

STATE OF INDIANA)
)SS:
COUNTY OF HAMILTON)

HAMILTON SUPERIOR COURT NO. 1

CAUSE NO.: 29D01-1610-CT- 9240

KATHLEEN MCLAUGHLIN; B.F., by
next of friend KATHLEEN MCLAUGHLIN;
and Q.F., by next of friend KATHLEEN
MCLAUGHLIN,

Plaintiffs,

v.

DOCTOR'S ASSOCIATES, INC. D/B/A
SUBWAY; FRANCHISE WORLD
HEADQUARTERS, LLC; SUBWAY
FRANCHISEE ADVERTISING FUND
TRUST, LTD.,

Defendants.

TAMMY BAITZ
CLERK
HAMILTON COUNTY COURTS

2016 OCT 24 AM 9:30

FILED

DEMAND FOR
JURY TRIAL

COMPLAINT AND DEMAND FOR JURY TRIAL

Come now, Kathleen McLaughlin f/k/a Kathleen Fogle ("Katie"), B.F., by next of friend Kathleen McLaughlin, and Q.F., by next of friend Kathleen McLaughlin, all by counsel, and submit this Complaint and Demand for Jury Trial and in support of the same state as follows:

Parties

1. Katie is a United States citizen who has resided within Indiana at all times relevant to this action.
2. B.F. is a minor child, age five, and United States citizen who has resided within Indiana at all times relevant to this action.
3. Q.F. is a minor child, age three, and United States citizen who has resided within Indiana at all times relevant to this action.
4. B.F.'s and Q.F.'s next of friend, Katie, is their biological mother, and she has sole legal and physical custody of them.



5. Katie is the now divorced former wife of Jared Fogle.

6. Defendant Doctor's Associates, Inc. d/b/a Subway is a domestic corporation incorporated and existing under the laws of the State of Florida with its principal place of business in the State of Connecticut.

7. Defendant Franchise World Headquarters, LLC is a limited liability company organized and existing under the laws of the State of Connecticut with its principal place of business in the State of Connecticut.

8. Defendant Subway Franchisee Advertising Fund Trust Ltd. ("SFAFT") is an unincorporated association and a Connecticut domestic statutory trust, created and existing under the laws of the State of Connecticut, namely Conn. Gen. Stat. § 34-501. Its principal place of business is in Connecticut. SFAFT's purpose is to receive, manage and distribute funds to advertise and promote Subway for the benefit of all Subway franchisees, which are located in every state in the United States, including Indiana.

9. Upon information and belief, the Defendants, collectively or one or more of them individually, owns and franchises the Subway restaurant chain and are involved in the marketing and advertising of the Subway brand and Subway franchises.

10. Defendants are collectively hereinafter referred to as "Subway."

Jurisdiction and Venue

11. This Court has personal jurisdiction over the Defendants as Defendants have systematic and continuous activity within Indiana that is related to the allegations pled in this matter. Defendants operate their business in Indiana and have purposefully availed themselves of the privilege of conducting activities within Indiana.

12. In addition, this Court has personal jurisdiction over the Defendants because Defendants have minimum contacts with and within Indiana that relate to the allegations pled in this matter.

13. Subway's acts as alleged below caused personal injury to Plaintiffs at all relevant times while Plaintiffs resided in Indiana.

14. At all relevant times Subway had a contractual relationship with Jared Fogle ("Jared"), Subway's acts and omissions alleged as the basis of this lawsuit are inextricably tied to its relationship with Jared, and at all relevant times, Jared was an Indiana resident.

15. Subway operates approximately seven hundred (700) stores in Indiana, promotes and advertises its business in and throughout Indiana via all traditional forms of media, including, but not limited, radio, television, newspapers, magazines, internet, and billboards.

16. Subway is subject to jurisdiction under Indiana Code § 32-36-1-9 for distributing within Indiana advertising material in violation of Indiana Code § 32-36-1-8.

17. During and as part of his relationship with Subway, Jared conducted promotional activities in Indiana, including without limitation, visiting schools and Subway franchises throughout Indiana.

18. Defendants' wrongful acts occurred in Indiana, including without limitation, distributing in Indiana a Subway commercial that violated Plaintiffs' privacy and property rights and causing personal injury to Plaintiffs, who have resided in Indiana at all relevant times.

19. Venue in this Court is proper under Rule 75 of the Indiana Rules of Trial Procedure.

Factual Allegations Relevant to All Counts¹

Jared Fogle Grows Subway into an International Restaurant Chain

20. After successfully losing 225 pounds eating only Subway sandwiches as a college student at Indiana University, Jared became Subway's official national advertising spokesman in 2000.

21. Over the next 15 years, Jared became Subway's cash cow.

22. Subway grew from a mid-size sandwich shop to a worldwide restaurant chain.

23. From 1998-2005, Subway's advertising budget reportedly grew from approximately \$90 million to \$300 million.

24. In 2005, Jared's presence as Subway's spokesperson declined; sales dropped by more than ten percent (10%) and Subway brought Jared back to the forefront of its marketing.

25. During Jared's tenure as Subway spokesman, Subway reportedly as much as tripled its U.S. sales, notably from \$3.1 billion to \$11.5 billion.

26. During Jared's tenure as Subway spokesman, Subway established more than 38,000 stores in 100 countries, which is more in the United States and globally than McDonald's.

27. In 2013, Subway's Chief Marketing Officer stated one-third to one-half of Subway's growth was directly attributable to Jared.

28. Just months before Jared was arrested and charged with child pornography and sex with minors, Subway signed Jared to a two-year extension of his previous five-year contract with Subway to continue as its spokesman in January 2015.

Subway Knew of Jared's Depravities and Failed to Act as a Responsible Corporation Should

¹ For the Court's convenience, attached hereto and incorporated herein as Exhibit A is summary of the factual allegations that follow.

29. On at least three (3) occasions during Jared's tenure with Subway, Subway received reports regarding Jared's sexual interest in and activity with children. With two of those reports, Subway responded by sending a public relations employee to ask Jared about the allegations. With the third report, Subway admitted the complaint was "not properly escalated or acted upon." Upon information and belief, Subway did not report any of the allegations to law enforcement.

30. As early as 2004, Subway's then Senior Vice President of Marketing received a complaint that Jared had approached a young girl at a promotional event for a Las Vegas Subway franchise for a sex act.

31. Driven by sales rather than the safety of kids, Subway sent its then Senior Public Relations Manager to ask Jared and the franchisee owner, rather than the victim, about the incident.

32. Other than sending a public relations employee to ask the wrongdoer about the incident, Subway did nothing more in relation to this event or to otherwise more fully investigate the allegations.

33. Subway either failed to have proper protocols in place to address and investigate this type of complaint or failed to follow those protocols.

34. Subway did not thoroughly investigate the report and did not alert the authorities as they were legally required to do.

35. A responsible corporation would take immediate action when hearing of this behavior, even if it was only allegations.

36. In 2008, Cindy Mills ("Mills"), a then Florida Subway franchisee, notified Jeff

Moody ("Moody"), then-CEO, via a phone call, that Jared had made disturbing comments about children.

37. Mills told Moody that Jared told her "he really liked them young."

38. Mills told Moody that Jared had had sex with minors from age 9 to 16.

39. Mills told Moody that Jared suggested Mills prostitute herself.

40. In response to Mills' report, Moody interrupted Mills and stated "Please don't tell me any more. Don't worry, he has met someone. She is a teacher and he seems to love her very much, and we think she will keep him grounded."

41. The "teacher" in question to whom Moody referred is plaintiff, Katie McLaughlin.

42. Mills also said Moody indicated he had dealt with similar complaints in the past.

43. Mills relayed this same information to her regional Subway franchise office.

44. Mills relayed this same information to two other Subway executives at a NASCAR event thereafter. Mills said she approached the executives because she was scared she would see Jared at the race.

45. Just like its response to the 2004 complaint, Subway sent its Senior Public Relations Manager to ask Jared about the complaint.

46. After Jared denied the allegations, Subway again did nothing more.

47. For the second time, Subway either failed to have proper protocols in place to report and investigate this type of complaint or failed to follow those protocols.

48. Having neither expert knowledge of pedophiles' predatory compulsions nor seeking guidance from experts, Subway made a terribly misguided assumption that Jared's marrying Katie would correct Jared's pedophilia behavior.

49. Subway did not and never did inform Katie about Mills' report or Moody's intention for Katie to keep Jared "grounded." Katie only learned of Mills' report and Moody's intention when Mills' story went public after the July 7, 2015 FBI raid on her home.

50. Katie and Jared got engaged in 2009 and married in 2010.

51. In 2011, a Florida journalist, Rochelle Herman-Walrond ("Herman-Walrond"), made a complaint through Subway's website that she had serious concerns about Jared being around children.

52. Subway admitted that complaint was "not properly escalated or acted upon."

53. Herman-Walrond has publicly indicated Jared made comments to her about his desire to perform illegal sexual acts with children and Jared asked for Herman-Walrond's help in getting him access to children.

54. Herman-Walrond worked with FBI to record conversations with Jared.

55. Subway failed every test of corporate responsibility in its response to each of these complaints.

Subway Continues to Capitalize on Jared's Fame to Drive their Sales, Putting Children at Risk

56. Despite knowing of Jared's sexual interest in children and the then-alleged sexual acts he committed with them, Subway continued to promote their star spokesman.

57. In particular, Subway launched multiple campaigns that required Jared to visit elementary schools around the country, including in Indiana.

58. In 2004, Subway launched the national marketing campaign called "Jared's School Tour" as a childhood obesity prevention initiative, which required Jared to visit elementary schools all over the United States.

59. Subway received the complaint about Jared soliciting a sex act with a young girl in 2004. Subway continued the elementary school tours.

60. In 2008, Subway launched the national marketing campaign called "Tour de Pants," for which he traveled the country with the pants he once wore when he weighed 425 pounds.

61. As part of the Tour de Pants campaign, Subway had Jared spend significant time in elementary schools.

62. Subway received the complaint from Cindy Mills the same year as the Tour de Pants campaign. Subway continued the elementary school tours.

63. The same marketing and public relations individuals who oversaw the various campaigns surrounding Jared were the same people who were sent to ask Jared about allegations Subway received about Jared's sexual interest in children in 2004 and 2008.

Subway Promotes Jared as a "Family Man"

64. After Jared married Katie in 2010, a former school teacher in Indianapolis, they had B.F., in 2011 and Q.F., in 2013. While Jared traveled approximately 200 days per year for Subway-related activities and work, Katie rarely traveled with him and stayed home as B.F.'s and Q.F.'s primary caretaker.

65. With Jared's weight loss story getting stale, Subway saw Jared's family as a marketing opportunity.

66. In February 2015, Subway announced a new marketing campaign promoting Jared as a family man.

67. Subway marketed Jared as a family man by showing his journey as “Jared the Subway Guy” who lost 225 pounds to “Jared the Family Man,” who is now an important role model for his and other children.

68. In March 2015, Subway began airing “Jared’s Journey,” a national commercial with Jared telling the story of his weight loss and introducing his family.

69. The commercial depicted the likenesses of Katie, B.F. and Q.F. through animations specifically designed to represent Jared’s family, including gender, age and physical characteristics.

70. Subway did not obtain proper consent to depict the likenesses of B.F. and Q.F. in the commercial.

71. Subway did not obtain Katie’s consent to depict her likeness in the commercial.

72. Subway created and/or authorized the commercial.

73. The commercial was distributed in Indiana for advertising purposes.

74. The commercial aired not less than 2,309 times from March 2015 to July 2015.

75. A true and accurate copy of the commercial, which is incorporated herein as Exhibit B, is available at <https://www.youtube.com/watch?v=Q7bzR-HmXzk>.

76. On April 3, 2015, in regards to the family man campaign, Subway Chief Marketing Officer said “Jared is inextricably linked with our brand.”

77. Jared was so inextricably linked that Subway exploited his family despite knowing of allegations that Jared was a pedophile and failing to properly investigate those allegations.

Subway Promotes the Jared Foundation

78. In 2008, Jared announced the formation of the Jared Foundation, a nonprofit corporation created to raise awareness of and combat childhood obesity.

79. Subway immersed itself with the Jared Foundation—Subway promoted the Foundation and provided a link to the Foundation’s website on Subway’s website; Subway provided the Foundation with free marketing opportunities at Subway’s national conventions; and Subway controlled the Foundation’s public messaging.

80. Russell Taylor was the head of the Jared Foundation.

81. Russell Taylor attended numerous Subway corporate events.

82. Russell Taylor was arrested in April 2015 and subsequently sentenced to 27 years in prison for secretly recording children who were nude or in sexually explicit acts in his home.

83. Russell Taylor shared those explicit images with Jared.

84. On the day Jared was arrested, Subway scrubbed its website of any link or reference to the Jared Foundation.

Jared Fogle’s Arrest and Conviction

85. On July 7, 2015, the FBI raided Jared’s and Katie’s home in Zionsville, Indiana.

86. That same day, Subway suspended its relationship with Jared.

87. On August 18, 2015, Subway terminated its relationship with Jared.

88. On August 19, 2015, the United States government charged Jared with possessing and distributing child pornography and commercial sex acts with a minor (paying for sex with someone who is younger than 18 years old). The FBI determined Jared possessed child pornography involving at least eight (8) minor females, including minors Jared knew, and paid for sexual acts involving at least two (2) minors. The FBI concluded Jared went to great lengths

to engage in commercial sex acts with minors, and sought to use prostituted minors to find other minor children with whom he could have sexual contact.

89. Jared's actions that led to these charges are the same actions that led to the multiple complaints Subway received, which Subway did little to nothing to address.

90. On November 16, 2015, Jared pled guilty to the charges and was sentenced to 15 years in prison.

91. On November 19, 2016, Katie's and Jared's divorce was finalized.

92. Subway was alerted on multiple occasions about Jared's immoral and criminal pedophile behavior.

93. Subway's assigning an in-house public relations employee to ask Jared about the allegations was intentional and reckless conduct.

94. Subway failed to follow proper corporate reporting protocols, if any existed.

95. Subway did not consult an expert in this area.

96. Having neither expert knowledge of a pedophile's predatory compulsions nor seeking guidance from experts, Subway made a terribly misguided assumption that Jared's relationship with Katie would correct his pedophile behavior and sexual interest in children.

97. Subway failed every test of responsible corporate behavior.

98. Subway had not only a moral obligation but a legal obligation to alert proper law enforcement authorities after receiving the allegations. *See* Ind. Code § 31-33-5-1; NRS 432B.220.1 and 4; Fla. Stat. 39.201.

99. The safety of kids was not a priority but Subway's bottom line was. To drive sales, Subway ignored its corporate responsibility and provided a platform for him to prey on children by sending him to elementary schools all over the country.

100. Subway then turned to Jared's family as a marketing tool to increase profits and utilized their likenesses without their consent, all the while knowing of a series of allegations of pedophilia and sexual interest in children.

101. Katie, B.F., and Q.F. have and will continue to suffer irreparable damage from the misappropriation and unauthorized use of their likeness.

102. Katie, B.F. and Q.F. have and will continue to suffer substantial emotional distress from Subway's intentional and reckless misconduct and negligence.

Count I – Invasion of Privacy – Misappropriation of Likeness

103. The allegations contained in all preceding Paragraphs are hereby incorporated as if fully set forth herein.

104. Despite all its knowledge of Jared's sexual interest in children and pedophile behavior, in 2015, Subway publicly ran a national commercial depicting Jared as a family man with then-wife Katie and children B.F. and Q.F.

105. Subway did not obtain proper consent to depict Q.F.'s and B.F.'s likenesses.

106. Subway did not obtain Katie's consent to depict her likeness.

107. The commercial ran nationally from March 2015 until July 7, 2015, the day the FBI raided Jared's home.

108. The commercial aired not less than 2,309 times during that time period.

109. The commercial aired in Indiana.

110. Subway created and/or authorized the commercial.

111. Subway's unauthorized use of Katie's, B.F.'s, and Q.F.'s likenesses was willful and intentional because Subway knew it did not have their consent and knew of Jared's alleged criminal behavior.

112. Marketing materials for the family man campaign remained on Subway's website until July 8, 2015, the day after the FBI raided Jared's home.

113. Subway profited from the misappropriation of Plaintiffs' likenesses and Plaintiffs have suffered damages as a result of Subway's misappropriation.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants and award Plaintiffs damages suffered as a result of Subway's invasion of privacy, attorney fees, costs, pre-judgment and post-judgment interest, and for all other relief just and proper in the premises.

Count II - Intentional Infliction of Emotional Distress

114. The allegations contained in all preceding Paragraphs are hereby incorporated as if fully set forth herein.

115. Subway's market share, profitability, and growth was caused in large part by Jared.

116. Subway believed that sustaining and expanding its market share, profitability and growth depended on Jared's reputation.

117. Subway knew its market share, profitability and growth would be diminished if Jared's reputation was tarnished.

118. Subway's ambition for sales and growth came at the expense of the Katie, B.F. and Q.F.

119. Jared's initial marketability was based on his weight loss from the "Subway diet."

120. In 2008, Jared began dating Katie. Subway knew this and saw this as a positive development for Jared and Subway, particularly given his (then) alleged criminal exploitation of children.

121. To continue to capitalize on Jared's public reputation, another theme besides weight loss was needed. So, Subway began a campaign to market Jared as a "family man."

122. Subway executives agreed to proceed with this campaign despite the reports they had received that Jared had sexual interest in children and committed acts of pedophilia.

123. Subway knew if there was truth to Jared's disturbing interest and conduct, then they would have to address it and Jared's reputation would be tarnished and potentially, destroyed. They would no longer be able to use Jared as a revenue-generating and growth mechanism. Subway chose to proceed with the "family man" marketing scheme, and in conjunction with that decision, also chose to exploit Katie, B.F., and Q.F. as Jared's family for Subway's own financial gain.

124. Subway did little to nothing to investigate these complaints and allowed Jared to continue down this criminal path, marry Katie, have son and daughter B.F. and Q.F.

125. Subway's conduct was extreme and outrageous.

126. With the knowledge Subway had, its conduct intended to harm Katie, B.F., and Q.F. and Subway acted knowingly and with reckless disregard.

127. Subway's conduct intentionally or recklessly caused severe emotional distress to Katie, B.F., and Q.F.

128. Katie, B.F. and Q.F. have suffered severe emotional distress.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants and award Plaintiffs damages suffered as a result of Subway's intentional infliction of emotional distress, including without limitation, compensatory and punitive damages, attorney fees, costs, pre-judgment and post-judgment interest, and for all other relief just and proper in the premises.

Count III - Negligence

129. The allegations contained in all preceding Paragraphs are hereby incorporated as if fully set forth herein.

130. Subway was notified on multiples occasions of Jared's sexual interest in children and alleged criminal activity.

131. Subway significantly relied on Jared for the company's financial success.

132. Subway was notified of Jared's multiple depravities prior to Katie marrying Jared.

133. One Subway executive even responded to one of these complaints that Jared's relationship with Katie would lessen the likelihood that he continued this conduct.

134. Subway had a duty to exercise reasonable care upon receipt of complaints of Jared's sexual interest in children.

135. Subway's relationship with Jared and use of Katie's, B.F.'s and Q.F.'s likenesses created a duty Subway owed to Katie, B.F. and Q.F.

136. By ignoring and failing to report the allegations about Jared's sexual interest in children and alleged criminal activity, Subway breached that duty.

137. By utilizing the likenesses of Katie, B.F. and Q.F. despite its knowledge, Subway breached that duty.

138. But for Subway's failure to warn Katie or failure to report Jared to law enforcement, Katie would have never married Jared.

139. With this information, Subway could reasonably foresee the commercial and the "family man" commercial scheme would harm Katie, B.F. and Q.F.

140. While Subway continued to profit by making billions of dollars off of Jared during his marriage to Katie, Katie, B.F., and Q.F. suffered substantial damages as a direct and

proximate result of Subway's failure to act when it had information of Jared's (then) alleged criminal conduct.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants and award Plaintiffs damages suffered as a result of Subway's negligence, attorney fees, costs, pre-judgment and post-judgment interest, and for all other relief just and proper in the premises.

Count IV – Negligence *Per Se*

141. The allegations contained in all preceding Paragraphs are hereby incorporated as if fully set forth herein.

142. Subway owed a duty to Katie, B.F., and Q.F. for the reasons stated in all preceding Paragraphs.

143. Pursuant to that duty, Subway should have reported actual or potential child abuse to the Department of Child Services or law enforcement because it had reason to believe a child was being abused. *See* Ind. Code § 31-33-5-1.

144. Violation of Ind. Code § 31-33-5-1 is negligence as a matter of law.

145. Given all of the information Subway had regarding Jared, Subway had reason to believe Jared was abusing children and should have made a report pursuant to Ind. Code § 31-33-5-1.

146. Subway failed to report.

147. Had Subway reported, Katie would have never married Jared.

148. Had Subway reported, Katie, B.F. and Q.F. would have never been exploited by Subway as part of the "family man" campaign.

149. As a direct and proximate result of Subway's negligence, Katie, B.F., and Q.F. suffered severe emotional distress.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants and award Plaintiffs damages suffered as a result of Subway's negligence *per se*, attorney fees, costs, pre-judgment and post-judgment interest, and for all other relief just and proper in the premises.

Count V – Right of Publicity

150. The allegations contained in all preceding Paragraphs are hereby incorporated as if fully set forth herein.

151. Subway violated Indiana Code § 32-36-1 *et. seq.*

152. Subway utilized Katie's, B.F.'s, and Q.F.'s likenesses for a commercial purposes in the commercial that was part of the family man campaign that depicted Katie, B.F. and Q.F. with Jared as Jared's family.

153. The purpose of this commercial was to advertise and solicit Subway's restaurants and food.

154. Katie has a personal property interest in her likeness and therefore, a right of publicity.

155. B.F. has a personal property interest in his likeness and therefore, a right of publicity.

156. Q.F. has a personal property interest in her likeness and therefore, a right of publicity.

157. Subway utilized the Plaintiffs' rights of publicity without written consent.

158. Subway created or authorized the commercial.

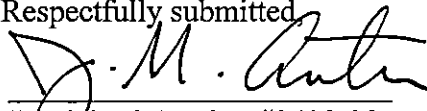
159. Subway's unauthorized use of Plaintiffs' rights of publicity was willful and intentional as Subway knew it did not have written consent.

160. Subway violated Indiana Code § 32-36-1 *et. seq.* by utilizing Katie, B.F. and Q.F.'s likenesses without written consent.

161. Plaintiffs have sustained damages as a result of Subway's unlawful actions.

WHEREFORE, Plaintiffs respectfully request this Court enter judgment against Defendants and award Plaintiffs damages suffered as a result of Subway's violation of Indiana Code § 32-36-1 *et. seq.*, including statutory damages, treble damages, attorney fees, costs, pre-judgment and post-judgment interest, and for all other relief just and proper in the premises.

Respectfully submitted,

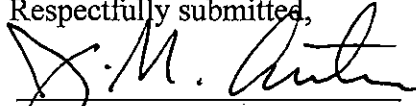


J. Michael Antrim, #2438-29
Alexander P. Pinegar, #26543-49
Kelleigh I. Fagan, #31292-49
Church Church Hittle + Antrim
Two North Ninth Street
P.O. Box 10
Noblesville, IN 46061
317-773-2190
apinegar@cchalaw.com
antrim@cchalaw.com
kfagan@cchalaw.com

Demand for Jury Trial

Plaintiffs, Kathleen McLaughlin, B.F., by next of friend Kathleen McLaughlin, and Q.F.,
by next of friend Kathleen McLaughlin, respectfully requests a trial by jury as to all issues
deemed so triable.

Respectfully submitted,



J. Michael Antrim, #2438-29
Alexander P. Pinegar, #26543-49
Kelleigh I. Fagan, #31292-49
Church Church Hittle + Antrim
Two North Ninth Street
P.O. Box 10
Noblesville, IN 46061
317-773-2190
apinegar@cchalaw.com
antrim@cchalaw.com
kfagan@cchalaw.com

Exhibit A – Summary of Factual Allegations

- 2000 Jared begins career as spokesperson for Subway.
- 2004 Jared asks young girl to perform a sex act on him at Las Vegas franchise promotional event.
- Complaint made to Subway Senior Vice President of Marketing, who directed a senior public relations manager/Subway spokesperson to ask Jared about the incident.
- 2004 Subway kicks off “Jared’s School Tour” and Jared visits elementary schools all over the country.
- 2008 Subway kicks off “Tour de Pants” campaign, sending Jared to elementary schools around the country.
- 2008 Katie and Jared begin dating.
- Cindy Mills, Florida franchisee, notifies Subway’s CEO of Jared’s sexual interest in children.
- Via phone, Mills tells CEO Jeff Moody what Jared told her—that he had sex with minors and that “he liked them young.”
 - Mills says Moody cut her off and said “Please don’t tell me anymore. Don’t worry, he has met someone. She is a teacher and he seems to love her very much, and we think she will help keep him grounded.”
 - Mills reported Moody indicated he had dealt with similar complaints in the past.
- Mills reports Jared’s comments to at least 2 more Subway executives at a NASCAR event.
- Mills was scared she would see Jared in a person at the race.
 - Executives assured her Jared wouldn’t be at the race.
 - The same senior public relations manager and Subway spokesperson who asked Jared about the 2004 incident confronted Jared for a second time about complaints, this time about Mills’ comments; Jared denies the allegations.
- 2009 Katie and Jared get engaged.
- 2010 Katie and Jared get married.
- 2011 Rochelle Herman-Walrond, Florida journalist, made a complaint through Subway website that she had serious concerns about Jared being in the presence of children.
- Jared had told Herman-Walrond that he was interested in sex with minors.

- Jared asked for Herman-Walrond's help in getting him access to children.
- Herman-Walrond worked with FBI to record conversations with Jared.
- Subway has acknowledged in public statements that Herman-Walrond's complaint was a "serious" complaint that was "not properly escalated or acted upon."

January 2015	Subway and Jared sign a 2 year contract extension.
March 2015	"Jared's Journey" campaign, portraying Jared as a family man, begins airing.
July 7, 2015	FBI raids Jared's home and Subway suspends relationship with Jared.
July 7, 2015	Last day that the "Jared's Journey" commercial aired.
August 18, 2015	Subway ends relationship with Jared.
August 19, 2015	Jared charged with possessing and distributing child pornography and commercial sex acts with a minor; Jared later pleads guilty.
November 16, 2015	Jared sentenced to 15 years in prison.
November 19, 2015	Jared and Katie's divorce is final.