs each pray for judgment against Defendants, jointly and severally, in an amount exceeding Twenty-Five Thousand Dollars (\$25,000.00), together with interest, costs, reasonable attorney fees associated herewith, and such other and further relief as the Court may deem just. Additionally, Plaintiffs pray for punitive damages against the Defendants in an amount to be determined by the trier of fact.

Respectfully submitted,

/s/ Angela H. Hartford  
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*Trial Attorney for Plaintiffs*

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all issues triable by right.

Respectfully submitted,

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*Trial Attorney for Plaintiffs*

**PRAECIPE**

**TO THE CLERK:**

Please serve summons and Complaint upon Defendants by Certified Mail, return receipt requested, at the addresses listed on the caption.

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