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6 JOHN LSS DOE, JOHN LHS DOE and JOHN
7 LMS DOE

FILED
Superior Court of California
County of Los Angeles
05/16/2022

Sherri R. Carter, Executive Officer / Clerk of Court
By: D. Jones Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

12 JOHN LWS DOE, an individual; JOHN LSS
13 DOE, an individual; JOHN LHS DOE, an
14 individual;

15 Plaintiffs,

16 v.

17 COUNTY OF SANTA BARBARA, SANTA
18 BARBARA COUNTY SHERIFF’S
19 DEPARTMENT, AMERICAN YOUTH
20 SOCCER ORGANIZATION, TERENCE
21 STEVENS and DEFENDANTS 5 through
22 100, inclusive,

23 Defendants.

Case No.: 22STCV09312

FIRST AMENDED COMPLAINT FOR DAMAGES

1. VIOLATION OF STATUTORY DUTY/NEGLIGENCE PER SE
2. SEXUAL ASSAULT
3. NEGLIGENCE
4. NEGLIGENT FAILURE TO EDUCATE, TRAIN, or WARN
5. BANE CIVIL RIGHTS ACT

COMPLAINT FILED: March 16, 2022

23 Based upon information and belief available to JOHN LWS DOE, JOHN LSS
24 DOE, JOHN LHS DOE AND JOHN LMS DOE, at the time of the filing of this Complaint,
25 PLAINTIFFS make the following allegations:

26
27 **BACKGROUND FACTS**

- 28 1. TERENCE STEVENS is a serial pedophile and has been criminally convicted of molesting

1 numerous children, including some of the Plaintiffs in this action. TERENCE STEVENS gained
2 access to his victims, and their trust through his coaching and refereeing for youth soccer in
3 Lompoc and San Diego County. PLAINTIFFS JOHN LWS DOE, JOHN LSS DOE, JOHN LHS
4 DOE AND JOHN LMS DOE are four of his many victims. Sadly, PLAINTIFFS as well as an
5 untold number of these communities' children were sexually molested by TERENCE STEVENS
6 because of the negligence of the COUNTY OF SANTA BARBARA, SANTA BARBARA
7 COUNTY SHERIFF'S DEPARTMENT, and the AMERICAN YOUTH SOCCER
8 ORGANIZATION ("AYSO"). The COUNTY OF SANTA BARBARA and the SANTA
9 BARBARA COUNTY SHERIFF'S DEPARTMENT received not less than 4 complaints from
10 1982 through 1991 that TERENCE STEVENS was suspected of sexually molesting children.

11 2. The COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY
12 SHERIFF'S DEPARTMENT violated The California CHILD ABUSE AND NEGLECT
13 REPORTING ACT, by failing to report these complaints to applicable child protection agencies
14 and the State Attorney General. The same law enforcement official with the COUNTY OF
15 SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT
16 responded to each complaint. In response to the first complaint in 1982, that official failed to so
17 much as interview the identified victims, which included Plaintiffs JOHN LWS DOE AND JOHN
18 LSS DOE. In response to the second complaint in 1989, despite PLAINTIFF LMS DOE and
19 TERENCE STEVENS (Perpetrator) both admitting TERENCE STEVENS fondled the genitals of
20 the then 14-year-old multiple times, nothing further was done to investigate, prosecute, nor cross-
21 report the complaint, the investigation or the findings of the investigation.

22 3. In 1991 agents of the COUNTY OF SANTA BARBARA and the SANTA
23 BARBARA COUNTY SHERIFF'S DEPARTMENT witnessed TERENCE STEVENS in Red
24 Rock recreation area, standing naked and masturbating over PLAINTIFF JOHN LHS DOE who
25 was then a 14-year-old boy. Within weeks of this third complaint, the fourth complaint was made
26 to the COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S
27 DEPARTMENT, this also that TERENCE STEVENS was suspected of molesting PLAINTIFFS
28 JOHN LMS DOE and JOHN LHS DOE. The same law enforcement official of the COUNTY OF

1 SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT who
2 had responded to the first two complaints, responded to the 1991 complaints. He did not interview
3 PLAINTIFF JOHN LMS DOE, nor any of the other youth soccer players the complaining witness
4 communicated she suspected him of sexually molesting. Instead, the law enforcement official
5 with the COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S
6 DEPARTMENT actively sought to discourage the complaining witness from speaking with others
7 about any possible investigations of TERENCE STEVENS for child molestation. The COUNTY
8 OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT
9 did not seek the prosecution of TERENCE STEVENS for child molestation in response to any of
10 these four complaints. TERENCE STEVENS was not prosecuted until another law enforcement
11 agency, years later received video footage of his sexual abuse of a child. Neither did the COUNTY
12 OF SANTA BARBARA or the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT
13 engage in the cross-reporting they were required to do by the CHILD ABUSE AND NEGLECT
14 REPORTING ACT.

15 4. Agents of the AMERICAN YOUTH SOCCER ORGANIZATION, likewise long
16 suspected TERENCE STEVENS was sexually molesting children. Despite these suspicions no
17 actions were taken to protect children that AYSO placed in TERENCE STEVEN's care. AYSO
18 was also long aware that its agents all too often sexually molest children, and the children are all
19 too often subjected to child sexual abuse by coaches in other youth activities and athletics. Despite
20 this knowledge, AYSO took no action to attempt to educate train or warn its agents, parents or
21 youth participants about prevention, detection or reporting of child sexual abuse in its programs.
22 Instead, AYSO created policies that educated and protected against embezzlement, appropriate
23 league governance and other topics designed to expand AYSO and to protect and increase its
24 prestige.

25 **GENERAL ALLEGATIONS**

26
27 **PARTIES**

28 5. Plaintiff JOHN LWS DOE is an adult male citizen of the United States born in the

1 year 1971. He was sexually assaulted, within the meaning of Code of Civil Procedure § 340.1,
2 subdivision (d), by TERENCE STEVENS beginning when he was approximately 11 years old.
3 JOHN LWS DOE came to know, and subsequently, came to be sexually assaulted by TERENCE
4 STEVENS through his association with AYSO's youth soccer program in Lompoc, California.
5 TERENCE STEVENS was a coach, referee and administrator of AYSO's youth soccer program
6 in the Lompoc region at the time he came to know JOHN LWS DOE and Plaintiff's family.
7 TERENCE STEVENS utilized the access and trust his position with AYSO created to gain access
8 to, and the trust of Plaintiff and his family and to sexually assault and molest Plaintiff. Plaintiff
9 JOHN LWS DOE is currently a resident of San Luis Obispo County, California.

10 6. Plaintiff JOHN LLS DOE is an adult male citizen of the United States born in the
11 year 1970. He was sexually assaulted, within the meaning of Code of Civil Procedure § 340.1,
12 subdivision (d), by TERENCE STEVENS beginning when he was approximately 11 years old.
13 JOHN LSS DOE came to know, and subsequently, came to be sexually assaulted by TERENCE
14 STEVENS through his association with AYSO's youth soccer program in Lompoc, California.
15 TERENCE STEVENS was a coach, referee and administrator of AYSO's youth soccer program
16 in the Lompoc region at the time he came to know JOHN LSS DOE and Plaintiff's family.
17 TERENCE STEVENS utilized the access and trust his position with AYSO created to gain access
18 to, and the trust of Plaintiff and his family and to sexually assault and molest Plaintiff. Plaintiff
19 JOHN LSS DOE is currently a resident of the state of Washington.

20 7. Plaintiff JOHN LHS DOE is an adult male citizen of the United States born in the
21 year 1977. He was sexually assaulted, within the meaning of Code of Civil Procedure § 340.1,
22 subdivision (d), by TERENCE STEVENS beginning when he was approximately 12 years old.
23 JOHN LHS DOE came to know, and subsequently, came to be sexually assaulted by TERENCE
24 STEVENS through his association with AYSO's youth soccer program in Lompoc, California.
25 TERENCE STEVENS was a coach, referee and administrator of AYSO's youth soccer program
26 in the Lompoc region at the time he came to know JOHN LHS DOE and Plaintiff's family.
27 TERENCE STEVENS utilized the access and trust his position with AYSO created to gain access
28 to, and the trust of Plaintiff and his family and to sexually assault and molest Plaintiff. Plaintiff

1 JOHN LMS DOE is currently a resident of North Carolina.

2 8. Plaintiff JOHN LMS DOE is an adult male citizen of the United States born in the
3 year 1974. He was sexually assaulted, within the meaning of Code of Civil Procedure § 340.1,
4 subdivision (d), by TERENCE STEVENS beginning when he was approximately 12 years old.
5 JOHN LMS DOE came to know, and subsequently, came to be sexually assaulted by TERENCE
6 STEVENS through his association with AYSO's youth soccer program in Lompoc, California.
7 TERENCE STEVENS was a coach, referee and administrator of AYSO's youth soccer program
8 in the Lompoc region at the time he came to know JOHN LMS DOE and Plaintiff's family.
9 TERENCE STEVENS utilized the access and trust his position with AYSO created to gain access
10 to, and the trust of Plaintiff and his family and to sexually assault and molest Plaintiff. Plaintiff
11 JOHN LMS DOE is currently a resident of Florida.

12 9. The COUNTY OF SANTA BARBARA is a County of the State of California
13 which operates a Sheriff's department, which is the SANTA BARBARA COUNTY SHERIFF'S
14 DEPARTMENT, in Lompoc, California. The COUNTY OF SANTA BARBARA has the capacity
15 to sue and be sued.

16 10. The SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT is the sheriffs'
17 department Operated by the COUNTY OF SANTA BARBARA, with jurisdiction over Lompoc,
18 California. The SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT's principal place
19 of business is within the confines of the COUNTY OF SANTA BARBARA in California. The
20 SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT is the principal law enforcement
21 agency of the COUNTY OF SANTA BARBARA.

22 11. The AMERICAN YOUTH SOCCER ORGANIZATION is a California
23 Corporation with its principal place of business in Los Angeles County, California. TERENCE
24 STEVENS was an agent of AYSO, utilizing the authority granted him as an agent of AYSO to
25 gain access to Plaintiffs and their families, as well as their trust and sexually molested Plaintiffs.
26 Plaintiffs were each youth members of AYSO's youth soccer program in Lompoc, California.
27 Membership dues were paid for each Plaintiff to be part of AYSO's soccer program in Lompoc.
28 AYSO assumed custody of PLAINTIFFS as part of their participation in AYSO's youth soccer

1 program.

2 12. Defendant Does 5 through 100, inclusive, are individuals and/or business or
3 corporate private or public entities incorporated in and/or doing business in California, whose true
4 names and capacities are unknown to Plaintiffs who therefore sue such DEFENDANTS by such
5 fictitious names, and who will amend the Complaint to show the true names and capacities of each
6 such Doe Defendants when ascertained. Each such Defendant Doe is legally responsible in some
7 manner for the events, happenings and/or tortious and unlawful conduct that caused the injuries
8 and damages alleged in this Complaint. Each of the DEFENDANTS had policies and expectations
9 requiring its agents and subsidiaries to report suspected or known molestation of minors by its
10 agents to higher level officials within each DEFENDANT, and by subsidiaries to the parent
11 corporations.

12 13. The COUNTY OF SANTA BARBARA, the SANTA BARBARA COUNTY
13 SHERIFF'S DEPARTMENT, the AMERICAN YOUTH SOCCER ORGANIZATION,
14 TERENCE STEVENS and Does 5 through 100 are hereinafter referred to as the
15 "DEFENDANTS."

16 **FIRST CAUSE OF ACTION**

17 **NEGLIGENCE PER SE/VIOLATION OF STATUTORY DUTY**

18 **(ALL PLAINTIFFS AGAINST THE COUNTY OF SANTA BARBARA AND THE SANTA**
19 **BARBARA COUNTY SHERIFF'S DEPARTMENT, and DEFENDANT DOES 5-100)**

20 14. PLAINTIFFS incorporate all paragraphs of this Complaint, as if fully set forth
21 herein. Pursuant to *Government Code Section 815.6*, the COUNTY OF SANTA BARBARA and
22 the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT are liable for the sexual abuse
23 committed upon PLAINTIFFS because the COUNTY OF SANTA BARBARA and the SANTA
24 BARBARA COUNTY SHERIFF'S DEPARTMENT violated mandatory duties imposed on these
25 defendants by statute.

26 15. On September 14, 1982, the COUNTY OF SANTA BARBARA and the SANTA
27 BARBARA COUNTY SHERIFF'S DEPARTMENT received a report of possible child sexual
28 abuse of 3-4 boys being committed by TERENCE STEVENS. The report was made by a neighbor

1 to a property in Lompoc that TERENCE STEVENS was house sitting at. The neighbor believed
2 TERENCE STEVENS was sexually molesting the boys, whom he was having stay overnight at
3 his residence. The neighbor communicated to the COUNTY OF SANTA BARBARA and the
4 SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT that she thought TERENCE
5 STEVENS was sexually abusing the boys.

6 16. The COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY
7 SHERIFF'S DEPARTMENT first responded to the complaint by having a law enforcement officer
8 with the COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S
9 DEPARTMENT go out to the property to interview the neighbor who had complained. The law
10 enforcement officer interviewed the neighbor that had called in the complaint, as well as another
11 neighbor. Both neighbors told the law enforcement officer they were concerned that TERENCE
12 STEVENS was sexually molesting the boys spending the nights with him. These neighbors
13 identified by name address and age, of two of the boys they were concerned that TERENCE
14 STEVENS had sexually molested, one of whom was PLAINTIFF JOHN LSS DOE. Plaintiff
15 JOHN LWS DOE was also one of the boys the neighbors complained TERENCE STEVENS might
16 be sexually molesting in the home.

17 17. The report of these complaints authored by the detective states TERENCE
18 STEVENS was identified by name and age, and his occupation, which was the Soccer Coach for
19 Cabrillo High School Varsity team as well as for 11-12- and 13-14-year-old youth soccer teams.
20 On September 14, 1982, the law enforcement official observed TERENCE STEVENS was alone
21 at the residence he had been housesitting. The law enforcement official did not question
22 TERENCE STEVENS or in any way investigate the complaints made by the neighbors that he
23 was sexually abusing boys in the house. Neither did the Detective attempt to contact or question
24 any of the children TERENCE STEVENS was suspected of molesting. Neither did the Detective
25 nor any other agent of the COUNTY OF SANTA BARBARA or the SANTA BARBARA
26 COUNTY SHERIFF'S DEPARTMENT contact or question the parents or guardians of any of the
27 children he was suspected of sexually abusing. This failure to investigate the complaints violated
28 *California Penal Code Section 1166.3* and other statutes.

1 18. At no time did the COUNTY OF SANTA BARBARA or the SANTA BARBARA
2 COUNTY SHERIFF'S DEPARTMENT or any of their agents investigate these complaints from
3 1982, nor cross report them or any investigation, finding or outcome of the complaints as was
4 required of them by *California Penal Code Sections* 11166, 11166.3, 11165.12, 11169 and 11170.
5 The COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S
6 DEPARTMENT violated *California Penal Code Sections* 11166, 11166.3, 11165.12. 11169 and
7 11170 by failing to make the required cross reports. Neither did the Detective nor the COUNTY
8 OF SANTA BARBARA or the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT
9 make any findings that the complaint that TERENCE STEVENS was sexually abusing a child was
10 founded, unfounded or inconclusive as they were required to do. The findings of the investigation
11 were required to be communicated to the California Department of Justice unless they were
12 determined by the COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY
13 SHERIFF'S DEPARTMENT to be unfounded.

14 19. *California Penal Code Sections* 11166, 11166.3, 11165.12. 11169 and 11170,
15 These sections create mandatory duties on the part of the COUNTY OF SANTA BARBARA and
16 the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT to conduct an investigation and
17 cross-report the initial complaint, the fact of their investigation and the outcome of their
18 investigation to other child welfare agencies, the District Attorney and the Attorney General. See
19 *B.H. v. County of San Bernardino*, (2015) 62 Cal.4th 168. The purpose of the Child Abuse and
20 Neglect Reporting act and its investigation and cross-reporting requirements is to prevent child
21 sexual abuse. These violations of the COUNTY OF SANTA BARBARA and the SANTA
22 BARBARA COUNTY SHERIFF'S DEPARTMENT's mandatory duties under CANRA were a
23 proximate cause of each Plaintiffs being sexually abused by TERENCE STEVENS.

24 20. CANRA dictates that the other child welfare agencies receiving the cross-reports
25 were themselves required to evaluate the complaints and conduct an investigation of the
26 complaints within 10 days of receipt of the complaints. See Welfare and Institutions Code Section
27 16501(f). The purpose of these cross reporting and multi-agency investigations is to the best
28 extent possible prevent child sexual abuse by having collaboration between these agencies with

1 differing expertise and perspectives.

2 21. Such additional outside expertise, would at a minimum have dictated that some
3 investigation of the complaints be done. Such basic investigation being interviewing the possible
4 victims including Plaintiffs JOHN LWS DOE, JOHN LSS DOE and/or their parents and guardians
5 to interview them to see if molestation was occurring. This sort of interview at a minimum would
6 have alerted the victims' parents and guardians to the concerns that their children were being
7 sexually abused by TERENCE STEVENS, so as to alert them to the greater need to safeguard
8 against such abuse. None of the required investigation or cross-reporting was done by the
9 COUNTY OF SANTA BARBARA or the SANTA BARBARA COUNTY SHERIFF'S
10 DEPARTMENT. None of the victims, including Plaintiffs JOHN LSS DOE or JOHN LWS DOE
11 were contacted, neither were their parents contacted. TERENCE STEVENS' access to
12 PLAINTIFF JOHN LSS DOE and JOHN LWS DOE continued unabated as did the sexual
13 molestation of PLAINTIFF JOHN LSS DOE and JOHN LWS DOE by TERENCE STEVENS.
14 TERENCE STEVENS thereafter continued to gain access to PLAINTIFF JOHN LWS DOE long
15 after these complaints were made. The COUNTY OF SANTA BARBARA and the SANTA
16 BARBARA COUNTY SHERIFF'S DEPARTMENT's breach of their statutory duties was a
17 proximate cause of this abuse continuing.

18 22. On January 19, 1989, the COUNTY OF SANTA BARBARA and the SANTA
19 BARBARA COUNTY SHERIFF'S DEPARTMENT received another complaint that TERENCE
20 STEVENS had sexually molested a minor. As with the complaint from 1982, the same Detective
21 of the COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S
22 DEPARTMENT responded to the complaint. The complaining witness complained that
23 TERENCE STEVENS was sexually molesting PLAINTIFF JOHN LMS DOE. PLAINTIFF
24 JOHN LMS DOE was 14 years old at the time. The Complaining witness was a co-worker of
25 TERENCE STEVENS at the Vandenberg Air Force providing security. The witness related
26 specific circumstances that caused him to believe TERENCE STEVENS was sexually molesting
27 minors. The witness provided names of other witnesses who also suspected TERENCE STEVENS
28 was sexually molesting PLAINTIFF JOHN LMS DOE as well as other underage soccer players

1 from TERENCE STEVENS's youth soccer teams that were part of AYSO's youth soccer program.

2 23. The Detective did this time interview PLAINTIFF JOHN LMS DOE as well as his
3 father. The Detective did so by treating the 14-year-old like a criminal, summoning him and his
4 father to the sheriff's station, where three law enforcement officers interrogated the 14-year-old
5 alone in a room with them. PLAINTIFF JOHN LMS DOE related that he had spent the night with
6 TERENCE STEVENS and been alone with him in TERENCE STEVENS's bedroom on many
7 occasions. PLAINTIFF JOHN LMS DOE admitted that there was at least one instance when
8 TERENCE STEVENS fondled PLAINTIFF JOHN LMS DOE's genitals, skin to skin.
9 PLAINTIFF JOHN LMS DOE admitted that on numerous other occasions TERENCE STEVENS
10 had grabbed his genitals over Plaintiffs' clothes. PLAINTIFF JOHN LMS DOE also admitted
11 TERENCE STEVENS had shown him video pornography when they were alone in TERENCE
12 STEVENS's bedroom.

13 24. PLAINTIFF JOHN LMS DOE was made to feel that he had done something wrong
14 and that he would be punished. Like so many victims of child sexual abuse who already experience
15 internalized shame and severely conflicting emotions stoked by their perpetrators, the COUNTY
16 OF SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT's
17 approach to interviewing PLAINTIFF JOHN LMS DOE, resulted in the boy underreporting the
18 abuse that had been occurring. In fact, TERENCE STEVENS had been severely and extensively
19 sexually abusing PLAINTIFF JOHN LMS DOE. Doing so under the guise of love and care for
20 the boy.

21 25. The Detective also eventually interviewed TERENCE STEVENS. Unlike the
22 interview with PLAINTIFF JOHN LMS DOE, this interview was pre-scheduled, and did not take
23 place at the sheriff station. This interview did not entail TERENCE STEVENS being interrogated
24 by three law enforcement officials. During the interview TERENCE STEVENS admitted to
25 PLAINTIFF JOHN LMS DOE staying over his home alone with him on many occasions. He also
26 admitted to grabbing PLAINTIFF JOHN LMS DOE's genitals on multiple occasions and that this
27 would happen in the evening when it was time to go to bed. The Detective did not ask TERENCE
28 STEVENS any questions about showing PLAINTIFF JOHN LMS DOE pornography. TERENCE

1 STEVENS characterized the physical contact as non-sexual and told the law enforcement officers
2 that he believed the initial complaint arose from a vendetta from a co-worker.

3 26. No further witnesses were interviewed as part of the investigation, though many
4 additional witnesses and possible victims were identified in the interviews conducted. Neither was
5 the 1982 complaint regarding TERENCE STEVENS so much as referenced. Though one of the
6 boys mentioned in that report, is mentioned in the 1989 report as having lived with TERENCE
7 STEVENS in the years following the 1982 report.

8 27. The Detective concluded the report finding the allegations regarding sexual abuse
9 of PLAINTIFF JOHN LMS DOE by TERENCE STEVENS were founded. However, the
10 Detective closed the case without cross-reporting his investigation or findings to the Department
11 of Justice, other child welfare agencies or the District Attorney as is required by CANRA.

12 28. Like the 1982 report, the COUNTY OF SANTA BARBARA and the SANTA
13 BARBARA COUNTY SHERIFF'S DEPARTMENT failed to cross-report either the complaint,
14 the investigation or the findings to any other governmental agency, including any other child
15 protective agency. This failure to cross-report, violated *California Penal Code Sections* 11166,
16 11166.3, 11165.12, 11169 and 11170. These sections create mandatory duties to cross-report at a
17 minimum the initial complaint to other child protective services entities, the District Attorney and
18 the Attorney General. See *B.H. v. County of San Bernardino*, (2015) 62 Cal.4th 168. They also
19 require that allegations of child sexual abuse that are deemed founded after an investigation are to
20 be reported to the Attorney General so that record can be kept in and referenced for future
21 background checks. The purpose of these cross-reporting requirements are in part to allow the
22 various agencies addressing child sexual abuse to collaborate, and to bring their respective
23 expertise to bear in responding to child molestation complaints. Such additional outside expertise,
24 would have dictated that the interview of PLAINTIFF JOHN LMS DOE be done in such a manner
25 as to minimize the boy's impression that he was to blame or had done something wrong. Bringing
26 the expertise of another child protective agency with more experience addressing child sexual
27 abuse would have significantly affected the way PLAINTIFF JOHN LMS DOE was questioned,
28 and the significance placed on his responses. Another very significant reason for the cross-

1 reporting is so that another agency can be involved, minimizing the possibility that the sensibilities,
2 perceptions and personal loyalties of one person, in this case the investigating officer, are solely
3 relied upon in responding to complaints of child sexual abuse.

4 29. In the wake of this investigation, TERENCE STEVENS continued to coach youth
5 soccer with AYSO in Lompoc. He continued to referee for youth soccer with AYSO in Lompoc.
6 He continued to find ways to spend time with PLAINTIFF JOHN LMS DOE, and continued to
7 sexually molest him.

8 30. On Saturday, June 29, 1991, two reserve on-duty deputies of the COUNTY OF
9 SANTA BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT while
10 patrolling the Red Rock campground of the Santa Ynez River area, witnessed 32-year-old
11 TERENCE STEVENS, completely naked, standing and masturbating over 14-year-old
12 PLAINTIFF JOHN LHS DOE who was laying down. The deputies cited TERENCE STEVENS
13 for violation of *California Penal Code Section 647(a)* lewd conduct in a public place. The deputies
14 suspected he had engaged in sexual conduct with PLAINTIFF JOHN LHS DOE. They asked the
15 14-year-old boy if TERENCE STEVENS had sexually abused him. Embarrassed and ashamed,
16 Plaintiff JOHN LHS DOE denied any sexual abuse occurring.

17 31. Incredibly, after initially placing TERENCE STEVENS under arrest, the deputies
18 allowed TERENCE STEVENS to drive PLAINTIFF JOHN LHS DOE alone with him in
19 TERENCE STEVENS's car, for the 1/1/2 hour drive back to Lompoc. The deputies only telling
20 TERENCE STEVENS that they would be contacting PLAINTIFF JOHN LHS DOE's parents.

21 32. The deputies clearly suspected TERENCE STEVENS was sexually molesting
22 PLAINTIFF JOHS DOE because they saw TERENCE STEVENS completely naked, standing and
23 masturbating over the boy. Despite this suspicion, the deputies violated CANRA by not making a
24 mandated report of suspected child sexual abuse. Instead, the deputies choosing to ignore the
25 obvious signs that sexual abuse in violation of *California Penal Code Section 647.6* had just
26 occurred, decided instead to categorize the offense as simply public nudity. The deputies cited
27 TERENCE STEVENS for violation of Penal Code Section 647(a) and Santa Barbara Ordinance
28 24-15 being nude in a public place. This citation was forwarded to the District Attorney's office

1 of the COUNTY OF SANTA BARBARA and to the Court. However, no cross-report as is
2 required by CANRA was made to any other child welfare agencies of the COUNTY OF SANTA
3 BARBARA.

4 33. In mid-July of 1991, another deputy of the COUNTY OF SANTA BARBARA and
5 the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT received a complaint that
6 another witness suspected TERENCE STEVENS was sexually molesting both JOHN LHS DOE
7 and JOHN LMS DOE, who were both still minors. The witness was familiar with TERENCE
8 STEVENS through AYSO's youth soccer program in Lompoc. The deputy receiving this
9 complaint conveyed it to the Detective who had responded to the 1982 and 1989 complaints.
10 However, the complaint of suspected child sexual abuse of Plaintiffs JOHN LMS DOE and JOHN
11 LHS DOE, was not cross-reported to any other child welfare agencies or the Department of Justice
12 as is required by CANRA.

13 34. The Detective also did not investigate the complaint. Instead, the Detective simply
14 spoke over the telephone briefly with the complaining witness. The witness conveyed that she had
15 long been concerned that TERENCE STEVENS might be sexually abusing children, specifically
16 Plaintiffs JOHN LMS DOE and JOHN LHS DOE, whom TERENCE STEVENS would spend
17 unusual amounts of time with, including spending the night with them. She conveyed that
18 TERENCE STEVENS would make derogatory sexual comments to 9-year-old children on his
19 teams. The witness conveyed that she had spoken with other friends who told her they too had
20 concerns about TERENCE STEVENS' overwhelming interest in young boys, which seemed to go
21 well beyond his simple interest in sports. The witness conveyed that she had also heard a rumor
22 that TERENCE STEVENS was being investigated into whether TERENCE STEVENS had
23 sexually abused a 14-year-old boy at Red Rock.

24 35. The Detective did not ask the witness the names of the other people the witness
25 knew who also suspected TERENCE STEVENS was sexually abusing children. The Detective
26 did not ask which children on his soccer teams TERENCE STEVENS had spoken to in a sexual
27 way. The Detective did nothing to follow-up or investigate any of the information the witness
28 conveyed. Instead, the Detective told the witness the rumor she had heard was incorrect, that

1 TERENCE STEVENS was not being investigated for possibly sexually molesting a boy. After all
2 of this, TERENCE STEVENS continued sexually molesting PLAINTIFF JOHN LHS DOE.

3 36. The failure of the COUNTY OF SANTA BARBARA and the SANTA BARBARA
4 COUNTY SHERIFF'S DEPARTMENT to fulfill the mandatory duties imposed on them to
5 investigate and cross-report complaints that TERENCE STEVENS was suspected of sexually
6 abusing children was a proximate cause of TERENCE STEVENS' continued sexual abuse of each
7 of the Plaintiffs. These failures to cross-report complaints, investigations and findings regarding
8 suspected child sexual abuse was the result of a policy of the COUNTY OF SANTA BARBARA
9 and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT to not make such cross-
10 reports to other agencies including other child protection agencies.

11 37. As a direct and proximate result of the wrongful conduct alleged herein, Plaintiffs
12 JOHN LWS DOE., JOHN LSS DOE, JOHN LMS DOE AND JOHN LHS DOE have suffered,
13 and continue to suffer great pain of mind and body, shock, emotional distress, physical
14 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
15 and loss of enjoyment of life; were prevented and will continue to be prevented from performing
16 their daily activities and obtaining the full enjoyment of life; and/or have incurred and will continue
17 to incur expenses for medical and psychological treatment, therapy, and counseling.

18 **SECOND CAUSE OF ACTION**

19 **CHILD SEXUAL ASSAULT**

20 **(PLAINTIFFS JOHN LWS DOE, JOHN LSS DOE AND JOHN LHS DOE Against THE**
21 **AMERICAN YOUTH SOCCER ORGANIZATION AND TERENCE STEVENS)**

22 38. PLAINTIFFS incorporate all paragraphs of this Complaint, as if fully set forth
23 herein. PLAINTIFFS JOHN LWS DOE, JOHN LSS DOE AND JOHN LHS DOE were sexually
24 assaulted and molested as minors within the meaning of *Code of Civil Procedure Section 340.1(d)*
25 by TERENCE STEVENS.

26 39. The AMERICAN YOUTH SOCCER ORGANIZATION is vicariously liable for
27 the child sexual assault committed upon PLAINTIFFS by TERENCE STEVENS: 1) AYSO
28 authorized the wrongful conduct; 2) AYSO ratified the wrongful conduct.

1 minor Plaintiffs JOHN LWS DOE, JOHN LSS DOE AND JOHN LHS DOE when they were
2 entrusted to their care by their parents. These Plaintiffs' care, welfare, and/or physical custody
3 were temporarily entrusted to AYSO and AYSO accepted the entrusted care of these Plaintiffs.
4 As such, AYSO owed these Plaintiffs, each of them minors, a special duty of care, in addition to
5 a duty of ordinary care, and owed these Plaintiffs the higher duty of care that adults dealing with
6 children owe to protect them from harm.

7 44. TERENCE STEVENS was able, by virtue of his unique authority and position as
8 an agent of AYSO, to identify vulnerable victims and their families upon which he could perform
9 such sexual abuse; to manipulate his authority to procure compliance with his sexual demands
10 from his victims; to induce the victims to continue to allow the abuse; and to coerce them not to
11 report it to any other persons or authorities. As an agent of AYSO, TERENCE STEVENS had
12 unique access to children such as these Plaintiffs. TERENCE STEVENS' access and authority
13 with minors was known to AYSO and encouraged by them. TERENCE STEVENS used his
14 authority and position as an agent of AYSO to sexually assault these Plaintiffs and other minors.

15 45. The AMERICAN YOUTH SOCCER ORGANIZATION, by and through their
16 agents, servants, and employees, knew or reasonably should have known of TERENCE
17 STEVENS' dangerous and exploitive propensities and/or that TERENCE STEVENS was an unfit
18 agent. It was foreseeable that if AYSO did not adequately exercise or provide the duty of care
19 owed to children in their care, including but not limited to these Plaintiffs, the children entrusted
20 to AYSO's care would be vulnerable to sexual assault by TERENCE STEVENS.

21 46. The AMERICAN YOUTH SOCCER ORGANIZATION breached their duty of
22 care to these Plaintiffs by allowing TERENCE STEVENS to come into contact with the minor
23 Plaintiffs without supervision; by failing to adequately supervise, or negligently retaining
24 TERENCE STEVENS who they permitted and enabled to have access to Plaintiffs; by failing to
25 investigate or otherwise confirm or deny such facts about TERENCE STEVENS; by failing to tell
26 or concealing from these Plaintiffs, their parents, guardians, or law enforcement officials that
27 TERENCE STEVENS was or may have been sexually assaulting minors; and/or by holding out
28 TERENCE STEVENS to these Plaintiffs and their parents or guardians as being in good standing

1 and trustworthy. As an agent of AYSO, TERENCE STEVENS was expected to work with minors
2 like these Plaintiffs and to take physical custody of these Plaintiffs away from the presence of these
3 Plaintiffs' parents and guardians.

4 47. As a direct result of the wrongful conduct alleged herein, these Plaintiffs have
5 suffered, and continue to suffer great pain of mind and body, shock, emotional distress, physical
6 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
7 and loss of enjoyment of life; were prevented and will continue to be prevented from performing
8 their daily activities and obtaining the full enjoyment of life; and/or have incurred and will continue
9 to incur expenses for medical and psychological treatment, therapy, and counseling.

10 **FOURTH CAUSE OF ACTION**

11 **NEGLIGENT FAILURE TO WARN, TRAIN, or EDUCATE**

12 **(PLAINTIFFS JOHN LWS DOE, JOHN LSS DOE AND JOHN LHS DOE Against THE**
13 **AMERICAN YOUTH SOCCER ORGANIZATION)**

14 48. Plaintiffs JOHN LWS DOE, LOHN LSS DOE AND JOHN LHS DOE incorporate
15 all paragraphs of this Complaint, as if fully set forth herein.

16 49. The AMERICAN YOUTH SOCCER ORGANIZATION was aware by the time of
17 TERENCE STEVENS's abuse of these Plaintiffs commenced, that child molestation by soccer
18 coaches, other sport coaches and authority figures with youth programs generally occurred with
19 alarming frequency. AYSO became aware of this at its highest levels due to criminal prosecutions
20 for child molestation of soccer coaches who served as agents of AYSO. AYSO was also aware of
21 complaints it had received from its own agents and parents of its members that AYSO's adult
22 coaches had utilized their position of trust and access created by their agency with AYSO to
23 sexually molest minors. Because of this AYSO had a duty to educate, train, and warn these
24 Plaintiffs, and other minors involved in youth programs involved with AYSO's youth soccer
25 program and/or in AYSO's care regarding prevention, detection and reporting of child abuse so as
26 to help safeguard these Plaintiffs and other minor participants from being sexually assaulted by
27 TERENCE STEVENS and any other adults associated with the programs and/or services that they
28 offered and facilitated. AYSO had a duty to educate, train, and warn parents and adult agents of

1 AYSO and other employees and agents that had regular contact with or oversight of minors in
2 AYSO's youth soccer program and/or services regarding prevention, detection and reporting of
3 child abuse so as to help safeguard these Plaintiffs and other minors from being sexually assaulted
4 while in those activities, youth programs, and/or youth services. No such education was given to
5 these Plaintiffs, their parents nor the agents of AYSO

6 50. The AMERICAN YOUTH SOCCER ORGANIZATION breached their duty to
7 take reasonable protective measures to protect these Plaintiffs from the risk of childhood sexual
8 harassment, discrimination, molestation, and assault by TERENCE STEVENS and others, by
9 failing to properly warn, train or educate these Plaintiffs, other minor participants, parents and
10 adult agents of AYSO, and other employees and agents that had regular contact with or oversight
11 of minors in AYSO's youth soccer programs and/or services about how to avoid such a risk.

12 51. As a direct result and proximate cause of the wrongful conduct alleged herein, these
13 Plaintiffs have each suffered, and continue to suffer great pain of mind and body, shock, emotional
14 distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem,
15 disgrace, humiliation, and loss of enjoyment of life; was prevented and will continue to be
16 prevented from performing their daily activities and obtaining the full enjoyment of life; and/or
17 have incurred and will continue to incur expenses for medical and psychological treatment,
18 therapy, and counseling.

19 **FIFTH CAUSE OF ACTION**

20 **BANE CIVIL RIGHTS ACT**

21 **(ALL PLAINTIFFS Against THE COUNTY OF SANTA BARBARA AND THE**
22 **SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT)**

23 (Plaintiff incorporates all paragraphs of this Complaint as if fully set forth herein.)

24 52. Law enforcement agents of the COUNTY OF SANTA BARBARA and the
25 SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT did acting under color of law,
26 interfere by threat, intimidation, or coercion with the exercise or enjoyment by Plaintiffs of rights
27 secured to them by the Constitution and laws of the United States and rights secured to them by
28 the Constitution and laws of the state of California. Those rights of Plaintiffs which were violated

1 under color of law, threats, intimidate or coercion by the COUNTY OF SANTA BARBARA and
2 the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT include: Plaintiffs right to be
3 free from sexual abuse as a child, and to have the Child Abuse and Neglect Reporting Act and its
4 mandatory duties followed by the COUNTY OF SANTA BARBARA and the SANTA
5 BARBARA COUNTY SHERIFF'S DEPARTMENT. This conduct by the COUNTY OF SANTA
6 BARBARA and the SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT was motivated
7 by Plaintiffs' gender and therefore constitutes a violation of California Code of Civil Procedure
8 Sections 52 and 52.1,

9 53. The COUNTY OF SANTA BARBARA and the SANTA BARBARA COUNTY
10 SHERIFF'S DEPARTMENT are vicariously liable for the conduct of their agents that violated
11 Plaintiffs' rights pursuant to *California Government Code* Section 815.2 and 815.6. Plaintiffs
12 were injured as a result of these violations.

13 **WHEREFORE**, PLAINTIFFS pray for compensatory damages; all other applicable
14 statutory damages, fees and costs; and such other relief as the court deems appropriate and just.

15 **JURY TRIAL DEMAND**

16 PLAINTIFFS demand a jury trial on all issues so triable.

17
18 DATED: May 16, 2022

LAW OFFICES OF ANTHONY M. DEMARCO

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20
21 By: /s/ Anthony M. DeMarco
22 ANTHONY M. DEMARCO
23 Attorney for Plaintiffs, JOHN LWS DOE, JOHN
24 LMS DOE, and JOHN LHS DOE
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